

Request for Public Comment: Workforce Innovation and Opportunity Act (WIOA) Implementation Comments

August 29th, 2014

The Honorable Johan Uvin
Acting Assistant Secretary for Career, Technical and Adult Education
Office of Career, Technical and Adult Education
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Assistant Secretary Uvin:

The National Association of State Directors of Career Technical Education Consortium (NASDCTEc) and the Association for Career and Technical Education (ACTE) submit the below comments in response to a recent blog post from the U.S. Department of Education's Office of Career, Technical and Adult Education (OCTAE) and the U.S. Department of Labor's Office of Special Education and Rehabilitative Services (OSERS) soliciting public input for the Workforce Innovation and Opportunity Act's (WIOA) implementation. The below comments are focused on the two common performance metrics— "indicators for effectively serving employers" and "measurable skills" gains— as they are beginning to be more fully developed by the U.S. Departments of Labor and Education.

- 1.) *In issuing definitions of performance indicators under Section 116, what should be considered in regulation or guidance when applying these indicators to adult education participants? How can the use of "measurable skill gain" best support services to low-skilled and limited English proficient individuals?*

Our organizations commend WIOA's focus on competency-oriented outcomes for program participants as this fosters a more results-driven system—something that benefits individual program participants and prospective employers.

As you more fully develop this particular measure, we encourage you to identify and build upon best practices in existing training programs that include multiple entry and exit points for participants. These entry and exit points can translate into measurable, stackable credentials or postsecondary credit allowing participants who exit a program prematurely to demonstrate some degree of competency to an employer and to be able to re-enter the program at a later date without losing progress toward attainment of a credential.

These stackable credentials would provide greater flexibility for adult education participants and other non-traditional participants whose availability for a training program depends on a variety of factors out of the control of the training provider, including childcare, transportation and part-time employment. Additionally, incentivizing entry and exit points throughout programs may also have the desirable side effect of fostering stronger partnerships between employers and training providers to ensure each exit point has labor market value to the both the employer and the program participant.

2.) WIOA emphasizes the importance of connecting job seekers and workers with the needs of employers and the regional economy. States will be required to report on their effectiveness in serving employers. What factors should OCTAE consider when defining how adult education and literacy programs may effectively serve employers?

Our organizations believe that workforce development programs should always seek to closely align and be responsive to the education and skill needs of the state, regional and local economy. As such, we applaud WIOA's strong emphasis on labor market and program alignment. One of the best methods for ensuring this linkage is for employers to have a clearly defined role and stake in state and local plan development for the programs and activities authorized under WIOA.

WIOA's new requirement that states be held accountable on programs' "indicators of effectiveness at serving employers" will be challenging to implement in a fair, objective and consistent way. As the Departments develop a metric for this, we urge you to bear in mind that the relationship between programs and employers is interconnected— one that requires a sincere effort from both parties. As such, any metric seeking to assess

this area must take into account genuine efforts on the part of programs to engage with employers, as well as the responsiveness of employers themselves.

Prior to the passage of WIOA, the Workforce Investment Act of 1998 contained a similar “customer satisfaction” measure, which sought to determine the level of satisfaction on the part of both employers and program participants. However, this metric consisted primarily of post-program surveys following program exit or in the following program year. The results of these surveys were often highly subjective and contingent on many variables that, in some instances, were out of a program’s ability to directly control. Moreover, the validity of data collected via post-program opinion-based surveys remains uncertain.

As a remedy, we strongly recommend using the time allowed under the new Act as an opportunity to develop valid, objective measures of employer engagement over time that can be incorporated into reliable longitudinal data systems. Building the capacity of these state systems would also enable WIOA’s performance accountability system to more effectively assess the nature of a particular employer-program relationship and evaluate the longevity, depth, and scope of such engagement and its impact on participant employment outcomes, among other added benefits.

As you work to more fully develop a specific indicator or set of indicators to gauge this measure, we encourage that consideration be given to objective criteria such as documented attempts to engage employers or the number of active partnerships with employers in lieu of a more subjective measure of employer satisfaction. Other criteria for this metric could include a measurement for how often and to what extent information and/or materials related to a specific program or the broader workforce system are provided directly to employers. Measuring the degree of information disseminated could facilitate greater levels of employer engagement with the workforce system by increasing employer awareness of the system and foster more opportunities for employers to utilize the services authorized under WIOA.

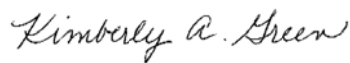
There may well be conditions unrelated to the training program that may impact employer’s satisfaction. For example, the status of a state or region’s economic conditions may or may not influence an employer’s overall satisfaction with the labor market pool and candidate qualifications. This measure should be clearly and narrowly crafted to focus on a particular program’s performance and not the overall state of the region’s economy and labor market supply.

Lastly, for any metric intended to gauge employer satisfaction with the workforce system, NASDCTEc and ACTE strongly recommend that the information collected is

limited to only those employers directly engaged with the workforce system in a given state or local area in the most current program year. In this way, the measures will assess a program's effectiveness in serving those employers who are most invested in maintaining a robust and effective system rather than those who may not be engaged to the same degree.

Thank you for the opportunity to provide input into the implementation of the Workforce Innovation and Opportunity Act. If we can provide any additional information or answer any questions, please contact Steve Voytek NASDCTEc government relations associate, at 240-398-5406 or svoytek@careertech.org; or Alisha Hyslop ACTE director of public policy, at 703-683-9331 or ahyslop@acteonline.org.

Sincerely,



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