



**Comments & Recommendations:**  
**Illinois Workforce Innovation and Opportunity Act Unified State Plan**  
Submitted by the Chicago Jobs Council  
February 24, 2016

CJC believes that the new Workforce Innovation and Opportunity Act (WIOA) law provides an opportunity to make progress in workforce development service delivery and program development. In addition to our comments and recommendations responding to the Illinois Unified State Plan, below are four specific areas where we believe state leadership is needed. We hope that combined leadership of the core agencies and the State Interagency Team will consider these in future WIOA implementation discussions:

- Given WIOA's focus on special populations, this is the opportunity to be more intentional in designing strategies for specific hard-to-employ populations. In addition to securing better employment and income outcomes for hard-to-employ individuals, a more intentional strategy focused on homeless and formerly incarcerated individuals will also have beneficial financial and social impact in other public systems, namely, SNAP, Corrections, and homeless services.
- With limited public resources, the emphasis on sectors and demand-driven strategies has the potential to build industry strategies that focus only on few sub-sectors and cannot possibly meet all of the skills need in the labor market. One approach to the use of public resources is to target its limited training funding to skills needed across occupations. The current work to examine how to bridge the digital literacy gaps in the workforce is exactly this kind of focus. Another area is customer service skills. The demand-driven strategies at the state level should also include a strategy to identify, target and develop strategies to train for cross-occupational skills.
- Within the focus on career pathways framework, Illinois is poised to solve the barriers to education pathways for those with the lowest literacy and numeracy skills. Continued state leadership is needed to expand on-ramps to the post-secondary parts of the pathways from various starting points. On-ramps from workforce development programs, in addition to adult education, should be expanded.
- Now is the time to clearly articulate the research agenda for understanding how low-skilled adults progress within and across Illinois' network of workforce development services and put the necessary resources and leadership behind that research agenda. With over 1.8 million working age adults (25-54) in Illinois with only a high-school degree or less (American Community Survey, 2013), we have to be able to articulate what works in order to expand the resources needed to close the basic skills gap.

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CJC makes six **recommendations to the Illinois WIOA Unified State Plan**, detailed in the sections below:

- I. Prioritize Target Populations with Specific, Focused Strategies
- II. Make Career Pathways Accessible to Low-Skilled Adults and Youth
- III. Invest in Work-Based Learning Strategies for Disadvantaged Job Seekers
- IV. Utilize the 21<sup>st</sup> Century Workforce Development Fund Advisory Committee
- V. Tie Work-Based Training to Employer Job Quality Standards
- VI. Support Ongoing Professional Development for Frontline Staff

**I. Prioritize Target Populations with Specific, Focused Strategies**

[Chapter 2, page 20, paragraph 2- Targeted Populations; Appendix I, page 4, paragraph 2- Governor’s Set Aside Funding, Priority Population Pilots]

The State Plan includes seventeen target populations that will be the focus of targeted initiatives to attain industry credentials and jobs. Seventeen target populations, however, is too many and it will be challenging to effectively advance specific strategies to serve each of these populations well. CJC encourages Illinois to identify a few target populations that have strategic significance and advance statewide strategies to serve them, assisting local areas to implement those strategies. For example, focusing services on formerly incarcerated individuals is strategic given the Administration’s goal to reduce the prison population by 25% by 2025 and the opportunity to leverage Illinois’ experience delivering targeted initiatives to this population at the state and county level.

The state should also focus on target populations that align with existing initiatives, using WIOA resources to enhance and expand current strategies. The WIOA system, for example, could support the Destination: Jobs initiative in Chicago. In this initiative, partners from the workforce and homeless services systems are working to improve services to homeless job seekers by implementing an employment assessment tool for the homeless services system and improving resources for frontline homeless service staff to enhance referrals to workforce services.

**Prioritize Strategies Targeted to Formerly Incarcerated Individuals:** ‘Reentry individuals’ are one of seventeen targeted populations identified, however the state plan does not identify specific strategies for serving this population. CJC strongly supports the state’s prioritization of formerly incarcerated individuals for several reasons:

- Investing in employment and training services targeted to this population reduces recidivism, which supports the Administration’s goal to reduce the prison populations by 25% by 2025.
- In light of recent challenges to the state budget, it is an opportunity to leverage federal funds to support reentry services and reduce incarceration costs resulting from reduced recidivism.
- It will reduce the social and economic burdens on counties and municipalities with high rates of returning parolees.
- Individuals returning to communities post incarceration will gain skills, attain employment, and earn income to support their families, all of which strengthen Illinois’ communities.

Specifically, we encourage the state to:

- Invest in training and work-based learning strategies that assist recently incarcerated individuals.
- Partner with the Illinois Department of Corrections (IDOC) and county probation departments to advance strategies.
- Advance a statewide transitional jobs strategy (see *Appendix I for CJC’s transitional jobs proposal submitted to the Commission on the Elimination of Poverty*)

- Advance sector strategies that combine industry skills training, job readiness training, case management, and paid work experience.

**Prioritize Strategies Targeted to Individuals Experiencing Homelessness:** Individuals experiencing homelessness, including those who are served by the homeless services system, should be prioritized by the WIOA system. Many individuals entering Chicago’s homeless services system identify employment as a goal, for example, while only 9% of individuals have increased income due to employment when they exit homeless services. WIOA provides an opportunity to leverage federal and local investment in homeless services and work being done by local areas to serve this population.

We recommend that Illinois advance some of the following strategies in order to enhance WIOA workforce services for individuals experiencing homelessness:

- Incent local areas to develop formal referral processes between the workforce and homeless services systems, so that that job seekers experiencing homelessness are served well.
- Pilot an employment navigator system between local Continuums of Care and the workforce system.
- Designate an existing advisory board to support aligned and coordinated services between the workforce and homeless services systems.
- Convene representatives from local Continuums of Care in order to develop aligned and coordinated strategies.

## II. **Make Career Pathways Accessible to Low-Skilled Adults**

CJC recommends that Illinois advance the following strategies and address them in the state plan, so that Illinois’ career pathways system ensures access and success for low-skilled adults and youth.

### **Adopt One Definition of Career Pathways across all WIOA Titles and for Use in Other Systems:**

[Chapter 7, page 39, paragraph 2- add as activity under Strategy 3: Career Pathways for Economic Advancement]

In order to support Illinois’ goal of a more unified career pathways system, the state should adopt a single career pathways definition and framework to be used across all workforce and education programs. CJC recommends that Illinois adopt the [Alliance for Quality Career Pathways \(AQCP\)](#) consensus framework on quality criteria for career pathways systems, which the Illinois Community College Board (ICCB) helped to develop, and codify it in the Unified State Plan. The AQCP definition, framework, criteria for best practices, and metrics strongly align with WIOA’s career pathways definition and system elements and will support planning and implementation. The following publications from CLASP will support career pathways planning: [Side by Side: Alliance for Quality Career Pathways Framework 1.0 & the Workforce Innovation and Opportunities Act \(WIOA\)](#) and the [Relationship between WIOA Performance Measures and Alliance for Quality Career Pathway Metrics](#).

### **Expand and Improve Bridge Programs:**

[Chapter 7, page 39, paragraph 4- under Activity 3.2: Expand and Improve Bridge and Integrated Education and Training Models; Appendix II, page 16, paragraph 3- Bridge Program definition]

We applaud Illinois’ commitment to the bridge program model, which is a strategy to help low-skilled adults transition to post-secondary education and skills training. As part of the state’s efforts to review the statewide bridge definition policy, CJC and Women Employed gathered and analyzed information from a range of stakeholders in the field about implementation (or not) of bridge programs in Title I and Title II programs. We encourage Commerce and ICCB to consider feedback and recommendations from the field (see *Appendix II, Bridge Definition Policy Review*) as it works to expand and improve bridge

programs, including enhancing the bridge definition policy. The following strategies will help to increase the accessibility and effectiveness of bridge programs for low-skilled adults and out-of-school youth:

- **Support co-enrollment:** Provide state guidance and improved procedures to support co-enrollment in Title I Adult/Youth and Title II, which will help to both increase the number of bridge programs delivered jointly by workforce and adult education providers and connect out-of-school youth with career pathways initiatives. Co-enrollment also helps to leverage funding streams for integrated service.
- **Integrate paid work-based learning:** Incorporating a paid work-based learning (WBL) component into bridge programs will provide low-skilled adults with work experience, work-task skills, and immediate wages, which are especially beneficial to those with limited work experience. Sector-focused work experience also supports career exploration and development.
- **Specify role of local workforce boards:** Add an additional activity to *Strategy 3: Career Pathways for Economic Advancement* (page 39), describing the role of local workforce boards to support the delivery of bridge programs. As part of their required career pathways planning, local workforce boards should develop strategies for the Title I and II systems to deliver bridge programs in the local workforce area, as well as describe how they will braid Title I and II funding streams.

#### **Implement Career Foundations as a way to Support Integrated Service Delivery and Provide On-ramps to Career Pathways:**

[Chapter 7, page 39, paragraph 2- add as activity under Strategy 3: Career Pathways for Economic Advancement; Appendix II, page 11, paragraph 7- add as a Statewide Leadership Activity]

CJC supports the state's goal of supporting initiatives that expand access and success of low-skilled adults in career pathways. The Career Foundations (CF) curriculum is a resource that can help to achieve this and also support integrated service delivery across education and workforce programs. CF supports career development, helping adult education students and participants in workforce development programs to explore career pathways and create a plan to transition to further education and training, including bridge programs as a first step—all with a focus on career-path employment. The curriculum, currently being implemented at City Colleges of Chicago and 12 community-based providers in Chicago, is available to community-based providers and community colleges to adapt and use it locally:

<http://womenemployed.org/pathways-careers-network>.

Illinois should support the expanded implementation of the Career Foundations (CF) curriculum across the workforce and education systems by dedicating state-level WIOA resources to:

- **Adapt the curriculum to meet each program's needs.** CF is currently being implemented within the Title I and II systems in LWIA 7. Wagner-Peyser Employment Services and Vocational Rehabilitation Services staff can also utilize CF to enhance career development services for individuals wanting to access further education and training;
- **Train frontline staff** at workforce centers, colleges, and community-based providers to deliver the curriculum; and
- **Pilot CF with Local Workforce Areas** to test and evaluate how CF can best be adapted and utilized across programs and geographies.

#### **Ensure State Longitudinal Data System and Metrics Support Services to Low-Skilled Adults:**

[Chapter 6, page 42, paragraph 6- Activity 6.2 Expand and Improve the State Longitudinal Data System]

We are encouraged that the Illinois data team and Interagency Work Group will continue work to expand and improve the State Longitudinal Data System (SLDS). Currently, low-skilled adults who enter the system via adult education and transition through bridge programs and other career pathways

initiatives into post-secondary education and training are not accurately tracked. In order to monitor and evaluate the effectiveness of career pathways strategies, it is critical that the SLDS has the ability to track the progress of low-skilled adults across workforce, adult education, college-level programs, and labor market data sources. This will allow Illinois to better understand the path that individuals take to earn industry credentials and postsecondary degrees and help the field to continuously improve career pathways programs and related strategies.

### **III. Work-Based Learning Strategies for Disadvantaged Job Seekers**

[Appendix 1, page 8, paragraph 1- add strategies to Work-Based Training Models]

CJC recommends the following strategies be addressed in the state plan and advanced during WIOA implementation in order to ensure WBL strategies meet the needs of job seekers with significant barriers to employment, with special emphasis on formerly incarcerated individuals and individuals experiencing homelessness:

**Develop One Definition for Work-Based Learning:** Develop one definition of WBL that (1) can be used by all four titles of WIOA and other programs that may use WBL (for example, TANF, SNAP E&T, JTED) and (2) is flexible enough to include existing best practices in the field, including those that have been developed outside of the WIOA system. Convene practitioners to assist with development of a definition that is relevant and useful to the field, especially in terms of services to job seekers with barriers to employment and limited work history.

**Commit to Work-Based Learning Strategies that Provide Foundational Skills and Wages:** We encourage Illinois to commit to advancing WBL strategies that provide foundational workplace skills in a temporary wage-paying jobs (e.g. transitional jobs), so that target populations identified under WIOA-- especially formerly incarcerated individuals and individuals experiencing homelessness-- can be most effectively served. To assist with this, direct the Advisory Committee of the 21<sup>st</sup> Century Workforce Development Fund (Fund) to develop a WBL strategy targeted to high-need job seekers that emphasizes foundational workplace skills and paid work experience, an already identified focus area of the Advisory Committee, and report this recommended strategy to the IWIB. The Advisory Committee includes an excellent cross-section of practitioners and administrators with relevant experience from the public and private sector.

**Commit to a Transitional Jobs Strategy:** Illinois should commit to developing and implementing a Transitional Jobs (TJ) program strategy that is targeted to formerly incarcerated individuals and individuals experiencing homelessness. TJ programs provide individuals with limited work history and significant employment barriers the opportunity to gain work experience, earn income and gain eligibility for work supports, connect with further education and training services. The state should leverage IDOC and Illinois Department of Human Services' experience implementing TJ programs, along with that of local areas. The Chicago Department of Family and Support Services and Chicago Housing Authority, for example, use CDBG, CSBG, and local resources to deliver TJ programs through community-based providers. These public agencies, along with TJ providers and national experts such as the National Transitional Jobs Network, can support a statewide TJ strategy under WIOA.

**Invest in Workforce Strategies that Integrate Paid Work Experience with Sector Training:** We encourage Illinois to invest in sector strategies targeted to disadvantaged job seekers that combine industry skills training and paid work experience. Incorporating a paid work experience provides individuals with work experience at an employer, an opportunity to practice skills acquired in training, and needed financial support, and can be especially beneficial for individuals with limited to no work history. A strong sector strategy targeted to high-need job seekers should incorporate industry skills

training, paid work experience, job readiness training, case management and support services, and includes strong workforce providers and employer partners.

*Program Model for Expansion: Training to Work*

[Appendix 1, page 4, paragraph 2- consider as a Priority Population Pilot for State's Use of Governor's Set Aside Funding]

We encourage Illinois to invest in sector strategies that combine industry skills training and paid work experience targeted to formerly incarcerated individuals. A programmatic example of this is Training to Work, which is a DOL-funded program leading to an industry credential. The program is being implemented by the Safer Foundation, IDOC, TMA, and manufacturing employer partners. This model provides CNC training as well as case management, job readiness, support services, and paid work experience to individuals housed at two IDOC Adult Transition Centers.

Please reference CJC's *Recommendations for WIOA Work-based Learning Strategies (Appendix III)* for additional examples of models that use WBL in sectoral training initiatives that have potential for expansion and replication.

**Invest in Capacity Building:** Commit to funding capacity building (for example, communities of practice, program development, etc.) that is focused on developing and expanding WBL models. This is especially important for youth agencies because they are required to provide WBL.

**IV. Utilize the 21st Century Workforce Development Fund Advisory Committee**

[Chapter 5, page 32, paragraph 5-State Board Functions; Appendix 1, page 4, paragraph 2- Priority Population Pilots for State's Use of Governor's Set Aside Funding]

CJC is encouraged that the state plan indicates that the Illinois Workforce Innovation Board (IWIB) will expand its role and relationship with the 21<sup>st</sup> Century Workforce Development Fund (Fund) Advisory Committee. We urge the state WIOA partners and IWIB to use the Fund Advisory Committee as a table for seeking new workforce funding for Illinois, as well as innovating service delivery for the most disadvantaged job seekers. The Advisory Committee is comprised of a strong cross-section of practitioners and administrators committed to developing innovative workforce strategies for disadvantaged job seekers, including: Illinois Department of Commerce, Illinois Department of Corrections, Illinois Department of Human Services, Illinois Community College Board, bipartisan legislators, and workforce, education, and economic development stakeholders.

**V. Tie Work-Based Training to Employer Job Quality Standards**

[Appendix 1, page 8, paragraph 1- add strategies to Work-Based Training Models; Chapter 7, page 39, paragraph 1- Sector-based business initiatives and employer initiatives; Chapter 5, page 32, paragraph 1-State Board Functions]

State and local WIOA plans can work toward improving the quality of jobs, especially entry jobs for lower-skilled individuals, by targeting work-based training grants to employers with high-road strategies that improve wages, benefits, scheduling, and other factors. Illinois' state plan should describe a strategy for the state and local workforce boards to establish mandatory job quality criteria as qualification for employers to participate in on-the-job training (OJT) and incumbent worker training. This is allowable under WIOA section 134(c)(H)(ii) and 134(d)(4)(A)(ii)). In addition, state and local workforce boards should commit to setting tiers of OJT wage reimbursements that are tied to job quality elements, so that the highest levels of wage reimbursement is reserved for high-road employers. WIOA allows expanded OJT grants to be conditioned on current wage and benefit levels and improved wages and benefit levels anticipated after the OJT placement, as well as other factors determined by the state or local boards.

## **VI. Support Ongoing Professional Development for Frontline Staff**

[Chapter 7, page 41, paragraph 2- Activity 4.3 Promote Continuous Improvement and Ongoing Professional Development, p. 41; Appendix 1, page 4, paragraph 4- Statewide Technical Assistance, Capacity Building Activities & Evaluation]

CJC supports the state's dedication to ongoing professional development for frontline staff. CJC's Frontline Focus Training Institute (Frontline Focus) should be considered as a professional development option for case management, career services, and business services staff. As the only Midwestern-based entity providing hands-on, experiential training for the workforce development field, Frontline Focus does three things:

- 1) Offers 20 course titles leading to certification in one of three tracks: Job Development, Leadership, and Client Services. Each of these tracks provides ~50 hours of training and the courses are developed in alignment with the National Association of Workforce Development Professional's (NAWDP) core competencies.
- 2) Convenes several communities of practice to encourage best practice sharing, collaboration and the development of new tools and resources for the field. These groups are designed to promote continuous improvement in the field.
- 3) Offers tailored technical assistance to workforce organizations nationwide, providing customized trainings in various topic areas and developing new tools organizations can use to improve their internal operations.

Since its inception, Frontline Focus has trained over 3,500 frontline staff and managers and certified 35 individuals over the past 5 years. In evaluation results from 2015:

- 94% of respondents said Frontline Focus had an overall positive impact on their work.
- 97% learned new concepts or strategies at their training
- 93% used the information 5-weeks post-training
- 95% said Frontline Focus increased their desire and ability to collaborate with others.
- 97% of surveyed participants would recommend Frontline Focus trainings to a colleague.