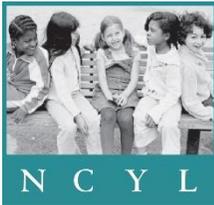


ALLIANCE FOR
Boys and Men of Color

Invest in the Health and Success
of California's Future

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Kids
IN COMMON



PREVENTING VIOLENCE
AND DEVELOPING
YOUTH LEADERS



HEARTLAND ALLIANCE
NATIONAL INITIATIVES



January 15, 2016

Tim Rainey, Executive Director
California Workforce Development Board
800 Capitol Mall, Suite 1022
Sacramento, CA 95814

Van Ton-Quinlivan, Chair, WIOA Implementation Group
Vice Chancellor, Workforce and Economic Development
Community Colleges Chancellor's Office
1102 Q St. #4
Sacramento, CA 95814

VIA E-MAIL

**RE: RECOMMENDATIONS FOR STRENGTHENING EQUITY IN CALIFORNIA'S UNIFIED STRATEGIC
WORKFORCE DEVELOPMENT PLAN**

Dear Executive Director Rainey and Vice-Chancellor Ton-Quinlivan,

On behalf of the undersigned organizations and the Alliance for Boys and Men of Color (BMoC), a statewide coalition of over 100 community organizations and partners committed to improving life chances for California's BMoC, we thank the California Workforce Development Board (CWDB) and the

Workforce Innovation Opportunity Act (WIOA) Implementation Workgroup for your leadership in developing the draft WIOA Unified Strategic Workforce Development Plan for California. The draft plan represents a comprehensive and innovative effort to build an effective and more aligned workforce system across the state. We'd also like to express our appreciation for the extension of the public comment period that has allowed additional organizations the opportunity to weigh in on this important process.

California's Unified Strategic Workforce Development Plan presents the state with a unique opportunity to improve the delivery of workforce development programming and services in a manner that meaningfully addresses the training and employment challenges of our highest need communities. Including this coalition's recommendations in the state plan will ultimately maximize education and employment outcomes for the state, boost our economy and support a future of shared prosperity. As organizations working to increase access to opportunity for our state's most vulnerable communities, we are concerned that the overarching credential attainment and apprenticeship goal of the plan will inadvertently exclude populations with the largest barriers to employment. While we support the intention of this objective, the increased weighting of this criteria could inadvertently perpetuate a system of creaming that leaves behind vulnerable groups in the absence of a more thorough and detailed framework that strongly prioritizes the needs of low-income communities and communities of color. Given that low income people and people of color make up a majority of Californians, ensuring that our workforce system supports the economic success of these communities is critical to securing a prosperous future for the state of California.

In order to sharpen the draft plan's focus on targeting services to the communities and populations that need them the most we share the recommendations below. These suggestions will make the draft plan more effective in directing, encouraging, and supporting regions and their providers to prioritize their residents of greatest need and strengthen the meaningful pathway to training, living wage jobs and careers for disadvantaged youth and adults.

- **Provide greater detail on achieving the state's apprenticeship goal and identify strategies to translate training and certification into job attainment.**

The Strategic Workforce Development Plan articulates the commendable goal of "doubling the number of apprentices who complete apprenticeship programs in 10 years." (p. 61). The Plan also notes on page 57 that one of the weaknesses of current apprenticeship programs is that there are few such programs outside the construction and building trades. Apprenticeship programs are a key element of the Plan's "earn and learn" policy strategy and a proven pathway to stable jobs in the construction industry and beyond. We recommend that the Plan include a state-level definition of apprenticeship to provide guidance to local workforce investment boards as more industries adopt apprenticeship models.

- **Identify strategies to translate training and certification into job attainment.**

The Plan places a strong emphasis on helping individuals to attain certifications, noting on page nine that "[b]etween 2017 and 2027, the state will produce a million "middle-skill" industry-valued and recognized postsecondary credentials." While we strongly support that goal, we

believe that the Plan does not adequately identify strategies to translate those certifications into long-term jobs. We recommend that the Plan identify policies, including local hire and first source programs that will help to ensure that certification programs will truly result in job attainment.

- **Address California’s alarming high school dropout rate.**

The plan should include strategies specifically aimed at reintegrating dropouts into the educational system and the workforce. In 2013-2014, The California Department of Education Data Reporting Office noted California has a 19.9% drop-out rate. The reasons for why students do not complete high school vary and can usually be attributed to challenges with financial stability, trauma and adversity, or some other life altering event. The long-term effects are severe as students who drop out are likely to be unemployed, homeless, on public assistance, and incarcerated.

Without the right strategies, and comprehensive, and integrated supports for recovering youth who are out of school, reintegrating them into the educational system and the workforce can be quite challenging. Research by WestEd demonstrates the challenges faced by schools seeking to reengage dropouts in that one-half of the dropouts who return to school stay for one year or less, one-third of returning dropouts fail to complete even one course after they reenroll, and as few as 18 percent of returning dropouts graduate.

Despite the challenges, there is so much to gain from successfully recovering and reengaging dropouts. Research by the Alliance for Excellent Education concludes that if only one-half of drop out students from a single year were to earn a diploma, the economic benefits to California would include an additional \$1.4 billion in earnings annually for the reengaged pupils and an annual increase in state and local tax revenues of \$167 million.

To address this crisis, and seize the opportunity presented by WIOA, the state plan should:

- **Define and standardize key terms:** California education code has various references to dropouts, but those definitions are not standardized and shared across agencies or jurisdictions. The lack of clarity around terminology makes accountability, data collection, and systemic responses to address dropout difficult.
- **Strengthen What Works:** While California does not have a formal dropout recovery system, there are several schools, cities, and community-based programs innovating in ways that blend comprehensive supports and ensure educational and career success. Those efforts should be lifted up, strengthened, and enhanced through the plan.
- **Develop a Statewide Student Recovery and Reengagement Program:** In addition to building on and strengthening the existing dropout recovery infrastructure. The plan should include a data-driven strategy to grow the number of cities, LEAs, schools, and community organizations adopting a focus on dropout recovery.
- **Set High Goals and Support Progress:** Dropout recovery programs are working with students with multiple barriers to achieving educational success and attachment to the workforce. For many, getting a diploma from a WASC accredited school can mean the

difference from generational poverty and a family sustaining wage. Given the vulnerability of this population, it's important to set high standards and make high school diplomas the goal while providing credit and supporting progress towards a work plan; receipt of a certificate or badge which notes the acquirement of knowledge, skills, or abilities; and securing employment.

- **Emphasize federal priority of service requirement.**

The state plan should include a section that provides background information and stronger emphasis on the priority of service provision in the federal WIOA that targets “public benefits recipients, other low-income individuals, and individuals who are basic skills deficient” when providing career and training services using WIOA Title I Adult funds. This will not only clarify and emphasize the intention of the federal law, but will further align with and support the state’s guidance in explicitly directing regions to focus on their most vulnerable residents. This section should also discuss how this provision will be implemented and monitored in California within the context of the state’s overarching credential attainment and apprenticeship attainment goal.

- **Local Boards should identify strategies for serving both youth and adults with employment barriers.**

On page 93 under “Regional Sector Pathways”, local boards should be encouraged “to identify strategies for reaching out to, engaging, and successfully serving” individuals with significant employment barriers pursuant to Section 14005 of the Unemployment Insurance Code in addition to “disconnected out-of-school youth.” On page 102, local boards should also be directed to develop “local agreements that recruit and serve” individuals with barriers to employment in addition to “out-of-school youth”.

- **State level assessment and performance must include detailed analysis of effectively serving disadvantaged populations.**

As indicated under State Assessment and Performance on page 113, “populations served” among other factors will be included. It should be clarified that this signifies an assessment of the percentage of individuals with employment barriers served, types of barriers experienced by this group, how they were served, and subsequent outcomes. Further we strongly encourage that the regional and local assessment and performance data be disaggregated by income level, basic skills deficiency, and/or individuals with employment barriers as defined by Section 14005 of the Unemployment Insurance Code in order to have a better understanding of who is benefitting from services.

- **Expand the definition of "out-of-school" youth and ensure regional and local plans incorporate it via their services and partnerships.**

It is imperative that youth with substantial barriers to success in school are prioritized and served. Many of these youth have a poor school attendance record and/or are years behind academically and would greatly benefit from the supports provided by the WIBs. We would like to encourage the state to consider a broader definition of “out-of-school” to include youth who are enrolled but struggle with barriers to success or vulnerabilities such as:

- having dropped out;
- within the age of compulsory school attendance, but has not attended school for at least the most recent completed school year calendar quarter;
- a homeless individual, a homeless child or youth, a runaway, in foster care or has aged out of the foster care system, 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

- **Define barriers to employment to include systemic barriers that prevent people of color and others from reaching their full potential.**

The plan should state that skill development and credentials will be insufficient to achieve equitable employment across race and ethnicity without successful efforts to overcome systemic barriers to employment, such as disparities in skill development program participation and outcomes, exclusionary hiring policies, implicit bias, hostile work climates, and lack of robust availability of transportation and childcare.

- **Strengthen accountability provisions to provide a disaggregated analysis on outcomes data. Make them available to the public, and build related reporting capacity.**

In the State Board and Performance Accountability section, the plan should supplement the statement that the “State Board will work with core programs to identify strategies for robust data collection in all federally mandated reports as well as additional measures identified by the state” with the following language: “the State Board will comprehensively obtain local level outcome data disaggregated by race, ethnicity, sex, and age, analyze it at the state and local levels, provide the analysis publicly in an easy to understand form, and make both the state-level outcome data and the local level data available for others to analyze.” Additionally, the data on income and education attainment disaggregated by race/ethnicity in Appendix G “Regional Planning Unit Summaries” along with data on poverty status, English learners, and individuals with barriers to employment should be provided at the state level in Chapter 1 as part of the comprehensive analysis on disparities in access to education, and economic opportunity across California.

- **Disaggregate data among Asian and Pacific Islander populations.**

When referring to the Asian and Pacific Islander population, disaggregate this data in order to encompass the many ethnic groups under this umbrella term. This is particularly important given the large disparities in educational attainment, income level, and access to economic opportunity across different groups.

- **Implement an assessment process to track the progress of WIOA Implementation.**
Institutionalize regular assessment benchmarks to determine areas of greater need; for example, state and regional workforce needs assessments should be conducted every two years. Moreover, State Board committee assessments should be made public in order to garner feedback about how to most effectively address persisting gaps.

- **Ensure all WIBS are certified as “high-performance workforce investment boards.”**
Building off of SB 698 (Lieu), the State Board should work with local workforce investment boards not certified as “high-performance workforce investment boards,” to determine strategies to meet the criteria for certification, thus permitting eligibility for funding, and more equitable allocation of the Governor’s Discretionary Fund.

- **Direct regions to utilize strategies that reduce racial disparities in employment.**
The plan should add “effective strategies to bring about equity in employment for members of communities of color whose earnings don’t provide economic security” to the areas named as the Policy, Legislation, and Research Branch’s responsibilities regarding development of policy recommendations and the identification and dissemination of information concerning best practices (pages 78-79). This should also be included in the elements named as the Strategy, Innovation, and Regional Initiatives Branch’s responsibilities regarding continuous improvement and implementation of best practices (pages 79-80). Examples of effective strategies should build on diversity, inclusion, and job quality criteria and the promotion of local hire stated below.

- **Form standing committee on reducing inequality and promoting income mobility for low-income youth and adults.**
As part of the state’s priority in the Unified Strategic Plan to reduce income inequality and increase income mobility for all Californians, the CWDB should create a standing committee with the specified task of focusing on the achievement of this statewide goal, monitoring outcomes across the state, and encouraging and tracking community-based organization (CBO) and youth participation at the regional level. It is particularly important to foster a space that addresses jobs and workforce issues for both youth and adults, especially in light of the elimination of a mandate for youth representation at the state and local level. Participants of this standing committee should not only include CWDB members but also CBOs and youth leaders working with low-income youth and adults.

- **Strengthen Workforce Accelerator Fund Language.**
The section on the Workforce Accelerator Fund should state its purpose is to achieve equitable employment outcomes for targeted populations, and in particular to achieve equitable employment outcomes for members of communities of color who have not attained economic security. Additionally, it should state that to achieve its purpose, the fund should support development of multiple, diverse pathways for targeted populations to enter and advance within the labor market. It should support the services needed and build local capacity specific to the unique circumstances of the target populations and communities of color, with a focus on changing the workforce system by scaling and replicating effective innovations. Doing so will help

clarify, and strengthen, its approach: “funding “ground up” solutions to some of the most vexing challenges that are keeping Californians with barriers to employment from achieving success in jobs and careers.

- **Include diversity, inclusion, and job quality criteria; and promote local hire.**

The plan should require establishment of both diversity and inclusion criteria and job quality criteria for employers with which the workforce system partners and to which it provides services, and it should promote local hiring. The plan should make the Policy, Legislation, and Research Branch responsible for setting criteria. Regarding diversity and inclusion, the criteria should include the existence of effective policies and practices regarding diversity and inclusion for front-line workers and others. Regarding job quality, the criteria should include the existence of job compensation that provides economic security, and if some jobs do not, career ladders that connect them effectively to jobs that do, and they should address other aspects of job quality. The Branch should establish local hiring policy as a requirement. Finally, in consultation with the Administrative Branch, it should set policy regarding procurement that supports and promotes both the criteria set for employers and the local hiring policy.

- **Encourage income support as example of supportive service.**

In addition to transportation, books, child-care, and other expenses, many low-income individuals with significant barriers to employment, and students living at or below poverty, require direct income support in order to successfully complete workforce programs. Under the provision of supportive services strategy on page 67, the plan should explicitly include and encourage income/financial support as a recommended supportive service that enables low-income individuals the ability to participate and complete workforce-funded programs and activities in order to secure and retain employment.

- **Integrate complementary anti-poverty and education programs.**

Programs such as CALWORKS (TANF), SNAP (Food Stamps) Training Programs, Adult Education and Career Pathways play a key role in reaching the overarching goals of WIOA. Workforce development programs historically have been developed within a silo. Although collaboration is often encouraged, true integration has been challenging. California has made a number of significant investments in these programs. In addition to this, the state has supported local control and implementation of many of these programs. It would be remiss to not articulate a clear plan on how communities can leverage the WIOA opportunities with anti-poverty and education/training programs. We strongly encourage the state plan to develop clear guidance on how to realize integration between state and local workforce, social service and education agencies.

The incorporation of the above recommendations will provide for a more successful implementation of the plan that better captures its spirit and intent to promote income mobility for all Californians. The recommendations set forth here add clarification and guidance in directing regions and providers to target workforce training investments to disadvantaged communities facing the largest employment barriers. This will expand access to well-paying jobs and careers for low-income communities and

communities of color, ensuring that every Californian has a fair chance to contribute and thrive, while maximizing economic outcomes for the state.

We thank you again for your commitment and leadership to this work and respectfully ask for your support of these important recommendations as this plan moves forward and gets adopted. Questions or concerns regarding this letter can be addressed to Erika Rincón Whitcomb, Senior Associate at PolicyLink at 510-663-4383 or ewhitcomb@policylink.org.

Warmest Regards,

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Alberto Retana
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Youth ALIVE!

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Southeast Asia Resource Action Center

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Director, Youth Policy
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About the Alliance for Boys and Men of Color

The Alliance for Boys and Men of Color is a statewide coalition of change agents committed to improving the life chances of California's boys and young men of color. The Alliance includes youth, community organizations, foundations, and leaders in government, education, public health, and law enforcement. Members of the Alliance include:

Advancement Project

Advocates for Health, Economics & Development

Alliance for Children's Rights

Amer-I-Can

Anti-Defamation League

Anti-Recidivism Coalition

APAYL

Attendance Works

Black Organizing Project

Black Youth Leadership Project

Bloom

Boyle Heights Building Healthy Communities

Brightline Defense Project

Brotherhood Crusade

Brotherhood of Elders Network

Brothers, Sons, Selves Coalition

Brown Boi Project

Building Healthy Communities-Richmond

California Association of African-American Superintendents and Administrators

California Alliance of African American Educators (CAAEE)

California Black Health Network

California Center for Civic Participation

California Coverage and Health Initiatives

California Immigrant Policy Center

California Pan Ethnic Health Network

California Partnership to End Domestic Violence

California Program on Access to Care

California School-Based Health Alliance

California School Health Centers Association

Californians for Justice

Californians for Safety and Justice

CA Health Workforce Alliance & CA Health Professions Consortium

CA Primary Care Association

Center on Juvenile & Criminal Justice

Center for Youth Wellness

Chief Justice Earl Warren Institute on Law and Social Policy

Children's Defense Fund California
Children's Movement – Fresno
Civicorps
City Heights Building Healthy Communities
Coalition for Responsible Community
Communities for a New California Education Fund
Communities United for Restorative Youth Justice (CURYJ)
Community Asset Development Re-defining Education (CADRE)
Community Coalition
Community Health Improvement Partners
Community Rights Campaign
Contra Costa Interfaith Supporting Community Organization (CCISCO)
Del Norte and Adjacent Tribal Lands Building Healthy Communities
East Bay Asian Youth Center
East Oakland Building Healthy Communities
East Salinas Building Healthy Communities
Eastern Coachella Valley Building Health Communities
Educators 4 Excellence-Los Angeles
Ella Baker Center
Every Neighborhood Partnership
Faith in Community - Fresno
Fathers and Families of San Joaquin
Fenton Communications
First Five Fresno
Focus Forward
Forward Change
Fresno Barrios Unidos
Fresno Building Healthy Communities
Fresno Street Saints
Gay Straight Alliance Network
Game Changers Project
Greenlining Institute
Hope Now for Youth
IDEATE CA
Inner City Struggle
Intertribal Friendship House
Haywood Burns Institute
LA Black Workers' Center
Khmer Girls in Action
Labor/Community Strategy Center
Latino Coalition for a Healthy California
Legal Advocates for Children and Youth
Legal Services for Prisoners with Children

Liberty Hill Foundation
Lifelines to Healing
Long Beach Building Healthy Communities
Los Angeles Alliance for a New Economy (LAANE)
Los Angeles Chamber of Commerce
Marcus Foster Education Fund
Mentoring Center
MILPA East Salinas
Movement Strategies Center
National Employment Law Project
National Center for Youth Law
National Compadres Network
National Council of La Raza
National Latino Fatherhood and Families Institute
Neighborhood Thrift
New America Media
PolicyLink
PICO Network California
Planned Parenthood Mar Monte
Public Counsel
Reading and Beyond
Reinvent Communications
Sacramento Building Healthy Communities
Santa Ana Building Healthy Communities
SCOPE LA
Social Justice Learning Institute
South East Asian Resource Action Center (SEARAC)
South Los Angeles Building Healthy Communities
Street Positive
Unity Council
United Roots/Urban Peace Movement/Determination
Urban Strategies Council
Weingart East Los Angeles YMCA
West Angeles CDC
West Fresno Family Resource Center
Western Center on Law and Poverty
Village Connect
Young Invincibles
Youth Alive!
Youth Leadership Institute
Youth Policy Institute
Youth Justice Coalition
Youth Uprising