

# HEARTLAND ALLIANCE

NATIONAL INITIATIVES

## Heartland Alliance's National Initiatives On Poverty & Economic Opportunity Workforce Innovation and Opportunity Act (WIOA) Notices of Proposed Rulemaking (NPRMs)

June 2015

Heartland Alliance is pleased to submit these comments pursuant to the Notice of Proposed Rulemaking (NPRM) RIN 1205-AB73 (Docket No. ETA-2015-0001), implementing Title I and Title III of WIOA; NPRM RIN 1205-AB74 (Docket No. ETA-2015-0002), "Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One Stop System Joint Provisions," and NPRM RIN 1830-AA22 (Docket No. ED -2015-OCTAE-0003), implementing programs and activities authorized under Title II of WIOA.

Grounded in over 125 years working with the most vulnerable men, women and children in our society, Heartland Alliance informs public policy decisions and advances solutions to improve opportunities and quality of life for people living in poverty and danger. Heartland Alliance's [National Initiatives](#) on Poverty & Economic Opportunity is dedicated to ending chronic unemployment and poverty. We work at the intersection of practice, policy, and research to catalyze change that is practical, informed by evidence, and grounded in experience. Through our field building efforts, we provide support and guidance that fosters more effective and sustainable employment efforts. Our policy and advocacy work advances solutions to the systemic issues that drive chronic unemployment.

Through the study of emerging problems and longstanding barriers, evaluation of promising solutions, and program and policy development and advocacy that leverages lessons learned, Heartland Alliance's research and policy work is advancing meaningful policy and systems change to create a more just global society.

The Workforce Innovation and Opportunity Act (WIOA) modernizes the federal framework that guides America's public workforce system and increases the system's accountability to support the employment needs and interests of adults and youth facing barriers to employment. The law articulates that one of the goals of the public workforce system is to prepare individuals – especially individuals with barriers to employment – to succeed in the labor market through increased access to employment opportunities, education, training, and supportive services. The prioritization of low-income adults and out of school youth for workforce services and subsequent guidance in this NPRM further instructs the system to be attentive to and direct resources to support these populations in entering and succeeding in work. State and local planning processes, implementation directives, expenditure requirements and partnership opportunities within WIOA can ensure that the workforce

needs and interests of adults and youth with barriers to employment are addressed by the public workforce system and partner public systems through new or expanded partnerships.

We strongly support this vision of WIOA and look forward to working with the Departments of Labor, Education as well as other federal agencies responsible for administration of partner programs to support the successful implementation of the law. The NPRMs released by the Departments in April 2015 are a critical step towards achieving this vision. Our comments reflect input from our coalition members in nearly every state in the nation and a range of stakeholders including workforce and human services practitioners, anti-poverty organizations, researchers, and others. Our comments also reflect and build upon recommendations and comments from other recognized national organizations such as the National Skills Coalition, the Center for Law & Social Policy, the Council of State Governments Justice Center and the Corporation for Supportive Housing among others. Throughout our comments we note areas where we believe the draft rules are consistent with the intent of the law, as well as areas where we believe additional regulatory clarification or guidance may be needed and/or where we believe further consideration is warranted by federal agencies as WIOA is implemented.

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## **1. Comments on NPRM RIN 1205 - AB74**

### **Integrated Data Systems - § 20576**

We strongly support integrated and aligned data systems signaled as a priority for Departments at § 20576. We offer considerations to inform DOL's process for doing so below. In order for communities, the public workforce system and other public systems to offer workforce services and supports that meet the needs and interests of adult and youth jobseekers with barriers to employment; allocate resources effectively; and form appropriate partnerships states and communities must understand the scope, scale and needs of jobseekers that face barriers to employment. In order to facilitate this and ultimately support better and more effective linkages to employment and supports for jobseekers facing barriers to employment the public workforce system must prioritize the collection and integration of better data. Because individuals facing barriers to employment often engage with multiple public systems and many data indicators such as the prevalence of homelessness or a criminal record are self-reported by jobseekers, assembling an accurate picture of the employment barriers and needs of jobseekers facing barriers to employment requires aligning data from multiple sources and thoughtfully developing assessment and participant characteristic questions.

- **National Standard for Integrated Data Systems.** As the WIOA system works to align and integrate data systems, we recommend that DOL work with other federal agencies to establish minimum national standards for how integrated data systems should be designed and interface with existing public systems to support the employment needs of adults and youth facing barriers to employment. Specifically, we urge DOL to work with other federal agencies and state and local areas to develop a list of minimum priority data elements that must be collected related to employment assessment and services and process data. Across the country, many communities are working on their own data collection systems – integrated or not – and there has been no national standard set with regard to workforce data systems. Moreover, given that multiple systems and programs comprise the full spectrum of the United States’ workforce services available across a range of federal agencies, we urge DOL to work with other federal agencies to ensure that integrated data systems align with existing data being collected on employment, education, and training services across federal programs.
- **More Accurate Data on Participant Characteristics.** Given WIOA’s increased focus on serving individuals facing barriers to employment, we believe that capturing more accurate information on participant characteristic and assessment data upfront will go a long way toward informing the WIOA system about who is being served in communities, how and through what employment, education, and training programs participants are being served, the degree to which these programs are successful in meeting the employment needs of these jobseekers, informing the most appropriate mix of services and partnerships needed, and help inform meaningful comparisons across populations and programs over time. Furthermore, we recommend that common definitions are agreed upon by DOL and used across the workforce system pertaining to participant characteristics. Every effort should be made to institutionalize those common definitions early in the WIOA implementation process in order to ensure continuity of data collected. We recommend that DOL begin with the definition of “individuals with barriers to employment” as articulated within WIOA legislation and work alongside relevant federal agencies and experts to craft meaningful definitions and fields. Much of the assessment and participant characteristic data that is currently collected by the WIA system is coded in binary fields, (i.e. “yes” or “no”). Data fields that are more reflective of the experiences of jobseekers facing barriers to employment would be very useful in getting an accurate picture of the characteristics and needs of participants which can then go a long way toward informing the workforce system on how well each subgroup is being served by the system, partnerships that need to be leveraged to support participant success, programs and models that may be effective.

  - For example, the risk of recidivism, (and the positive impact that employment interventions can have on the likelihood that an individual will recidivate) tends to be much higher among individuals who have been [recently released](#) from incarceration. However; in several states, data is only collected on whether or not someone is an ex-offender and whether the offense was a misdemeanor or felony. This oversimplified categorization misses an opportunity to assess whether or not a person is “recently released” and the type of offense which could have important considerations for employment

programming and intensity, support services, partnerships among the WIOA and the criminal justice system and employer partners. Given that Second Chance Act grantees are mandatory partners of the WIOA system moving forward, we recommend that DOL work closely with leaders at the Department of Justice (DOJ) to craft assessment and participant characteristic fields that reflect more relevant and reflective data fields in assessment and intake processes.

- Similarly, data on participant housing status needs to go beyond the question of “are you homeless or not?” and reflect more accurate and reflective assessment questions that acknowledge that [housing instability](#) can exist along a continuum and signal a myriad of considerations in employment programming and support services. For example, questions about housing instability should reflect that a large number of individuals who are instability housed are living “doubled up” with friends or family, living in shelter, rapid rehousing, and/or transitional housing. And, although many individuals experiencing homelessness can face significant barriers to getting and keeping jobs, many are already working but not earning enough to make ends meet or keep a stable roof over their heads. Assessment questions that are more reflective of the myriad of ways that housing instability can manifest itself for individuals and families will go a long way toward serving these jobseekers better.
- **Require Assessment & Participant Data to Be Collected.** In our experience working to align WIA data systems, key assessment and participant characteristic fields built into WIA data systems are not being used – or used uniformly. This creates gaps in participant information regarding those being served by the WIOA system and makes it much more difficult for the system over time to draw comparisons or unpack the efficacy of its services. For example, data on whether or not an individual is a survivor/victim of domestic violence, or a custodial/noncustodial parent has been frequently missing from nearly all customers – despite the fields being available. Similarly, fields on level of education, long-term unemployment, and public benefits receipt have often been left blank. In addition to addressing these issues, the WIOA data systems could be improved by starting to collect or improving the collection of health barriers, employment history (including level of skills required in previous jobs), support networks in place, and childcare/child support obligations. We encourage DOL to consider including a minimal set of required data elements that local and state systems must collect with regard to participant characteristics plus a set of highly encouraged data elements. In order to encourage implementation we encourage DOL to consider incentivizing local and state communities for more collecting more complete participant data.

## **State Plan Development**

WIOA makes a number of key changes intended to support greater alignment across federal workforce and education programs. One of the major changes under WIOA to support these alignment efforts is a requirement that states develop and submit “unified state plans” covering all core programs authorized under the law, rather than submitting separate plans

for each program. The law also authorizes states to submit “combined” plans that could incorporate other federal workforce programs, including programs funded through the Temporary Assistance to Needy Families (TANF) block grant, and career and technical education programs funded under the Carl D. Perkins Act.

Since multiple agencies and systems comprise the full spectrum of the United States’ workforce services, meeting the employment and service needs of adult and youth jobseekers that face barriers to employment requires that the public workforce system and other public systems leverage one another’s strengths and resources in intentional ways. The new planning options under WIOA present unique opportunities for states and local communities to work to align employment, education, and training services for the benefit of jobseekers facing barriers to employment who are often overlooked or whose needs are not accounted for explicitly in state planning. We believe that thoughtful and effective planning processes can go a long way toward ensuring that a robust menu of employment and support services are identified, offered, and implemented, public system strengths are leveraged in order to use resources efficiently, new or expanded workforce resources are identified and implemented and coordinated access, assessment, and referral process are developed and promising solutions such as co-location of services and employment navigators among others can be explored and implemented across public systems.

We applaud the Departments for strongly encouraging states to submit a Combined State Plan on the basis that doing so in an intentional and thoughtful way can ensure that adult and youth jobseekers facing barriers to employment are accounted for. We also applaud the Departments’ reflection of the legislative “purposes” section of WIOA law in the NPRM - in particular the section at 20 CFR 676.10 that emphasizes the need for greater collaboration and coordination across systems, and in particular referencing the need to ensure that workforce and education investments **support the needs of individuals with barriers to employment**. Our recommendations are intended to strengthen DOL’s final rule to ensure that state plan development accounts for and benefits adult and youth jobseekers facing barriers to employment to the largest extent possible:

- Consistent with recommendations from other national workforce organizations, we recommend that language be strengthened to require assurances that **all such entities** have approved the inclusion of the programs in a combined plan, especially where such programs do not fall under the direct control of a governor. The draft regulations at 20 CFR 676.140(e)(4) reiterate the statutory requirement that all of the entities responsible for planning or administering a program described in a combined plan have a meaningful opportunity to review and comment on all portions of the plan.
- Consistent with the statutory requirements guiding the development of strategic planning elements within WIOA state plans, we recommend that language at § 676.105 (1) be strengthened to reflect WIOA legislation more accurately and include the requirement for state plans to be informed by and include an analysis of the educational and skill levels of the workforce, **including individuals with barriers to employment**. WIOA statutory language requires that state and local planning efforts include and be informed by an analysis of various data – including data that include

the education and skill levels of individuals with barriers to employment. This NPRM stops short of articulating that this requirement holds true for assessing the education and skill level needs of individuals with barriers to employment. We believe the intent of the legislation should be reflected in DOL state planning guidance in order to ensure that states are indeed leveraging data analysis requirements to ensure that the needs of adults and youth facing barriers to employment are accounted for in state planning activities. This requirement can be a catalyst for communities and states to take stock of the education and skill levels of adults and youth facing barriers to employment and is critical to informing the public workforce system about the workforce services and supports needed to meet the needs and interests of adult and youth jobseekers with barriers to employment; allocate resources effectively; and form appropriate partnerships.

In addition to the specific recommendations above, we note that NPRMs also make multiple references to “joint planning guidance” that will be issued by the Departments and are intended to provide additional instructions related to the planning process and plan elements – particularly with respect to the combined plans. We offer recommendations and considerations below to ensure that combined state planning takes into account and benefits adult and youth jobseekers facing barriers to employment to the largest extent possible.

- **Encouraging Inclusive Planning Processes - § 676.130.** We appreciate the reiteration of the Department’s Sunshine Provision requirement at § 676.130 focused on promoting public comment and feedback processes to strengthen WIOA state plan development. We strongly encourage the development of inclusive WIOA state planning processes that take into account feedback from a range of stakeholders from multiple systems and across programs as well as experts – particularly those with expertise in designing and implementing employment services for adults and youth facing barriers to employment. We encourage forthcoming joint planning guidance mentioned by the Departments within this NPRM to encourage feedback processes, outreach and engagement strategies that include a range of stakeholders – including jobseekers facing barriers to employment and other stakeholders with expertise serving adult and youth jobseekers facing barriers to employment. Consistent with other national workforce organizations, we also encourage the Departments to emphasize that all potential partner programs should be engaged in the development of the state’s strategic vision and plan development, regardless of whether the state opts to submit a unified or combined plan.
- **Use of Data - § 676.105.** We encourage forthcoming joint planning guidance to encourage the use of a range of data sources to inform the strategic planning elements of state plans – in particular the “education and skill levels of the workforce, including individuals with barriers to employment” at § 676.105. Data available through state agencies overseeing homeless services, human services, corrections and juvenile justice, and veterans affairs among others may be valuable in identifying and understanding the employment, training, and education levels, past work experience, engagement with other public systems, as well as needs of individuals with barriers to employment in local and state public workforce areas.

Moreover, leveraging data from other public sources can help identify trends and factors that can shed light on potential barriers to employment or economic opportunity faced by populations in specific geographic areas.

- **Considerations for Specific Programs & Systems in Combined State Planning - § 676.140.** We applaud the ability for states to develop state plans alongside a range of other programs and systems – including TANF, HUD employment and training programs, Second Chance Act programs and others. We believe that thoughtful planning can lead to better access to employment services and better alignment of support services to support greater economic opportunity for populations of adults and youth that face barriers to employment. We offer considerations and recommendations below as states seek to partner with specific state agencies in planning employment services for specific populations facing barriers to employment. We urge DOL to consider issuing guidance and considerations for states to this end in future “joint planning guidance” as well as partnering with appropriate federal agencies to issue joint guidance in the future.
  - **Serving Homeless Jobseekers:** Homeless jobseekers consistently articulate a need for and interest in working and many are already working but not earning enough to keep a stable roof over their heads or meet basic needs. HUD has several employment programs that State WIOA planners may not be aware of but could support the WIOA requirement that state WIOA plans articulate how they will expand access to employment, training, education and support services as part of state planning operational components. We recommend that DOL encourage workforce development boards to establish effective operational partnerships with Continuum of Care bodies and state councils focused on homelessness, wherever possible. These partnerships will help promote mutual awareness of available resources and collaboration on shared goals. We also suggest that DOL encourage State plans to include specific strategies for using employment to prevent and end homelessness. In addition, HUD supports programs specifically for public housing residents and for individuals with housing vouchers. For example, Section 3 requirements apply to public housing authorities, state and local governments that receive HUD contracts for community revitalization. The goals of Section 3 are to give residents of assisted housing a priority for these jobs. Section 3 covered projects and activities include the development, operation, and modernization of public and Indian housing. They also include housing and community development projects like construction, reconstruction, conversion or rehabilitation of housing and other public construction. In addition, the Family Self Sufficiency Program (FSS) is not on its own an employment program, but rather an asset building/financial literacy program. Is it a voluntary program for HCV holders, PH residents and recently extended to residents in Project-Based Section 8. The program includes an escrow account in which income earned can be diverted to participants’ escrow accounts. Escrow accounts can be used for a variety of purposes – including additional training and education which could be provided through the WIOA system. As states consider joint planning with HUD funded employment services, we urge consideration of

how these programs in particular can be aligned in state planning to promote greater access to these specific programs and employment, education, and training services available through the WIOA system through referrals and use of navigators between homeless and workforce systems. In addition, we believe that these programs could be greatly expanded with more education and awareness and that the WIOA system could support such efforts by supporting education and awareness efforts. Further, we urge DOL to work with HUD and other national experts and [initiatives](#) to identify and lift up [promising examples](#) of where and how homeless services systems and workforce systems are working together for the benefit of increasing employment and economic opportunity for these jobseekers.

- **Individuals Returning From Incarceration or Those With A Criminal Record.** The likelihood that a person is arrested, commits a new crime, or becomes incarcerated is related to stable employment and earnings - especially for low-income individuals. In addition, evidence suggests that engagement in intensive employment interventions can decrease the likelihood that individuals commit new crimes and be [reincarcerated](#). WIOA mandates that Second Chance Act reentry programs be partners of the WIOA system. In order for partnerships to be effective and lead to greater employment and economic opportunity for individuals returning from incarceration and those with a criminal record, we urge DOL to work closely with the Department of Justice to outline additional recommendations and considerations within future “joint planning guidance” for working specifically with the Second Chance Act partners and state Departments of Corrections. In particular, we urge DOL to be cognizant that the Second Chance Act is a small program in relative size to the needs of jobseekers with criminal records across the country and that the Second Chance Act does not represent a system but rather a group of grantees that may change from year-to-year based on competitive grants to states and localities.
- **Cross Program Alignment.** State WIOA boards must assist the Governor in developing strategies to support the use of career pathways for the purpose of providing individuals with barriers employment with workforce activities, education and supportive services to enter or retain employment and articulates strong support for implementation of innovative adult education and training models such as integrated education and training. This said, there is limited guidance around how non-core programs and serviced can be engaged. Consistent with other national workforce organization recommendations, we encourage joint planning guidance should highlight opportunities for alignment at the state and local levels and provide examples, as appropriate of program alignment to achieve the

## **Performance Accountability**

WIOA contains a number of changes from WIA that are intended to improve cross-program data and performance measurement that will go a long way toward creating a system of shared accountability.

**Definition of Participant.** The definitions of “participant” and “exit” are important because they set the parameters about what participants in the WIOA system count, who does not count, and when they count for performance measurement purposes. Our comments on these issues are consistent with other national organizations and are driven, in part, by our belief that co-enrollment in employment, education, and training programs and services under WIOA can support more comprehensive services for participants and improve outcomes, especially for adults and youth who face barriers to employment. According to the proposed rule, a participant is “a reportable individual who has received staff-assisted services after satisfying applicable programmatic requirements for the provision of services, such as eligibility determination.”

- With regard to all programs, we urge the Departments to clarify that receiving an assessment does not make an individual a participant for any program. If it did trigger participation, we are concerned that there would be inappropriate disincentives to provided needed assessments to individuals that seek WIOA services. We believe that participant status should not be triggered by receiving an assessment. In our view, it is inappropriate and inconsistent with effective practice to attach a person to a program for accountability purposes prior to knowledge of the person’s service needs and the person’s acceptance of their plan of service.

**Definition of Exit - § 677.150(c).** For all programs except for Vocational Rehabilitation, the Departments propose defining “exit” as the last date of service, meaning that the individual has not received any services for 90 days and there are no future services planned. For this definition, “service” does not include self-service, information-only activities, or follow-up services. Consistent with other national organizations, we appreciate the Departments’ efforts to use one consistent definition, because this common measurement can promote shared accountability and will make it far easier for research and evaluation to be conducted on WIOA programs over time.

We are also pleased that “exit” cannot be triggered if future services are planned. WIOA programs should be able to flag in their records that future services are planned. This could be used to support longer, planned interventions like youth programs with multiple components or career pathways with on ramps and off ramps to employment and training and be especially important for adult job seekers who may progress in education and training programs across an extended period of time due to the need to work or take care of family obligations. For example, in some cases, adults and youth who were receiving services will stop receiving services due to life events such as pregnancy, or family hardships such as the illness of a parent or child, or personal setbacks such as incarceration, among other reasons. If these events are documented and participants are expected to return to continue their plan of service we suggest that a hold status should be available to stop the exit “clock” until the participant is able to resume services. It should be a part of state monitoring to look at who is on hold and for what reasons, to ensure that the hold provision is not being used inappropriately to delay exit and impact performance measurement.

With regard to the 90 day threshold for determining exit we suggests that the Departments extend this threshold – especially for [youth](#) who often engage in services over an extended period of time. We recommend that the Departments consult the research community, programs and national experts serving adult and youth jobseekers facing barriers to employment in determining an appropriate length of time for program exit.

Further, we recommend that regulations enable providers to reenroll participants who were “negative” exits due to loss of contact with the program. If a participant wants to reengage in services, the program should be able to reenroll the participant and have the opportunity to positively exit them at a later date if performance outcomes are achieved. A more flexible exit policy and the ability to reenroll will encourage, rather than discourage, programs to serve people experiencing homelessness, out of school youth, and other populations that are more likely to disengage and then reengage in services due to life circumstances.

**Measurable Skill Gains Indicator - § 677.155(a)(1)(v).** The measurable skill gains indicator measures the percentage of participants who, during a program year, are in education or training programs leading to a recognized postsecondary credential or employment, and who are achieving measurable skills gains. We applaud the use of a measurable skill gain as a way to track progress in employment, education, and training programs over time. We think that this measure will create incentives for the WIOA system to serve a greater number of adults and youth who face barriers to employment and may take longer to complete employment, education, and training programs. In particular we support many of the specific recommendations submitted by the Center for Law & Social Policy.

**Interim Progress Measure.** The Departments are considering using the Measurable Skills Gains indicator to measure interim progress of participants who may be enrolled in education or training services for a specified reporting period. We strongly support using this indicator as an interim measure of progress that helps programs show the progress of low-income or lower-skilled individuals who may take longer to achieve a postsecondary credential or complete a program and enter employment. If properly designed, this indicator can encourage longer-term and more intensive training, for example through participation in a career pathway program. In particular we support many of the specific recommendations submitted by the Center for Law & Social Policy.

**Adjusted Levels of Performance - § 677.170.** As part of the process for establishing the adjusted levels for the primary indicators of performance, the draft rule says that the Secretaries of Education and Labor will establish “an objective statistical model” based on economic conditions and participant characteristics. The participant characteristics listed in the draft regulations reflect the statutorily required factors: 1) indicators of poor work history; 2) lack of work experience; 3) lack of education or occupational skills attainment; 4) dislocation from high-wage and high-benefit employment; 5) low levels of literacy; 6) low levels of English proficiency; 7) disability status; 8) homelessness; 9) Ex-offender status; and 10) welfare dependency. We urge the Departments to interpret the statutory list as required elements, but not a fully inclusive list of all the possible factors the Secretaries may use. We advise that the rule should recognize that the Secretaries will have to establish multiple statistical models, not just one as implied in the proposed rule. Separate models should be

created for different indicators and programs, as is the practice under WIA. For example, the youth models will likely differ from the models for programs that serve primarily adults.

The Departments request comments on whether any additional factors beyond those in the statute should be considered in developing the models. We believe that gender and race/ethnicity should be considered for inclusion in the models. Inclusion would give incentives to serve those who may have lower expected earnings, have been historically and disproportionately impacted by unemployment and poverty and those who have historically not been served by the public workforce system. We also suggest including age and lack of a high school diploma and a ratio of earnings at program entry to child support arrearages – particularly as it may relate to low-income noncustodial parents. We believe the adjustment models should be sensitive to the characteristics of the population served and the makeup of communities in which services are delivered. For instance, a geographic area that chooses to serve a younger high-school dropout population or a geographic area of high poverty should have different performance expectations than one that serves older high school graduates or geographic areas of affluence. We also recommend that once the model is developed DOL alongside states and localities test this model over a time-limited trial period, (we recommend 1 year), after which the model should be re-examined and improved based upon information gleaned from the trial period. Moreover, we highly recommend that the model is periodically reviewed to ensure that it is still factoring in appropriate indicators.

Finally, we recommend that the Departments continue to consult with the research community, state and local practitioners and policy experts on the development of the adjustment models, as well as other aspects of the performance management policy under WIOA.

**Entered Employment Rate.** The Departments propose collecting or reporting information on an entered employment rate and an employment retention rate and request specific public comments on these two rates in addition to the statutory primary indicators of performance for employment. Consistent with other national organizations, we believe it is a mistake for the Departments to highlight measures of entered employment and employment retention. Focusing attention on these measures is confusing for the system and could impede the system's transition from the measures in WIA to the measures in WIOA. The Departments can still analyze data on employment in various ways without drawing attention to the old measures. At a minimum, the Departments should be clearer that collecting or reporting entered employment and employment retention would be for informational purposes only and not for performance accountability.

The NPRM also seeks public comment in this section on whether or how to collect information on the quality of employment and how WIOA's programs help employed and underemployed individuals find new or better jobs. We appreciate WIOA and the NPRMs interest in trying to assess the degree to which WIOA programs contribute to the quality of jobs received by participants. A downfall of the WIA system currently is that while WIA data systems may track an hourly wage of participants that enter employment, these systems rarely count the number of hours worked by jobseekers during a week. This can lead to incorrect assumptions about the quality of jobs received by participants and the degree to

which these jobs lead to family sustaining work. For example, if a jobseeker is making \$20 an hour but only working 10 hours a week – the assumption at first glance might be that the job is a good job but coupling this information with the hours worked highlights that the individual or family is still be living well below family sustaining wages. For these reasons we strongly recommend that DOL consider a range of data indicators, that are not linked to local or state system performance, for assessing job quality and the degree to which WIOA contributes to unemployed or underemployed individuals finding new or better jobs.

**Youth Earnings Measure - 677.155(d)(3).** The earnings measure proposed at 677.155(d)(3) is new for youth. The WIOA statute and the proposed regulations encourage placement of youth upon exit in postsecondary education and training. This is strong strategy, and one that could serve to increase the numbers of youth in postsecondary education and training. Since those youth placed upon exit in education and training will most likely work part-time if at all, their inclusion in the median wage measure is likely to negatively impact performance on this measure. Areas that are highly successful in exiting youth to postsecondary education and training should not be unduly penalized and subject to sanctions. Thus, youth who are working part-time and are also in education or training activities, including postsecondary education, should be excluded from the calculation of median wage.

## **2. Comments on NPRM RIN 1205 - AB73**

**Board Representation - § 679.120.** This NPRM encourages representation from CBOs that have demonstrated experience and expertise, as defined in proposed § 679.120, in addressing the employment, training, or education needs of individuals with barriers to employment across the State. We applaud DOL for highlighting this as we believe that involvement by community based organizations that have expertise in serving adult and youth jobseekers with barriers to employment will ensure that state and local plan development will reflect the employment, education, and training needs and interests of these jobseekers. We would encourage DOL to consider encouraging states to include representation by adults and youth with barriers to employment on state and local planning boards. Adults and youth facing barriers to employment can be a critical source of authentic lived-experience and information that we believe should not be overlooked in the process making informed decisions with regard to the workforce services and supports needed in communities.

**Priority of Service - § 679.560(b)(21).** Under WIOA, there is **no requirement** that local areas must designate funds as “limited” in order for the priority to go into effect, as there was under WIA. The priority is now in effect regardless of funding, but the draft rule is silent on this change. Specifically, the draft regulation conveys the statutory requirement that priority for career and training services with Title I Adult funds “must be given to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient” but stops short of articulating that this priority is effect regardless of funding. We strongly urge the Departments clarify in the final rule that the priority is in effect regardless of funding and to mirror the statute. We also strongly suggest that “joint planning guidance” by the Departments recommend that state WIOA plans articulate the state’s commitment to upholding this priority and the Departments develop, in consultation with state and local practitioners and policy experts, oversight mechanisms to hold states accountable.

Proposed 680.600(c) states that the local board and Governor may establish a process that also gives priority to other individuals eligible to receive such services, language that is also present in the WIA regulations. However, the WIOA draft regulation adds a new clause saying that such a priority must be “consistent with the priority of service for veterans.” This implies that a priority could be set below veterans, but above the high-needs adults targeted by this provision. We urge the Department to modify the final rule to read “consistent with the priorities for veterans and public assistance recipients, other low-income individuals, and individuals who are basic skills deficient,” to be clear that no new priority can be set above the targeted high-needs adults targeted by this provision.

## **Transitional Jobs - § 680.830**

We applaud the inclusion of a definition of Transitional Jobs in WIOA and the ability for local boards to leverage 10 percent of training funds for the implementation of Transitional Jobs programs for individuals with barriers to employment. We appreciate this NPRM’s inclusion of WIOA’s statutory authority at 680.830. As defined by the [National Transitional Jobs Network](#), Transitional Jobs combine wage-paid work, job skills training, and supportive services to help individuals facing barriers to employment succeed in the workforce. We noticed that in the NPRM that the definition of Transitional Jobs, while consistent with the statute, could be strengthened by further guidance by DOL. In particular, we urge DOL to reiterate in the final WIOA rule that the intent of the definition of Transitional Jobs as “time-limited, work experiences that are subsidized...” means “wage-paid” subsidized employment consistent with other definitions of [subsidized employment](#) in federal law and agency guidance.

Because this is the first time that Transitional Jobs programs have been codified into federal public workforce law and all elements of the strategy are considered allowable uses of local WIOA training funds, we believe that further guidance will be needed for states and localities to design and implement effective programs. We urge DOL to play an active role in supporting the implementation of these models in order to uphold the goals, intent and evidence-based practice of implementing these models. We urge DOL to release subsequent guidance and support to States and localities to inform their implementation of Transitional Jobs. We offer guidance around the goals, core components, and evidence-based practice for implementing Transitional Jobs in the subsequent sections.

## **II. GOALS OF TRANSITIONAL JOBS PROGRAMS**

The goals of Transitional Jobs programs are multi-pronged and based on research outcomes and program evidence from the field. Transitional Jobs programs implemented by State and local WIOA boards should reflect these goals:

**Providing immediate paid work for people that would not otherwise have access to employment:** Research indicates that without the opportunity to engage in real, wage-paid work of Transitional Job programs, many people with barriers to employment would not otherwise have access to employment. For many participants, the Transitional Job is often the first job they have. By design, Transitional Jobs programs make work pay by offering the

opportunity for participants to earn a wage while importantly learning the norms and behaviors of work, gaining on-the-job success, increasing stability at a job, and increasing soft and hard job skills.

**Stabilizing people through providing needed income and supports:** The earned income and supportive environment of Transitional Jobs programs is essential for individuals and families who struggle in poverty and need to meet basic needs such as food, housing, and clothing. The TJ program, in addition to creating a safe environment for participants to learn to manage behaviors of work, helps the participants address employment-hindering challenges such as conditions of probation or parole, fatherhood and parenting needs, child support issues, substance abuse or mental health challenges, transportation issues and others.

**Creating linkages to stable unsubsidized employment:** Upon entry into Transitional Jobs programs, staff are focused on determining the most feasible routes into unsubsidized work for participants. Participants receive a mix of job readiness classes, experiential learning on-the-job with frequent feedback, career planning and education and skill assessments. Through all these, participants create a plan and are moved into unsubsidized jobs when ready.

**Establishing a platform for positive earnings and income trajectory:** TJ programs help chronically unemployed people establish an employment history and references critical for being hired into future jobs. In addition, being in a Transitional Job increases the likelihood that they will be eligible for the Earned Income Tax Credit, Unemployment Insurance, Social Security, and other wage-based income supports. TJ programs often serve as the gateway into education, skills training and building a career pathway for low income people.

**Cost savings to states and localities:** Prolonged unemployment is associated with rising crime and lost production in communities, potential workers experiencing poorer physical and psychological health, and families feeling the strains of poverty and hardship for generations. Using Transitional Jobs to break the cycle of unemployment bears savings at many levels, as demonstrated in multiple cost-benefit and return on investment analyses.

**Increasing public safety:** The likelihood that a person is arrested, commits a new crime, or becomes incarcerated is at least somewhat related to employment and earnings - especially for low-income individuals. TJ programs work to stabilize individuals through employment and supports providing structured days and earnings, activities shown to decrease crime and improve public safety.

**Reducing recidivism in several measures:** One part of the Enhanced Services for the Hard to Employ study<sup>1</sup> a random assignment, control group evaluation of the Center for Employment Opportunities, found that TJ participants were significantly less likely than the control group to be arrested, convicted for a new crime, or incarcerated at the three year mark. These

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<sup>1</sup> The project is sponsored by the Administration for Children and Families and the Office of the Assistant Secretary for Planning and Evaluation in the U.S. Department of Health and Human Services (HHS), with additional funding from the U.S. Department of Labor. MDRC is the lead researcher.

results show the TJ model effectively combating cycles of incarceration and helping stabilize individuals returning from incarceration.

**Reducing reliance on public benefits:** Another part of the Enhanced Services for the Hard to Employ study, a random assignment, control group evaluation of the Transitional Work Corporation serving longtime public assistance recipients, found that after 1 and a half years the TJ participants experienced statistically significant increases in earnings as well as statistically significant decreases in both receipt of TANF and TANF payment amounts. These results show the TJ model providing significantly better outcomes than both the control group and the group receiving pre-employment services.

**Benefiting employers through more work-ready candidates, better-matched candidates, increased capacity, and incentives:** Employers benefit from TJ by receiving workers at a reduced cost, trying out potential candidates for permanent employment who are matched according to skills and interests, and employing workers who receive skills training and support services, as well as accessing tax credits in some cases. Survey research of employers that have partnered with transitional jobs programs indicates that the majority of TJ employers experience benefits to their businesses that include increased capacity and productivity. The majority of employers also indicate that they would partner with a TJ program again.

### **III. ALLOWABLE USES OF WIOA FUNDS.**

In order to support the core elements of the Transitional Jobs program strategy and to ensure that State and local boards can implement best practice programs, the allowable use of funds should include:

- Wages paid to Transitional Jobs program participants during their subsidized job placement;
- Support for all of the activities outlined in the program design recommendations section of the memo such as:
  - Fund employment-related case management and supports such as transportation vouchers and clothing allowances, within the program to assist in the removal or management of employment barriers;
  - Fund job retention services for no fewer than six months after placement in a subsidized job, to help participants stay in their unsubsidized positions upon completion of the transitional job; and
  - Support integration of literacy, adult basic education, training, and career advancement resources within in the program model.
- Support for program capacity-building needs, such as adding additional staff and/or infrastructure improvements as they are appropriate.

### **IV. PROGRAM DESIGN AND BEST PRACTICE RECOMMENDATIONS**

The Transitional Jobs strategy is highly adaptable to different delivery models, including subsidized jobs in work crews, in-house placements, or in scattered employment sites. Regardless of the structure, it is important that the core elements of the strategy be present to maximize outcomes. Lessons from the field indicate that a comprehensive package of wage-

paid employment with ongoing support services throughout the TJ program is essential for participant success. DOL should support all components of a comprehensive Transitional Jobs program and issue further guidance and support to states and localities around the core components of TJ programs:

- Targeting and assessment
- Job readiness and skill development
- Employment-focused case management and supportive services
- Subsidized, wage-paid temporary employment
- Unsubsidized job placement
- Job retention support
- Linkages to literacy/education/training
- Protections around displacement of workers.

### **Targeting and Assessment:**

Research indicates that Transitional Jobs programs are most successful and best targeted at people with severe and multiple barriers to employment. In order to ensure that Transitional Jobs implementations serve people who face the most serious barriers to getting and keeping employment, the NTJN recommends that programming is targeted at populations that typically demonstrate multiple employment barriers and those that have sporadic, problematic, and inconsistent work histories within the 2 years prior to engaging in the Transitional Jobs program. Participants should be thoroughly assessed for barriers to employment, including but not limited to substance abuse and mental health challenges, disability, criminal history, housing, transportation, literacy and adult basic education as well as a thorough assessment of academic skills, vocational skill development, employment experience, vocational and/or educational goals and interests. Populations and participant characteristics to be prioritized include:

- People experiencing homelessness
- Opportunity youth, especially homeless youth, justice-involved youth, youth aging out of foster care, and LGBTQ youth
- People reentering communities from prison and those with criminal records, including all types of criminal convictions
- Long-term recipients of TANF, SNAP, or other public benefits
- Low-income noncustodial parents, particularly those with arrearages
- Other chronically unemployed people with little or no work history, or problematic work history

### **Job Readiness and Skill Development:**

In order to reinforce the real work experience of the program, participants need access to in-program support, peer-learning experiences, and class work to reinforce learning done on the worksite, support participant skill building, and future educational attainment as needed prior to the start of the subsidized employment as well as ongoing throughout and following the program. Job readiness and skill development should:

- Address, at minimum, soft job skills, family support issues, and personal barriers such as anger management, stress reduction, conflict resolution, and other life skills to support the work of the real work experience and employment-focused case management. Other life skills and job readiness activities should include instruction on how to write a resume, filling out an employment application, how to conduct a job

search and interview, computer literacy, financial literacy, learning how to dress for the job, explanations of appropriate workplace behaviors, contextualized learning and opportunities to learn how to engage in education, training, and career planning and their benefits.

- Structure internal programs or strong collaborations with literacy and educational programming including ABE, ESL, GED, college and vocational training as well as address continuing education leading to an employer-recognized credential or degree and/or skills training. Academic and occupational skill development should be contextualized to transitional work experience whenever possible.

### **Employment-Focused Case Management and Supportive Services:**

Support services geared toward assisting participants in managing barriers that hinder their ability to be consistently productive workers are critical as they learn and take steps towards unsubsidized employment. Case management and supportive services should include:

- Ongoing supervision and coaching of Transitional Jobs employees by the designated workplace supervisors/work-crew leaders, balancing the goals of barrier management work-readiness of the participants and the goals of the employers frequently in the initial few weeks and on a regular basis based on the needs of the participants.
- Clear communication between the subsidized employer or work-site supervisor, the participant and the case management staff to ensure a consistent flow of information and ongoing assessment of participant needs and progress, based on agreed-upon and codified measures of job-readiness such as punctuality, cooperation with supervisors and coworkers, appropriate dress and personal presentation, following workplace rules, and work effort.
- Case management and support services associated with participant success, including but not limited to, transportation, clothing allowances, substance abuse and mental health counseling, anger management, communications, literacy and financial literacy, fatherhood programming, obtaining accurate identification, and other support services as needed.
- Employment-focused supportive services that should be available to TJ workers based on individual needs to eliminate or mitigate barriers to employment. Available services should be comprehensive and provided on a case-by-case basis with the goal of improving the likelihood of success in programming and employment. Programs should link to services including but not limited to:
  - Child care assistance
  - Transportation assistance
  - Housing assistance
  - Interview and work clothing
  - Behavioral and chemical health services
  - Financial management and asset building services

### **Subsidized Transitional Job Placements:**

Subsidized employment is the vehicle through which participants gain work experience while earning a wage and developing an employer reference while receiving support and guidance. The subsidized employment experience is an essential aspect of the Transitional

Jobs program and critical for participant success. Essential TJ program structure elements and policies that should apply to all program implementations include the following:

- TJ may be structured as time-limited placements in the community at private-sector, public-sector, or nonprofit employers, or at in-house social enterprise or work crew placements that offer real work experience. Social enterprise, in which a revenue-generating business operated by the employment program provider serves the dual purposes of providing program revenue and a venue for participant work experience and training, can provide a cost-effective means to deliver the transitional jobs strategy.
- TJ workers classified as employees, not independent contractors or trainees, and are paid real wages for work performed—not stipends or any other form of non-wage compensation. TJ workers subject to all rights and protections as employees including all wage and hour laws, workplace safety, minimum wage, unemployment insurance, workers compensation insurance, and the Affordable Care Act.
- The TJ provider acts as employer of record or contracts with a third party to do so, rather than reimbursing wage costs directly to employer partners. Acting as employer of record, programs pay participants' hourly wages at or above the local, state, or federal minimum wage and comply with all the legal and regulatory requirements of the employer-employee relationship, such as withholding payroll taxes and participating in unemployment and worker compensation insurance. TJ workers may transition part-way through the subsidy period as part of a “step-down” structure intended to build employer investment and facilitate a transition to unsubsidized employment.
- Length of time in subsidized employment should be as flexible as possible and based on the skill development needs of the individual worker.
- Offer subsidized employment to participants for no fewer than 20 hours per week and allow them to remain in the subsidized employment position until it is determined that the participant is ready and unsubsidized employment slots are available for the participant to transition into.
- Worksite agreements with employer partners should include employer roles to support participant development and skill building, including offering relevant experience, constructive feedback, and appropriate training
- Provide personal contact and consistent follow-up between program staff, participants and employment supervisors and provide an immediate opportunity for the participant to work with a case manager for the participant to address serious issues if they arise.
- TJ is distinct from on-the-job training (OJT) not only in the expectation that the employer partner will necessarily hire the hosted worker; it is also different with regard to who acts as employer of record (program vs. worksite employer), jobseeker characteristics (TJ is for those with more barriers), and level of wage subsidy (100% for TJ; up to 75% for OJT).

#### **Job Development and Unsubsidized Job Placements:**

Transitioning TJ participants in unsubsidized jobs is among the most challenging aspects of TJ program operation, especially in times of high unemployment when TJ participants are competing for entry-level jobs with many candidates who do not face the same barriers to employment. Organizations implementing TJ programming should:

- Dedicate adequate resources to job development, by fully funding and staffing job development efforts, and investing in professional development for job developers.
- Build and leverage relationships in the community that can provide exposure to potential employer partners, through chambers of commerce, philanthropic and professional societies such as Rotary, and informal networks.
- Emphasize the advantages that TJ participants have over other entry-level candidates, such as soft skills training, access to job coaches, and ongoing retention support.
- Educate employers about incentives such as the Work Opportunity Tax Credit, for which most populations served by TJ are eligible.
- Focus on preparing TJ workers for quality jobs with access to advancement and benefits rather than low-wage, low-quality jobs, by connecting to industry-recognized training, selecting high-quality employer partners for placements, and helping participants map career pathways.
- Employer engagement should focus first on the business case for partnering with transitional jobs programs: HR functions such as candidate matching, work readiness training and supportive services that help workers to be better prepared and more reliable, and the ability of businesses to build capacity and try out candidates by hosting TJ workers.
- When applicable, target appropriate industries that do not prohibit hiring people with criminal records and dispel stereotypes and myths about this population.
- Identify and build long-term relationships with employer partners that understand not only the business case for hiring TJ graduates, but also believe in the social mission and community benefits of TJ.
- Take a "dual customer" approach that actively addresses both the skills needs of employers and the career interests of participants
- Transition participants into unsubsidized employment in the community with non-profit, government, or for-profit employers with minimal time between subsidized and unsubsidized employment.
- Reengage participants in subsidized employment if the participant loses the unsubsidized job.

### **Job Retention Support:**

Employment retention support is critical for the success of TJ participants. Retention in unsubsidized work should be a priority of programming from the first day a participant enters a TJ program. Case management, job readiness training, soft- and hard-skills training, and job coaching should all focus on ultimately helping participants stay and advance in unsubsidized jobs. It is also critical that retention activities receive the same amount of planning, resources, and staff time as any other component of the TJ model. Research has indicated that retention services lasting no fewer than six months and programs conducting three or more participant contacts per month are associated with positive outcomes such as working more months, working full time, and higher earnings. In order to maximize the likelihood that workers are retained in unsubsidized employment, programs should:

- Monitor participants and provide retention services for no fewer than 6 months ongoing following unsubsidized job placement.

- Provide regular, frequent follow-up contacts by retention specialists with both employees and employers.
- Conduct ongoing retention-focused activities such as workshops, peer learning groups and support groups.
- Offer retention incentives, which can take the form of monetary bonuses or nonmonetary incentives such as child care services.
- Provide reemployment services for workers who are terminated from unsubsidized employment.

Core retention services such as follow-up contacts should begin as soon as a participant enters unsubsidized employment. Research from P/PV indicates that the length of time in a retention/advancement program—receiving services for at least six months—was associated with working more months, working full time and having higher annual earnings. The intensity of program retention/advancement services—averaging three or more contacts with program staff per month—has been associated with having an increase in wages of \$1 or more per hour, working full time and having health benefits.

#### **Protections against Displacement of Non-Transitional Workers:**

Concerns about potential substitution and displacement require serious consideration in program design and policy development, but are not a substantial obstacle to effective TJ implementation. Eligibility for TJ services requires participants to have substantial or multiple barriers to employment, long-term disconnection from the workforce, or problematic work histories, which would prevent employers from removing current employees from payrolls and rehiring them in TJ positions. Moreover, the time-limited nature of TJ, typically three to nine months and seldom longer than a year, makes the use of TJ to substitute or displace incumbent workers less attractive. In order to effectively avoid displacement, implementations should include:

- Strong prohibitions against substitution and displacement.
- Protections for recently laid-off employees, workers on leave, and striking workers.
- Preservation of recall rights under collective bargaining agreements for union employees of TJ employer partners.

## **V. TECHNICAL ASSISTANCE SUPPORT FOR STATES AND LOCALITIES**

The Transitional Jobs strategy is complex and requires expertise in workforce development, social service delivery, and understanding of the unique needs of the population targets the program is serving. We recommend that technical assistance resources are allocated to ensure that programs are adequately designed and implemented, and reflect current knowledge of best and promising practices.

### **Youth Services & Expenditures - § 681.410**

At 681.410 the proposed rule, reiterates WIOA's statutory requirement that State and local areas expend at least 75 percent of youth funds to provide services to out-of-school youth. We strongly support this proposed rule. The intent of WIOA statute is for the Title I youth funding stream to serve more out-of-school youth, up from a required 30 percent to 75

percent. We strongly encourage the Department to maintain a strict assessment when considering waivers to States regarding decreasing their expenditures to serve out-of-school youth within local areas. Further, we recommend the Department be more prescriptive about what is required the “analysis of in-school youth and out-of-school youth populations in the local area.” For example, based on the out-of-school definition, the Department should require any State seeking a waiver to provide at minimum documentation of the following, using available Census data and data from reliable state and local sources:

- Number and percentage of youth age 16 to 24 who are not enrolled in school and do not have a high school diploma or equivalent;
- Number and percentage of youth age 16 to 24 who are not enrolled in school, do not have a high school diploma or equivalent, and are not working;
- Number and percentage of youth age 16 to 24 who are subject to the juvenile or adult justice system and are not enrolled in school;
- Number and percentage of youth age 16 to 24 who are defined as homeless under WIOA law; and
- Number and percentage of youth age 16 to 24 who are a runaway, in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act (42 U.S.C. 677), or in an out-of-home placement and are not enrolled in school.

### **3. Comments on NPRM RIN 1830 - AA22**

Among the key changes to Title II under WIOA is a greater emphasis on the connection between adult education programs and employment. While we support the intent of these changes we suggest some areas where DOL could consider providing more support to local and state communities to support implementation.

**English Language Acquisition Program - §463.32.** At §463.32 the NPRM specifically invites public comment on how a program that is intended to be an English language acquisition program meet the requirement that the program leads to attainment of a secondary school diploma or its recognized equivalent and transition to postsecondary education and training or leads to employment. We recognize the intent of WIOA around ensuring that English language acquisition supports employment and workforce goals; however, in our experience as one of the largest providers of English language programs to refugees, asylees, and others we are concerned that this requirement will create disincentives to serving individuals who seek to learn English as a second language as a means to achieve other goals associated with individual or family well-being. For example, many program English as a second language learners seek to improve their English language skills in order to support their children’s academic achievement, improve well-being, or make it easier to perform daily living tasks in the community such as commuting, shopping or civic involvement. If an individual’s goal is not aligned with attaining a post-secondary degree or employment, over time we are concerned that providers will opt to not serve these individuals. We highly recommend that the Departments consider adopting other ways in which English Language Acquisition programs can demonstrate their value in improving communities and fostering civic engagement of all individuals so as to not dissuade English language learners from further developing their skills.

**Definition of “Integrated” Education and Training - §463.24.** We agree with the proposed requirement that programs have a “single set of learning objectives that identifies specific adult education content, workforce preparation activities, and workforce training competencies.” Consistent with other national organizations, we would encourage the Department to consider providing additional guidance to states and eligible providers on appropriate tools for measuring workforce preparation activities and workforce training competencies. These two areas are newer curriculum elements for many providers, and it may be valuable to offer resources on how they can best be measured.

## **About Us**

Heartland Alliance’s **National Initiatives on Poverty & Economic Opportunity (NI)** is dedicated to ending chronic unemployment and poverty. We believe that every person deserves the opportunity to succeed in work and support themselves and their families. Employment fulfills individuals, strengthens families, builds communities, and is fundamental to a prosperous America. Through our field building, we provide support and guidance that fosters more effective and sustainable employment efforts. Our policy and advocacy work advances solutions to the systemic issues that drive chronic unemployment. Working at the intersection of practice, policy and research, we catalyze change that is practical, informed by evidence and grounded in experience. **NI is home to several initiatives designed to help focus attention on critical populations and solutions:**

The **National Center on Employment & Homelessness (NCEH)** is dedicated to ensuring that employment is a key element in the fight to prevent and end homelessness. Through NCEH we promote employment as a fundamental solution to homelessness; identify and advance evidence-based employment interventions; advance systems change; and connect workforce and homeless service systems. We have launched a competitive process, the Connections Project, in which we will fund five sites to plan, implement, and strengthen innovative systems collaboration ideas aimed at increasing employment and economic opportunity for homeless jobseekers.

The **National Transitional Jobs Network** is a national coalition dedicated to getting chronically unemployed Americans back to work. We advance employment solutions including Transitional Jobs that combine wage-paid work, job skills training, and supportive services to help individuals facing barriers to employment succeed in the workforce. We open doors to work through research and evaluation, education and training, and policy advocacy. Our coalition is comprised of city, state, and federal policy makers; workforce organizations; and nonprofit service providers and advocacy organizations.

The **B.MORE Initiative** seeks to open doors to employment and economic advancement for low-income black men and youth across the country through policy advocacy, resource creation, and coalition building. We work at the intersections of child support, criminal justice, and employment to promote better policies and to equip providers to run more effective programs and systems account for the employment needs and interests of low-income black men and youth.