

## **Advance CTE Recommendations for the Reauthorization of the Workforce Innovation and Opportunity Act (WIOA)**

Advance CTE, representing the state leadership for secondary, postsecondary and adult CTE in all 50 states, the District of Columbia and the U.S. territories, offers the following recommendations for the reauthorization of WIOA:

### Connect Education and the Workforce

- **Align WIOA with Perkins V:** Perkins V has many ties to WIOA, including a requirement that CTE programs are responsive to the local, regional or state labor market; inclusion of an aligned vision in both state plans; and common performance indicators among other connection points. In order to further strengthen the relationship between these two federal laws and thus the services offered to participants, Advance CTE recommends that WIOA reciprocates by more intentionally connecting to and aligning with Perkins V and CTE. These connection and alignment efforts would greatly aid in the development of a wider career preparation ecosystem. Specifically, WIOA state plans should be constructed in a manner that is parallel to the state Perkins V plan, even if the state does not submit a combined state WIOA plan (CSP). This means requiring:
  - A shared vision for workforce development and CTE regarding how these systems will prepare an educated and skilled workforce that ensures coherence in order to achieve improved and equitable learner supports and outcomes;
  - A shared commitment to transparency and efficiency;
  - A prioritization of funding to be dedicated to underserved communities and populations;
  - Robust stakeholder engagement, aligned with the requirements of Perkins V, particularly with regards to representatives of underserved or otherwise marginalized special populations; and
  - The use of participant, program and labor market information to guide state and local decisions.
- **Provide Joint Planning Guidance:** In addition to these suggested improvements, Advance CTE further recommends that future WIOA legislation require the U.S. Departments of Education (ED) and Labor (USDOL) to published guidance that facilitates an improved submission process for combined state plans (CSP). State CTE Directors report that states electing to make use of the WIOA CSP option have encountered numerous administrative hurdles and related difficulties in submitting these plans for federal consideration given the cross-jurisdictional nature of the programs included. While Advance CTE strongly believes the submission of CSPs should remain optional for states in future legislation, new guidance should seek to reduce the significant administrative burdens that still exist as part of the CSP plan submission process.
- **Require CTE representation on workforce boards:** To further accomplish systems alignment between WIOA and Perkins V, CTE should be better integrated into the governance of WIOA. For instance, Advance CTE strongly believes that State CTE Directors should be a required stakeholder on state workforce boards and that local CTE leaders be a required stakeholder on local workforce

boards. In this way, further synergies between CTE and workforce development can be realized at all levels of governance.

#### Align Federal Policy to the Needs of the 21st Century Workforce

- **Coordinate federal funding for programs and worker supports:** WIOA funding must be coordinated with other federal funding streams that have aligned or parallel purposes in order to best serve workers, especially those most vulnerable, through cohesive worker supports and services. State CTE leaders have shared that an inability to coordinate or braid funding sources often leads to challenges in effectively leveraging WIOA resources. Advance CTE recommends a new planning requirement in states' WIOA plans for how core programs will be aligned with, and not duplicative of, related programs funded by other federal laws. Further, subsequent reporting should require periodic updates of programmatic alignment to ensure efficacy of implementation and provide federal agencies the information necessary to provide technical assistance to states to further improve upon these efforts and share best practices with peers.
- **Update one-stop infrastructure requirements:** WIOA supports a nationwide system of American Job Centers, also known as “one-stops,” which are the primary entities that coordinate and deliver workforce development services within states and local workforce areas. The wider one-stop “system” is composed of 12 federal programs, including postsecondary CTE programs supported by Perkins V, which are each required partners of this system. As currently constructed, WIOA mandates that each of these partner programs contribute to the physical infrastructure costs of one-stop centers. WIOA dictates that these partnerships must exist and that these partnered programs contribute to these costs. However, this statutory language remains unnecessarily ambiguous. As a consequence, a convoluted cost sharing process has been developed via federal regulation and related guidance to implement these requirements. State CTE leaders have consistently reported that this process does not support meaningful collaboration among one-stop partner programs, and in fact often results in the bare minimum of just sharing of funding, rather than the aspired systems alignment.

Advance CTE therefore recommends that current infrastructure cost-sharing language be removed from future legislation. In its place, new legislation should provide a dedicated set-aside of funding to cover the actual infrastructure costs of the nation's one-stop centers. This change would allow partnered programs to focus efforts on aligning programs and services rather than negotiating cost sharing agreements and would provide much-needed clarity for state and local workforce systems as they plan efforts for the future.

Relatedly, future legislation should more directly invest in and acknowledge the digital infrastructure – virtualization of one-stop services, online program delivery, etc. – that has grown due to natural technologic progression and the investments made to continue throughout the pandemic. Advance CTE supports, in limited circumstances and with the appropriate guardrails in place, allowing local workforce areas to establish virtual one-stop centers in lieu of the law's current physical center requirement so long as these virtual centers are able to ensure equitable access to all individuals served by WIOA.

- **Align basic skills with current workplace needs:** The definition of basic skills deficient in current legislation is limited to English reading, writing and computing skills. Advance CTE recommends that this definition be expanded to reflect the skills that are necessary to be successful in the 21st century workforce, including but not limited to: digital literacy; interpersonal communication; time management; critical thinking; career navigation; cultural competency and financial literacy.

### Support Successful Outcomes for In-and Out- of School Youth

- **Formalize processes to determine the split of youth funding:** Currently, WIOA mandates that 25% of youth funds be allocated for in-school youth and 75% for out-of-school youth. This can have the unintended consequence of preventing services from being offered to learners at risk of dropping out, since only out-of-school youth qualify for particular interventions that would help proactively address these challenges. The statutorily prescribed split of funds may also not reflect the actual needs of states or local areas which may have greater youth workforce activity needs for one of these populations over another. These challenges are further underscored by the fact that nearly half of all states in the most recent program year received a waiver from the U.S. Department of Labor absolving them of this statutory requirement.

Rather than this split being dictated at the federal level, Advance CTE believes future legislation should empower states to make this determination in consultation with important stakeholders such as CTE leaders. Provisions in future legislation should require that allotments between in-school and out-of-school youth be revisited on at least an annual basis. One strategy to accomplish this might be to incorporate the use of a comprehensive local needs assessment to formally ascertain the youth funding needs of local communities as it pertains to youth workforce activities. These assessments could be constructed similar to those found in Perkins V to ensure youth workforce funding resources are being directed to the areas of greatest need.

### Improve Data and Accountability

- **Expand data system capacity, transparency and utilization:** The state data infrastructure needed to forecast and better understand the needs of the labor market must be expanded so that state and local workforce development systems can proactively respond to rapidly changing conditions. Data infrastructure is also essential so that workers have access to better, more transparent, and real-time information on career opportunities, earnings, and how these decisions can or do interact with individuals' access to support services (e.g. those already funded by WIOA, Temporary Assistance for Needy Families, Supplemental Nutrition Assistance Program, Child Care Development Fund Subsidies, etc.). To achieve this, Advance CTE recommends that future WIOA legislation encourage and provide support to states for the creation of public-facing data tools to facilitate better usage of this information and promote a wider understanding of WIOA-funded programs' outcomes.
- **Expand state and local capacity to leverage labor market data:** Advance CTE recommends a new federal investment to modernize publicly funded labor market information services and offices. In order for the education and workforce systems to be responsive to state, regional and local labor market demand, there must be a greater investment in real-time labor market information systems, that aggregate, collaborate with and integrate information and data from other federal agencies such as the U.S. Department of Education and agencies that provide benefits such as the U.S. Department of Health and Human Services into a transparent, accessible and forward-looking talent and labor market information system. These efforts will enable our systems to better support individuals wherever they are in their career journey, and paint a more comprehensive picture for policymakers, practitioners and workers regarding the full impact of workforce development programs.
- **Expand the scope of data collection and related reporting:** Data collection and reporting is pivotal to identifying inequities in access, delivery and implementation of WIOA programs—a key first step to ensuring a stronger programmatic focus on equitable outcomes. Towards these ends, Advance CTE recommends that the current law's statistical adjustment model (SAM) incorporate an explicit focus on special populations of learners, as defined by Perkins V. Expanding the scope of

data collected for this purpose will help to further ensure WIOA-funded initiatives are overseen to close opportunity gaps and ensure continuous improvement.

Further, data should be made transparent and easily accessible in order for learners and workers to understand the value and outcomes of specific career pathways, including how pathway outcomes might differ based on a learner's race or ethnicity, gender, educational background or other demographics. It is especially critical that all eligible providers of training, including and especially postsecondary institutions, report on these data as initially envisioned by current statute. All collected data should be disaggregated to, at a minimum, reflect gender, race, ethnicity, special population status and age. Any reporting of gender data should offer, at minimum, a "prefer not to disclose" option so that learners who identify outside of the exclusively male and female categories can be represented. Disaggregated short- and long-term program-level outcomes data for learners is critical to continuous improvement.

- **Adopt common performance metrics and terminology:** There are often shared goals between programs that are supported by federal legislation. In these cases, such programs should be coordinated to efficiently use resources, reduce duplication and better serve those utilizing these programs. Advance CTE recommends using common performance metrics and definitions across these federal programs that have a shared or common purpose, at a minimum aligning with the Strengthening Career and Technical Education for the 21st Century Act (Perkins V) and the Higher Education Act (HEA), as well as the adoption of related common terminology and measurement methods. This includes but is not limited to credential attainment, postsecondary attainment and employment status.

Advance CTE further recommends that WIOA require cross-system alignment for the federal laws implicated throughout all of WIOA and the related state programs. This should include, but is not limited to, common data collection and reporting, cross-system planning and regular consultation which require valid and reliable data to ensure success.

### Elevate Career Pathways

- **Reimagine career pathways:** Well-designed high-quality career pathways help learners and workers navigate their interests, talents and work experiences, as well as their acquisition of skills, competencies and credentials of value. Most career pathways have been constructed linearly, designed to be vertically "stackable." This presumes that labor markets function in a similar fashion, with skills and competencies transferring directly to the next. Unfortunately, this is not how our economy functions. As the nature of work continues to change and the forces of globalization and automation continue, workers will not only need a chance to acquire the knowledge, skills and competencies needed to land a first job, but will also require additional opportunities as they grow older and the needs of the economy continue to change. Supporting worker transitions from one industry to another, or one occupation to another, will take on increasing importance in the future.

Advance CTE therefore recommends that WIOA supports innovation in the design and delivery of flexible and responsive career pathways – that value learning wherever and whenever it occurs - to help workers upskill, reskill or transfer and enhance skills in existing or new industries that offer opportunities and pathways to self-sufficiency. One strategy to accomplish this is by providing dedicated funding for the state and local development and implementation of career pathways and the integration of related supportive services. Such resources should be aligned with efforts to implement CTE programs of study, to ensure alignment of these efforts and avoid redundancies. In addition, Advance CTE calls for improved credit for prior learning practices, statewide articulation efforts, and postsecondary transfer policies with workforce development as a means to break down

the arcane silos that often exists between traditional postsecondary education and workforce development.

- **Elevate the role of Area Technical Centers:** It is critical that future WIOA legislation allow for the reimagining of how states and regions work to mitigate redundancies and maximize the nation's existing skills development capacity to more efficiently and effectively support the needs of employers and workers alike. Of note, Area Technical Centers (ATCs) are often left out of workforce training and related systems. While some states include them as an eligible training provider, and are currently allowed to designate ATCs as a one-stop operator, many do not. With nearly 1,400 of them, area technical centers are a vital component of the delivery of skilled training and must be a recognized component of the WIOA delivery system.
- **Prioritize high-wage, high-skill or in-demand occupations based on real-time labor market data:** Any workforce or education program should prepare participants for a job that is part of a career pathway and offers self-sufficiency. In order to achieve this, WIOA must be responsive to high-wage, high-skill or in-demand occupations- determined and updated in real-time according to state, regional and local labor market information. Therefore, Advance CTE recommends that all WIOA funded programs be organized into and delivered through career pathways, leading to a career in in-demand fields and ensure workers achieve self-sufficiency.

*Advance CTE represents state and territory leaders of CTE through leadership and advocacy that supports an innovative and rigorous CTE system that prepares students for both college and careers. State CTE Directors lead the planning and implementation of CTE in their respective states and these recommendations reflect their priorities.*

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