

# A New WIOA Measure Deserves a New Way of Measuring

A Point-Menu System for Measuring Effectiveness in Serving Employers

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### Introduction

Two years ago, in July 2014, Congress passed and President Obama signed the Workforce Innovation and Opportunity Act (WIOA). It reauthorized the Workforce Investment Act (WIA) and provided updates to the federal government's core workforce programs. One of the more significant changes in the reauthorized law was the introduction of a performance measure to gauge core programs' effectiveness in serving employers. The Aspen Institute Workforce Strategies Initiative (AspenWSI) saw this new measure as a unique and exciting opportunity to rethink traditional performance measurement systems and propose a new approach that works better for employers, workers, the state and local workforce systems, and the federal administrators and investors of this system.

This concept paper outlines a novel approach for defining and measuring this new indicator. We developed this concept in 2014 and 2015, drawing on our history engaging in a variety of work with local workforce organizations, considering their data management systems, business engagement strategies, and outcomes measurement capacity, as well as working with them on ideas that will improve livelihoods of low-income workers and job seekers. We solicited several rounds of review — at conferences, through an online feedback process, and via individual outreach — from a variety of thought leaders in the field, including leaders from local workforce boards, other workforce service

providers, policy analysts, association heads, and foundation officers, among others.<sup>1</sup> We are grateful for their reviews and feedback. This paper is much richer for their willingness to share their thoughts, ideas and constructive critiques. That said, all errors, omissions, and "out-of-the-box" ideas put forth in this paper remain the responsibility the authors.

We submitted a draft of this concept paper to the US departments of Labor and Education during the public comment period on proposed regulations for WIOA's performance measures in the spring of 2015. In June of 2016, the departments released the final regulations for defining and measuring the new indicator of effectiveness in serving employers, along with regulations for many other aspects of WIOA, in the final *Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions*.

In the new regulations, the departments discussed the limitations of several proposed traditional measures of this indicator and proposed state pilot programs to test and assess the proposed and other measures. The departments specifically mentioned our proposed "point-menu" system in the final rule. They noted that it was "expressly supported by some commenters" and indicated that they "will consider this approach in the course of the pilot program."<sup>2</sup>

Given that the US departments of Labor and Education will consider this concept for piloting with state and local workforce development systems, we have finalized this concept paper and would like to share it widely with interested parties. If your state is interested in piloting this concept, please contact us at wsi@aspeninst.org.

## WIOA Background

WIOA is very similar to WIA in many aspects. WIOA continues the job center and workforce development board structures established under WIA as well as the core programs – adult, dislocated worker, and youth formula programs; Wagner-Peyser employment services; adult education; and vocational rehabilitation. It codifies and officially allows many of the incremental changes that workforce systems have been adopting over the years including sectoral strategies, career pathways, and workbased learning.

Some of the most significant changes in the law are in the area of performance accountability. WIOA establishes a set of common performance indicators on which core programs and other authorized

<sup>&</sup>lt;sup>1</sup> We would like to thank several reviewers including but not limited to: Laine Romero-Alston, Program Officer, Ford Foundation; Steve Dawson, Founder and Past President, PHI; Allison Gerber, Program Officer, Annie E. Casey Foundation; David Hunn, Executive Director, Northern Virginia Workforce Investment Board (workforce area #11); Kermit Kaleba, Federal Policy Director, National Skills Coalition; Eleni Papadakis, Executive Director, Workforce Training and Education Coordinating Board (Washington); Lisa Rice, Executive Vice President of Development, Dynamic Workforce Solutions (former President, CareerSource Brevard in Florida); David Socolow, Director, Center for Postsecondary and Economic Success, CLASP; and James Van Erden, Senior Policy Advisor, National Association of State Workforce Agencies.

<sup>&</sup>lt;sup>2</sup> See: US Departments of Labor and Education, Joint Rule for Unified and Combined State Plans, Performance Accountability, and the One-Stop System Joint Provisions; Final Rule, released June 30, 2016, page 208, https://www.doleta.gov/wioa/Docs/wioa-regs-joint-final-rule.pdf, accessed July 21, 2016.

programs<sup>3</sup> will be required to report.<sup>4</sup> These core indicators for adult and dislocated formula programs, adult education, Wagner-Peyser employment services, and vocational rehabilitation include:

- Percentage of program participants who are in unsubsidized employment during the second quarter after exit from the program;
- Percentage of program participants who are in unsubsidized employment during the fourth quarter after exit from program;
- Median earnings in unsubsidized employment;
- Credential attainment (NEW);
- Achieving measureable skill gains toward a credential or employment (NEW); and
- Effectiveness of core programs in serving employers (NEW).

Programs for youth will be measured using similar measures that are tailored to disadvantaged youth. The last three performance indicators are new measures under WIOA. The credential attainment measure is defined in the statute and has precedence in previous guidance from the US Department of Labor. The last two measures have been defined by the US departments of Labor and Education in the final regulations.

The legislative language for the indicator of effectiveness in serving employers is in Textbox I. It is a new indicator, but it builds from a related indicator under WIA — customer satisfaction of employers and participants which was one of several indicators for the WIA programs. The customer satisfaction indicator was measured using a survey of a group of randomly selected employers who had received any substantial workforce system services in the previous year.<sup>5</sup> The minimum mandated three questions focused on overall satisfaction with the services, the extent to which the services met expectations, and how well the services received compared with the employers' envisioned ideal set of services.

#### Textbox I: Excerpt from WIOA on indicator of effectiveness in serving employers (WIOA, Section II6(b)(2)(A)(iv)):

"(iv) INDICATOR FOR SERVICES TO EMPLOYERS.—Prior to the commencement of the second full program year after the date of enactment of this Act, for purposes of clauses (i)(VI), or clause (ii)(III) with respect to clause (i)(IV), the Secretary of Labor and the Secretary of Education, after consultation with the representatives described in paragraph (4)(B), shall jointly develop and establish, for purposes of this subparagraph, I or more primary indicators of performance that indicate the effectiveness of the core programs in serving employers."

<sup>&</sup>lt;sup>3</sup> Other authorized programs include Job Corps, YouthBuild, Indian and Native Americans, and Migrant and Seasonal Farmworker programs.

<sup>&</sup>lt;sup>4</sup> All national performance measures will be negotiated between the US Department of Labor and each state's governor. Each governor will then negotiate performance with the local workforce areas within each state. Performance expectations are adjusted based on characteristics of the participants and the condition of each labor market.

<sup>&</sup>lt;sup>5</sup> The Department of Labor required programs to use the American Customer Satisfaction Index (ACSI) from the University of Michigan (a commonly used survey tool for companies and individuals). State agencies could add their own additional questions regarding employer satisfaction.

## A Unique Opportunity for Advancing the Field in Serving Employers and Helping Workers

The new WIOA employer measure promises to be an improvement on the old WIA measure in several ways. It is focused more sharply on the outcome of services, and it has the potential to provide more useful information about the services workforce agencies provide employers and their results. However, the new measure has been challenging to define, as the departments described in the final regulations (see pages 203-212 in the final **Joint Rule**).

This new WIOA measure provides a unique opportunity for a fresh approach to how we measure performance in the workforce system. The pilot programs proposed by the departments of Labor and Education could be shaped to test and assess new and more useful approaches. The workforce development system should seize this opportunity and design and test a measurement approach that is dynamic enough to accommodate the wide variety of employers, industries, occupations, and regions with which workforce professionals engage. The system needs a measure that is broad and flexible enough to cover the variation in workforce professionals' experiences working with employers and the types and levels of services. It would be helpful to design a measure that not only measures performance but also yields useful information about the services provided. Ideally, the measure would provide aspirational benchmarks for each workforce area to engage in a deeper and richer relationship with its employer partners and help them advance their shared goals. The system should avoid indicators that measure only the least-common-denominator level of activity and that fail to give credit for more sophisticated and meaningful work with employers.

### A Fresh Idea for the WIOA Employer Services Measure

We do not think that the traditional types of one-size-fits-all measures — such as percentages of employers involved or services delivered, or the number of hires divided by the number of referrals — will be useful or meaningful, especially if they are implemented as stand-alone measures. While it may be tempting to develop an indicator that measures easily quantifiable data, if this data is not useful beyond simple monitoring, this will have been a wasted opportunity.

We propose a more customizable "point-menu" system that would award varying levels of points to workforce development boards (WDBs) based on the degree of intensity and the value of services provided. Services earning high points would clearly reflect deeper relationships with employers and activities that are the result of longer-term relationships. They also would include not just activities that facilitate training and improved talent pipelines, but also ones that address the structure of jobs in ways that utilize worker skills and improve job quality elements such as wages, benefits, scheduling, etc.

Each state would negotiate with the federal government a certain number of points on the effectiveness of employer services indicator as its goal for the year. As determined in the final WIOA performance measure regulations, this point goal would be shared across all WIOA core programs. Each state would negotiate or work with local program administrators to establish their core programs' contributions toward the state goal. States might require a certain number of points as a condition of funding, or

provide incentive funds for completion of certain activities that earn points toward the state goal, or chose other approaches.

Throughout the year, the state would accumulate points toward its point goal as the local entities administering the various WIOA titles and programs (i.e. local WDBs, adult education providers, employment services offices, vocational rehabilitation agencies) complete activities and outcomes defined in a master menu.<sup>6</sup> To provide states and local workforce areas with operating flexibility throughout the year, the specific activities should not be negotiated ahead of time; only the overall point goal should be set prior to the start of the measurement year.<sup>7</sup>

Menu items would have to include a variety of indicators of effectiveness — some appropriate for Title I administrators, some appropriate for Title II administrators, etc. But not all menu items need to be applicable to all core programs. This method allows the federal and state governments to develop and provide one common menu, while at the same time allowing for customization for each core program and for each administrator in the state participating in the WIOA performance measurement system. Menu items would increase in value from low-point activities to higher point activities. The federal agencies overseeing WIOA would establish a minimum point value and would specifically define and set a point value for each indicator in the menu. States would be required to meet their negotiated point goal. Those that do not would face corrective action or penalties consistent with those defined elsewhere in WIOA statute and/or final regulations.

For example, imagine State #1 negotiates a point goal for the year of 150. This state uses a variety of approaches across different core programs to accumulate points towards this goal. It negotiates with local WDB X a point goal of 10 for the year. (This WDB will be responsible for 10 out of the 150 points the State negotiated with the federal government.) WDB X would meet this goal by completing a combination of the items on the point menu, which range from lower-point activities such as filling job orders (at any legal wage level) to medium-point activities such as providing retention services for an employer's workers. WDB X does not have a deep track record working with employers and needs to build its experience. So it focuses on achieving several activities at the lower end of the point menu in order to build relationships with employers and to build staff capacity and experience. But this WDB is inspired by the higher-point items and determines to make its own long-range plan to build up to those higher point activities over the next five years.

Another WDB, WDB Y, is much more experienced with employer engagement and has deep relationships with employer partners. It negotiates with the state a goal of 20. This WDB likely will count some of the activities it does at the lower end of the menu, but it really wants to get credit for the hard work it has been doing with a group of home care agencies in its area to establish common training standards for home care aides, implement employer-paid training, and increase and stabilize the

<sup>&</sup>lt;sup>6</sup> While the concept of a menu of options for a performance measure is new, it is not completely foreign. For example, the Center for Law and Social Policy (CLASP) has proposed a menu system for another new indicator in WIOA on "measureable skill gains." See the CLASP concept paper, "Using Measurable Skill Gains to Best Serve Low-Income, Lower-Skilled Individuals," by Anna Cielinski, December 2014, available online: http://www.clasp.org/resources-and-publications/publication-I/WIOA skillgains.pdf.

<sup>&</sup>lt;sup>7</sup> One early reviewer indicated that, although the specific activities would not need to be identified at the beginning of the year, many WDBs likely would identify the specific activities they plan to carry out throughout the year as part of their strategic planning and budgeting.

work hours for home care aides. These changes would not only help the employer by reducing turnover, decreasing the likelihood of worker injury, increasing employee reliability, and improving the quality of care (which also helps the customer); they also would help the home care aides. The point menu includes some higher point items where WDB Y could earn points for its successes with these agencies.

As this measure is shared across WIOA core programs, program administrators of other WIOA titles and core programs also are involved. For example, in competitively awarding contracts to adult education providers, states might want to provide incentive points or funds to applicants or contractors who coordinate with their local WDBs to deliver work-based adult education services to employees of their employer partners, such as adult basic education or English language education.

In this scenario, higher value measures are likely to stem from longer-term relationships and reflect not just transactional results but deeper, transformational changes in employer business models or practices that support the ultimate goal of the workforce system to help job seekers and workers "succeed in the labor market." Lower point measures are more transactional interactions, but are necessary steps toward building working relationships needed for higher value outcomes.

At the end of the year when the Department of Labor receives reports on states' employer services scores, staff can analyze the spread of points across the menu. It can highlight those states and administrators that earned points through high-point accomplishments that benefitted both the employer and worker customers, and it can share learnings with other administrators. One idea would be to develop a best practices newsletter to share nationally with all administrators in the workforce system to promote system change and improvement. The Department of Labor also can provide technical assistance to administrators at the lower end of the point spectrum to continuously "up their game" to higher levels of service and value — to both employers and workers.

We hope this type of measure would include several key design elements. They include: a simple way for states to demonstrate compliance, such that it does not add substantially to the paperwork and reporting burden that administrators currently face; sufficient detail about employer engagement activities that is informative and useful for system administrators, program operators, and the field; and flexible and adaptable to accommodate the evolving maturity of program administrators' engagement with employers.

To begin developing such a menu, we have started with a table of sample indicators. For each indicator, we posed the question: "We would know the core program was effective in serving employers if ...." As the table below shows, the number of points increases as the intensity of the work and the depth of the relationship with employers increases. The relationships with employers evolve from *transactional*, in which the administrator provides basic services, to *transformational*, in which employers are co-investing (money, time, and effort) and the outcomes for employers and workers or jobs seekers are significantly more robust.

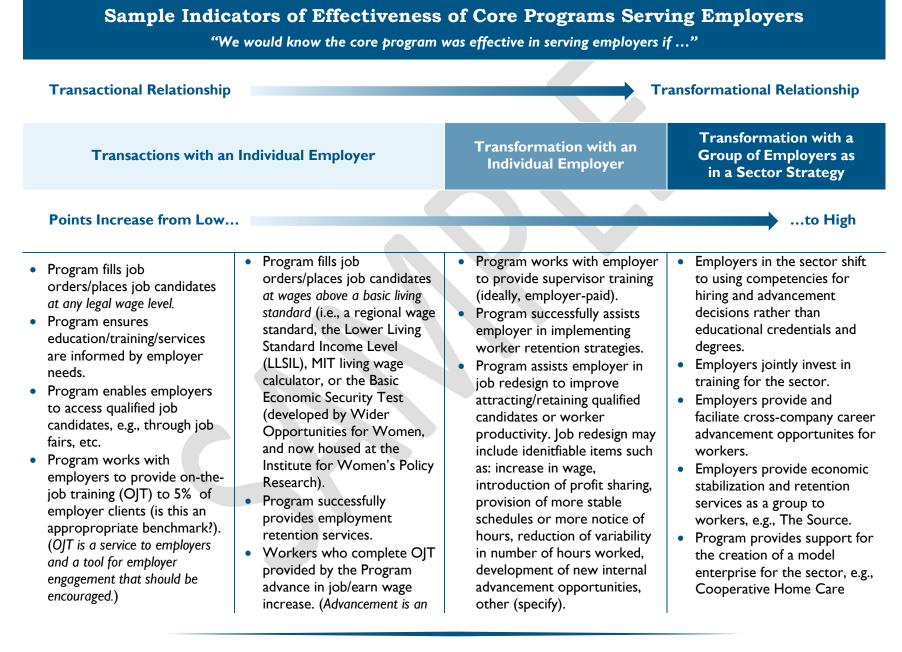
The highest point value column on the far right includes transformational activities and outcomes with a group of employers. This set of indicators can provide credit to WIOA administrators successfully implementing sector strategies and career pathway systems. These two approaches are required under WIOA, but the law does not establish any measures of performance in implementing them. This point

menu system can do "double duty" by not only providing a flexible and customizable performance measurement system for the new effectiveness in serving employers indicator; it also can help administrators measure their success in implementing sectoral and career pathway strategies under WIOA.

The sample indicators in this table are illustrative only. Also, they tend to focus on the types of activities and outcomes appropriate for WIOA Title I administrators because we have the most familiarity with this part of WIOA. The federal agencies developing WIOA regulations would need to develop indicators appropriate for all titles.

Agencies or organizations interested in exploring this concept as a pilot program will want to consider the following questions as they develop specific indicators:

- Are these the right types of indicators?
- Are they reflective of what WIOA administrators are doing, should be doing, and/or can do?
- Would these indicators produce interesting and helpful information about the effectiveness of serving employers for Department of Labor, for the state and local administrators, and for external audiences?
- What other types of indicators should be added?



- Market penetration measure: Program serves 5-10% (?) of businsses in workforce area. (may want to adjust to focus on sectors?)
- Business retention rate/repeat business: at least 20% (?) of businesses served in the last calendar/program year have returned for services in the current calendar/program year.

## indication of employer satisfaction with training.)

- Program successfully provides incumbent worker training.
- Program successfully provides lay-off aversion/Rapid Response services.
- Program conducts assessment of worker skill needs.
- Program conducts assessment of employment practices. (Award high points in this range.)
- Market penetration measure: Program serves 10-20% (?) of businsses in workforce area. (may want to adjust to focus on sectors?)
- Business retention rate/repeat business: at least 40% (?) of businesses served in the last calendar/program year have returned for services in the current calendar/program year.
- Employer recommends
  Program to peers/colleagues.

- Program assists employer in developing and implementing an apprenticeship program.
- Program works with employer to build internal career pathways for workers and demonstrate evidence that workers are advancing on the career pathways.
- Program assists employer with improved human resources policies in ways that allow them to tap into new underutilized sources of labor, e.g., people without bachelor's degrees, ex-offenders, older workers, etc.
- Program successfully assists employer in adopting/improving/expanding employee ownership.

Associates worker-owned home health agency.

- Program becomes a recognized resource in the sector as evidenced by invitations to particiate on local or state task forces, economic development committess, etc.
- Program influences a shift in industry norms in an industry or occupation to improve labor market conditions for entry-level workers, e.g., increased industry wages, regularized schedules, increased provision of paid leave, etc.
- Employer partners demonstrate increased utilization of entry-level workers' skills.

Some of these menu items may feel redundant to the WIOA indicators focused on job seekers and workers, and it may feel like we are "double counting" the same activities. This may or may not prove to be problematic. On the one hand, double counting is a form of gaming, which the performance system should safeguard against. On the other hand, some indicators of effectiveness face two directions in that they are indicators of value both to job seeker and worker clients and to employer clients.

Early reviewers of this concept paper suggested that program administrators will need robust training and useful tools to help them select and implement their menu items. Several of these reviewers also noted that WDB staff would benefit from more formal training on providing business services. In our experience, some WDB or job center staff may not feel comfortable approaching employers – either because they are intimidated or because they view their role as serving jobs seekers and workers not "selling" services to employers. Any training of workforce system staff should include content that addresses these issues.

## **Points for Consideration**

There are several issues to consider in designing this concept.

#### 1. Effectiveness in serving individual employers or employers as a group?

Some of the sample menu indicators above are aimed at measuring core programs' success in serving individual employers, e.g., employer better understands the labor market or employment laws. Others are aimed at serving employers as a group, e.g., the market penetration indicators. Is the intent of WIOA to measure the public workforce system's effectiveness in serving individual employers, employers as a group, or both? If the intent is focused on serving employers as a group, the limited resources and staff capacity of many program administrators must be addressed. Measures should be calibrated properly in order to be a fair — as we have suggested in the menu above by incrementally increasing the expected market penetration rate — and rates should be considered in light of the size of the market and the available resources.

#### 2. How to determine appropriate point goals for each state and local areas

A strong argument for a flexible, customizable measurement system, such as the point-menu system proposed here, is the wide variation in program administrators' size and capacity, their experience and expertise in working with employers, and regional labor markets. It also points to the need for a reasonable and fair method for determining the appropriate level of points in each state and core programs' annual point goal. Some early reviewers have suggested the development of a regression model to statistically adjust performance targets based on relevant variables – similar to the regression model process that the Department of Labor began to use with all states in Program Year 2011 under WIA. The idea of a regression model raises a number of technical questions. But at this time, since the public workforce system has not systematically collected information on these types of indicators or

outcomes, a regression model is not feasible. This idea could be explored more specifically after gaining some experience and when more data are available.

It may be more appropriate and feasible at this stage to develop criteria to guide the negotiation of the point goal for this metric. Factors that would seem to be important for the criteria include but are not limited to: size of the core program (perhaps based on funding allocation), current labor market conditions (e.g., wages), current proportion of "low road" employers and "high road" employers, types of industries, size of employers, the strength of organized labor, the status and maturity of any sector strategies, etc.

As mentioned elsewhere in this concept paper, we would recommend piloting this system before widespread use in the public workforce system. Perhaps an initial set of indicators could be developed for the 2016 implementation of the WIOA measures. This would be a streamlined set of easily understood indicators that may simply build from the WIA employer satisfaction measure. During the first few years of WIOA implementation, the federal agencies could pilot a more robust set of indicators and select the most appropriate ones for the final menu based on results of the pilot testing. Some of the reviewers for this concept paper have enthusiastically volunteered to be considered for piloting this concept.

#### 3. Gaming

As with any new and untested measurement system, this one will need to be designed to discourage "gaming." First, clear definitions of each menu item will be needed to ensure that only appropriate activities and outcomes are "counted" toward the point totals. Good examples, guidance, and training will also help ensure consistency. Appropriate — but not over-burdensome — levels of documentation also will help. Audits by the Department of Labor will be a high-stakes test of the quality of activities and outcomes counted in the menu.

It is important to note that some of the "gaming" may not be intentional, but rather the result of misunderstanding a new measure. It may be helpful to implement a grace period for this measure in which states must report their performance but are not sanctioned for falling below performance levels. Such a grace period would give everyone time and data to better understand appropriate expectations. Similarly, piloting this measure would be advisable.

Second, the departments should prevent gaming in terms of states and program administrators simply "loading up" on low-point easy activities and avoiding higher-point, harder activities. This may be somewhat countered by appropriately scoring each menu item and ensuring that harder, more value-add activities and outcomes are scored high enough to be worth the extra effort. Recognizing program administrators for higher-point outcomes — for example, through Department of Labor communications — might also provide incentives and even provide a little healthy competition in the field. Ultimately, engaging in the higher-point activities provides more valuable service to employers, clients, and communities, which we hope provides incentive in itself.

## 4. Is the intent of this new indicator to measure transactional and programmatic activity or to measure strategic efforts with employers or both?

Related to the question of WIOA's intent regarding service to *individual* employers or employers as a *group* is whether the law intended for the new indicators to measure transactional programmatic activities or more strategic (and perhaps transformational) activities. This question drives the types of indicators that are appropriate for the point menu. One possibility is that the indicators should be broadly interpreted to include both programmatic services and strategic activity. The indicators in the sample menu above have been drafted with this broader application in mind. Wherever the line is drawn, cost accounting rules will need to allow charging this work as a program cost, an administrative cost, or both.

#### 5. Considerations for Management Information Systems (MIS)

Any new metric on employer services will require changes to current MIS. In order to reduce data reporting burden and possible gaming, the reporting requirements and MIS for this proposed pointmenu system should be simple, streamlined and useful to participating states and program administrators, as well as the Department of Labor. Program administrators should be allowed to self-report data. The Department of Labor audit process may suffice as the mechanism to confirm reported activity. Verification of reported activities or outcomes will vary by menu item and should be clearly defined. The MIS for this measure may need to include a field to connect to official employer information such as the Employer Identification Number or DUNS number. A few early reviewers of this concept paper suggested that an employer account management system — similar to client case management systems — may be a helpful tool to develop. Such a system could help staff manage relationships with employers and document activities and outcomes (both those that accumulate points and those that do not). Such a system should be developed to serve both individual employers and groups of employers as in a sector strategy.

## 6. Are we asking too much of the system by focusing some (high point) indicators on job quality?

A few early reviewers asked this question: are we asking too much of our public workforce system by considering efforts to improve job quality a possible part of their work, especially given how underfunded it is? We do not think this is asking too much of the system. First, although the point-menu system is designed to encourage a focus on job quality and promote innovation in identifying and serving employers who will contribute to improving the quality of opportunities available to workers and job seekers, it does not require the system as a whole to be engaged in influencing job quality. We believe the point-menu system is an especially good tool to capture a range of information about how employers are served and to encourage aspiring to a deeper level of service and building the knowledge of how to take steps toward that greater level of service.

Second, much of the focus in the public workforce development system has been on skill development and access to jobs (sometimes quality jobs, sometimes not). Given the magnitude of the erosion in wages, benefits, job stability and meaningful jobs, as well as the crisis level of economic inequality in this country, attention to job quality is critically important. We believe that the workforce system works best when it truly advances the interests of both its customers — workers and employers — and this system of metrics helps keeps a focus on how to advance job quality within the context of supporting strong businesses.

### Conclusion

The US departments of Labor and Education have proposed state pilot programs to test and assess various approaches to measuring WIOA core programs' effectiveness in serving employers. They specifically indicated that they would consider this point-menu concept as a potential pilot. We encourage the departments and interested states to explore this concept further and to let us know if you intend to pilot this idea.

This idea is a novel approach to performance measurement, and there are many, many details that need to be worked out. But this new WIOA employer services measure is a unique opportunity to think differently about how to measure performance and get more out of the measures designed. We hope this approach to the employer services measure would not only be useful for performance monitoring, but would also offer opportunities for system learning and for setting aspirational goals that are tailored to local situations and local capacities. Even more importantly, this is a time when this country's workforce development system needs to use its limited resources to meet significant needs for workers and employers in order to contribute to vibrant local economies and strengthen communities. A lot more is riding on whatever performance measurement system we develop than simply tallying numbers and percentages.

#### About the authors

Maureen Conway is vice president of policy programs at the Aspen Institute and executive director of the Economic Opportunities Program (EOP). She founded EOP's Workforce Strategies Initiative (AspenWSI) and has led workforce research at the Aspen Institute since 1999. She leads a team of staff in a variety of initiatives to identify and advance strategies that help low-income Americans gain ground in the labor market, promote cross-sector dialogue, and develop ideas for improving and expanding economic opportunities for working people.

Vickie Choitz has been the associate director of the Economic Opportunities Program (EOP) since 2014. She provides strategic research and leadership for a number of program initiatives to advance the mission of EOP. Her primary focus is on EOP's work to improve both the quality of low-wage jobs and career advancement opportunities as a key strategy to address deepening economic inequality in America.