



February 5, 2016

Comments on

Workforce Innovation and Opportunity Act Draft State Implementation Plan (Submitted electronically to the Colorado Workforce Development Council)

Many Coloradans become homeless after losing a job because it's nearly impossible to pay rent without sufficient income and savings. One in 4 Colorado renters -164,600 -pay more than 50 percent of their income for rent, putting them at risk for homelessness. Since 2007, average rent here has increased by 21 percent, while income for renters household has only increased by 1.1 percent. In today's economy, the reliability and consistency of work hours may vary – particularly for those with the lowest-wage jobs. In metro Denver, over 30 percent of those experiencing homelessness have worked in the last month. One's best hope for stable housing could be skills training to get a better paying job.

Under the new Workforce Innovation and Opportunities Act, workforce boards and job centers are supposed to prioritize services to those with barriers to employment, including homelessness. The plan mentions this (p 53), indicating that a majority of Colorado's WIOA adult customers will come from these priority populations. What will be changing because of WIOA's required priority of service? This should be spelled out explicitly.

A majority of those experiencing homelessness have children in the household. Physical disabilities or mental illness can make working impossible, but many with such disabilities would welcome the opportunity to work. Some of those who are homeless are leaving prison or jail. They are required to work, but finding employment and housing is more difficult because of their record. Domestic violence victims may also struggle to secure employment, income, and stable housing if they are forced to leave their homes and jobs.

Are workforce centers planning to implement the culture change and change in business practices necessarily to effectively serve people who have experience homelessness and the resulting trauma, or are there plans to identify, partner with, or subcontract to specialized programs? Or are they planning to have specially trained staff within workforce centers who can spend additional time with each person?

What factors are weighed in deciding whether to co-locate services in a one-stop, contract with CBOs or station staff within a community-based organization (COB)? For many clients, a community-based organization is far more approachable than a government workforce center.

How are outcome measures negotiated? Under WIOA, outcome measures were placement rate and salary level, building in pressure to “cream.” As one former workforce employee was frequently told, “homeless people ruin the numbers.” Realistic outcome measures need to include documented skills gained, and need to factor in increased support for homeless clients.

What types of employment and training approaches are needed to effectively serve those who have experienced homelessness? Some may benefit from adult education to obtain a high school equivalency diploma, opening up more possibilities for jobs. Some need VocRehab to retrain after injury prevents them continuing their previous vocation. Some without recent work history may need supported employment or transitional jobs to learn the soft skills and discipline associated with job retention. Many need paid training or immediate employment to have the income to maintain stable housing. Many need support services like child care or transportation. Some need help to know how employment income will affect eligibility for SNAP, LIEAP, housing, social security, or disability benefits.

How will WIOA funded entities including workforce centers, vocational rehabilitation, adult education, youth programs, etc. work with programs and services who work with the same populations? SNAP E&T is mentioned, but no partnership or collaboration is described. How will they collaborate with HUD funded Continuum of Care programs (which have work requirements) to serve those who have experienced homelessness? Ideally, in a world of limited budgets- working across silos would allow providers to serve people more efficiency. Cross training could help WIOA entities serve those with barriers to employment. Suggested topics would include trauma informed care and motivational interviewing.

Since membership on Workforce Investment Boards and the Colorado Workforce Development Council is limited by law, we would suggest an advisory committee to develop and assess WIOA’s progress in serving those with the WIOA named barriers to employment. Truly giving priority of service to the WIOA named populations is best done in conjunction with other programs that work with homeless individuals, the formerly incarcerated, out of work youth, single parents, people with disabilities, etc.

The Colorado Center for Law and Policy will work with employment programs that serve homeless Coloradans and compile data and information on best practices. We look forward to working with the state workforce system and with regions and localities on employment and training services to people who have experienced homelessness.

Chaer Robert
Program Manager
Family Economic Security Program
789 Sherman St #300
Denver, CO 80203
crobert@cclponline.org
303-573-5669 x307