

Public Comment and Responses

DCEO received input from the following organizations during the public comment period: AFSCME, Chicago Jobs Council, and the Shriver Center. Women Employed submitted material following the close of the public comment period. The full text of the comments received is included as attachments. The following are excerpts of the key points of public comment and responses.

American Federation of State, County and Municipal Employees

1. In order to ensure compliance with WIA, regulations implementing both Summer Youth Public Service Employment (PSE) programs and adult worker PSE programs (should a waiver from the U.S. Department of Labor be granted) must include the requirement that employers consult in advance with labor organizations representing its employees.

Response:

The State Plan Modification includes several passages that encourage Local Workforce Investment Areas (LWIAs) and local labor councils to collaborate on implementing various elements of the Recovery Act. This collaboration should include discussions with local labor organizations regarding the use of Public Service Employment as a means for providing training opportunities.

Chicago Jobs Council

1. The need for state-level investment to support the delivery of services and the kind of collaboration that we think is necessary to reach the most disadvantaged populations. We noticed that many of the state strategies outlined in the plan consist of encouragement to and communication with the local areas about the development of strategies to reach individual job seekers. We recommend below that the state use its discretionary resources to incent the kind of service delivery strategies and collaboration that are needed to reach low-income individuals. Using the state's resources to incent and support local collaboration that includes community-based partners will also support the effective expansion of the bridge strategies that the state plans to focus on.

Response:

Illinois generally concurs with Chicago Jobs Council (CJC) that state resources should be used to incent desired activity, including the targeting of resources at specific activities and the need to strengthen collaboration between organizations that impact workforce development. Using WIA Policy Letters and local planning guidance, DCEO has directed local areas to establish policies to allow for needs related payments and other supportive services when appropriate to those customers that are deemed through local policy to be in need of those types of services in order to complete training .

The State Plan modification specifically refers to priority of service for low-income and TANF recipients that may not have access to services from other sources. In addition, Governor's Policy Letter 99-01 mandates that 51 percent of local formula funding must be targeted for low-income customers. This policy letter also covers Recovery Act funding. The modification

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also specifically encourages collaboration with community based organization and potential expansion of their programs.

State grants will fund training for new and incumbent workers including a major focus on low-skill and low-wage workers through bridge programs. The State has, and will continue to provide accelerated support for Social Enterprise OJT / transitional employment programs. DCEO has used its policy-making authority as a strategy to encourage the use of bridge programs by modifying minimum training expenditure policy to allow bridge program expenditures to count toward meeting expenditure requirements for training. The evaluation tool used in reviewing applications for state funded Grant Opportunities provides extra weighting for proposed projects targeting customers with barriers to employment or evidence of established relationships between community based organizations and local workforce areas. The State Plan modification specifically promotes partnerships between education institutions, extension offices and non-profit organizations.

The State enthusiastically supports the concept of strengthening partnerships among and between state and local agencies. Through the Recovery Act Regional Roundtables and a follow-up Technical Assistance Conference for local area staff, the State invested significant time, effort and resources to provide information to key individuals in every region of the state. DCEO and the Illinois Workforce Partnership collaborated on these meetings to reach leaders in the private sector, education, community based organizations and appointed and elected leaders to facilitate linkages between their respective organizations. Local areas were encouraged to enter an ongoing dialogue with their community colleges as well as local labor councils to develop class-size and pre-apprenticeship focused training opportunities that increase the number of customers and types of customers served.

Illinois has also cultivated non-traditional partners such as public libraries, community-based organizations and other local venues through the Illinois workNet™ web portal. The State appreciates CJC's acknowledgement of our support of both lateral cross-system collaboration and state-local collaboration. However, setting a goal for the number of new local partnerships, as CJC suggests, may not have the intended effect to improve service delivery. We believe it is better to let partnerships develop where and when they add tangible value to service delivery, rather than set an arbitrary quota where creating partnerships would add unneeded bureaucratic effort to meet this new requirement.

2. Opportunity to develop specific strategies to reach at-risk youth. We noted a couple of instances where guidance from DOL requested specific strategies related to at-risk youth, but none were outlined. Because at-risk youth face unique challenges to labor market participation and success even when the economy is strong, we believe that at-risk youth are more vulnerable in this recession. The transitional jobs and pre-apprenticeship strategies pointed to by DCEO for all youth, are specific strategies that we recommend for at-risk youth, but must be tailored for that population.

Response:

The State is continually looking for effective strategies to provide services to at-risk youth and welcomes input from our partners and other interested parties. We encourage local areas to work with at-risk youth and to try innovative approaches to service delivery for this population. Illinois has set aside a significant percentage of Recovery Act WIA funding for

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innovative projects targeted at youth, including at-risk youth.

State funded projects are intended to incent innovative practices across a variety of key economic sectors, such as healthcare, manufacturing, transportation/distribution, information technology, agriculture and green activities. There will be opportunities for activities in each of these sectors to impact at-risk and out of school youth, and job seekers of all wage and skill levels. The local areas were encouraged to consider how at-risk customers with barriers to employment, both adult and youth, could be better served with Recovery Act funding. Statewide grant opportunities will be made available that will provide an opportunity for innovative approaches to address these issues. One example is the Community Gardens initiative, which provides state funding to support summer employment opportunities for youth and is a deliberate attempt to reach at risk youth with Recovery Act funding.

In addition to these types of projects, Illinois has taken other tangible steps to help at risk youth. Illinois workNet provides all youth with access to updated career awareness information, job readiness training as well as educational material intended to help them develop into workforce-ready adults. DCEO has adjusted state policy to encourage the use of bridge programs by allowing for such costs to count toward the forty percent minimum training expenditure requirement.

Shriver Center

1. Address the needs of all low-income people regardless of skill level, work history or other barriers to employment.

Response:

The State of Illinois is committed to providing appropriate services for individuals eligible for WIA and Wagner-Peyser funded activities. It is our belief that individuals willing to commit to developing the skills necessary to enter or reenter the workforce should be met by a system ready to provide a full range of services. These services range from soft-skill work readiness services, to occupation-specific skill training and supportive services so that individuals can start on the path to reach their fullest potential.

DCEO is collaborating with the Illinois Community College Board and the adult education community to establish bridge programs that will help low income, low skill persons. DCEO provided significant match funding for the Shifting Gears initiative and changed state policy to allow bridge program costs to count toward the forty percent minimum training requirement and to require local areas to establish policy on needs related payments and other supportive services intended to help low income persons.

DCEO is also looking to the Job Training and Economic Development (JTED) program to provide insight on successful programs and providers that could be adapted for

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WIA customers. There are several very successful JTED providers that could potentially provide best practice program models for WIA. Some of these were highlighted at a Recovery Act technical assistance event for local areas. The workforce development needs of low-income individuals are as varied as the individuals themselves and the state and local workforce systems are committed to helping this population.

2. Work toward greater representation of women and people of color in the construction industry.

Response:

The Illinois workforce development system is committed to equal opportunity for all. DCEO is working, and will continue to work with organizations such as: the Urban League and Chicago Women in Trades to ensure training opportunities targeted at women and people of color.

DCEO has collaborated with the Illinois Department of Transportation, the Home Weatherization program, community colleges, the Illinois Workforce Partnership Labor Task Force, and the State AFL-CIO to encourage local labor councils and local workforce areas to find ways to develop ongoing partnerships for placing WIA customers in construction trade training. We also facilitated having DOL Region V staff provide information on innovative ways to use WIA funding to support registered apprenticeships.

The State strongly encourages the local areas to consider collaboration with non-traditional partners or programs with a history of proven effectiveness. This will allow regions to leverage established expertise and non-WIA funding to align resources for greater overall efficiency and effectiveness in serving more customers or providing enhanced services to at risk or other targeted populations.

Although not funded by WIA or Wagner-Peyser, the DCEO Employment Opportunities Grant Program (EOGP) works to expand the number of individuals in historically underrepresented populations who enter and complete building trades apprenticeship programs and achieve journey-level status within building trades unions. Information on this program was provided to local areas as a potential resource for assisting qualified customers.

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Women Employed

We strongly support the integration of bridge programming and career pathways throughout this plan and the references to work with community colleges and community-based organizations to serve the needs of targeted populations. However, we believe that the plan should be more specific about how this work will be done, providing a more coherent blueprint for the state's recovery efforts related to key industries.

Response:

We appreciate Women Employed's support for the integration of bridge programs and career pathways with our community college partners. We believe that it is better to speak to these efforts in a general fashion in the State Plan so as not stifle local creativity in implementing these efforts. At the local area technical assistance conference DCEO provided several examples of how community based organizations provide training and other services to clients with barriers to employment. The plan modification refers to modeling proven methods for services to at risk populations used in the JTED program. DCEO has also funded such career pathway activity via organizations targeting minorities, such as Instituto del Progreso Latino.

These projects provide viable service delivery models that can potentially be adapted to other targeted populations. Each area will have the latitude to develop diverse program solutions based on the needs and realities of the regional economy, availability of training providers and community based organizations. Illinois will incorporate best practices developed regionally into the statewide program as they emerge.
