

Implementation Study of the Workforce Innovation and Opportunity Act (WIOA) Regarding Title I and Title III Core Programs

State and Local Efforts to Strengthen Workforce System Governance and Planning Under WIOA

Based on findings from 14 states and 28 local areas in 2019

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- Operationalizing Changes to the Title I Youth Program Under WIOA
- State and Local Efforts to Strengthen Workforce System Governance and Planning Under WIOA
- New Requirements for American Job Center Systems Regarding One-Stop Operators, Partnership Agreements, and Certification
- Change and Continuity in the Adult and Dislocated Worker Programs Under WIOA
- Performance Accountability, Eligible Training Providers, Labor Market Information, and Evaluation Requirements
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Executive summary

The Workforce Innovation and Opportunity Act (WIOA) of 2014 included multiple provisions to strengthen service quality, access, accountability, and alignment across many programs (see Exhibit ES.1). This report focuses on implementation of key changes to governance of the workforce system and how state and local workforce boards engage in planning across the core programs. Discussed here are the successes and challenges, promising practices, and possible areas for further technical assistance related to WIOA for workforce system governance and planning.

The report is one in a series of five reports, developed as part of a study of WIOA implementation commissioned by the U.S. Department of Labor (DOL) and conducted by Mathematica and Social Policy Research Associates. The other reports address changes in the following:

- Services for adults, dislocated workers, and employers;
- Services for youth;
- American Job Center (AJC) system requirements; and
- Performance accountability and reporting, eligible training providers, labor market information, and evaluation requirements.

Data for this report are drawn primarily from site visit interviews, conducted in early 2019, with administrators, board chairs and members, employer and agency partners, and frontline staff in 14 states and 28 local areas (see Exhibit ES.2). Other sources of information include relevant state and local documents. The site visit locations were purposively selected to assure diversity geographically and in size, among other criteria. The findings here, based on those interviews, should therefore be viewed as suggestive of common experiences and not assumed to be nationally representative.

The Workforce Innovation and Opportunity Act

Signed into law on July 22, 2014, WIOA retained many provisions from the prior law, the Workforce Investment Act of 1998 (WIA), which created a system of service delivery at the local level through American Job Centers (AJCs), with guidance and oversight from local workforce development boards, all under the policy and oversight from state workforce agencies and boards. As did the prior law, WIOA authorized multiple workforce programs as well as two related programs administered by the U.S. Department of Education. Overall there are six “core” programs under the law for which coordination and integration were required to be strengthened at the state and local levels, along with multiple other programs required to be included in local partnerships.

Exhibit ES.1 WIOA’s six core programs and other required partner programs

WIOA Core Programs

U.S. Department of Labor (DOL):

- Title I - 3 Programs: a) Adult, b) Dislocated Worker, and c) Youth Programs
- Title III - Wagner-Peyser Act - Employment Service (ES)

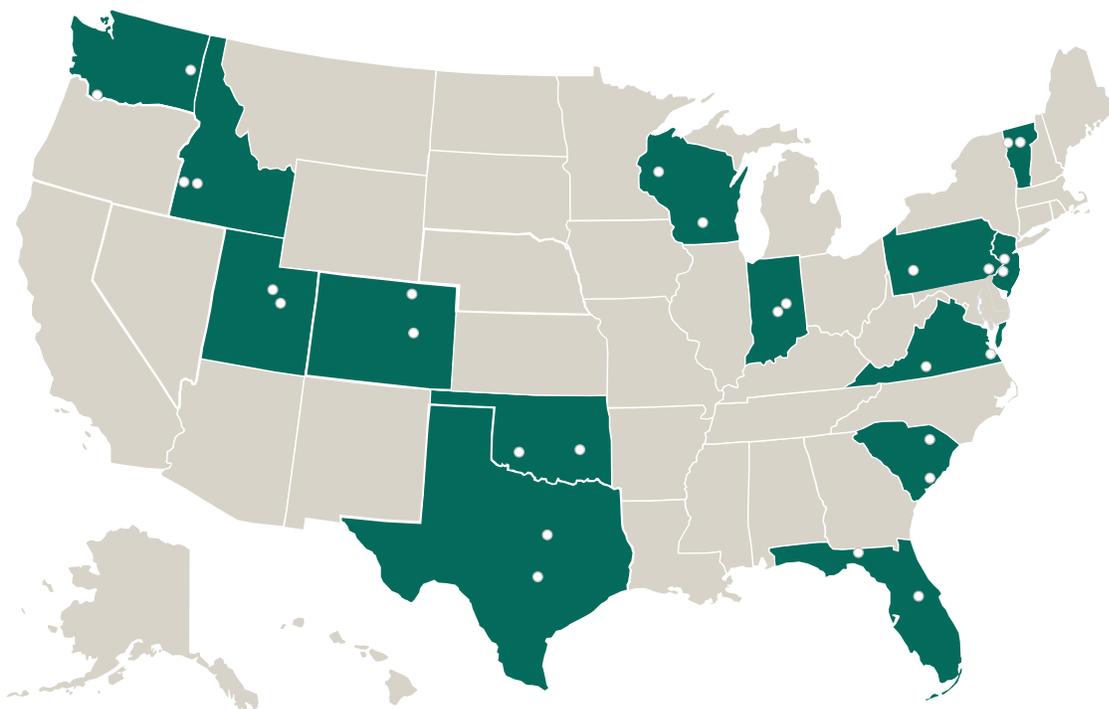
U.S. Department of Education:

- Title II - Adult Education and Family Literacy Act (AEFLA)
- Title IV – State Vocational Rehabilitation (VR) programs under the Rehabilitation Act of 1973

Other Required One-Stop Partner Programs

- U.S. Department of Labor: Job Corps, YouthBuild, Indian and Native American programs, National Farmworker Jobs Program, Migrant and Seasonal Farmworker Programs, Senior Community Service Employment Program, Trade Adjustment Assistance, Unemployment Compensation programs, Jobs for Veterans State Grants, and Reentry Employment Opportunities
- U.S. Department of Education: Carl D. Perkins Career and Technical Education Act programs
- U.S. Department of Housing and Urban Development: Employment and Training programs
- U.S. Department of Health and Human Services: Community Services Block Grant employment and training programs and Temporary Assistance for Needy Families (TANF)

Exhibit ES.2. Site visit locations in 2019 (14 states and 28 local areas)



Note: White dots are local areas visited for the study. See Appendix A.1 for a list of states and local sites included in the study. The list, along with more detailed information on the site visits, is also found in a separate Technical Appendix for the entire evaluation.

A. Governance and planning under WIOA

State and local workforce boards are responsible for overseeing the management and performance of the workforce system under WIOA, and for conducting strategic planning to ensure the workforce system meets the needs of employers and job seekers. WIOA built on the governance and planning structure that existed under the Workforce Investment Act of 1998 (WIA) by articulating new requirements in an effort to streamline governance, enhance strategic planning, and encourage more collaboration and engagement across core programs. The most noteworthy of these changes, according to state and local respondents, included:

1. Changes to the composition requirements for state and local board membership, including mandating representation for Adult Education and Family Literacy Act (AEFLA), Vocational Rehabilitation (VR), and registered apprenticeship programs; removing the requirement for representation from all American Job Center (AJC) partners; and moving from youth councils to youth committees.¹
2. Expansion of the role of boards in strategic direction and oversight of the system, including certification of AJCs, guidance for the allocation of infrastructure funds in the AJCs, procurement of AJC operators, identification of regions, and development of strategies related to career pathways and industry partnerships.²
3. Requirement for states to develop a single, 4-year “unified plan” that would cover all six core programs, with a modification required at 2 years. States could, if they wish, develop a 4-year “combined plan” that included other partner programs.³ Overall, the integrated planning process was intended to lead to better service coordination and collaboration among core programs and other partners, such as the Temporary Assistance for Needy Families (TANF) program.
4. Requirement to designate regions consisting of one or more local workforce development areas, and to develop a regional plan for each region along with local strategic plans.⁴

B. Key findings

At the time of the study site visits, state and local areas had undertaken efforts to implement WIOA’s key governance and planning provisions. State and local program administrators and staff, workforce development board staff and chairs, and partners noted that while there were some challenges in implementing these changes, they felt that implementation had generally been successful in encouraging more coordination across partners and a greater focus on strategic planning. Site visit respondents described their implementation efforts to date, including challenges they encountered and useful strategies. Respondents shared their perspectives on the changes in WIOA to governance and planning as they relate to (1) structures and roles of state and local workforce boards, (2) integrated state planning,

¹ WIOA Section 101(b).

² WIOA Section 101(d).

³ Other partner programs include: career and technical education programs under the Perkins Act, Temporary Assistance for Needy Families (TANF), employment and training programs under the Supplemental Nutrition Assistance Program (SNAP), the Senior Community Service Employment Program (SCSEP), Trade Adjustment Assistance, Jobs for Veterans State Grants (JVSG) programs, employment and training activities carried out under the Community Services Block Grant, employment and training activities carried out by the Department of Housing and Urban Development, Unemployment Insurance (UI) programs, and Second Chance Act programs (20 CFR 676.140).

⁴ WIOA Section 106(a).

and (3) regional and local planning. Below are key findings regarding implementation of WIOA's changes in each of these areas.

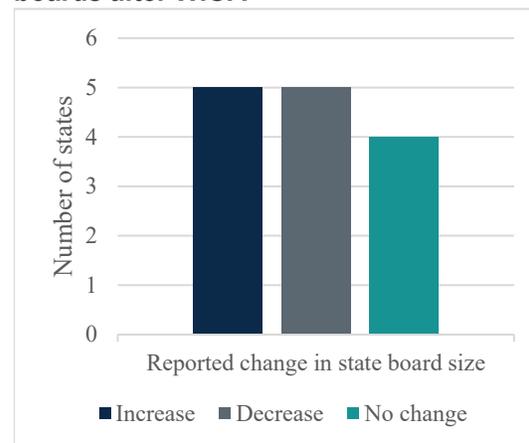
1. Structures and roles of state and local workforce boards

a. State and local board composition

WIOA changed the requirements for the composition of state and local workforce boards. Among these changes were mandates to include representation for AEFLA and VR programs, as well as registered apprenticeship. WIOA maintained the requirement that at least 50 percent of the board membership be made up of business representatives (nominated by state business or trade organizations), and that the chair of the board be selected from those business members. Local workforce boards were no longer required to have Youth Councils, although they were encouraged to form youth standing committees to guide services and programming for youth. WIOA also removed the requirement for all AJC partners to be represented on the local board. State and local respondents reported that the changes brought better opportunities to coordinate across partners as well as streamlining of board membership in some states, but also resulted in larger boards in other states.

- Some state boards reported a decrease in board size while others reported larger boards under WIOA.** Five state boards reported they became smaller under WIOA, while another five reported increasing in size (Exhibit ES.3). Four boards reported no change in the size of the state board.
- Observations about the value of these changes varied according to size of the new boards.** Those on smaller boards felt that it was important to streamline membership because large boards had difficulties in engaging all members and in generating meaningful discussion; members of boards that grew larger reported that they benefited from a broader cross-section of agency partners and businesses.
- Including representatives from AEFLA and VR was viewed as beneficial.** State board staff and program administrators from across the core programs stated that the presence of AEFLA and VR representatives on the board enhanced the partnerships among the core programs and elevated the focus on the populations served by those agencies. They also felt that having each of the core programs on the state board provided an opportunity for all programs to discuss and, if possible, align goals and strategies.

Exhibit ES.3. Change in the size of state boards after WIOA



Source: State interviews

b. Roles of state workforce boards

WIOA expanded the roles of state workforce boards to enhance how it provides strategic direction and oversight of the workforce system in the state, including requiring boards to develop and review state policies on the certification of AJCs, guidance for the allocation of infrastructure funding in the AJCs, procurement of AJC operators, identification of regions, and strategies related to career pathways and

industry partnerships.⁵ State board staff and chairs reported that they made efforts to conduct more coordinated strategic planning across their members, but also felt the burden of increased board responsibilities with regards to workforce system operation.

- WIOA requirements resulted in both more strategic planning and more “administrative” tasks for boards.** During the initial phases, state board respondents reported that there was a conscious shift from being compliance-oriented (“box checkers” as one respondent noted) toward identifying a vision for the system, and how it could be implemented at the local level. To this end, boards identified key economic or industrial sectors that were likely to grow, and commissioned more labor market information (LMI) and analysis to aid in the planning process. However, the expansion of state board functions was also, paradoxically, viewed by some respondents as a barrier to implementing a more strategic approach. State board staff and chairs reported spending much of their time in board meetings in the first few years after WIOA was enacted reviewing and approving new operational policies, such as those related to local certification and accessibility requirements and operator procurement.
- Respondents reported increased connections to education partners at the local level.** Local board staff reported that the emphasis on career pathways at the state level encouraged local boards, and their staff, to strengthen the connections with the K-12 and higher education systems and to create new career pathways programming. This resulted, in several areas, in locating AJC services on community college campuses and partnering with educational institutions to develop training and services that promote career pathways.
- Governor’s role viewed as helpful for strategic planning.** Several states reported that their governor played a key role in helping convene the WIOA partners and increasing engagement in state workforce board activities. In six states, the state workforce board was administratively within the governor’s office or directly reporting to the governor. Board staff in these states noted that this arrangement provided better insight into the policy levers at the state level that affected workforce development.
- Additional oversight stretched board staff capacity.** State board staff noted that one of the challenges with the expansion of the state board’s oversight role was limited staff capacity to carry out administrative and strategic convening responsibilities, particularly where boards expanded and required the coordination of a greater number of members.

“I think there has been a big emphasis, from all of us, on the language around that warm handoff or referral, and in no wrong door.... I don't think that that language and that type of mindset was as strong or was as present in WIA as it is now in WIOA.”

— State AEFLA staff

2. Integrated state planning

In a change from prior law, WIOA required states to develop a single, 4-year “unified plan” that would cover all six core programs, rather than just the four DOL programs under Titles I and III. States also had the option to develop a 4-year “combined plan” that included other partner programs. States are required to submit a modification after 2 years. Overall, the integrated planning process under WIOA was intended to lead to better service coordination and collaboration among core programs and other partners, such as

⁵ WIOA Section 101(d).

TANF. State board staff and chairs reported modest changes to the content of state plans, but a significant shift in how states drafted the plans.

- **Inclusion of core partners viewed as beneficial.** In all visited states, AEFLA and VR agency leadership described some degree of involvement in the development of the state plan. In a handful of states, one or both of these agencies was already involved in plan development and did not perceive WIOA as a significant shift. In other states, AEFLA and VR respondents felt membership on WIOA interagency planning workgroups and committees afforded them a valuable avenue for advocacy of their students and consumers.
- **State board staff reported using multiple methods for obtaining input from all partners.** Several state boards convened inter-agency subcommittees with representatives across all core programs to develop language around key focus areas such as career pathways and youth services. Board staff noted that these exercises helped partners to develop their working relationships. Some state boards also reported that they had partners review and provide feedback on early drafts written by other partners, which was reported to enhance the working relationship and the mutual appreciation and trust between partner agencies.
- **Changes in plan content were small.** According to state board staff in most states, there were modest changes in the content that states submitted in their WIOA plans in comparison to plans under WIA. Board staff reported that their WIOA plans placed greater emphasis on work-based learning, career pathways, sector strategies, and coordinated employer and community engagement, than plans under WIA.
- **Collaboration brought with it challenges in communication and consensus.** Several state respondents reported facing challenges in state plan development, including lack of common terminology across programs and differences in perspectives with regard to workforce system priorities, which could make it difficult to agree on the content of the plan.

3. Regional and local planning

a. *Regional designations and planning*

WIOA required state governors to designate regions that include one or more local workforce areas. Although not required under WIA, some states did designate regions under WIA. If a region includes more than one area, the local workforce boards in the region are required under WIOA to jointly develop a regional plan and strategy based on regional LMI that aligns with their local plans as well as regional economic development efforts. If the region has only one local area within its boundaries, only a local plan is required. Across the 11 states in the study that were not single-area states, most reported using existing boundaries to designate regions (Exhibit ES.4). While some state respondents found regional planning helpful, others found that regions were not always suitable for more rural areas of the state or where local areas did not share common industries or strategic interests.

- **The most common approach for designating regions was to designate individual local areas as regions.** Regional designations and planning largely duplicated the local planning process in the states and local areas included in site visits. Among the 11 multi-area states included in site visits, 5 designated individual local areas as regions.

- **When multiple local areas were designated as a region, some states provided additional funding to support planning activities.** Some states that designated regions that included multiple local areas issued grant funding to support the process. The local areas in these regions used the funding to hire consultants to help them develop regional plans aligned with the strategic focus of the local areas.
- **Challenges with regional planning included competing planning activities and difficulty aligning local interests.** Local board respondents in some states noted that they already participated in multi-area planning activities, often across state lines, and that those areas did not align with the regions designated by their state. Board staff in rural areas noted that it was logistically difficult to coordinate planning with other local areas as well as hard to align priorities with other areas that may not be as rural.

Exhibit ES.4. How study states designated regions

State approaches to designating WIOA regions	Number of states
Designated single local areas as regions	5
Used existing WIA regional boundaries	3
Collaborated with local boards to create regional boundaries	2
Used LMI to create regional boundaries	1
<i>No regions in state (single statewide workforce area)</i>	3

Source: WIOA Implementation Study visits.

b. Local planning

In addition to participating in the regional planning process, local boards are required to develop local plans that integrate planning for all core programs, similar to the state plans (unless the local area is the only one in the region). Local board staff and members reported that the role of the board chair was particularly important to partner engagement, and that AEFLA and VR partners had greater engagement in the process, similar to findings at the state level.

- **Local board chair involvement appeared to be a critical factor.** According to local board members and partner staff, the leadership of the local workforce board director appeared to play a particularly important role in local planning and the extent to which the partners were invited to actively contribute to the local plan and engaged in that activity.
- **Involvement of AEFLA and VR program staff was greater than under WIA but not universal.** WIOA required local plans to include information about the AEFLA and VR programs, and local board staff reported that staff from those programs were, at a minimum, reviewing the local plans and in some cases actively contributing to the plan text. Involvement of these partners in both reviewing and contributing to local plans represented a change from WIA when in most cases these partners had no or limited involvement in the local planning process. However, board staff in only half of the 22 local areas visited described significantly more engagement and coordination with AEFLA and VR partner programs under WIOA in support of local planning. This was reported to be more common in states where there also close engagement of AEFLA and VR staff in the state planning process.
- **Differences in administrative structures across partners were a barrier to planning.** Board staff and members in some of the local areas visited reported that the differences in administrative structures across the core programs often made it difficult for AEFLA and VR partners to fully engage in the local planning process. VR is operated at the state level and employs state staff, and relevant planning occurs at the state level, making it both more difficult and redundant to participate in the local planning process. While AEFLA operates locally, AEFLA programs must submit

applications to the state to receive funding. In practice, these applications function as local plans for the programs, making the WIOA local planning process redundant for AEFLA partners.

C. Looking ahead

State and local respondents described their efforts to implement WIOA's requirements for governance and planning during the study's site visits. As indicated by respondents, guidance issued by DOL informed their efforts; however, they also identified several areas where additional or enhanced guidance could prove helpful. DOL has developed and provided a number of technical assistance products on unified and combined state plans, local area designation and regionalism, and strategic boards; all were made available on WorkforceGPS, including a toolkit on state and local workforce development boards.⁶ In addition, DOL also released a resource for states and local areas that links to the guidance issued jointly by federal agencies in the workforce system.⁷ The experiences of states and local areas in implementing WIOA's requirements for governance and planning, as described above, suggest several areas for additional technical assistance to further support implementation and help assure that the new requirements are met. These include:

1. Targeted training on managing state and local board sizes.

Although larger boards often benefit from the representation of more partners in the workforce system, which can be important for aligning priorities across the system, they can also be difficult to manage and keep all members engaged. Some state and local boards might benefit from additional technical assistance on how to take advantage of smaller committees and strategically gain input from relevant partners while still adequately representing the overall workforce system.

2. Technical assistance on engaging partners in local planning.

The differences in administrative structures across the core programs also present barriers to effective coordination and planning at the local levels. VR is operated at the state level and employs state staff, and relevant planning occurs at the state level, making it both more difficult and redundant to participate in the local planning process. While AEFLA operates locally, AEFLA programs must submit applications to the state to receive funding. Local areas might benefit from more information or technical assistance on how to engage partners effectively and empower local and regional representatives of core program agencies to participate in local strategic planning.

3. Cross training to improve understanding of terminology and guidance.

Different programs often use different terminology and interpretations of key concepts related to the workforce system and service delivery. These differences often were perceived to hamper communication and effective collaboration as reported during the site visits. Additional technical assistance or resources for cross-training to states and local areas may help improve communication across partners. This could be especially important for VR partners, who often use medical terminology that has different meanings for other partners in the workforce system.

⁶ See State and Local Workforce Development Board Resources, posted September 11, 2019, and available at <https://ion.workforcegps.org/resources/2019/06/14/16/43/State-and-Local-Workforce-Development-Board-Resources>.

⁷ See WIOA Federal Agency Collaboration Guide, published May 11, 2018, and available at https://ion.workforcegps.org/resources/2017/10/05/11/48/~/-link.aspx?_id=020DBC950CD44F04A9400DCE63D29CD8&_z=z.

I. Introduction

The Workforce Innovation and Opportunity Act (WIOA) of 2014 included multiple provisions to strengthen service quality, access, accountability, and coordination across many programs (Exhibit I.1). WIOA continued to emphasize the importance of coordination across partners in the workforce system and strategic planning, as WIA had done, with provisions changing the requirements for board governance and state and local planning. This report discusses the experiences of states and local areas in implementing those changes, including their successes, challenges, and potential promising practices.

A. Study overview

The report is one in a series of five papers developed as part of a study of WIOA implementation, commissioned by DOL and conducted by Mathematica and Social Policy Research Associates. Data for this report are drawn primarily from site visit interviews, conducted in early 2019, with state and local administrators, board chairs and members, employer and agency partners, and frontline staff, in 14 states and 28 local areas. The site visits included visits to three states with single workforce areas. To learn about local implementation in these states, visits included interviews with staff located at two American Job Centers. Perspectives from these respondents are included among the perspectives of local area respondents from the other 11 states. This report also draws on information from relevant documents provided by states and local areas.

Exhibit I.1. WIOA's six core programs and other required partner programs

WIOA Core Programs

U.S. Department of Labor (DOL):

- Title I - 3 Programs: a) Adult, b) Dislocated Worker, and c) Youth Programs
- Title III - Wagner-Peyser Act - Employment Service (ES)

U.S. Department of Education:

- Title II - Adult Education and Family Literacy Act (AEFLA)
- Title IV – State Vocational Rehabilitation (VR) programs under the Rehabilitation Act of 1973

Other Required One-Stop Partner Programs

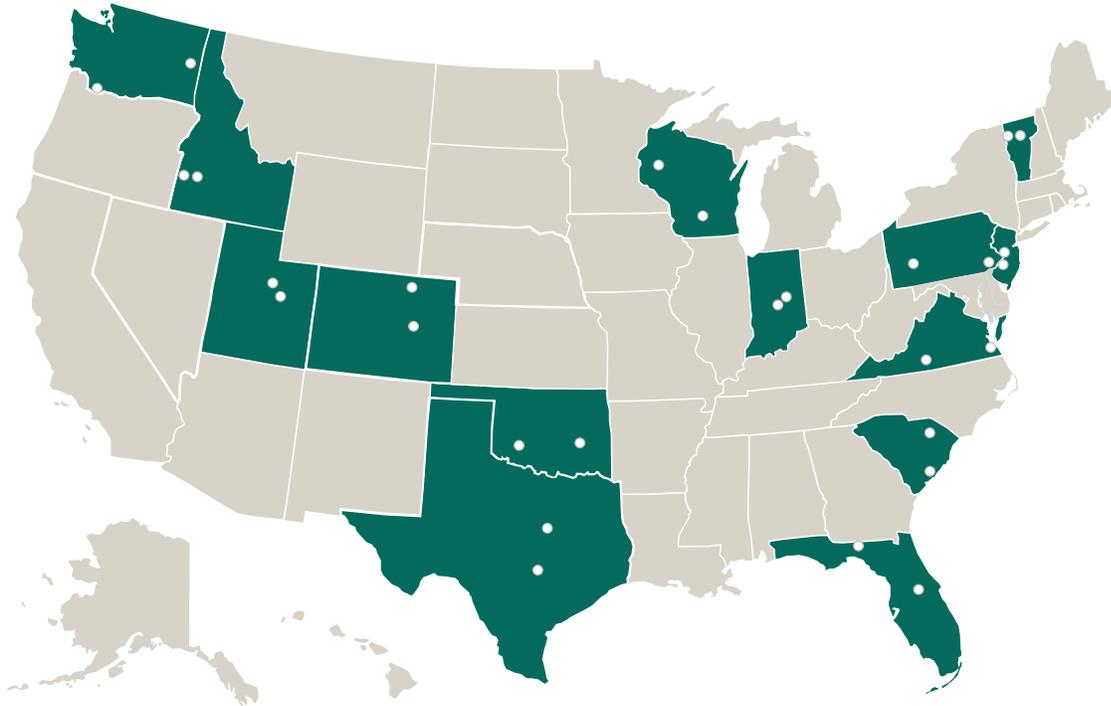
- U.S. Department of Labor: Job Corps, YouthBuild, Indian and Native American programs, National Farmworker Jobs Program, Migrant and Seasonal Farmworker Programs, Senior Community Service Employment Program, Trade Adjustment Assistance, Unemployment Compensation programs, Jobs for Veterans State Grants, and Reentry Employment Opportunities
- U.S. Department of Education: Carl D. Perkins Career and Technical Education Act programs
- U.S. Department of Housing and Urban Development: Employment and Training programs
- U.S. Department of Health and Human Services: Community Services Block Grant employment and training programs and Temporary Assistance for Needy Families (TANF)

All locations were purposefully selected to assure diversity geographically and in size, among other criteria. Exhibit I.2 identifies the states and local areas visited; Exhibit I.3⁸ identifies types of site visit respondents. More information about the site visits, site visit respondents, and other components of the WIOA Implementation Study is provided in the technical appendix. The findings here, based on those

⁸ Three of the 14 states were single-workforce area states, and the team visited two AJCs in each of those states. The report includes these AJCs when it refers to “local areas”. The study team also conducted four site visits in late 2017 to capture WIOA implementation at an earlier stage. Technical information about the site visits can be found in the technical appendix.

interviews, should therefore be viewed as suggestive of common experiences and not assumed to be nationally representative. The study overall also used information from other sources, including state plans and program data, to provide additional context for insights from site visit interviews.

Exhibit I.2. States and local areas visited in 2019 (14 states and 28 local areas)



Note: White dots are local areas visited for the study. See Appendix A for a list of states and local sites included in the study. The list, along with more detailed information on the site visits, can also be found in the Technical Appendix for this evaluation.

Exhibit I.3. Types of site visit respondents at the state and local levels

Types of state-level respondents	Types of local-level respondents
State workforce board chair	Local workforce board chair
State workforce board staff	Local workforce board staff
State workforce agency director	AJC manager
State WIOA policy staff	AJC operator
Title I Adult and Dislocated Worker program and performance staff	Title I Adult and Dislocated Worker program manager
Title I Youth program staff	Title I Adult and Dislocated Worker frontline staff
Title III Employment Services program staff	Title I Youth provider or program manager
Unemployment Insurance administrator	Title III Employment Services program manager
Title II Adult Education and Family Literacy Act administrator	Title III Employment Services frontline staff
Community college, career technical education, or K–12 partner staff	Title II Adult Education and Family Literacy Act program manager
Title IV Vocational Rehabilitation administrator (including services for the blind if separate)	Community college, career technical education, or K–12 partner manager
TANF staff	Title IV Vocational Rehabilitation program manager
	TANF area manager
	Other partner manager (YouthBuild, Senior Community Service Employment Program, National Farmworker Jobs Program, etc.), if applicable

B. Governance and planning under WIOA

State and local workforce boards are responsible for overseeing the management and performance of the workforce system under WIOA, and for conducting strategic planning to ensure the workforce system meets the needs of employers and job seekers. WIOA built on the governance and planning structure that existed under the Workforce Investment Act of 1998 (WIA) by articulating new requirements in an effort to streamline governance, enhance strategic planning, and encourage more collaboration and engagement across core programs. The most noteworthy of these changes, according to state and local respondents, included:

1. Changes to the composition requirements for state and local board membership, including mandating representation for Adult Education and Family Literacy Act (AEFLA), Vocational Rehabilitation (VR), and registered apprenticeship programs, and moving from youth councils to youth committees.⁹
2. Expansion of the role of boards in strategic direction and oversight of the system, including certification of American Job Centers (AJCs), guidance for the allocation of infrastructure funds in the AJCs, procurement of AJC operators, identification of regions, and development of strategies related to career pathways and industry partnerships.¹⁰
3. Requirement for states to develop a single, 4-year “unified plan” that will cover all six core programs, with a modification required at 2 years. States can, if they wish, develop a 4-year “combined plan”

⁹ WIOA Section 101(b).

¹⁰ WIOA Section 101(d).

that includes other partner programs.¹¹ Overall, the integrated planning process is intended to lead to better service coordination and collaboration among core programs and other partners, such as TANF.

4. Requirement to designate regions consisting of one or more local workforce development areas, and to develop a regional plan for each region along with local strategic plans.¹²

C. Roadmap to the report

The remaining chapters in this report discuss some of the key changes under WIOA related to governance and planning and the challenges and promising practices that states and local areas reported in implementing the changes. Chapter II discusses changes to state and local workforce boards. Chapter III focuses on how the core programs and their administrative agencies coordinated to implement WIOA. Chapters IV and V discuss the state and local planning processes and how they changed under WIOA, while Chapter VI focuses on state approaches to regional designation and planning. Chapter VII concludes with considerations for workforce system stakeholders as they look ahead at WIOA implementation.

¹¹ Other partner programs include: career and technical education programs under the Perkins Act, Temporary Assistance for Needy Families (TANF), employment and training programs under the Supplemental Nutrition Assistance Program (SNAP), the Senior Community Service Employment Program (SCSEP), Trade Adjustment Assistance, Jobs for Veterans State Grants (JVSG) programs, employment and training activities carried out under the Community Services Block Grant, employment and training activities carried out by the Department of Housing and Urban Development, Unemployment Insurance (UI) programs, and Second Chance Act programs (20 CFR 676.140).

¹² WIOA Section 106(a).

II. The changing roles and structures of state and local workforce boards

Under WIOA and its predecessor, the Workforce Investment Act (WIA), state boards were charged with developing policies that support alignment and coordination across programs authorized under each law, as well as with other programs in the workforce system. WIOA changed the requirements for composition of state and local boards in an effort to streamline membership and make boards more flexible and responsive to local needs, while promoting greater collaboration across the core programs. WIOA also expanded the role of state and local boards to have oversight of the policies used to administer the AJC system, including certification, operator procurement, and infrastructure funding. State and local respondents across the sites in the study reported the changes in WIOA seemed to encourage more collaboration across partners at the state and local level, while the expanded role of state and local boards required a high level of engagement from members and board staff in the early years of WIOA. In this chapter we first discuss changes to state boards and then look at changes to local boards.

A. State workforce development boards

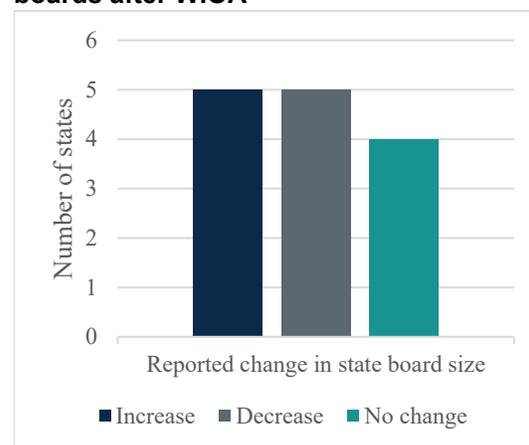
WIOA changed the requirements for the composition of state workforce boards. Among these changes were mandates to include representation for AEFLA and VR programs, as well as registered apprenticeship. WIOA maintained the requirement that a majority of the board membership be made up of business representatives, and that the chair of the board be selected from those business members. State respondents reported that the changes brought better opportunities to coordinate across partners as well as streamlining of board membership in some states, but also resulted in larger boards in other states. Board staff in most states also reported enhanced partnerships between the Adult, Dislocated Worker, Youth, and ES programs and AEFLA and VR programs. Boards also felt a broadening of their oversight and administrative roles in the workforce system under WIOA.

1. Changes in state board size

Changes in the composition requirements had varying effects on the size of boards across the 14 states visited for the study (Exhibit II.1).

- **At least five states experienced a decrease in the size of their board under WIOA.** Some of the reasons for this downsizing included a lack of meaningful engagement from many previous members and a desire to have more purposeful and streamlined involvement from members. Many of these states were also able to downsize because they could have one member represent different programs, although guidance from DOL and the U.S. Department of Education specify

Exhibit II.1. Change in the size of state boards after WIOA



Source: State interviews

that AEFLA and VR programs are required to have unique representation.¹³

- **By contrast, five states reported that their boards increased in size under WIOA.**

These boards added members to ensure that they complied with all the representation required under the federal law, as well as, in some cases, simultaneous state requirements for the composition of the state board. Board staff in one state explained that an increase in non-business members in their state necessitated more business members to

maintain a 51 percent business majority. Some boards reported that they were able to engage a wider range of businesses across industry and regions in their states, and that the infusion of new members had reinvigorated the board, as new members brought different perspectives and a desire to learn about the system. Board staff in one state noted that an increase in business members added burden for board staff, as business representatives were more difficult to recruit and tended to have more frequent turnover than public sector representatives.

In Utah, local office directors were considered an important source of recommendations for potential business representatives to the state workforce board. The state board created a form that their area directors used to nominate potential candidates to the board, and this encouraged directors to engage and actively recruit businesses for the role.

2. Increased involvement of AEFLA and VR

In 10 of the 14 states visited, state staff from across the core programs noted that having AEFLA and VR representatives mandated to be on the board enhanced the partnerships among the core programs.

- **AEFLA and VR administrators reported that their consistent presence in state board meetings elevated the focus on the populations served by those agencies,**

including individuals with low basic skills and individuals with disabilities. They felt that the interests of the populations in their programs were included in the policy and strategy discussions related to the workforce system, and that this was a change from what occurred under WIA.

“What I’ve experienced over the past few years is just the collaboration and the partnership that’s definitely improved where I feel like we all kind of understand everyone’s lane. I think that’s been a benefit that I’ve seen come out of [the state workforce board].”

—State VR staff

- **The presence of AEFLA and VR programs provided a cross-system opportunity to align goals and strategies.** One state AEFLA administrator reported that the agency’s presence on the board had allowed for greater interaction with industry representatives, noting that “It has helped our messaging and our mission definitely, being included at this level, and interaction with industry and [sharing] the value of what our programs bring.”

¹³ DOL added several provisions (20 CFR 679.110(b)(3)(iii)(A)(I)(i) through (iii)) to clarify that, for Title I and Wagner-Peyser Act programs, a single lead state official with primary responsibility for those programs may represent more than one of those programs. The preamble continues and explains that AEFLA and VR programs must have a single unique representative. Additionally, the regulations require that the individuals representing the core programs, including the VR and AE programs, have “optimum policy-making authority.” (20 CFR 679.110(e)). The regulation states that a representative with “optimum policy-making authority” is an individual who can reasonably be expected to speak affirmatively on behalf of the entity he or she represents and to commit that entity to a chosen course of action (20 CFR 679.120(a)).

3. Expansion of state board functions

State respondents reported that WIOA supported a stronger oversight role for state workforce boards, which made boards look more closely at their regions and local areas to understand what service strategies were working or not working in those areas. To carry out WIOA’s strategic emphasis, state boards are required to address numerous administrative aspects of workforce system oversight, including developing policy and guidance for procuring AJC operators, criteria for the certification of AJCs, and state requirements for infrastructure funding. A few board members noted that they were able to leverage state funding to expand their staff beyond WIA levels to support the expanded role under WIOA, but board staff in other states noted that their new role stretched their capacity.

- **Most state workforce boards reported that they made a conscious shift from being compliance-oriented—or “box checkers”—to having a vision for the system and implementing that vision on the ground after WIOA.** WIOA encouraged state boards to be more strategic and to focus on high-need target populations and industries. Many boards have identified key industry sectors which are growing or have high unmet demand for skilled workers, and are developing customized strategies to meet the needs of businesses in those sectors.

- **Board staff and members felt torn between administrative policy functions and strategy.** Members from a handful of boards noted that they spent much of the time in board meetings in the first few years after

“It’s helped our messaging and our mission definitely, being included at this level, and interaction with industry and [sharing] the value of what our programs bring.”

—State AEFLA staff

WIOA reviewing and approving new policies,

including operator procurement policies and AJC certification standards, although boards in some states were already performing these roles under WIA. This meant that there was less time for more high-level discussions around sector strategies or partnerships, among other areas for innovation.

Also, business members seemed to find it difficult to engage in the more administrative aspects of the board’s work, which focused on technical aspects of WIOA that required time to learn and internalize. Board committees were noted by some respondents as a helpful forum for drafting and fine-tuning the guidance around each of the processes.¹⁴

- **State board staff in some states reported limited capacity.** Broadly speaking, state workforce board staff reported that their roles and responsibilities increased as they made the transition to WIOA. Board staff reported dedicating more time to coordination with partner agencies, including efforts to make data and information easier to identify, collect, and disseminate. For example, board staff in two states discussed developing online resources such as performance dashboards that are updated regularly and publicly available.

“There has been this mandate from the top down that all of the different departments will work together and align these priorities. And [the state board] has kind of become the vehicle by which that is all done.”

— State workforce board staff

Respondents from a few boards noted that their staff were often stretched thin because of the extensive coordination required with board members from many agencies and businesses across the state. Some board staff managed operations for more than one state-level board at a time, acting as staff for the state workforce development board as well as for other interagency boards and committees in the state. One state board staff member explained that it was difficult for the board to

¹⁴ Another report from the study discusses states’ experiences with AJC operator procurement, certification, and infrastructure funding in more detail.

function as a central workforce “hub” for the whole state because there were so many workforce programs in it, each with its own unique needs for coordinating with other partners, and only limited board level staff to support coordination with those program.

State board respondents also suggested that having sufficient staff dedicated to the operations of the board itself was critical for keeping board members engaged and for maintaining progress toward board objectives. A few state board staff respondents noted that changes to the composition of the state board under WIOA necessitated more staff in order to acquaint new members with the features and expectations of WIOA. This was particularly relevant, although certainly not exclusive to, states that had a new governor and subsequent turnover in leadership across agencies.

4. Promising strategies for state boards

State respondents pointed to four main contributing factors that they believed helped to strengthen their structures and processes, and make their boards more effective: (a) connections to the governor’s office, (b) the hiring of WIOA implementation managers, (c) strategy-focused board committees, and (d) improving economic data.

a. Connections to the governor’s office

A number of states reported that their governor, who is a required member of the state board, played a key role in increasing engagement in state workforce board activities and helping convene the core WIOA partners. In six states, the state workforce board was administratively housed within the governor’s office or directly reported to the governor. These states reported that having a direct channel to the governor gave board staff better insight into the state-level policy approaches that affect workforce development. This connection was reported to also give board staff better leverage over partners to encourage relevant agencies to attend and engage in board meetings, and then to obtain their buy-in on board decisions. Staff in some states noted that a stronger relationship with, and backing from, the governor had a positive influence on the alignment of board activities with the governor’s agenda and coordination across state agencies.

b. WIOA implementation managers

Three states appointed a dedicated WIOA implementation manager to facilitate collaboration across core programs and with the board for the purposes of state planning as well as ongoing strategy development and execution. In these states, newly added partners on the board credited the WIOA implementation manager with bringing them to the table and in contributing to their satisfaction with the collaborative process for developing a strategy with other members of the board.

c. Strategy-focused board committees

Although not mandated by WIOA, but allowed under WIA, the use of targeted committees was cited by a majority of states in the study (10 of 14) as a strong factor in board effectiveness. According to respondents, such committees allowed partners to collaborate more effectively and encouraged greater engagement, in part because of the smaller group size. As one respondent noted, “The committees are where the real work happens.”

- **States reported a wide range of committees targeted to strategic initiatives.** The most frequently mentioned committees were those for apprenticeship, youth, and career pathways. AEFLA and VR partners indicated that participation on these committees was one of the primary ways in which they engaged actively with other workforce partners. Also, AEFLA and VR partners were more likely to hold positions of leadership on committees which concerned services that targeted the students and/or consumers of AEFLA and VR. For example, across all visited states, AEFLA partners described holding leadership roles on committees focused on adult learners, career pathways, and credential attainment. Similarly, VR partners held leadership roles on disability, job seeker services, and, in one state, the one-stop operator committee. Even where AEFLA and VR partners did not serve in a leadership role, they frequently had a role on committees where they have a shared strategic stake in policy and service delivery. These included business services, youth services, career pathways, special populations and those with barriers to employment (for example, justice-involved individuals and people with disabilities), apprenticeship, and literacy.

Colorado described the organic creation of a job seeker services alignment committee as a result of cross-training efforts in the state. The committee looked across the system and facilitated conversations in local areas to explore how to make referrals across partners more consistent. Eventually they began working on a matrix-oriented triage form that could be used to effectively direct any visitor at any AJC in the state to the most appropriate program.

- **States recommended appointing business representatives to chair committees or having a mix of public and private sector representatives in chair and vice chair teams.** Business representatives seemed more likely to contribute to, and feel more comfortable in, committees where there were fewer individuals and they could “dig in” to the substance better than with a full board. States also recommended including representatives on committees that are not agency heads or that are not official members of the board; this allows more flexibility for determining the most appropriate individuals for a particular committee.

5. Improving economic data

“We’re trying to be proactive to answer some of the questions that the companies might be asking, especially if they are thinking of locating, relocating, or building. While we are not where we want to be, we are in a better position to be able to provide information ... to the folks who have or are a part of that structure of getting new companies to locate -companies that are there to grow- and help them to fill their needs.”

— State board chair

A number of boards noted the importance of developing more locally-relevant labor market data in order to have timely information to understand labor market dynamics that would make the workforce system more responsive to sudden or anticipated economic changes. One state noted that the federal performance indicators are useful but do not tell the full story, especially from the perspective of industry. In order to have

the tools to frame strategy and priorities for the workforce system, boards expressed a need to understand more about the labor market as well as the gaps in skills across industries and the state, and how to fill those gaps. One state board reported that many of their partners, including AEFLA and VR programs, needed more accurate data on jobs and skills requirements that were not typically available to them. Many boards rely on their Title I and ES partners, who usually have staff within their agency dedicated to collecting labor market and economic data.

For example, Florida’s state board commissioned a new survey of 50,000 employers in the state, in order to have better information on jobs and workers. The resulting data has been heavily utilized by their education partners. New Jersey’s state board identified state LMI staff to serve as experts in particular industries under its “Talent Network” initiative. Experts support sector strategies in key industries identified by the board, and identify the credentials that are best suited for the career pathways strategies being developed within each Talent Network industry.

B. Local workforce development boards

WIOA made similar changes to the requirements for the composition of local workforce boards, including representation for AEFLA and VR programs, as well as registered apprenticeship. WIOA maintained the requirement that a majority of the board membership be made up of business representatives, and that the chair of the board be selected from those business members. Local workforce boards were no longer required to have Youth Councils, although they were encouraged to form youth standing committees to guide services and programming for youth.¹⁵ WIOA also removed the requirement for all AJC partners to be represented on the local board. Local board staff and members reported that while WIOA made modest changes to how the local boards are structured or operate, it did help motivate them to have a more strategic focus and also to expand connections to partners. Local board staff and members mentioned four areas in which they saw progress: (1) board member engagement, (2) a more strategic board, (3) development of career pathways, and (4) greater focus on individuals with barriers.

1. Efforts to improve board member engagement

Local board members in one-third of the local areas visited (in states that are not single-state workforce areas) reported that their board became smaller after WIOA and this helped improve member engagement. Among the other local areas visited, the boards tended to be large and to include representatives of many community organizations, and sometimes had multiple representatives from the same organization but different geographic areas. However, many respondents noted that boards with large numbers of members often find it difficult to have meaningful discussions, and many members often miss meetings. A couple of board staff reported efforts to address these problems. Staff for one board reported they analyzed the board membership to identify duplication across represented programs that they could target to reduce the number of members on the board. Another board reduced the frequency of meetings of the full board to once per quarter, served breakfast, and featured board partnerships at every meeting to encourage more collaboration across the board. They also reduced the frequency of committee meetings to six meetings per year.

2. More strategic boards

A majority of the local areas visited reported that their boards have also become more focused on strategy in the years following WIOA rather than concentrating on performance, and this has helped encourage more participation from board members, especially businesses. As the local areas engaged in more targeted strategies, partners

“I think we’ve done a very good job engaging the board members, and also focusing on what we can do in and out of meetings for those board members to really understand what it is we’re doing, why we’re putting these policies in place, what the goal of the individual committees are, how the board can help the office, how the office can help the board.”

— Local workforce board staff

¹⁵ The elimination of the Youth Council requirement is discussed in another report in the series, *Operationalizing Changes to the Title I Youth Program Under WIOA*.

reported that business members of the board felt more purposeful in the ways they could engage and contribute to the work of the board.¹⁶ One local board noted that having a state Title I representative sit in on board meetings as a nonvoting member has been very helpful, as this representative can help explain state guidance and answer questions from board members. Boards also noted that community partners, such as the local chamber of commerce and local economic development agencies, are useful resources for the board, as they bring a strong understanding of business needs and convening power among businesses, as well as knowledge of government initiatives and economic trends in the local area. As with state boards, committees were a critical avenue for making progress at the local level, enabling more meaningful conversations and better understanding of partners' roles. Board members also reported that under WIOA the structure and guidance for the board was clearer than before.

3. Development of career pathways

A new key function of local boards (from the WIOA statute) is to “lead efforts in the local area to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services that are needed by adults and youth, particularly individuals with barriers to employment.”¹⁷ Each of the local areas visited had community college or career technical education representatives on their boards, and local board respondents generally credited WIOA for encouraging them to strengthen the connections between employment services and the education system to improve career pathways. Local board respondents also noted that employers are increasingly looking for more skilled workers, as the older generation of workers ages out of the workforce. To address this need, local areas are seeking to leverage the education system as a central part of the solution, including locating AJC services on community college campuses and building replicable models for career pathways. Community colleges have also benefited from WIOA's inclusion of core programs, noting that the increased coordination with partners through local boards has opened potential funding sources for them and given colleges better information on where partnerships are possible. One local area noted that having the workforce board review AEFLA grant applications had fostered better relationships and forced partners to work together where they traditionally had not.

4. Focus on individuals with barriers

A few local boards reported focusing on WIOA's goal of increasing access to individuals with barriers. To operationalize this focus, one local area formed a “barriers” committee specifically to create strategies and coordinate agencies around serving individuals with barriers. This committee focused on informing committee members about the nuances of being a person with a specific barrier and educating the board on the organizations that serve these individuals. Other board members on this committee who represented local programs reported that these meetings were very informative and generated ideas on how to connect to the organizations serving these populations to improve outcomes in the workforce system. However, one local area board member noted that the change in WIOA requirements resulted in there being fewer community-based organizations on their board, and these organizations were often conduits to serving individuals with barriers. These organizations can be important sources of referrals as well as critical avenues for informing the public about workforce programs.

¹⁶ Business representatives on local boards were not interviewed for the study unless they were the chair of the board.

¹⁷ WIOA Section 107(d).

III. Coordination between core partners at the state level in transitioning to WIOA

Study respondents reported that state-level coordination between core partners frequently occurs through two mechanisms: (1) partner representation on the state board and (2) interagency coordinating committees that have formed to operationalize both the planning and implementation of WIOA. Under WIOA, each of the core agencies must be represented on the state board; in most cases, this translated to the lead officials of each partner agency engaging regularly on shared issues and communicating parallel messaging through their respective agencies. AEFLA and VR leadership in several states noted that they felt more incorporated into the workforce system and that their role on the board enabled them to advocate more effectively for their students and consumers. States generally reported increased opportunities for collaboration on state planning, policy, coordinated guidance, and industry engagement. With that said, participation of AEFLA and VR leadership on the state board or in coordinating committees was not universal. Where participation was lacking, states reported that coordination among the core programs was inhibited.

A. Challenges in collaborating across agencies

State respondents discussed barriers to collaboration on WIOA implementation, including lack of core partner representation, communication challenges, different interpretations of federal guidance, differences in structures across agencies, and staff turnover.

1. Lack of core partner representation

Under WIOA, each core program must have representation on the state board. This position is typically filled by the lead of the agency that administers the program. However, some states may have multiple core programs administered within the same agency. For example, VR may be

“We have a lot of great ideas at the state level, but still it has to be implemented at a local area. Being able to influence that is sometimes not as successful as you might think.”

— State Title I staff

nested under a state department of human services, which also oversees other required partner programs such as TANF. In some cases, the legislation allows a single official to represent multiple programs, as is the case for Title I and ES programs. However, the legislation specifies that AEFLA and VR programs must be represented separately.¹⁸ This difference in the treatment of representation for the core programs appears to have been a source of confusion for a handful of states in the study, whose respondents reported that AEFLA and VR were not well represented in the state board. VR staff in a handful of states reported that VR was represented by the lead of a state umbrella agency. Additionally, AEFLA staff in two states reported that AEFLA had no meaningful representation on the state board. As might be expected, leadership from the VR and AEFLA programs said that their absence from the state board

¹⁸ DOL added several provisions (20 CFR 679.110(b)(3)(iii)(A)(1)(i) through (iii)) to clarify that, for Title I and ES programs, a single lead state official with primary responsibility for those programs may represent more than one of those programs. The preamble continues and explains that AEFLA and VR programs must have a single unique representative. Additionally, the regulations require that the individuals representing the core programs, including the VR and AE have “optimum policy-making authority.” (20 CFR 679.110(e)). The regulation states that a representative with “optimum policy-making authority” is an individual who can reasonably be expected to speak affirmatively on behalf of the entity he or she represents and to commit that entity to a chosen course of action (20 CFR 679.120(a)).

inhibited coordination and partnership efforts, such as preventing state agencies from issuing joint guidance directives to local boards.

2. Communication challenges across state agencies

Numerous respondents described situations where partner agencies struggled to communicate because of differences in terminology, definition, interpretations of key concepts related to plan development, and service implementation. This was particularly true for VR staff, who are accustomed to using medical terminology that has different meanings in workforce programs, such as “assessment.” In many of the states visited for this study, partner agencies have historically provided direct services independent of other core partners and conducted their own strategic planning in relative isolation. As agencies began to coordinate around some of the more contentious plan elements, respondents in several states reported that they lacked cross-agency fluency. Operating in tandem, but with differences in terminology, several state agencies reported competing perspectives on the key challenges and corresponding solutions that the workforce system should prioritize.

3. Different interpretations of federal guidance

Other frequently cited hindrances to coordination between partners during state plan development were differences in interpretation of federal guidance issued jointly by the Department of Labor and Department of Education. Under WIOA, these two key federal agencies issued joint guidance using the same language under different standard guidance documents.¹⁹ However, several states noted that communication with federal project officers or other federal staff led them to differing interpretations on the meaning of formal guidance letters.

“Are we customers, are we clients? Is the employer the customer? It depends who you're asking.... A simple word like ‘assessment’; assessment for [Title I] are career assessments, tests. Assessments for us are medical assessments, things from the doctor. They're asking, ‘Can I see your assessments on this client?’ We're saying, ‘No, you don't have release to see this information....’ Things like that [get interpreted as] being difficult.”

— State VR staff

These differing interpretations appeared to be particularly common around the more contentious elements under WIOA (for example, cost sharing, infrastructure funding agreements [IFAs], memoranda of understanding [MOUs], and co-location). When such discrepancies occurred, state agencies typically declined to consider solutions deemed outside the bounds of their federal reporting agency. One example where this difference in interpretation was manifested was the use of skill assessments in one state. In this state, the AEFLA agency understood that federal guidance from OCTAE directed states to use the Test for Adult Basic Education for testing, whereas corresponding Title I core program partners viewed guidance from the Employment and Training Administration (ETA) as permitting flexibility on the use of assessments and preferred to deploy the Comprehensive Adult Student Assessment Systems test as the primary assessment tool. The use of both assessments would be both burdensome and duplicative for the agencies and the participants taking the two assessments.

¹⁹ DOL’s Training and Employment Guidance Letters may be accessed at https://wdr.doleta.gov/directives/All_WIOA_Related_Advisories.cfm; the Department of Education’s corresponding Technical Assistance Circulars may be accessed at <https://www2.ed.gov/policy/speced/guid/rsa/techassis-circular.html>. The first joint-guidance issue is dated August 13, 2015: 04-15 and TAC-15-01.

4. Differences in structure and local communication between agencies

The diversity in organizational structures, and how information is passed between state directors and local providers, repeatedly presented challenges to system coordination and collaboration. ES and VR are administered by top-down agencies with state-level control over local and regional service delivery. By contrast, program funding for AEFLA is primarily passed to various local and often geographically overlapping schools and agencies. For example, in two states the AEFLA administrators indicated that one of the challenges to working effectively with other workforce partners at the state level was simply that, as administrators for AEFLA, they did not always know what challenges existed for schools at the local level.

5. High staff turnover

Several states experienced a high amount of state agency staff turnover, particularly as new administrations came into office. This resulted in delays to collaboration on the development of policy, drafting of the state plan, and issuance of guidance. As one respondent noted, “So many of us were new, we were just trying to figure out what WIOA was.”

B. Strategies for collaboration across core partners

While WIOA presented many coordination challenges for core program partners, program staff focused much of their early collaborative efforts building interagency communication at the state level and developing opportunities for learning and unified customer engagement at the regional and local level. The degree of progress toward collaboration varied significantly across states, but broad advances were made in several areas. Chapter IV details additional strategies for collaboration around state plans.

1. Departmental organization of core partner agencies

Coordination is often easier and barriers reduced or eliminated between partner agencies when they are located within the same umbrella agency. This structure has enabled some states to collaborate in innovative ways. In Colorado, the Title I core programs, ES, and AEFLA programs have developed a shared staffing model where each contributes a percentage toward the salaries of cross-agency service staff. The state is directing adult education funding toward training these individuals on a shared career advising model, which ultimately supports the service needs across all three agencies.

In Texas, the VR program is implementing a statewide, structured pre-employment transition services (pre-ETS) model that requires every workforce board to identify a work experience opportunity for enrolled youth with disabilities progressing through VR’s pre-ETS services.

2. Ongoing communication between core agencies

Most states spoke about the benefit of ongoing communication between core agencies following the development of the state plan. Some of the workgroups that formed during plan development transitioned into WIOA implementation workgroups, with many of the same individuals representing core agencies participating in both. These implementation groups function as alternative parallel channels (alongside the state board) for communication and coordination between agencies.

3. Education and training opportunities

Respondents across all states described opportunities for cross-training of statewide staff occurring in a variety of capacities and at multiple levels—from state leadership to local frontline service staff. For example, in one state the Title I agency hosts two yearly conferences: one focuses on workforce concepts and information sharing and the other focuses on operationalizing strategic workforce goals. These conferences are attended by a cross-section of workforce personnel. In most states, training topics focused on effective service delivery strategies.

C. Supporting WIOA-related collaboration at the local level

The work to implement WIOA happened through partner engagement on boards, committees, and other advisory bodies (such as Governor-appointed councils), as well as the dissemination of policy guidance and information to the local boards. The methods used by state agencies to communicate to local areas varied widely across states. For instance, a few states were developing new or updated public-facing dashboards or other online data portals where local partner agencies could easily access state guidance along with LMI and results on performance delivery and outcomes across core partner agencies. The development of these portals involved collaboration by state representatives from several core partners.

Several states provided statewide trainings on agency services and state initiatives that cut across multiple partners. For example, in several states, VR respondents spoke about providing disability awareness and etiquette training to Title I and ES staff operating within AJCs, as well as other required partner staff, such as TANF and Jobs for Veterans State Grants (JVSG), where they existed. One state developed an online training module to make training more accessible (see box).

Other strategies for communicating information focused on dissemination of documents, templates, roadmaps, and training materials that could be shared across partner agencies. One state AEFLA agency described providing a weekly newsletter as a mechanism for keeping local service providers up to date with state-level guidance on WIOA implementation requirements and strategies for partnering locally with other agencies.

Virginia developed online training modules that would be accessible to all state and local staff across all core partners. The online modules were supplemented by an initial in-person “foundation” training to ground participants in the general principles of WIOA implementation. The training modules focus on state initiatives, such as sector strategies and career pathways.

IV. The development of strategic state plans

The purpose of state plans under WIOA is to communicate a vision for the state’s workforce system and serve as a vehicle for aligning and integrating this system across federal programs.²⁰ Under WIOA, states must submit either a Unified State Plan or a Combined State Plan. Both plans include the core partner programs, but a Combined State Plan also includes at least one additional partner as specified in Section 103 of WIOA.

Most state respondents indicated that the planning process and ultimately state plans themselves tended to be more strategic than under WIA. Respondents in several states attributed this to factors at play in the state that coincided, but were largely unrelated, to WIOA. Many others indicated that because state plans now “belong” to all core partners and not just Title I programs—because WIOA compelled the core partners to provide input and participate in the planning process—the state plan ultimately benefited from these additional perspectives.

A. Changes in state plans from WIA to WIOA

Exactly half the study states had developed a unified plan and half a combined plan (Exhibit IV.1). Among the states that submitted combined plans, the most common partners included JVSG, Trade Adjustment Assistance, the Senior Community Service Employment Program, and TANF. In general, the states that opted to pursue a combined plan perceived it as a potentially more challenging undertaking, since it required the inclusion of at least one partner beyond the six core programs. However, these states felt that the inclusive approach would better reflect the intent of WIOA and result in a more integrated workforce system.

Exhibit IV.1. Types of state plans

	Study states	All states and territories
Unified plan	7	27
Combined plan	7	30

Source: Site visits and state plans.

States are required to revisit and update their state plan every four years. Additionally, whenever changes occur, and at least every two years, states must submit a modification to the four-year plan.

(20 CFR 676.135)

Regardless of whether states pursued combined or unified plans, respondents noted that there were a number of changes to state plans under WIOA. Several state respondents spoke to a sense of stepping into unfamiliar territory with the new planning processes and partners called for under WIOA. The most significant changes in plans from WIA to WIOA cited by respondents were

those related to the inclusion of AEFLA and VR in the primary indicators of performance, which all core partners are required to report on, followed by the integration of partner agencies in the plan itself as well as in the process of plan development.

Other notable changes related to state plans included:

- **Increases in work-based learning and career pathways strategies.** State board and program staff described a renewed focus on work-based learning and, to a lesser extent, career pathways. Notably, respondents in several states indicated that career pathways were an existing initiative under WIA and that WIOA presented an opportunity to reassess progress. State respondents also described efforts to

²⁰ 20 CFR 676.100.

specifically address services to target populations, such as youth, justice-involved individuals, and people with barriers to employment.

- **Focus on sector strategies based on LMI data.** Respondents indicated that state plans delineated strategies that addressed both industry needs and the needs of the workforce. For example, in one state, the costs of child care were having a noticeable impact on employers' ability to find and retain qualified workers, and workers' ability to find and bear the costs of child care when they go to work. Workforce agencies targeted this issue in particular to promote partnership with other state initiatives focused on the issue, such as child care supports and early childhood education.
- **Increased engagement of employers, community members, and local elected officials.** In a few states, agencies sought to gather public input from communities served by all core programs, not just the Title I programs. One state agency discussed the importance of having a more direct level of engagement with community stakeholders and local elected officials as they developed the WIOA plan, rather than relying on partner agencies to represent the interests of all workforce customers.
- **Leveraging funding across partners.** At the same time WIOA was coming into effect, several states reported that they were experiencing declining Title I program formula funding. Reductions in formula funding led Title I staff to rely on partners with differing funding streams to determine the focus and composition of state plans. One respondent commented that this reliance inadvertently reinforced the intent of WIOA to encourage collaboration between core partners.

“Under WIA, we had basically a Title I and III plan. Under WIOA, the... combined plan required us to involve others. WIOA is night/day from WIA.”

— State Title I staff

B. Involvement of AEFLA and VR partners in plan development

One of the most notable differences across states in the process of developing the state plans after WIOA was the involvement of AEFLA and VR programs. In half the states visited, staff from one or both programs had already been involved in plan development under WIA and did not perceive WIOA to be a significant change in the process. This was particularly true where these programs were housed under the same umbrella agency as Title I and ES.

“[The WIOA planning process] felt more that you were involved from the ground up, and it felt more as though you had the opportunity to weigh in and change and influence the outcome.”

— State Title I staff Sidebar Head

In many of the remaining states, AEFLA and VR respondents described an increase in involvement in plan development compared to under WIA, and viewed their inclusion as an indication of their agency's greater importance in the workforce system. They still drafted language for discrete

sections of the state plan focused on their respective programs, although there were cases where AEFLA and VR staff reviewed draft language developed by a lead author housed under the Title I agency or other third-party entity (such as the governor's office).

1. Benefits of collaborative planning

The process of core program staff working in coordination to develop the state plan was described by some respondents as opening the door for new opportunities. A frequent sentiment across all states and partner agencies was that coordinated efforts had begun to break down historic silos. Some of the benefits mentioned were:

- **Message alignment.** A coordinated drafting process allowed partners to receive shared feedback and align messaging, while also enabling everyone to be on the same page when drafting the plan.
- **Input from new partners.** The new level of involvement was said to give voice to agencies that did not have a say in the process previously, bringing interests of their clients to bear on the planning process, and elevating their stature in the state workforce board. One respondent also suggested that this increased level of collaboration would have positive down-river impacts on smaller partner entities such as community-based organizations whose customers were also connected to the greater workforce system.
- **Development of relationships over time.** Biannual requirements under WIOA to revisit the planning process collectively gave partners the opportunity to develop relationships over time and address big challenges incrementally. Many states retained the committees initially formed to develop the first state plan, even if those were relatively dormant in between planning phases. At the time of site visits in early 2019, numerous respondents indicated that planning committee meetings were preparing to ramp up ahead of 2020 plan development.

2. Strategies to develop plans that reflect all partners

Several states employed strategies to engage the core partners and ensure that the state plans reflected an alignment of priorities across the programs. These included interagency workgroups, cross-partner reviews of plans, coordination of resources for planning, and the use of consultants.

- **Formal collaboration through interagency workgroups.** Board members and staff in several states described a process where, early in the planning phase, the board formed interagency subcommittees and working groups comprised of staff from the core programs to develop language or recommendations around key focus areas (such as youth services, sector strategies, career pathways, and so on). The purpose of these groups was to develop high-level vision and policy guidance, draft language on collaborative state plan sections, and allow partners to review or edit draft language developed by other partner agencies. The interagency groups frequently served other objectives as well: driving the strategic planning process, allowing partners to familiarize themselves with other agencies, and providing opportunities for them to build rapport and break down silos between different programs. Workforce system respondents noted the establishment of the interagency committees and work groups enabled AEFLA and VR representatives to more readily contribute to the development of the state plan. AEFLA and VR representatives also reported leading discussions and drafting specific initiatives (for example, youth) within these committees.
- **Developing trust through cross-partner reviews of plans.** Another strategy frequently employed by states was to have members of interagency workgroups review and provide feedback on early drafts of plan sections they did not write. AEFLA and VR respondents from several states felt both appreciation and increased trust when given the opportunity to provide critical feedback. At least one respondent also indicated that such an exercise afforded them an additional avenue to advocate for their consumers and agency partners, which they viewed as an essential role for their agency.

In some states, core partners other than Title I and ES were limited to drafting plan sections for their respective programs. In at least two states where this approach was taken, those partners described their involvement in the planning process and representation in the plan itself as superficial. Notably, this opinion contradicted that of the Title I and III agency staff who led plan development and described processes as inclusive of partner agencies.

- **Coordination of resources to smooth transition to WIOA.** In addition to the approaches described previously, respondents in a few of the visited states described strategies to ensure state plans that not only took into consideration the perspectives of the core partners and other key stakeholders, but also various coordination challenges related to timing, resource shortfalls, and staffing. For example, board staff in one state described the development of a “bridge plan” to assist state policy staff to ease the transition from WIA to WIOA. Before much of the planning effort took place, board staff conducted an asset-mapping exercise, held conversations with state level partners and local board directors, and developed a set of recommendations so that board members had a shared understanding of what the first WIOA plan would build upon.
- **Use of consultants in the development and drafting of the plan.** To work through some of the anticipated challenges of bringing new partners into the planning process, a handful of state boards hired external consultants to assist with partner coordination, negotiation, or drafting of the state plan. The purpose for bringing in a consultant varied. In some instances, consultants drafted sections of the state plan that were subsequently integrated into the final product, while in other instances consultants facilitated core partner meetings to help partner staff familiarize themselves with the expectations and requirements of WIOA. In at least two states, the Title I agency hired consultants to collect data at the regional and local level that was subsequently used to develop the state plan. In a third state, the state agency used consultants to facilitate workshop trainings for the core partners to formulate a shared vision for WIOA, which could then guide subsequent plan development. Another state struggled with the early coordination requirements of WIOA and brought in a consultant to do all these things, including engage core partner agencies individually, collect data, and ultimately draft the state plan. In most states that used consultants, respondents indicated that the consultants were viewed as neutral third parties and thus were well positioned to facilitate planning meetings between core partners or lead information-gathering activities, such as focus groups, surveys, and interviews that could then be used to inform plan development. Additionally, several states noted the need and benefit of having the subject matter expertise of outside consultants to help with drafting sections of state or local plans, particularly during periods of high staff turnover, such as with a change of administration in the governor’s office.

C. Common challenges in developing plans

State respondents reported several challenges to the development of state plans, as well as logistical challenges to completing and submitting plans by the federal deadline.

1. Delayed federal guidance

A near universal frustration among state respondents was the short timeline between when final federal guidance was released and when plans were due. Partner agencies often have established processes and approval procedures for collecting public feedback, involving key agency personnel in the drafting of language and approval bodies that convene at scheduled intervals. States often found that they did not have enough time to coordinate these steps across multiple partner agencies. As one respondent noted, “There [are] 24 boards, their board meetings are scattered. They have got to get the plan signed by their executive director and the chief public official. If, for some reason, the chief public official is not at the board meeting they have to wait until they can have that person sworn in to sign the thing. Then put it out for public comment for 30 days.... [I]f you only have 60 to 90 days to do all of that, it's hard to make all of that happen in a reasonable amount of time.”

Additionally, in all single-area states visited, respondents expressed frustration with the lack of relevant guidance for them to plan effectively. For example, one state discussed receiving initial guidance that they needed to develop local and regional area plans, and then several weeks later, after engaging substantively with stakeholders in various parts of the state, DOL provided alternative guidance that local planning was not required for single-area states. Respondents noted it would be helpful to have clear guidance customized for the unique circumstances of single-area states.

“We did the bare minimum public input for the first plan, just given the timeframe with the guidance coming out.”

— State board staff

As an exception to this trend, AEFLA staff in one of the visited states organized a statewide effort to collect public input by working with their local area grantees. Local partners were tasked with synthesizing the input and communicating it to state staff. This input was subsequently incorporated into the first WIOA plan.

2. Difficulty with plan format and using submission portal

A significant challenge for state staff in nearly all states was the difficulty coordinating and uploading the state plan to the submission portal.²¹ Respondents indicated there were several issues:

- **Compromised readability of the plan.** Several respondents indicated that the format of the plan portal couched the exercise in a compliance framework and inhibited efforts for partners to innovate around shared challenges. Respondents also lamented that the final product yielded a document that was less readable for employers and other entities who typically access the plan.
- **Inability to leverage other state planning.** In several states, workforce agencies and partner agencies draft parallel strategic plans based on the existing state legislative or executive priorities. Historically, workforce agencies under WIA could translate language from these plans toward federal workforce plans. Under WIOA, some states reported they were unable to translate work conducted under other planning processes to WIOA because of the rigid format of the submission portal.
- **Logistical challenges.** Respondents in several states described the need to take steps to address version control, which included maintaining a single representative who was empowered to load section responses into the system. This created a bottleneck effect, particularly as states struggled to meet the deadline for submitting the plan. Further, this single submitter was almost always a representative from the lead agency charged with drafting the plan (typically Title I staff) and rarely had sufficient knowledge of other partner programs to accurately interpret and, where needed, make final editorial adjustments to language developed by another partner agency. One state described a strategy to bypass this version-control challenge by having several state board staff working together at the same time to load plan sections in the portal and reaching out to core partner representatives on the board to make last-minute adjustments to language.
- **Lack of visuals.** A common frustration cited by respondents was the inability to incorporate charts, graphs, and other supplementary visual data into the portal. As a VR respondent in one state explained, these portal restrictions were due to the requirements of Section 508 of the Rehabilitation Act for information to be presented in an accessible format for disabled individuals. In nearly every

²¹ The Department of Education created a “state plan portal” for use by the WIOA partners for submitting Unified and Combined State Plans. It was designed to help states submit plans that would be accessible, consistently formatted, and comparable with other state plans. The portal was updated for the 2020 plan cycle.

state that cited this issue, respondents indicated that the portal's inability to accept these data led to significant delays as staff scrambled to edit graphical content or develop alternative text that would communicate the information accurately.

V. Development of local plans

The process local boards followed for drafting local plans took one of two forms: (1) one partner took primary responsibility for developing the local plan and partners reviewed the plan or (2) partners worked together to develop the vision for the plan with one or more partners responsible for drafting the text of the plan. Approaches for developing local plans most often stemmed from state guidance and often mirrored the process for developing state plans. This was also the case in the four states visited for the early implementation phase of the study in 2017.²²

As described earlier, WIOA called for unified and integrated planning at the state, regional, and local levels, particularly across the core programs. This chapter describes challenges local boards faced implementing WIOA's local planning requirements, and then identifies strategies used to support the local planning process.

A. Challenges for local workforce planning

Similar to the challenges in planning at the state level, respondents across the local areas pointed to a few key factors that limited core partner involvement in the WIOA local planning process. These factors also affected their ability to develop innovative and strategic local plans.

- **Different structures and programmatic requirements for VR and AEFLA.** As state and local respondents across core programs highlighted, the different structures and programmatic requirements for both VR and AEFLA created barriers to engaging in strategic local workforce planning. Because VR is operated at the state level and employs state staff, relevant planning occurs at the state level, making it both more difficult and redundant to participate in the local planning process. While AEFLA operates locally, AEFLA programs must submit applications to the state to receive funding. In practice, these applications function as local plans for the programs, making the WIOA local planning process duplicative for AEFLA partners. WIOA requires local boards to review AEFLA applications for alignment to the local plan, and local AEFLA staff to review and possibly contribute to local WIOA plans. This required connection between AEFLA programs and local boards represents a change from WIA. In some local areas, this connection informed a more strategic and coordinated local planning process, but in most cases local boards and AEFLA programs worked to comply with the mandate rather than engaging in strategic planning.
- **Perceptions that local plans are primarily compliance documents.** In four states, local boards solicited partner input on the plans but did not do so in a strategic or coordinated way. Rather, local board respondents described these efforts as more of a compliance check. Local board respondents from two states indicated that state guidance regarding the local planning process focused on ensuring compliance rather than promoting strategic planning. This led to local boards engaging partners only to the extent needed to meet compliance requirements. A local board in one state preferred to initiate its own local strategic planning process outside of WIOA and funded by foundation grants that convened the local board, city staff, county staff, and other partners.
- **Time pressures.** Local respondents highlighted that the local planning process was one of many competing WIOA implementation priorities. As these respondents described, deadlines for the local planning process, coupled with developing MOUs and infrastructure funding agreements with partners and conducting one-stop operator competitions, limited the extent to which the local

²² See companion report “*Early Insights from State Implementation of WIOA*”.

planning process could be both strategic and coordinated. Instead, local plans were often treated as compliance documents so that the local boards and partners could focus on implementing other time-sensitive WIOA mandates.

- Local board respondents from two states stressed that engaging in a meaningful and strategic local planning process required time; local respondents from one state noted that they had three weeks to complete a process that should take three months. State staff from two states also highlighted this tension and described local and state planning happened in tandem rather than sequentially. This limited the extent to which the state's visions for WIOA guided local-level strategic priorities. Additionally, the layers of approval required for local plans, including obtaining required signatures and receiving state approval for plans, created additional time pressures, given competing WIOA responsibilities and priorities. Local respondents from one state indicated that regional planning also occurred simultaneously, which limited the extent to which the regional and local plans could align and reinforce one another. Recognizing this challenge, the state board submitted a request to extend the local plans for one year to allow the state to continue to engage the local boards in the state planning process.
- **Delayed or insufficient federal and state guidance.** Respondents from three states pointed to delays in federal and/or state guidance in limiting the extent to which partners contributed to local planning. In two of these states, respondents pointed to delays in federal guidance on the local planning process as creating frustration among partner programs that made it difficult to engage them in the local planning process. Local respondents from one state noted that the guidance issued by the state came out in a piecemeal fashion and corrections were often issued, which created more confusion in the process. Consequently, respondents from this local board described doing their own research to see how other states and local boards were approaching local planning. The third state was slow to issue guidance regarding how the local planning process should support the strategic state planning process.

B. Strategies for coordinated local planning

Board members and staff in about half the local areas included in the site visits said that, under WIOA, local planning processes were more coordinated and strategic than they had been under WIA. Respondents in these local areas identified a number of factors that enabled a more coordinated and strategic local planning process.

- **Importance of state leadership and vision.** Local respondents highlighted that state board and workforce agency leadership played an important role in setting the stage for engaging in a more strategic and coordinated local planning process. A few state boards set the stage for strategic local planning by bringing together local boards and partners early in the WIOA implementation process. Early gatherings of local board directors, as well as AEFLA and VR partners, provided opportunities for local stakeholders to provide input on the local planning process. Further, these opportunities allowed local board staff to gain a sense of what the local planning process would look like prior to the issuance of formal state guidance. Colorado, for example, held a WIOA summit that engaged local board and partner staff. During the summit, the state provided guidance on the local planning process and how partner staff should be engaged in and contribute to the local planning process. Most states developed templates for use by local boards when developing local plans. Templates were coupled with state-issued guidance on the local planning process.

Local respondents in two states reported that efforts by the state workforce agency to engage AEFLA and VR partners in support of the local planning process allowed local boards to engage in more strategic and coordinated local planning efforts. For instance, in one state, the state workforce agency issued extensive guidance to support the local planning process, including providing clear guidance regarding partner involvement. Additionally, state AEFLA staff encouraged AEFLA providers to actively contribute to the local planning process. This work by the state helped set the stage for a more coordinated process at the local level. Local respondents from another state also stressed that state processes supported their efforts to engage partners in the local planning process.

- **Formalizing strong preexisting partnerships.** In addition to strong support from state officials, a preexisting culture of collaboration in local areas helped to facilitate greater coordination in the local planning process. For instance, respondents from local areas in one state highlighted that their areas have always been collaborative, due in part to rural locations. So, while formal partner engagement increased under WIOA, the collaboration specified in their local plans reflected the existing cultures of the local areas. In this state, the plans ultimately did not reflect major changes from WIA, but the process itself was more collaborative, leading to more AEFLA and VR partner engagement and opportunities to cultivate new partnerships with non-core programs. WIOA presented an opportunity to formalize this culture of collaboration, laying the groundwork for continued strategic efforts at the local and regional levels. Similarly, respondents from a local area in one state highlighted that the local planning process formalized and strengthened existing partnerships.
- **Increased partner engagement.** Local area respondents from four states reported that under WIOA, the local planning process was one in which partner programs felt more invested, due to increased engagement by AEFLA and VR partners and in some cases TANF partners. In two of these states, AEFLA and VR partner programs provided input and support for the planning process but did not contribute to drafting the plans themselves. In the other two states, AEFLA and VR partner programs took responsibility for drafting major sections of the local plans.

Strong leadership from local board directors also played an important role in determining the extent to which AEFLA and VR partners, as well as other partners like TANF, were involved and engaged in the local planning process. Local area respondents from four states stressed that the leadership of the local board's director helped to ensure partner engagement in the local planning process. State board and program staff from these states also highlighted this dynamic and indicated that leadership played an important role in operationalizing WIOA's vision for a more strategic and coordinated planning process.

- **Reassessment of service delivery approach.** Local respondents in three states reported that they used the local planning process to reassess their service delivery approaches or to formalize preexisting efforts to shift service delivery approaches. For instance, in one state, the local board used the local planning process to reassess key features of its service delivery model and strategically engage and solicit input from partner programs, especially AEFLA and VR, to inform strategic efforts like career pathways and sector strategies. This local board hired a consultant to conduct focus groups with partners regarding their priorities, reviewed LMI to identify priorities for the local plan, and held partner convenings focused on key topics, such as sector strategies. This resulted in a planning process that engaged partners and helped to align with employer needs.

VI. Regional designations and planning across local workforce boards

WIOA required Governors to designate regions that include one or more local workforce areas. Although not required under WIA, some states did have regions under WIA. If a region includes more than one local area, the local workforce boards in the region are required under WIOA to jointly develop a regional plan and strategy based on regional LMI that aligns with their local plans as well as regional economic development efforts. If the region only has one local area within its boundaries, only a local plan is required. Designated regions are only required in states that have more than one local area across the state. Across the 11 states in the study that were not single-area states, most reported using existing boundaries to designate regions. While some state respondents found regional planning helpful, others found that regions were not always suitable for more rural areas of the state or where local areas did not share common industries or strategic interests.

A. Approaches to defining regional boundaries

Among the 11 multi-area states, only three states created regional boundaries under WIOA based on LMI or through input from local boards (Exhibit VI.1). Three states used previously established regions to designate WIOA regions to support the regional planning process. Two of these states had established regions under WIA and retained those same regions under WIOA. The third state used preexisting economic development regions, also used under WIA. The remaining five states designated existing individual local workforce areas as regions.

1. Motivation for single-local-area regions

State respondents offered a few key reasons for designating single local areas as regions:

- **Local areas already represented regions.** Respondents from three states indicated that from the state's perspective, local workforce areas already represent economic or labor market boundaries, based on the way that states' local areas are designated. In one of these states, the state convened a task force to determine if the state needed regions beyond its local areas and determined that most local areas aligned with the state's primary regions. Based on the task force recommendation, this state designated just one region that encompassed two local areas and represented a major metropolitan labor market.
- **Regions could diminish opportunities for collaboration.** Although local boards can conduct planning with other boards outside of their region, respondents from one state expressed concern that designating regions would limit opportunities for collaboration. Rather, representatives from the state workforce agency stressed that they wanted local boards to coordinate with other local boards that best met their strategic needs rather than those included in a designated region. This approach seemed to be working in practice, as representatives for both local boards in the state described cross-board efforts to promote sector strategies and career pathways.
- **Regions would add a layer of bureaucracy.** Respondents from one state pointed to additional bureaucracy associated with establishing regions as the primary driver for designating single local areas as regions.
- **Local board concerns about consolidation.** Another state's respondents highlighted a fear of local area consolidation as a reason for local resistance to regions. State respondents highlighted that they

focused their WIOA efforts on prioritizing other changes that would be less contentious and worrisome to local boards. The four visits conducted in 2017 also found that resistance at the local level, the timing of WIOA federal milestones, and limited resources kept states and local areas from utilizing the regional planning process in a meaningful way.

2. Approaches for developing multi-area regions

In states where the Governor assigned more than one local area to a region, the approach for designating regions and convening the regional planning process took different forms with varying levels of local board and partner engagement.

- Consulting local board directors.** Two states proactively engaged local board directors in the regional planning process. In one state, the local board directors attended a state-facilitated retreat to provide input on regional designation and the planning process. Local board directors from this state reported satisfaction with the regional designations and the resulting regional planning process and indicated that regions can help them better advance their workforce priorities by allowing them to take advantage of a larger pool of resources to support common goals. Further, local board directors in this state viewed regional planning as a better approach for engaging with other WIOA partners that operate at the state rather than local level. In the other state, local board directors consulted on the proposed regions. Based on that feedback, regions largely mirrored local areas, with only two regions—representing major metropolitan labor markets—consisting of more than one local area.
- Using LMI and other data.** One state worked closely with a local university to examine LMI, as well as transportation and commuting patterns within the state, and used the resulting analyses to establish its regions.
- Following existing region designations.** Three states used previously established regions to designate WIOA regions to support the regional planning process. Two of these states had established regions under WIA and retained those same regions under WIOA. The third state used preexisting economic development regions, also used under WIA, reporting a desire to align efforts with the work of the economic development agencies and a belief that regions were appropriate for advancing sector-focused efforts.

Exhibit VI.1. How study states designated regions

State approaches to designating WIOA regions	Number of states
Designated single local areas as regions	5
Used existing WIA regional boundaries	3
Collaborated with local boards to create regional boundaries	2
Used LMI to create regional boundaries	1
<i>No regions in state (single statewide workforce area)</i>	3

Source: Site visit interviews.

3. Challenges with regional boundaries

In practice, most states that designated regions that consisted of more than one local area did so to create regions that represented metropolitan labor markets. Local and state board directors and staff from the 11 states with multiple workforce areas typically felt that the regions “worked” but that the process resulted in less than ideal designations for several reasons. These included:

- **Cross-state labor markets.** Respondents from 4 of the 11 states noted that regions crossing state boundaries would better align with primary labor markets and better support strategic workforce development efforts. One local board participated in a formal cross-state regional partnership to meet the needs of job seekers and employers in the cross-state regional labor market. This partnership focused on advancing the workforce and economic development interests of a cross-state metropolitan area and pursued sector-focused efforts. Although WIOA allows for cross-state regions, the logistical challenges associated with designating the regions and then developing the associated plans prevented states from formally exploring this opportunity.²³
- **Unique situation for rural areas.** Local board staff stressed that regional planning would not meet or help advance the strategic interests of rural areas. According to these respondents, the large geographic dispersion of these areas made regional planning logistically difficult. Further, these respondents did not believe that they would benefit from working with urban or suburban areas with different workforce needs.
- **Misalignment of local area needs.** Two states expanded on the difficulties of identifying appropriate regions. Local board staff from one state that established regions comprised of multiple local areas noted that the designations resulted in regions that were too large to support a useful regional planning process. In this state, each region included local areas with different workforce needs, employers, and industries. As a result, defining a strategic regional vision proved challenging, limiting the extent to which the process could help advance strategic priorities and initiatives. Local board directors from another state also noted that the state's regional designations did not sufficiently take industry into account. Local areas within regions in the state did not share common industries and there were limited opportunities to engage in strategic regional planning.

4. Role of partners

In determining boundaries for regions, AEFLA and VR partners played a limited role. AEFLA and VR respondents from most states indicated that any involvement they had in the process for determining regions happened based on their individual level of engagement in the activities of state boards rather than through explicit partner engagements. Across states, these respondents noted that they provided input on the boundaries but that the boundaries had typically already been determined.

WIOA required that regions be comprised of one or more local areas; however, local area boundaries often do not align with service delivery areas for other core partner programs, as well as TANF. Consequently, core partner program staff tended to be minimally involved in the regional planning process. In cases when there was alignment, these respondents saw it as more of a coincidence based on natural economic regions existing in the state rather than as a purposeful effort to align regions to support strategic planning. One state closely coordinates its WIOA services with TANF services and, as a result, state board staff consulted with TANF directors to ensure the WIOA regions aligned with the state's counties as TANF is administered at the county level. Outside of TANF, partners in this state did not report being engaged in the process for designating regions.

B. Approaches to regional planning

Across the 11 multi-area states, the regional planning process was shaped by the extent to which states designated regions that consisted of more than one local workforce area.

²³ See WIOA Sec. 106(a)(C).

When states designated single local workforce areas as regions, local areas reported two approaches to regional planning:

1. **Integrating regional planning in the local planning process.** These states typically required local boards to integrate the required regional plan elements in their local plans. States embedded regional planning requirements in templates provided to support the local planning process. Local respondents then described completing the regional planning process as “checking a box.”
2. **Planning outside of regions.** Local boards often described efforts to work at the regional level to advance strategic priorities. Local boards from one state that did not establish multiarea regions described efforts to coordinate across local areas on business outreach. Other states, and in particular single workforce area states, conducted additional planning to coordinate service delivery and integration across local areas.

Respondents from the Southern New Jersey region described how WIOA regional planning brought local areas and partners together to support common priorities, including cross-training staff on regional activities. New Jersey’s geography and population density made regional rather than local planning particularly useful, as regions better represented labor markets and commuting patterns. Recognizing that many Southern New Jersey residents work in Philadelphia, the region engaged the Philadelphia Chamber of Commerce as a relevant regional stakeholder.

When states developed multi-area regions or used existing WIA regional boundaries that include multiple local areas, they took two approaches:

- **Funding to support the regional planning process.** Upon designating regions, three states provided funding in the form of grants to support the regional planning process. One state workforce agency issued regional planning grants upon request from regions. In the other two states, the state boards issued these grants to all regions to facilitate the regional planning process. In practice, this funding allowed the regions to hire consultants who then developed and wrote the regional plans with guidance from local boards included in the regions. Consistent with findings from early visits to four other states, funding to support the regional planning was often critical, given the lack of regional-level staff or infrastructure to support this work.
- **Engaging partners in regional planning.** Although AEFLA and VR partners at the state level typically played a limited role in defining WIOA regional boundaries, they were more involved in the regional planning process in states that established multi-area regions. In these states, AEFLA and VR partners through their involvement in the state boards had opportunities to contribute to regional planning guidance and to review and approve submitted regional plans. Although state representatives from these partners used their positions on state boards to influence the regional planning process, the resulting regional plans did not focus on convening core partners. Instead, plans focused on how local boards could work together to support industry needs and advance sector-focused efforts. In two states, WIOA regional planning formalized preexisting regional planning efforts.

Despite challenges associated with designating regions and establishing regional plans, both state and, in some cases, local level respondents reported that in the future regional planning could help advance workforce planning and priorities by better meeting the needs of industry. Site visits highlighted how under the right circumstances, regional planning could help advance strategic priorities. Respondents in three states—Colorado, New Jersey, and Pennsylvania—noted that the WIOA regional planning process was particularly impactful for some regions. In Colorado, state respondents highlighted that regionalism

prompted conversations among local areas regarding leveraging shared staff, allocating unused funds, and advancing sector partnerships. Pennsylvania respondents highlighted the efforts one region took to deeply engage in the local planning process and noted that resulting planning reflected the “love, time, and attention put into it.”

Site visits also highlighted that even when states and local areas did not designate multi-area regions, local boards were often thinking and working at the regional level to advance strategic priorities. In these instances, regional efforts were coming from the ground up to meet identified needs. For example, in Virginia, local boards worked together to conduct business outreach to ensure that industry needs were met and to minimize the number of programs and staff contacting employers. While WIOA may have not been the impetus for some of these regional efforts, site visit interviews revealed that key stakeholders recognized the need to work at a regional level to address certain workforce issues.

VII. Looking ahead

This report explored the experiences of a relatively small sample of 14 states and 28 local areas in implementing WIOA's governance and planning requirements, based on data collected through site visits that reflected the status of implementation at one point in time, i.e., in early 2019. While the experiences of the respondents are not broadly generalizable, they do provide examples of how states and localities implemented key WIOA requirements for governance and planning. As indicated by respondents, guidance issued by DOL informed their efforts, but the respondents also identified several areas where additional or enhanced guidance could prove helpful.

DOL has developed and provided a number of technical assistance products on unified and combined state plans, local area designation and regionalism, and strategic boards; all were made available on WorkforceGPS, including a toolkit on state and local workforce development boards.²⁴ In addition, DOL also released a resource for states and local areas that links to the guidance issued jointly by federal agencies in the workforce system.²⁵ The experiences of states and local areas in implementing WIOA's requirements for governance and planning, as described above, suggest several areas for additional technical assistance to further support implementation and help assure that the new requirements are met. These include:

1. Targeted training on managing state and local board sizes.

Although larger boards often benefit from the representation of more partners in the workforce system, which can be important for aligning priorities across the system, they can also be difficult to manage and keep all members engaged. Some state and local boards might benefit from additional technical assistance on how to take advantage of smaller committees and strategically gain input from relevant partners while still adequately representing the overall workforce system.

2. Technical assistance on engaging partners in local planning.

The differences in administrative structures across the core programs also present barriers to effective coordination and planning at the local levels. VR is operated at the state level and employs state staff, and relevant planning occurs at the state level, making it both more difficult and redundant to participate in the local planning process. While AEFLA operates locally, AEFLA programs must submit applications to the state to receive funding. Local areas might benefit from more information or technical assistance on how to engage partners effectively and empower local and regional representatives of core program agencies to participate in local strategic planning.

3. Cross training to improve understanding of terminology and guidance.

Different programs often use different terminology and interpretations of key concepts related to the workforce system and service delivery. These differences often were perceived to hamper communication and effective collaboration as reported during the site visits. Additional technical assistance or resources for cross-training to states and local areas may help improve communication across partners. This could

²⁴ See <https://ion.workforcegps.org/resources/2019/06/14/16/43/State-and-Local-Workforce-Development-Board-Resources>.

²⁵ See <https://ion.workforcegps.org/resources/2017/10/05/11/48/~link.aspx?id=020DBC950CD44F04A9400DCE63D29CD8&z=z>.

be especially important for VR partners, who often use medical terminology that has different meanings for other partners in the workforce system.

References

- U.S. Congress. “The Workforce Innovation and Opportunity Act.” Pub. L. 113-128, July 22, 2014. Available at <https://www.congress.gov/bill/113th-congress/house-bill/803/text>. Accessed November 8, 2019.
- U.S. Department of Education. Technical Assistance Circular (TAC) 15–01. “Vision for the One-Stop Delivery System under the Workforce Innovation and Opportunity Act (WIOA).” Washington, DC: U.S. Department of Education, Rehabilitation Services Administration, August 13, 2015. Available at <https://www2.ed.gov/policy/speced/guid/rsa/subregulatory/tac-15-01.pdf>.
- U.S. Department of Labor. Training and Employment Guidance Letter (TEGL) 4–15. “Vision for the One-Stop Delivery System Under the Workforce Innovation and Opportunity Act (WIOA).” Washington, DC: U.S. Department of Labor, Employment and Training Administration, August 13, 2015. Available at https://wdr.doleta.gov/directives/attach/TEGL/TEGL_04-15.pdf.
- 20 CFR § 679 (2017). Available at <https://www.govinfo.gov/app/details/CFR-2017-title20-vol4/CFR-2017-title20-vol4-part679>.
- 20 CFR § 676 (2017). Available at <https://www.govinfo.gov/app/details/CFR-2017-title20-vol4/CFR-2017-title20-vol4-part676>.

Appendix A:

WIOA Implementation Study Sites

Exhibit A.1. WIOA Implementation Study: Site visit states, regions, and local areas

State/Region		1	2	3	4	5	6	State workforce agency	Local workforce area	Local workforce board	American Job Center
1	New Jersey	✓						NJ Department of Labor and Workforce Development	Gloucester County	Gloucester County Workforce Development Board	Gloucester One-Stop Career Center
									Middlesex County	Middlesex County Workforce Development Board	New Brunswick One-Stop Career Center
2	Vermont		✓					Vermont Department of Labor	Single workforce area	Single workforce area	Burlington Career Resource Center
											Morrisville Career Resource Center
3	Pennsylvania		✓					Pennsylvania Department of Labor & Industry	Chester County	Chester County Workforce Development Board	PA CareerLink® Chester County
									Southern Alleghenies	Southern Alleghenies Workforce Development Board	PA CareerLink® Cambria County
4	Virginia			✓				Virginia Employment Commission	Hampton Roads	Hampton Roads Workforce Development Board	Virginia Career Works—Norfolk Center
									South Central	South Central Workforce Development Board	Virginia Career Works—South Boston
5	Florida			✓				Florida Department of Economic Opportunity	North Florida	CareerSource North Florida	Madison office
									Central Florida	CareerSource Central Florida	Orlando office
6	South Carolina				✓			South Carolina Department of Employment and Workforce	Pee Dee	Pee Dee Workforce Development Board	SC Works Pee Dee
									South Coast	Trident Workforce Development Board	SC Works Trident
7	Colorado				✓			Colorado Department of Labor & Employment	Weld County	Weld County Workforce Development Board	Employment Services of Weld County
									Pikes Peak	Pikes Peak Workforce Development Board	Pikes Peak Workforce Center
8	Oklahoma				✓			Oklahoma Office of Workforce Development	South Central	South Central Oklahoma Workforce Board	Lawton Workforce Center
									Southern	Southern Workforce Board	McAlester Workforce Center

Exhibit A.1 (continued)

		State workforce agency						Local workforce area	Local workforce board	American Job Center
State/Region	1	2	3	4	5	6				
9	Texas			✓			Texas Workforce Commission	Heart of Texas	Workforce Solutions for the Heart of Texas	McLennan County Workforce Solutions Center
								Capital Area	Workforce Solutions Capital Area	North Center
10	Utah				✓		Utah Department of Workforce Services	Single workforce area	Single workforce area	Price Center Provo Center
11	Indiana				✓		Indiana Department of Workforce Development	Central	Region 5 Workforce Development Board	WorkOne Greenfield
								Marion County	Employ Indy	WorkOne Indy
12	Wisconsin					✓	Wisconsin Department of Workforce Development	South Central	Workforce Development Board of South Central Wisconsin	Dane County Job Center (Madison)
								West Central	Workforce Development Board of West Central Wisconsin	Eau Claire County Job Center
13	Idaho					✓	Idaho Department of Labor	Single workforce area	Single workforce area	Boise Caldwell
14	Washington					✓	Washington State Employment Security Department	Vancouver	WorkSource Southwest Washington	WorkSource Vancouver
								Spokane	Spokane Workforce Council	WorkSource Spokane
15	Massachusetts (pilot)	✓					Department of Career Services	North Shore	MassHire-North Shore Workforce Board	MassHire North Shore Career Center—Salem
								Lowell	MassHire-Greater Lowell Workforce Board	MassHire Lowell Career Center
16	Mississippi (pilot)		✓				Department of Employment Security	Twin Districts	Twin Districts Local Workforce Development Board	Hattiesburg Job Center
								Southcentral Mississippi Works	Southcentral Mississippi Works Local Workforce Development Board	Madison Job Center
17	Ohio (pilot)				✓		Department of Jobs and Family Services	Area 20	South Central Ohio Workforce Partnership	OhioMeansJobs Fairfield County
								Area 11	Workforce Development Board of Central Ohio	OhioMeansJobs Columbus—Franklin County
18	California (pilot)					✓	Employment Development Department	San Joaquin County	San Joaquin County WorkNet	Stockton WorkNet Center
								Contra Costa County	Workforce Development Board of Contra Costa County	Concord American Job Center



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