



February 5, 2016

COMMENTS ON DRAFT  
WORKFORCE INNOVATION AND OPPORTUNITY ACT DRAFT STATE PLAN  
Hard Copy of Electronically Submitted Comments

Skills2Compete Colorado is a multi-sector advocacy coalition focused on workforce development and middle skills jobs. Previously, we lobbied for the Colorado Skills for Jobs Act (2012), the Integrated Basic Education and Skills Training (IBEST) bill (2013), the Adult Education Workforce Partnerships (2014), and the approval of two other high school equivalency vendors in addition the GED (State Board of Education (2015)). We lobbied federally for WIOA passage as part of the National Skills Coalition. This list also reflects our values and priorities.

While data from the Skills for Jobs Act Report contributed greatly to the draft plan, we would have loved to have seen more about the Adult Education Workforce Partnerships and IBEST in the report. Both are great examples of what we think the new WIOA envisions: working across systems to better help people acquire skills for in-demand jobs.

Our most over-riding comment is that the **plan seemed to be more about what Colorado programs are currently doing** rather than what they will be doing differently. Some members commented that both the Adult Education and the Colorado Works sections seemed to be a cut-and-pasted from older plans. We would want to see more in the plan about the new bridges between programs that WIOA envisions, as well as how WIOA entities will partner with other government programs (SNAP Employment and Training, Child Care Assistance Program, HUD Continuum of Care, etc.) and community based organizations. Given flat funding for WIOA, coordination across agencies is the best opportunity to serve people better. The Governor's set aside priorities includes funding for staff training. Cross training of staff can help those working in workforce centers, adult education programs, vocational rehabilitation, Colorado Works, and youth services understand the other services and programs a person might need and the role they play in a larger vision of skills acquisition, career pathways, support services, etc.

We also expected to see more about the new priority for serving those with barriers to employment. We know that nationally about 40 percent of clients would fall into one of the populations listed in WIOA as requiring priority of service. In the Colorado draft plan, the target appears to be 50 percent ("a majority"). As our unemployment rate falls, it would seem that more of the unemployed job seekers might have significant challenges. We would like to know how the new priorities will be expressed in business practices, adjustments to outcome measures, recruitment efforts, changing need for support services, and staff time for work with clients and businesses. Voc. Rehab at least opens the door by acknowledging (page 202) that they have underserved certain populations. In the Voc. Rehab and Senior Community Service Employment Program section, they do list some planned outreach measures.

In the data section (page 307), we would like to see more description and figures. Shouldn't it include data and narrative on who are the English language learners in Colorado, or who lacks a high school diploma? Page 307 does list a number for TANF —91,439 – but does not explain what the number represents. The figure is certainly high than the current state caseload of households receiving a monthly grant. We would also like to see a figure indicating how long Colorado families tend to remain on TANF. This has implications for the length of training opportunities that best serve TANF recipients, as well as income, and potential shifts in access to child care and other support services. The sections on veterans and on seniors both contained a portrait of the variety seen within their populations and a brief analysis of the challenges facing those groups. They also gave specific efforts to customize services to each group. We work like to see more of this elsewhere in the document.

Skills2Compete also submitted comments separately specifically on the Eligible Provider Training List. We have been working on the need for consumer information about career training options, and in particular on the more expensive private occupational schools. Since WIOA will require outcome, employment, and income data, it is an important opportunity to make this information publically available to all Coloradans, and in a consumer friendly format.

We are very excited and supportive of the vision of WIOA— with emphasis on sector partnerships, career pathways, serving more job seekers with challenges to employment, and working across the siloes that are so frustrating for job seekers. As a cross sector coalition, we gain much by hearing the perspective of those working in different programs and agencies, including adult education, community colleges, community based work preparation and job placement services, vocational rehabilitation, advocacy organizations, private employers, and workforce center representatives. We would love to see more of this reflected in the plan.

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