



WIOA WORKING GROUP SUMMARY SUMMER / FALL 2016

To: DC WIOA Implementation Executive Committee
From: Workforce Investment Council (WIC)
Date: September 19, 2016
Subject: Key Updates and Considerations from WIOA Working Groups

The WIC staff has continued to work closely with agency partners and subject matter experts to ensure the District's implementation of the Workforce Innovation and Opportunity Act (WIOA) is an effective transition. One of the primary WIOA implementation processes was the development of the State Plan. The State Plan was submitted on March 31, 2016. On June 24, 2016, the WIC received an approval letter from the U.S. Department of Labor (USDOL) and U.S. Department of Education (USDOE). The approval letter offered positive feedback and approval was granted conditionally, with the requirement that further clarification be provided on specific areas: state operating systems and policies relating to WIOA compliance progress; WIOA compliant state board; state funds; priority of services; state strategies including improving outcomes for out of school youth; agricultural outreach plan; registered apprenticeships; Rapid Response; staff training; and the Adult and Family Literacy Act programming implementation. The WIC and agency partners addressed the specific areas needing further clarification and submitted responses on September 1, 2016 to USDOL and (USDOE).

As part of this transition, the WIC established and convened the District of Columbia's (4) four WIOA working groups, who are comprised of subject matter experts and a variety of partner agencies, and education to ensure collaborative decision-making. WIC staff chair all workgroups. The (4) four WIOA work groups convened meetings beginning in May through August 2016 to address the following key WIOA provisions:



- 1) System Integration: One-Stop partner integration, unified business services, ensuring access to all DC residents, coordinated service delivery, alignment of youth services
- 2) WIOA Funding and Procurement: One-Stop procurement and funding, drafting MOUs, procurement of new service providers to meet District needs and align with WIOA, leverage resources between local and federal dollars, contract and resource sharing
- 3) Data Integration and Performance: Integrate data systems required by WIOA and ensure enhanced delivery of services, sharing of Labor Market Information to guide policy decisions, identify optimal common performance measures
- 4) Administration and Board Structure: Identify and inform new policies in light of WIOA and District goals and strategies

These groups met in the third quarter during July and August 2016. The working groups received and reviewed the District of Columbia WIOA Unified State Plan that USDOL and USDOE approved conditionally based on receiving further clarifying information in specific areas that were noted for response by September 1, 2016 by the WIC.

WIOA working groups met in the third quarter between June 10th and August 3, 2016 to address key priorities and developing input that will help inform Executive Team decision making. Regular report outs on ongoing implementation activities within each agency were also incorporated as relevant. A summary of activities for each of the four working groups follows

Administration and Board Structure Working Group

Meeting Date:

- August 4, 2016

Activities

- Reviewed working group objectives and projected outcomes
- Reviewed One Stop Operator (OSO) procurement mechanism
- Review of Cohort and Work Based Training Models as it relates to WIOA

Decisions Discussed and Recommendations

- Discussion of WIOA final regulations that were released on June 30, 2016.
- Discussion and review of the One Stop Operator procurement (678.600 subpart D) and sections on cohort and work based training (680.320 subpart C and 680.700, 680.840 subpart F).
- Discussion and decisions around One-Stop Operator (OSO) Procurement –the WIC would lead the MOU development and process, the OSO will have oversight to ensure the partners are abiding by the MOU. The OSO needs to be in place by July 2017. Further discussion on OSO regarding the level of detail that needs to be considered including in the RFQ that speak to DC uniqueness include:
 - ✓ We have more CBO service and training providers than higher education which is unlike most other jurisdictions;
 - ✓ We operate both as a city and a state;
 - ✓ We have a unique demographic of populations that we serve (both highly educated population as well as high level of residence with significant barriers). Employers should identify the AJCs as the place to look to which serves all levels of jobseekers and employers well as those who are highly educated and looking to transition to new careers);

- ✓ We are a metropolitan region where residents are in close proximity to other jurisdictions. We should consider expanding and broadening spectrum of opportunities and access for DC residents across the regional area, including MD and VA; and
 - ✓ Other considerations are to note what is occurring in the AJCs now in terms of what works and what the challenges are that need to be improved upon so that it would be addressed in the RFP.
- Discussion to efficiently use public funds: Local WIBs may contract to an eligible training provider (ETP) in order to facilitate the training of multiple individuals in an in-demand industry or occupation.
 - Discussion and review of WIOA as it relates to cohort and work based training.
 - Review and determine eligibility for contracted training providers that would be funded through WIOA and evaluate how target populations are chosen in order to avoid de incentivizing service to individuals who face barriers to employment.
 - Review of work based training is employer driven and involves a commitment from employers to employ participants who successfully complete the program. How contracts for training services may be used instead of ITAs.
 - Review and decision that the ITA funding model cannot be eliminated, given the new flexibility in the law, the District should be considering focusing its investment of WIOA training funds into other (more effective) training models that can be used to fund career pathways and sector strategies through contracts with employers and training providers.
 - Decision and consideration to implement cohort training with federal funding. The WIC to establish a policy regarding cohort training contract that allows flexibility for innovation and creativity for agencies and the providers, that sets specific limitations.

Attendance

- Working group members from the WIC (staff and Board members), DOES, DHS, DDS/ UDC-CC, and OSSE were all in attendance at the meeting.

A community representative for this group also was in attendance for this meeting.

System Integration Working Group

Meeting Dates:

- Met August 4, 2016

Activities

- Review working group objectives.
- Reviewed WIOA final regulations that were released on June 30, 2016.
- Review One Stop partner integration and coordinated service delivery.
- Review of Unified business services
- Review of access for all DC residents

Decisions Discussed and Recommendations

- Discussion and review of the final regulations, highlighting the final rules regarding the One Stop partners in section 678.415(e), which changed the default One stop partner under Perkins Act from the State agency administering the initiative to a local postsecondary recipient of (Perkins funds).
- Discussion on planning around one stop integration and drafting the MOU required meeting WIOA law. As follow up the group will complete worksheets handout to the Chair Lauren for compilation and further discussion at the next group meeting.
- Discussion on location of Comprehensive One-Stop – the group discussed the location of the certified/comprehensive One-Stop Center(s), noting that the current certified center is the least accessible by public transportation and has the least space to accommodate co-location of partners; they agreed that the new center at 2100 MLK would be the ideal location for a certified comprehensive center, however the construction timeline for that building may prohibit certification by the regulatory deadline. The group noted that all of the other One-Stop centers are more accessible and could physically accommodate more partners than the center that is currently certified (2100 MLK).

- Co-location – The group agrees that the following additional programs should be collocated or made accessible through the One-Stop: TANF (physical presence); Second Chance Act services or services for returning citizens (Mayor’s Office on Returning Citizens is at 2100 MLK); DBH mental health services (access to); locally funded adult education, charter schools, and UDC-CC (access to)

Attendance

- Working group members from the WIC (staff), DOES, OSSE, DDS/RSA, UDC-CC, and DHS were all in attendance.
- WIC Board members were not in attendance.

Funding and Procurement Working Group

Meeting Date:

- Met July 28, 2016

Activities:

- Reviewed WIOA final regulations that were released on June 30, 2016.
- Reviewed results of the One Stop Operator (OSO) survey sent out
- Review of OSO procurement

Decisions Discussed and Recommendations:

- Decisions based on the results of the OSO survey were to recommend to the WIC Board for the mall manager role. This role would include the following:
 - ✓ Convenes partners in the areas of (communication, accountability etc.,)
 - ✓ Ensure MOUWs are fully implemented within the Center
 - ✓ Collects and tracks data
 - ✓ Performance management and reporting
 - ✓ Manages operations
 - ✓ Oversight of integrated service delivery
 - ✓ Ensuring accessibility
- Discussion on OSO procurement and sole source procurement along with who could be in charge of the OSO selection.

- Discussion around resource sharing agreements under WIOA for One Stop partners.

Attendance

- Working group members from the WIC staff, UDC-CC, and a community member were in attendance at this meeting.
- Representatives from DOES, DDS/RSA, and DHS were not in attendance.

Data Integration and Performance Working Group

Meeting Date:

- Met August 3, 2016

Activities

- Review and status updates
- Review of data integration and labor market research survey
- Review of WIOA regulations
- Review of DC specific performance measure

Decisions Discussed and Recommendations

- The group was led in a recap discussion on the level of data integration that would be best for the District to pursue given compliance needs, cost and administrative burden, and our ability to effectively manage performance. The consensus from the group was that higher levels of data integration would be helpful moving forward, and while progress is being made through the Data Vault, more was needed to get past basic compliance to effective integration.
- Discussion of the final WIOA regulations on June 30, 2016 from USDOL and (USDOE).. Key resources were reviewed as related to the working group's purview: subpart E- performance accountability under Title I of WIOA (Section 361.150 and 361.240) and WIOA joint performance ICR remains relevant.
- Discussion that the District has been in the process of negotiating final performance levels with DOL using their statistical model.
- Discussion on key decisions the District needs to make in implementing performance elements of WIOA are:

- ✓ Discussions on the District establishing a common exit status across programs here allowed or maintain program specific exit determination, were that we should maintain program-specific exit determinations. Our delivery system is not ready for common exits across programs at this time and there would be a significant administrative burden in making this update.
- ✓ Discussion and consensus was that some supplemental data should be utilized to help document outcomes in cases where wage data may not be available, such as individuals that are self-employed. However, the group cautioned that sources need to be vetted carefully and used consistently in reporting. It was also noted that the regulations required that if supplemental data is used for employment related measures, it must also be utilized for wage-related measures. Supplemental provider performance data was also cited as a positive in getting a better view of performance, particularly for the broader scope of non-WIOA participants in assessing eligible training providers. However, group members noted that information coming from third parties must be verified with appropriate and standardized documentation.
- ✓ Discussion and additional areas for guidance referenced included which exams would be allowable for use in showing progress towards a credential, which industry-recognized credentials should be allowed for use with ITA programs and any standards for relationships with employer requirements. DOES is working to update their internal policies and procedures based on the regulations and will define some of these items for their purposes in that process. The decision from the group was that the following two measures were most relevant among options provided by DOL:
 - Employer Retention (repeat business) measure
 - Employer/market penetration

Despite this consensus, the relative weakness of some of these items was noted, such as a lack of control over retention once someone is placed and the administrative burdens and subjectivity of market share measures. Multiple group members noted an Aspen Institute initiative alternative for accurate and comprehensive employer performance measurement that the District could elect to sign on to and utilize through a waiver (see website: <http://www.aspenwsi.org/wordpress/wp-content/uploads/A-New-WIOA-Measure-Deserves-a-New-Way-of-Measuring.pdf>). The entire group did not weigh in on this item, but the WIC board may choose to consider this moving forward as well.

- ✓ Discussion regarding requirements in the regulations related to eligible training provider (ETP) performance reports and whether updates are needed to DOES's current template to ensure compliance. DOES acknowledge that while their current report template does cover most of the information requested in the regulations, it does not cover all items. Additionally, DOES noted that their score cards were created as an internal performance initiative and not specifically to address WIOA. Further discussion, the WIC and DOES will need to determine if a separate report card process may be needed to satisfy regulatory requirements, including making such data public on eligible training providers; or whether the DOES initiative should serve this broader purpose and be updated.
- ✓ Discussion if there are any additional DC-specific performance measures needed. No DC-specific performance measures were proposed, and several group members noted that ensuring federal measures are fully implemented should take priority. Additionally, OCA staff noted that the CapStat process would address performance from a program effectiveness perspective that is DC-specific; and it was agreed that this and other

internal processes would be more dynamic on their own and cover a broader range of locally funded programs without being formally incorporated in federal reporting. One group member noted that it may be useful for the District to begin measuring our progress toward increasing collaboration across title programs, and toward implementing the strategies laid out in the state unified plan.

- Due to time constraints, most of the status updates portion of the meeting was not covered during the meeting. An OCA representative did note that CapStat workforce data collected previously is being shared with senior agency leads and the Mayor in September, after which they will work with DMGEO and the WIC to coordinate additional information sharing and follow up steps. The group agreed that updates would be revisited at the next meeting on the following ongoing initiatives relevant to this group's work: 1) OSSE update to group on Data Vault; 2) DOES update to group on provider scorecards and survey; and 3) OCA update to group on CapSTAT process.
- Additional consideration for other working groups / external groups is the following: additional WIC policy guidance on how measurable skills gains will be defined within the District was recommended moving forward. This guidance would address items such as which exams would be allowable for use in showing progress towards a credential, and which industry-recognized credentials should be allowed for use with ITA programs and any standards for relationships with employer requirements.
- Technical Assistance Needed with assessing the validity, effectiveness, and compliance of utilizing various supplemental data sources in performance reporting (such as the National Database of New Hires, Jacob France Institute data, and The Work Number) were raised as an item where further technical research and consideration may be helpful in determining effective policy and procedure updates.

Attendance

- Working group members from the WIC (staff), DOES, DDS/RSA, UDC-CC and OSSE were in attendance.



Board members from IT sector, DHS, and the community representative for this meeting were not in attendance.