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February 15, 2016

Commissioner Clark Sieben, DEED
Commissioner Cassellius, MDE
Deputy Chief of Staff Hardy, Governor's Office
Assistant Chief of Staff Dornfeld, Governor's Office
Chair Beeth, Governors Workforce Development Board
Director Ireland, Governors Workforce Development Board
Director Roy, DEED

Dear Minnesota Leaders:

On behalf of the undersigned organizations that the Northwest Area Foundation is currently supporting under our *Good Jobs Pathway Initiative* I am forwarding their request to participate in March 9, 2016 GWDB public meeting regarding their comments to the Minnesota Workforce Innovation and Opportunity Act (WIOA) draft state plan. The Good Jobs Pathway Initiative is an effort to assist MN Community Based Organizations that are serving communities of color to increase their participation and success in the local work force delivery system. These Community Based Organizations serve the communities that are most often left out of the current system. With the looming labor force shortages projected in the near future it is critical that all Minnesotans get connected and trained to be a part of the labor force solution. This opportunity exists now as the State implements WIOA.

I want to personally thank the Minnesota Workforce Development Board and the state agencies involved for the development of the State implementation plan. However, collectively we are concerned that this document, which governs public investment in Minnesota's most disenfranchised youth and adults, was developed without the voice of the communities it is intended to serve and falls well short of a clear strategy for engaging Minnesota's growing workforce and business communities.

The Workforce Investment Act of 1998 largely failed Minnesota's communities of color, leading to the education and employment disparities that shame our state and hurt Minnesota's current and future economy. The Workforce Innovation and Opportunity Act of 2014 offers hope for individuals and employers in our communities. A stated purpose and the opportunity inside WIOA is "to increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for employment, education, training, and support services they need to succeed in the labor market" [Public Law 113-128 Sec 2(1)]. As the data clearly shows, Minnesota's communities of color face the steepest barriers to employment and economic success.

We believe the current leadership in Minnesota has the desire to **address racial disparities in the state that are perpetuated in the current education and workforce development system**, but Minnesota's current WIOA draft does not present a clear strategic or operational framework for doing this. We share the state's goals of individual prosperity and regional economic competitiveness and are ready to truly partner to achieve those goals. As a community of practice that has long served our diverse and growing communities, we bring a critical lens and set of skills to this discussion. Our skills and experiences can aid the state in meeting WIOA's mandates and authentically engage our state's communities of color to create the vital workforce needed to sustain our future economy.

Minnesota's ever-diversifying population is an asset that has not been leveraged. WIOA is one opportunity among many other necessary system-change opportunities for changing the paradigm from deficit-focused to asset-building. Attached to this letter are some specific recommendations for utilizing WIOA planning to develop a truly strategic and operational plan for addressing Minnesota's racial disparities in education and employment, including **clearly defining target populations in priority of service mandates and authentically partnering with community-led agencies to provide culturally responsive service models.**

To begin, The Good Jobs Pathway Initiative Co-hort is asking for 30 minutes of open dialogue at the March 9, 2016 GWDB public meeting and a commitment of the state to revise the current WIOA draft with the input of community, to share that revision prior to its submission on April 1, 2016, and to document a commitment to maintain an on-going partnership to reach our shared goals. Please contact me directly with verification of our inclusion on the GWDB agenda by February 23, 2016. We look forward to the conversation on March 9, 2016.

Sincerely,

A handwritten signature in black ink that reads "Martin Jennings". The signature is written in a cursive, flowing style.

Martin Jennings
Program Officer
Northwest Area Foundation
mjennings@nwaf.org

The following page includes the participating Community Based Organizations under the Good Jobs pathway Initiative.

Joe Hobot
President and CEO



Steven Belton
President and CEO



Bao Vang
President and CEO



Tuleah Palmer
Executive Director, *Northwest Indian CDC*



Ekta Prakash
Executive Director



Louis King
President and CEO



Ruby Lee
President



Minnesota Workforce Innovation and Opportunity Act State Plan Draft Comments – Northwest Area Foundation, Good Jobs Pathway

Minnesota’s economic well-being depends on bringing all Minnesotans to prosperity. Minnesota’s Workforce Innovation and Opportunity Act state plan must not miss the chance to be a strategic and operational framework for addressing the racial disparities that harm our communities and our economies.

Our recommendations:

- **Stop Planning to FIND the Solution & Start to FUND the Solution through Partnership with Community-led Organizations**
- **Implement the Required WIOA Priority of Service**
- **Set Training Benchmarks**
- **Define Barriers to Employment to Include System Barriers**
- **Focus on Out of School Youth**
- **Make Career Pathways a Reality for Individuals with Barriers to Employment**
- **Incentivize Innovative Adult Education Practices**
- **Institute Effective Programming and Assure Implementation in Communities of Color throughout the State**
- **Use the *Eligible Training Provider List* Process to Drive Services**
- **Use Performance Accountability Measures to Drive Services to Target Populations**
- **Include Diversity, Inclusion, and Job Quality Criteria**
- **Make the Combined Plan Robust**

Stop Planning to FIND the Solution & Start to FUND the Solution through Partnership with Community-led Organizations

The analysis of the state workforce identifies that

“Minnesota lags behind much of the rest of the United States in advancing the needs of individuals from communities of color to obtain employment in occupations that pay family sustaining wages” (p 23) and “that many potential customers do not find the environment [sic] of the one-stops as welcoming and conducive to learning” (p 24).*

But rather than introduce any strategies for addressing the economically crippling reality of leaving behind key members of the workforce in a time of workforce shortages or strategies for making the public system work for the communities who need it, the plan simply is to plan:

“This four year plan will explore and provide [sic] guidance [sic] on modernizing services for the challenges we face as individual organizations and as a system” (p 24).

Minnesota has already engaged in many planning efforts, including the development of a plan putting community-led organizations at the center of engaging and uplifting communities of color in education, training, and employment services in partnership with the public system. Culturally competent community-led organizations are providing

* All page numbers reference the version of MN WIOA State Plan available 2.11.2016

successful models and approaches that can be scaled for greater impact as opposed to more planning. The Emerging Workforce Coalition plan is such an example that would enable the capacity building of the public system while focusing resources in the communities where most needs exist through organizations that have the cultural competencies to serve their communities.

The single operational step outlined in MN's draft WIOA plan to address racial disparities is a survey of employers who will be asked "why they seek to increase racial diversity in their workplace" in order to "create 'a what works for employers' communication plan" (p 40). This language reveals an offensive mentality that continues to view diversity as a problem rather than an opportunity. Minnesota's looming workforce shortage can only be addressed through finding solutions within the communities of color that will make up 100% of Minnesota's working age population growth. The public system needs to promote these solutions. In addition, this action seeks only to address what works for employers. Solutions to addressing Minnesota's need for creating a strong and diverse workforce must also address what works for employees. Minnesota's public system clearly needs to truly partner with leaders in the community to solve the disparity crisis and put more Minnesotans to work. Minnesota needs to stop planning and start doing.

Implement the Required WIOA Priority of Service

While priority of service for veterans is detailed, the MN state plan needs to also include a section that provides background information and stronger emphasis on the priority of service provision in WIOA that targets "public benefits recipients, other low-income individuals, and individuals who are basic skills-deficient" when providing career and training services with WIOA Title I Adult funds. This should be accompanied by the state explicitly directing regions to focus on their most vulnerable communities and setting a goal for training.

Set Training Benchmarks

Minnesota should devote far more resources from WIOA Title I Adult to training. In PY2013, only 59% of WIOA Adults with less than a high school education received training services which were predominantly undefined "skill upgrading;" only 6% of those adults without a high school diploma or equivalency were enrolled in adult basic education, the first step on a solid career pathway program.[†] Minnesota should establish that at least 75% of Title I Adult funding must be used on training, of which 70 percent must be spent on public assistance recipients, low income individuals, and individuals who are basic skills deficient. The state should establish a technical assistance group to support local areas and their service providers in meeting the benchmarks and allow for the sharing of best practices. Furthermore, the WIOA barriers to employment definition should be expanded.

Define Barriers to Employment to Include System Barriers

Systemic barriers that prevent people of color and others from reaching their full potential need to be explicitly addressed in the MN WIOA plan. The plan should state that skill development and credential attainment will be insufficient to achieve equitable

[†] https://doleta.gov/performance/results/WIASRD/PY2013/PY2013DataBook_Mn.pdf

employment across race and ethnicity without successful efforts to overcome multiple systemic barriers to employment. These disparities include training-based disparities such as less participation in skill development programs and fewer positive outcomes due to language and educational barriers; employer-based disparities like exclusionary hiring practices, hostile work climates, implicit bias; and infrastructure disparities including lack of robust availability of transportation and childcare. Of critical importance are youth who have disengaged from work and education.

Focus on Out of School Youth

75% of WIOA youth funds need to be spent on out of school youth, as the state defines them. It is imperative that youth with substantial barriers to success in school are prioritized and served. The MN state plan should directly define out-of-school youth to include individuals aged 16-24 who:

- have dropped out;
- are within the age of compulsory school attendance but have not attended school for at least the most recent school quarter;
- are homeless, a runaway, in foster care or aged out of foster care, a current or former foster child eligible for independent living services or in an out-of-home placement;
- pregnant or parenting;
- an individual who is subject to the juvenile or adult justice system;
- an individual with a disability;
- a low-income recipient of a secondary school diploma or its recognized equivalent, and who is basic skills deficient, or an English language learner; or
- a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

Make Career Pathways a Reality for Individuals with Barriers to Employment

While Minnesota's plan calls out career pathways as a core strategy, there needs to be much more operational guidance on creating a career pathway **system** that ensures access and success for populations of people with multiple barriers to education and employment success. Minnesota's plan should address:

- co-enrollment between youth services and adult education to re-engage out-of-school youth;
- co-enrollment between career services and training services, including adult basic education/English language learning *and* postsecondary and/or industry-valued credential training;
- common assessment between programs to align services;
- incentives for incumbent worker career pathways for employers and employees;
- utilizing transitional jobs and on-the-job training to build on-ramps for individuals without solid work history;
- re-entry services with education and training services;
- specific targets for local workforce board partnership with community-led organizations;

- flexible program design to fit differences in demographic populations being served by non-profit organizations;
- service models tailored to communities' cultural strengths and needs;
- shared definitions of key terms to allow career pathway programs to be identified and evaluated for continuous improvement across the state.

The state needs to create the policy framework and incentives to allow local providers to build their career pathway systems.

Incentivize Innovative Adult Education Practices

The Minnesota plan outlines the 2017 full re-compete of funds for adult basic education/English as a second language services. While addressing the required 13 considerations (p 81), the plan should further define how to focus on culturally competent service providers and incent providers to deliver service models that have proven effective such as Integrated Education and Training: a three-part service approach that provides 1) adult education and literacy activities concurrently and contextually; 2) workforce preparation activities; and 3) workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement.

Once these practices are underway, implementation should gauge continuous improvement.

Institute Effective Programming and Assure Implementation in Communities of Color throughout the State

Under the topic of System Management, again, the Minnesota plan is to plan, to “look at designing a system dash-board” and to generally state “further work and consultation is needed with this approach” (p 36). Instead, a set of regular assessment benchmarks should guide continuous evaluation and improvement strategies for the state and local boards. As part of the state’s priority to eliminate racial disparities, the GWDB should create a standing committee with the explicit task of focusing on achievement of this statewide goal, monitoring effective practices and outcomes and then publicly presenting a report for the state on a yearly basis, and encouraging and tracking community-based organizations and youth participation at a regional level to ensure all local workforce boards are working in partnership with community-led organizations. Participants of this standing committee should include not only GWDB members but also CBOs and youth leaders, including those from the very communities you seek to support, who are also working with low-income youth and adults.

Use the *Eligible Training Provider List* Process to Drive Services

As Minnesota’s plan asserts, “Minnesota’s implementation of the Eligible Training Provider List [ETPL] changes is key to enhancing access to education for our workforce development system customers” (p 66). As the key mechanism guiding WIOA training investment, the ETPL process needs to actively engage community training providers to ensure their inclusion in ETPL. State and local workforce development board staff should provide direct outreach to education and training programs targeting communities of color and other at-risk youth and adults. The state plan should encourage local workforce development

boards to partner and/or contract with organizations that serve and are led by people of color.

Use Performance Accountability Measures to Drive Services to Target Populations

WIOA responds to the “creaming” that often took place under WIA to hit local and state performance measures by instituting a performance accountability system disaggregated by target population. To ensure equity, Minnesota’s plan should define how local regions will identify their target populations and drive aligned services to them. The state should aggressively focus on serving communities of color through investment in community-led organizations and take full advantage of disaggregated reporting to incent this work.

Include Diversity, Inclusion, and Job Quality Criteria

Minnesota’s public workforce system services individuals and employers. The WIOA plan should require establishing diversity and inclusion criteria as well as job quality criteria for employers who partner with and receive services from the public workforce system. Criteria should include the existence of effective diversity and inclusion policies and practices from front-line workers and others. In terms of quality, employers should use fair scheduling practices and demonstrate clear career progression for even their most entry-level positions.

Make the Combined Plan Robust

We commend Minnesota for opting for a combined state plan. Programs such as Temporary Assistance to Needy Families (Minnesota’s Family Investment Program - MFIP), an enhanced SNAP E&T 50/50 reimbursement plan, and Carl D Perkins Career and Technical Education play a key role in reaching the overarching goals of WIOA. The current version of the state plan does not include any information or details on how Perkins CTE, MFIP, or an enhanced SNAP E&T 50/50 plan will be a part of this plan. It is unconscionable to move forward with a combined plan without further information on how this will be implemented. Taking these programs from their siloes into an integrated, comprehensive plan would help Minnesota move from weak and spotty collaboration to a true cross-system, public-private integration model.