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

Change and Continuity in the Adult and Dislocated Worker Programs under WIOA

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

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Reports in this series

- 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
- Early Insights from State Implementation of WIOA in 2017
- WIOA Implementation Study: Technical Appendix
# CONTENTS

Acknowledgments ......................................................................................................................................... iii

Executive summary ...................................................................................................................................... vii

I. Introduction ............................................................................................................................................ 1
   A. Study overview ................................................................................................................... 1
   B. The Adult and Dislocated Worker programs under WIOA ........................................................... 3
   C. Roadmap to the report .................................................................................................................. 4

II. Job seeker services: work-based learning ............................................................................................ 5
   A. Registered apprenticeships .......................................................................................................... 5
      1. Perceptions of WIOA’s influence on registered apprenticeship efforts ..................................... 6
      2. National data on adult and dislocated worker exiters who enrolled in registered apprenticeships ...................................................................................................................... 6
      3. Challenges providing apprenticeships for Adult and Dislocated Worker program participants ............................................................................................................................ 7
      4. Promising strategies to increase registered apprenticeship opportunities for adult and dislocated workers .......................................................................................................... 9
   B. On-the-job training ....................................................................................................................... 10
      1. Perceptions of WIOA’s influence on OJTs ........................................................................ 10
      2. National data on adult and dislocated worker exiters who participated in OJT .................. 11
      3. Challenges implementing OJT under WIOA ...................................................................... 11
      4. Promising strategies to increase use of OJTs under WIOA ............................................... 12
   C. Customized training and transitional jobs ................................................................................... 13
      1. Perceptions of WIOA’s influence on customized training and transitional jobs .................. 13
      2. National data on customized training and transitional jobs under WIA and WIOA .......... 13
      3. Challenges implementing customized training and transitional jobs services .................... 13

III. Job seeker services: career pathways ............................................................................................... 15
   A. Perceptions of WIOA’s influence on career pathways efforts ....................................................... 16
   B. Challenges to implementing career pathways ............................................................................... 16
   C. Promising strategies for expanding career pathways ............................................................... 17

IV. Job seeker services: access for people with barriers to employment ............................................... 18
   A. Perceptions of WIOA’s influence on serving more people with barriers ................................. 18
   B. National data on individuals with barriers to employment served by the Adult and Dislocated Worker programs .............................................................................................................. 19
C. Challenges to serving a greater number of individuals with barriers to employment................. 20
D. Promising practices for serving more people with barriers to employment........................... 22

V. Job seeker services: coordinating and aligning services across core programs....................... 24
   A. Perceptions of WIOA’s influence on the coordination and alignment of services for adults and dislocated workers................................................................. 24
   B. National data on streamlining of services........................................................................... 24
   C. Challenges in aligning and coordinating services and systems......................................... 25
   D. Promising practices to better align and coordinate services............................................... 27

VI. Employer services under WIOA............................................................................................ 31
   A. Providing employer services in partnership with Vocational Rehabilitation ..................... 32
   B. Building industry and sector partnerships.......................................................................... 34
   C. Promoting incumbent worker training............................................................................... 35

VII. Looking ahead....................................................................................................................... 38

References.................................................................................................................................. 40

Appendix A: National data on the Title I Adult and Dislocated Worker programs ...................... A,1
Appendix B: WIOA Implementation Study Sites......................................................................... B.1
EXHIBITS

ES.1  WIOA’s six core programs and other required partner programs .................................................. viii
ES.2  Site visit locations in 2019 (14 states and 28 local areas) ............................................................. viii
I.1   WIOA’s six core programs and other required partner programs .................................................... 1
I.2   States and local areas visited in 2019 ............................................................................................. 2
I.3   Types of site visit respondents at the state and local levels ............................................................ 3
II.1  Number and percentage of all Adult and Dislocated Worker program exiters enrolled in a registered apprenticeship, PY 13 - 17 ............................................................................................. 7
II.2  Percentage of all adult and dislocated worker exiters receiving training who participated in OJT ............................................................................................................................................. 11
IV.1  Changes in the percentage of adult exiters with selected barrier-related characteristics ............. 20
V.1   Co-enrollment between the Adult and Dislocated Worker programs and ES ................................ 25
A.1   Number and percent of Title I Adult and Dislocated Worker program exiters with selected barriers PYs 2013–2017 .............................................................................................................. A.2
A.2   Number and percent of Title I Adult and Dislocated Worker program exiters co-enrolled in Employment Services or other Title I programs PYs 2013–2017 .................................................. A.3
B.1   WIOA Implementation Study: Site visit states, regions, and local areas ..................................... B.2
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 the Title I Adult and Dislocated Worker programs under WIOA. Discussed here are the successes and challenges, promising practices, and possible areas for further technical assistance related to WIOA for these two programs.

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

- Governance and planning;
- The Title I youth program;
- 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 administrative data and 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.
Exhibit ES.1. WIOA’s six core programs and other required partner programs

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<td>• Title II - Adult Education and Family Literacy Act (AEFLA)</td>
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<tr>
<td>• Title IV – State Vocational Rehabilitation (VR) programs under the Rehabilitation Act of 1973</td>
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</table>

**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 B for a list of states and local sites included in the study. The list, along with other information on the site visits, is also found in the Technical Appendix for the entire evaluation.
A. The Adult and Dislocated Worker programs under WIOA

WIOA’s Adult and Dislocated Worker programs, two of the six “core programs” identified in the law, authorize a broad array of services for adult job seekers and employers. Although the services available under WIOA for these programs are in many ways similar to those that were offered under WIA, WIOA articulated some new priorities and opportunities, both overall and specifically for these programs. According to most state and local respondents, the most noteworthy changes concerned the following:

1. A greater emphasis on "training that is job-driven," particularly “work-based training,” such as registered apprenticeships, on-the-job training (OJT), and customized training. As part of this emphasis, WIOA provides “additional options and flexibilities” for these work-based training options, and also authorizes the use of transitional jobs as a new type of work experience activity aimed at helping customers “develop important workplace skills.”¹

2. An increased focus on career pathways as a way to “improve the quality and labor market relevance of workforce investment…efforts” for job seekers, particularly related to education and training services, including registered apprenticeships.²

3. A focus on “individuals with barriers to employment…to ensure access to quality services for these populations.”³

4. New opportunities for coordination and alignment with other WIOA core programs, including Adult Education and Family Literacy Act (AEFLA), and Vocational Rehabilitation (VR).

5. A stronger emphasis on employers as customers through more explicit requirements for the provision of certain employer services, including more flexibility to provide incumbent worker training using program funds.⁴

B. Key findings

State and local program administrators and staff, workforce development board staff and chairs, and partners generally reported that WIOA’s changes to the Adult and Dislocated worker programs built upon WIA’s priorities, creating incremental changes to service delivery. At the time of the site visits, state and local areas had begun efforts to implement these provisions. Site visit respondents described their implementation efforts to date, including challenges they encountered and useful strategies. Below are key findings regarding implementation of WIOA’s changes to jobseeker and employer services.

Adult and Dislocated Worker program services for job seekers

Respondents shared their perspectives on how key changes in WIOA affected (1) the emphasis on work-based learning, (2) career pathways, (3) access for people with barriers to employment, and (4) the streamlining of services across the core programs, as discussed below.

² 20 CFR 675.100; WIOA Sec.3(7); TEGL 19-16, p.13.
³ TEGL 19-16, p.8-9.
⁴ WIOA Sec. 134(a)(2)(B)(v)(III); Sec. 134(c)(1)(A)(iv-v); TEGL 19-16, p.15-18.
1. **Work-based learning: new options and flexibilities for work-based training and work experience**

As noted above, WIOA provided “additional options and flexibilities” related to the use of work-based learning and work experience available through the Adult and Dislocated Worker Programs. These changes included modifying and clarifying requirements on use of program funds to subsidize registered apprenticeships, on-the-job training (OJT), and customized training, as well as adding transitional jobs as an allowable work experience. Although states and local areas reported making efforts to provide participants with more of these work-based learning opportunities—particularly apprenticeships, they reported facing challenges in doing so.

- **Increased efforts to promote use of work-based learning.** State and local respondents reported that they had focused on trying to develop work-based learning opportunities—particularly registered apprenticeships.

- **Little change in receipt of work-based learning.** Despite changes to provisions related to work-based learning and efforts to expand its use, national level data on the Adult and Dislocated Worker programs (compiled from state data) showed that the number of program participants exiting the programs (that is, exiters) who received registered apprenticeship, OJT, and customized training services during the first 3 years of WIOA (program years 2015-2017) remained the same or was only slightly higher than during the last two program years (PYs) of WIA. The number of exiters who had received a transitional job as of the third year of WIOA (PY17) was also very low and included only 1,285 adults and 345 dislocated workers across the entire country.

- **Reasons for low enrollment in work-based learning.** State and local respondents shared their perspective that the low numbers reported in national data were likely due to the amount of staff-time needed to develop work-based learning opportunities and the lack of interest among employers and participants for such services.

   “We've had…tons of conversations about how to...understand the path to get apprenticeships developed and approved...that's not easy understanding [how] to do that.”

   —State workforce board chair

2. **Career pathways**

WIOA requires state and local workforce boards to develop strategies to use career pathways for serving adults and dislocated workers and provides a detailed definition that specifies their necessary components. State workforce board and program administrators reported that the emphasis on career pathways in WIOA aligned well with their efforts to collaborate with other partners.

- **Alignment with existing Adult and Dislocated Worker program efforts.** Nearly all states (13 of 14) and local areas (26 of 28) reported they were already implementing career pathways efforts of some kind for their adult and dislocated worker participants before WIOA.

- **Clearer definition of career pathways strategy.** Respondents from two states and two local areas reported that WIOA helped their Adult and Dislocated Worker programs to better promote and align

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5 TEGL 19-16, p. 12.

6 For PYs 2013-2015, Workforce Investment Act Standardized Record Data (WIASRD); for PYs 2016-2017, Participant Individual Record Layout (PIRL) data.

7 PY 2017 Data Book.

8 WIOA Sec. 101(d)(3)(B) and Sec.107(d)(5).
their approaches to career pathways with other core and required partners. In particular, they reported that WIOA’s clear definition of a career pathway enabled state and local areas to better communicate about the strategy with partners.

3. Access to services for people with barriers to employment

WIOA includes a stronger focus than did WIA on serving job seekers with barriers to employment, listing 14 specific populations of such individuals. WIOA also added individuals with basic skills deficiencies to the groups of individuals who must be prioritized for receiving individualized career or training services within the Adult Program. The law was also amended to clarify that such priorities must be implemented, regardless of funding limitations. Respondents from eight states and 15 local areas reported an increased focus on serving people with barriers to employment and spoke to the importance of partnerships across programs to address a variety of challenges, including lack of staff expertise and capacity to serve individuals with such barriers.

- Increased focus on people with barriers to employment. Respondents from 8 states and 15 local areas reported that WIOA’s passage pushed them to try to serve more people facing barriers to employment, including those with disabilities, low basic skills, and involvement in the justice system. In addition to the Act's focus on these populations, six local areas also reported that WIOA’s emphasis on partnerships with other WIOA core programs, such as VR and AEFLA, had also pushed them to focus more on the participants of those programs, who all had barriers to employment—either disabilities or low basic skills. One way that local programs tried to enroll more of these individuals was by adjusting their assessments of suitability for the programs.

- Little change in number of people served who had barriers to employment. Despite reports of shifting focus to people with barriers to employment, national program data on the Adult and Dislocated Worker Programs show that the percentage of people with barriers to employment served by the programs stayed fairly flat from the end of WIA (PY 13-14) through the first years of WIOA (PYs 15-17).

- Partnerships were reported to be key to addressing challenges in serving individuals with barriers to employment. Adult and Dislocated Worker program respondents from eight local areas noted several challenges with serving an increased number of people with barriers, including challenges identifying which priority groups people belonged to, staff not having the expertise to work with individuals with certain barriers to employment, and lack of capacity to ensure people were receiving services from partner programs to address their barriers. Adult and Dislocated Worker program staff from these eight areas spoke to leveraging partnerships with partner programs like VR to provide specialized services, train staff on how to work with individuals with barriers to employment, and increase their access to program participants.

4. Aligning and coordinating services for adult and dislocated worker job seekers across core programs and other partner programs

Although WIA also focused on aligning and coordinating programs, WIOA goes further by designating six core programs—two of which are the Title I Adult and Dislocated Worker programs—and emphasizing the importance of partnerships and coordinated and integrated service delivery across those programs. Key elements to promote program coordination and integration include the requirement for the core programs to submit a single integrated state plan and the establishment of common performance indicators across the core programs.
Change and Continuity in the Adult and Dislocated Worker Programs Under WIOA

Adult and Dislocated Worker program respondents from 18 local areas and 11 states reported increases in coordination with some programs, especially VR, and continuing the work that began under WIA to integrate intake, improve co-enrollment and referrals, and reduce redundancy in service provision. Other findings related to coordination across core programs include:

- **Some increased alignment with partner programs.** Most Adult and Dislocated Worker program respondents at the state and local levels reported that they had already been relatively well-aligned with certain partners under WIA, particularly the Employment Services (ES). However, as noted above, respondents from 18 local areas and 11 states reported that WIOA had increased their alignment at least somewhat with other core programs, most commonly with Vocational Rehabilitation.

- **Communication and relationship-building improved partnerships.** Adult and Dislocated Worker programs and their partners reported facing a number of barriers in trying to align services across programs, such as challenges coordinating across partners when they were not co-located, a lack of knowledge about partner programs, and lack of a unified case management system. Improving knowledge sharing and relationships between partners was cited as important for trying to address some of these challenges.

- **Refining processes to streamline services for job seekers.** To further align and streamline services, local workforce boards designed new and improved processes for referral, intake, and staffing. In most cases, these were long-term efforts that built upon progress that began under WIA.

**Services for employers**

Respondents shared their perspectives on WIOA’s changes to employer services, as well as challenges and promising practices as they relate to (1) the emphasis on serving employers as customers in the workforce system, (2) industry and sector partnerships, and (3) incumbent worker training.

1. **Employers as customers**

WIOA makes a strong case for treating employers as equally important customers as job seekers, under the Adult and Dislocated Worker programs. WIOA specifically identified employer services as an allowable service under the Adult and Dislocated Worker programs and added a performance indicator for measuring services to employers. Respondents from 7 states and 17 local areas noted that WIOA helped them build on efforts to consolidate business services across programs in the last years of WIA and promoted stronger coordination with VR staff.

- **Support for existing efforts to consolidate business services.** Two-thirds of the local areas visited reported that they had developed cross-program business services teams with staff funded by the Adult and Dislocated Worker programs before WIOA, often with ES staff. VR respondents from at least four states reported increasing the number of their staff members who focused on working with employers under WIOA, which made it easier to expand these cross-program business services teams.

- **Partnerships with Vocational Rehabilitation.** As noted, changes to the VR program increased the focus on business services for that program—and often the staff devoted to it—which respondents indicated had led to greater interest in partnerships with Adult and Dislocated Worker programs across 10 local areas. About half of the state and local respondents noted that they had stronger partnerships between the Adult and Dislocated Worker programs and the Vocational Rehabilitation program.
2. **Industry and sector partnerships**

WIOA mandates the use of Adult and Dislocated Worker program funds to develop relationships with employers and “develop, convene, or implement industry or sector partnerships.”9 This mandate complemented efforts already underway in many states and local areas to use industry-specific strategies in workforce development and led to better coordination of partnerships.

- **New industry and sector partnerships were less common.** Most states (12) and local areas (21) reported that they had begun their industry and sector efforts under WIA. Just one state and three local areas described WIOA as motivating major new efforts.

- **States and local areas reported employing a variety of strategies to support partnerships.** These efforts included summits and convenings that enabled practitioners to network and learn from one another, grants to increase staffing, and staff training.

3. **Incumbent worker training**

WIOA allows local Adult and Dislocated Worker programs to spend up to 20 percent of their funding on incumbent worker10 training; under WIA, such training could generally only be provided with state set-aside funds.11 WIOA’s allowance of incumbent worker training for upskilling as well as for layoff aversion also helped make it more popular among local areas and employers.

- **Respondents reported that the tight labor market had spurred employer demand for incumbent worker training.** Respondents from six local areas reported being able to implement incumbent worker training because of increasing demand from employers, especially in industries with severe shortages of skilled workers.

- **Rebranding, as well as simplified paperwork and reporting requirements, helped sell training to employers in some areas.** Respondents from three local areas described employers as unwilling to deal with the paperwork and reporting requirements of training contracts, and one found that employers had a negative association with the word “incumbent.” Respondents reported several strategies to address these challenges, including rebranding, marketing training opportunities with videos, and simplifying the paperwork involved.

**C. Looking ahead**

During the site visits, state and local respondents described their efforts to implement to WIOA’s new requirements for the Title I Adult and Dislocated Worker programs. As indicated by respondents, guidance issued by DOL informed their efforts; however, they also identified several areas where additional or enhanced guidance or technical assistance could prove helpful. DOL has developed and provided a number of technical assistance products on career pathways, work-based training, and sector

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9 WIOA Sec. 134(c)(1)(A)(iv-v).

10 20 CFR, Part 680, Subpart F. (page 56149), provides a definition of the workers who can receive incumbent worker training as follows: "To receive incumbent worker funding under WIOA, an incumbent worker must have an employer-employee relationship, and an established employment history, with the employer. Incumbent workers are employed at the time of their participation, and the contract funds are paid to the employer for training provided to the incumbent worker either to avert a lay-off or otherwise retain employment."

11 DOL did provide some states with waivers to allow the use of local Adult and Dislocated Worker funding under WIA.
strategies; all were made available on WorkforceGPS, including a toolkit on OJT.\footnote{See https://ion.workforcegps.org/resources/2017/12/01/11/19/On-the-Job-Training-Toolkit), an enhanced guide and workbook on developing career pathways https://careerpathways.workforcegps.org/resources/2016/10/20/10/11/Enhanced_Career_Pathways_Toolkit), and multiple resources on registered apprenticeships (https://apprenticeshipusa.workforcegps.org/), and industry and sector partnerships https://olderworkers.workforcegps.org/resources/2016/09/20/11/33/Sector_Strategies_Resources). Further, DOL has provided a number of TEGLs on these topics, including TEGL 19-16, TEGL 13-16 (on apprenticeships and WIOA).} In addition to those products, DOL funded the State Apprenticeship Expansion grants to support states’ efforts to develop apprenticeship programs aligned with WIOA’s objectives.\footnote{See, for example, TEGLs 15-19, 17-18.} In addition to issuing guidance focused on specific service delivery strategies, DOL also released guidance focused on promoting collaboration across core and required partners.\footnote{See https://www.workforcegps.org/resources/2020/01/23/11/48/Service-Delivery-WorkforceGPS-Communities-and-Federal-Partners in collaboration with Federal Partners, DOL also released joint guidance (TEGL 7-16 for OL) in 2016 to help states match data for WIOA reporting.} The experiences of states and local areas in implementing WIOA’s requirements for the Title I Adult and Dislocated Worker programs, 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:

**Targeted training and resources.** The development of work-based learning and career pathways opportunities, as well as industry and sector partnerships, requires market demand, staff resources, and expertise. State and local area respondents noted the need for additional targeted guidance and training to help strengthen their efforts in these areas. In addition, states and local areas indicated that they need additional resources to fully develop and nurture employer relationships and support participants in their long-term career goals.

**Building staff skills to better serve jobseekers with barriers to employment.** While Adult and Dislocated Worker programs are focusing more on serving participants with barriers to employment, staff feel ill-equipped to serve these participants and leverage partner programs effectively. To successfully meet the needs of these job seekers, program staff reported that they needed to become more skilled in working with these populations. They also indicated that closer partnerships with programs that specialize in serving individuals with barriers to employment—especially VR and AEFLA—can mutually benefit staff across programs.

**Technical assistance on sharing participant data.** Respondents reported working on formalizing local procedures to facilitate referrals, co-enrollment, and follow-up to help ensure participants are connected to the right services at the right times. Additional guidance on building collaboration across partner program staff, and technical assistance in developing effective procedures for sharing information, was also requested to help states and local areas better serve employers and job seekers, including those with barriers to employment.

In addition to these suggestions for additional guidance and technical assistance, the study findings point towards potential areas for future research. Future research topics could include (1) integrated intake, case management, and data systems currently in use, and (2) innovative strategies identified by respondents to improve referrals and case management, and their relationship to outcomes.
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). Although WIOA left the Title I Adult and Dislocated Worker programs substantially similar to what they were under WIA, WIOA did make some changes to the two programs. This report discusses the experiences of states and local areas in implementing the most noteworthy of those changes, including their successes, challenges, and potentially 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 USDOL 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

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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.3 identifies types of site visit respondents. More information about the site visits, site visit respondents, and other components of the

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15 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.
WIOA Implementation Study is provided in the technical appendix. The findings here, based on those 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**

Note: White dots are local areas visited for the study. See Appendix B for a list of states and local sites included in the study. The list, along with other information on the site visits, is also found in the Technical Appendix for the entire evaluation.
B. The Adult and Dislocated Worker programs under WIOA

WIOA’s Adult and Dislocated Worker programs, two of the six “core programs” identified in the law, authorize a broad array of services for adult job seekers and employers. Although the services available under WIOA for these programs are in many ways similar to those that were offered under prior law, WIOA articulated some new priorities and opportunities, both overall and specifically for these programs. According to most state and local respondents, the most noteworthy of these included the following:

1. A greater emphasis on "training that is job-driven," particularly “work-based training,” such as registered apprenticeships, on-the-job training (OJT), and customized training. As part of this emphasis, WIOA provides “additional options and flexibilities” for these work-based training options, and also authorizes the use of transitional jobs as a new type of work experience activity aimed at helping customers “develop important workplace skills.”

2. An increased focus on career pathways as a way to “improve the quality and labor market relevance of workforce investment…efforts” for job seekers, particularly related to education and training services, including registered apprenticeships.

3. A focus on “individuals with barriers to employment…to ensure access to quality services for these populations.”

4. New opportunities for coordination and alignment with other WIOA core programs, including AEFLA, and Vocational Rehabilitation.

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17 20 CFR 675.100; WIOA Sec.3(7); TEGL 19-16, p.13.
5. A stronger emphasis on employers as customers for the programs through more explicit requirements for the provision of certain employer services, including more flexibility to provide incumbent worker training using program funds.\textsuperscript{19}

C. Roadmap to the report

The remaining chapters in this report discuss the specific changes under WIOA and the challenges and promising practices that states and local areas reported in implementing the changes. Chapters II through V discuss changes to job seeker services, including changes to work-based learning services, career pathways, services to individuals with barriers to employment, and collaboration with core and required partner programs. Chapter VI discusses employer services, including partnerships to provide employer services, industry and sector partnerships, and incumbent worker training. Chapter VII concludes with considerations for workforce system stakeholders as they look ahead at WIOA implementation.

\textsuperscript{19} WIOA Sec. 134(a)(2)(B)(v)(III); Sec. 134(c)(1)(A)(iv-v); TEGL 19-16, p.15-18.
II. Job seeker services: work-based learning

Although WIOA authorizes many of the same work-based learning services available through the Adult and Dislocated Worker programs under WIA, it provides new opportunities and flexibilities for several types of work-based learning services. For example, WIOA authorizes transitional jobs as a new type of work experience service that can be used for adults or dislocated workers. The Act also makes it easier for registered apprenticeship sponsors to stay on Eligible Training Provider (ETP) lists and allows states and local workforce boards to increase the reimbursement to employers for OJT from 50 to 75 percent.20 In the rest of this chapter we discuss the use of work-based learning services by the Adult and Dislocated Worker programs during the first three years of WIOA as compared to under WIA, beginning first with a discussion of registered apprenticeship.

A. Registered apprenticeships

WIOA strongly encourages the use of registered apprenticeships for adult and dislocated worker participants as part of its overall emphasis on work-based learning. According to DOL, registered apprenticeships are valuable for their ability to meet employer needs and enhance partnerships while at the same time strengthening job seeker skills and earnings potential (TEGL 13-16).

Before WIOA, Adult and Dislocated Worker programs, as well as state and local workforce development boards (WDBs), tended not to be highly involved with the registered apprenticeship system despite sharing similar goals (Bergman and Kobes 2017). Although WIA allowed registered apprenticeship sponsors to be on the ETP list, they did not receive any special status under the legislation, and registered apprenticeships were not commonly used as a workforce system strategy. In contrast, WIOA encourages workforce system involvement with registered apprenticeships in several concrete ways.

- **WIOA makes registered apprenticeship sponsors automatically eligible for the state ETP list**21 (TEGL 13-16). They are not subject to the same application, performance, reporting, or continued eligibility requirements that other trainer providers must follow. Although a registered apprenticeship sponsor might decide not to be on the ETP list, those who choose to be included benefit from this streamlined process. WIOA allows these exemptions from review to encourage the use of apprenticeships for training and because registered apprenticeship sponsors already go through separate vetting and review (TEGL 13-16). This simplified process makes it easier for registered apprenticeship sponsors to get on ETP lists, theoretically resulting in increased opportunity for states and local areas to use Title I funds to pay for registered apprenticeship training using Individual Training Account (ITAs).

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21 The ETP list includes those training providers who have been vetted and approved to provide training services funded by a WIOA Individual Training Account (ITA). Only those training providers that are on the ETP list can receive WIOA ITA funding.
• **WIOA requires states to coordinate with the state’s DOL Office of Apprenticeship or State Apprenticeship Agency office to gather information about registered apprenticeships.** Such coordination includes collecting contact information for registered apprenticeship sponsors and letting the relevant office know about the ETP list.

• **Registered apprenticeship programs must be represented on state and local WDBs.** This requirement did not exist before WIOA.22

In addition to these legislative changes, WIOA’s clear emphasis on and encouragement of work-based learning opportunities also serves to promote registered apprenticeships.

1. **Perceptions of WIOA’s influence on registered apprenticeship efforts**

   “These conversations [about apprenticeships] started before WIOA. WIOA, I think, reinforced it but it also reinforced something that we were very excited to do; so it wasn’t like we were being pushed into something we weren't interested in. We had expressed interest, we worked it, and we are continuing to work it.”
   —State Title I program staff member

   Respondents from 10 states and 20 local areas reported that WIOA had increased their focus on registered apprenticeships. About half of these respondents indicated that their states and local areas were already involved with registered apprenticeship efforts but were focused on expanding those activities, while others were newly motivated by WIOA to concentrate on this strategy. Adult and Dislocated Worker program respondents from only four study states either did not think WIOA had any influence on their registered apprenticeship efforts or thought it had increased them only very minimally.

   New apprenticeship programs with active WIOA adult or dislocated worker participants were still relatively rare. Program administrators from five states and two local areas explained that designing the necessary program structures, getting approval for apprenticeships, building partnerships, and engaging employers all take significant amounts of time. As one state Adult and Dislocated Worker program administrator noted, “It takes time to gear up, to ramp up, you know. What we’ve done in three years, yes we’ve done a lot of good things in terms of developing programs, our apprentices went up, but it takes time…, it takes money…to develop…the capacity to deliver an apprenticeship program.”

2. **National data on adult and dislocated worker exiters who enrolled in registered apprenticeships**

   Despite the increased interest in the strategy, the actual number of adults or dislocated workers who participated in a registered apprenticeship remained low. Although participation in registered apprenticeships increased during the first year of WIOA, numbers have since trended slightly downward and are very small in real terms (Exhibit II.1). For example, in PY 2017 (2017-2018) (the third year of WIOA implementation), less than one percent of adults or dislocated workers exiting the programs (that is, exiters) who had enrolled in any kind of training were reported to have been enrolled in a registered apprenticeship.23 However, even though the real apprenticeship participation numbers are small, it is

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23 Note that data are for program exiters. It is possible that, due to the length of registered apprenticeships (which are frequently two to five years), some other adult and dislocated worker participants might have enrolled in a registered apprenticeship following WIOA’s passage but had not yet exited as of the time these data were reported.
important to acknowledge that they represent an increase in percentage terms from participation under WIA and suggest increased efforts in this area.

Exhibit II.1. Number and percentage of all Adult and Dislocated Worker program exiters enrolled in a registered apprenticeship, PY 13 - 17

Sources: For PYs 2013–2015, Workforce Investment Act Standardized Record Data (WIASRD); for PYs 2016 and 2017, Participant Individual Record Layout (PIRL).

Note: Percentages in parentheses represent the percentage of adult or dislocated worker program exiters, of those who had received any training, who participated in a registered apprenticeship.

3. Challenges providing apprenticeships for Adult and Dislocated Worker program participants

Adult and Dislocated Worker program administrators from seven states reported that adding registered apprenticeship programs to the ETP lists was challenging despite those programs' special status, and they faced numerous challenges in doing so.24 Generally, these respondents cited a lack of interest by apprenticeship sponsors for being on the ETP list as the reason they had not been able to persuade those sponsors to join. Other specific challenges faced by these states included the following:

- Some registered apprenticeship sponsors noted that even the streamlined ETP list process was too burdensome. Respondents frequently said that employer sponsors would not complete even simple paperwork to indicate interest in the ETP list, such as responding to a letter.

- Some registered apprenticeship sponsors did not want to use the ETP list as a source of recruitment for additional candidates. Two state Adult and Dislocated Worker program staff members stated that they thought apprenticeships sponsors did not need additional recruitment opportunities—such as the ETP list—to find sufficient candidates. As one of these respondents stated,

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24 Many of these challenges were similar to those highlighted in previous research on apprenticeships (Bergman and Kobes 2017; Lerman 2016).
“They don’t want WIOA participants who are the general public to say, ‘Hey! I hear you have an apprenticeship.’”

- **Registered apprenticeship sponsors were not aware of the WIOA funding available through the ETP list.** Respondents from one state reported that they did not think that apprenticeship sponsors in their state knew that Title I funding could pay for supportive services or that their candidates could benefit from this support. Without this knowledge, they had no major incentive to get on the list.

As a result of these challenges, at least half of the study states said that few or none of their state’s registered apprenticeship programs were on the ETP list.

> “Our apprenticeships sponsors are not on that yet ... because it’s very...paper intensive and our employers do not see the value of their apprentices getting services under WIOA.”

—State registered apprenticeship director

**Staff concerns about lack of resources to support apprenticeships.** Adult and Dislocated Worker staff from 10 states and four local workforce areas described challenges they had building apprenticeships. In addition to generally having trouble persuading employers to participate, they mentioned a lack of business services staff to conduct outreach, a lack of funding to advertise the strategy, and difficulty accessing information about registered apprenticeship in the state from DOL.

**Concerns about apprenticeship length.** Local program staff in one state explained that given the length of most registered apprenticeships, they did not feel comfortable supporting a participant through the entire experience using WIOA Title I funds. Instead, they decided to use WIOA funding to support pre-apprenticeship or other programming to help apprentices get off on the right foot. This respondent noted that once a person is in an apprenticeship, that person might need retention services more so than financial support.

**Employer misconceptions about apprenticeships.** Adult and Dislocated Worker program respondents from about half the states and four local areas or offices found it difficult to convince employers to participate in a registered apprenticeship. These respondents mentioned the following barriers: employers associate apprenticeships with unions, they do not feel the paperwork or bureaucracy is worth the effort, they have misconceptions about which industries are appropriate for apprenticeships, or they think the registration process is too onerous. In at least two other local areas, respondents said that there were employers who chose to do an OJT instead of an apprenticeship or to self-fund their apprenticeship program rather than go through what they perceived as a challenging apprenticeship registration process.

**Job seeker concerns about apprenticeships.** Adult and Dislocated Worker program respondents from two states reported that job seekers shared some of the same concerns about apprenticeships as did employers, such as having misconceptions about which industries had opportunities or who might succeed in them. They reported that some job seekers also found the length of apprenticeship programs (which often last from two to four years) daunting and wanted to go back to work right away. In at least one state, Adult and Dislocated Worker program respondents also mentioned that the local culture was such that people felt pressure to attend college rather than participate in an apprenticeship.

> “We are running into a lot of very staid and old-fashioned ideas about what an apprenticeship is and what career fields are apprenticeable. A lot of time, research has been spent without reach to the general public about, this is what a registered apprenticeship is, it's not just sheet metal, pipe fitters, electricians, and fence carpenters.”

—State Adult and Dislocated Worker program staff member
4. Promising strategies to increase registered apprenticeship opportunities for adult and dislocated workers

Despite implementation challenges, states and local areas were still very involved in efforts to build and expand the Adult and Dislocated Worker programs’ involvement in apprenticeships. This work took many forms, from hiring new staff using Title I funds to supporting certain participant costs related to apprenticeships.

Creating new apprenticeship offices and hiring dedicated staff. In six states or local areas, Adult and Dislocated Worker program respondents reported hiring new apprenticeship staff using Adult and Dislocated Worker program funding. In some of these locations, these new staff were part of entirely new apprenticeship offices, hired to lead or support efforts to develop new apprenticeship opportunities, particularly for adults and dislocated workers. A state staff member from one of these states attributed hiring a staff person dedicated to work-based learning to an increase in the number of registered apprenticeships in the state.

Funding supportive services and classroom training for apprentices. WIOA also allows, and DOL encourages, using Title I Adult and Dislocated Worker funds to cover costs related to registered apprenticeships for eligible participants. Despite this encouragement, as of the time of study site visits, only four states or local areas reported that they had yet used Title I dollars to cover the following apprenticeship-related costs.

- Supportive services. Adult and Dislocated Worker program respondents from three states or local areas used or were planning to use Title I program funds to provide supportive services to registered apprenticeship participants. These respondents noted that even if many of the larger costs associated with an apprenticeship, such as training, are paid for by the employer sponsor or another source, not being able to cover additional costs like uniforms could still prevent participation. They further asserted that the ability to use Title I funds to cover these costs thus could increase the number of people who can take part in a registered apprenticeship and perhaps allow lower-income people to consider the option.

- Classroom training component. Two states reported that they had used Adult and Dislocated Worker program funds to pay for the classroom training portion of apprenticeships so that neither the employer nor the participant had to cover those costs. Respondents from two other states had not yet funded training in this way but said they hoped to do so in the future.

- OJT component. One local area reported funding the OJT portion of registered apprenticeships with Title I dollars to make employers more willing to participate in apprenticeships. A respondent from this area noted that Adult and Dislocated Worker funds generally cover the initial portion of the apprenticeship’s OJT. Once the person is established in the apprenticeship, the employer takes over covering these costs.
Braiding funding for apprenticeships. More than half the states reported combining Title I Adult and Dislocated Worker program funding with funding from other grants to support their apprenticeship efforts. Respondents from these states usually mentioned other DOL grants or state money for this purpose, including grants from the American Apprenticeship Initiative and State Apprenticeship Expansion. In general, Adult and Dislocated Worker program respondents from these eight states indicated that these apprenticeship-focused grants, as opposed to Adult and Dislocated Worker funds, were the key financial driver of the workforce system’s registered apprenticeships.

Increasing apprenticeship sponsors on ETP lists. WIOA requires states to inform registered apprenticeship sponsors about the ETP list, yet it also allows some flexibility in how sponsors “indicate their interest.” Although not permitted in DOL guidance, respondents from one state reported more success adding registered apprenticeship sponsors to their ETP list by creating an opt-out, rather than an opt-in, process for joining the list. After receiving notifications from the state, no sponsors opted out; however, a state respondent reported that “many employers probably don’t even realize they’re on it.”

Marketing apprenticeships to employers. To overcome employer reluctance to participate in apprenticeship programs, a state staff member from one state noted that creating even one successful partnership can pay dividends. He said that word of mouth between businesses can lead to additional interest: “But eventually, they got to a success story... and obviously under the current economic conditions, businesses are struggling to fill jobs. So, they’re like, ‘Sure. Yes. We’ll participate in your apprenticeship program.’”

B. On-the-job training

OJT is a type of work-based training that allows Adult and Dislocated Worker programs to provide up to 50 percent of the wage rate of OJT participants to their employers for the costs of training those participants. This definition is the same under WIOA as it was under WIA with one exception: WIOA allows governors and local WDBs to increase the reimbursement rate from 50 percent up to 75 percent under certain conditions. For example, a higher reimbursement rate can be provided to certain employers (such as small businesses), for certain job seekers (such as people with barriers to employment), for certain types of training (such as for an in-demand occupation that will lead to an industry-recognized credential), or other factors determined by a state’s governor. The reimbursement rate was increased in part as a response to feedback from the workforce development system that a higher rate might incentivize more employers to participate (Dunham 2015).

1. Perceptions of WIOA’s influence on OJTs

Five states reported that WIOA’s changes to OJTs had influenced their use of OJTs when working with employers. Local program staff in one state reported that they were more likely to recommend OJTs than

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25 Subsequent to study site visits, DOL announced additional grants under the Apprenticeship State Expansion program with funding available to all U.S. states (TEGL 17-18).
26 TEGL 13-16, p. 7.
27 TEGL 19-16, pp. 14-15
28 WIOA Final Rule, 680.730. Note that some states had waivers under WIA to increase the allowable employer reimbursement rate above 50 percent, in some case up to 90 percent.
they were under WIA because the reimbursement rate is more attractive to employers and OJT is more manageable for participants’ schedules than classroom training.

In the other nine states, respondents reported few changes to using OJT. One state Adult and Dislocated Worker program administrator noted that a reimbursement rate of 75 percent was not a radical change from WIA: “I don’t know [what] the numbers show, but I would say under WIA, we had the waiver for OJTs…to go up to 90 percent. If there’s a change, it wouldn’t be based on the reimbursement rate.” Of note, some Adult and Dislocated Worker program respondents in eight states did not even seem to be aware of WIOA’s change to allow increased reimbursement for certain OJT contracts.

2. National data on adult and dislocated worker exiters who participated in OJT

National data from the Adult and Dislocated Worker programs suggest WIOA has not increased OJT use. The percentage of adult and dislocated worker exiters who participated in OJT (of those who participated in any kind of training activity) remained essentially flat between the last few years of WIA and the first few years of WIOA (Exhibit II.2).

Exhibit II.2. Percentage of all adult and dislocated worker exiters receiving training who participated in OJT

![Percentage of all adult and dislocated worker exiters receiving training who participated in OJT](chart)

Sources: For PYs 2013–2015, WIASRD; for PYs 2016 and 2017, PIRL.

Note: This exhibit uses percentages rather than numbers because there was an overall decline in adult and dislocated worker participants. Raw numbers would show a decline in the absolute number of OJTs.

3. Challenges implementing OJT under WIOA

The key challenges with implementing OJT under WIOA noted by program respondents included a perception of excessive burden on employers and limited resources, as is the case with other work-based
learning strategies. These challenges have also been reported in the past (Dunham 2015, D’Amico et al. 2015).

**Employer reluctance to participate.** As was found in earlier research on OJTs, Adult and Dislocated Worker program respondents in 9 states reported that many employers did not want to deal with the paperwork or wait time required for an approved OJT contract, as well as the monitoring and reporting involved once a participant was hired.

**Limited funding for wages and staff time.** Another reported challenge related to OJTs was the cost of providing this service. Adult and Dislocated Worker program respondents from at least four states and local areas indicated that the funding needed to support wages in an OJT contract limited their ability to implement them. These respondents also mentioned that developing an OJT contract was staff intensive and that they did not always have enough time to develop and monitor OJT contracts.

### 4. Promising strategies to increase use of OJTs under WIOA

Across the five of states that did report changes to their use of OJT under WIOA, Adult and Dislocated Worker program respondents reported helpful guidance and support from the state on providing OJT services, as well as increased partnerships across partner programs for OJT contracts.

**State support for marketing OJT.** Two states and two local areas reported small changes to their OJT procedures that they hoped would increase their use. One state provided guidance to local areas on increasing work-based learning under WIOA through a training guide for frontline staff. Another state provided funding to market work-based training to the public. State staff in one state provided a template for a simplified OJT contract to local workforce boards; two boards in the state reported revamping their own OJT contracts based on the state model and shortening it down to just two pages.

**OJT-related partnerships.** WIOA encourages coordination across core and partner programs for service delivery to participants, including for the use of OJTs. Adult Education and Family Literacy Act (AEFLA) and Vocational Rehabilitation (VR) respondents in four states reported new partnerships with the Adult and Dislocated Worker and Temporary Assistance for Needy Families (TANF) programs to provide OJTs. A VR staff member from one local area noted that WIOA’s focus on coordination and serving people with barriers to employment has made Adult and Dislocated Worker program staff more open to connecting VR participants to OJTs. In that area, the Adult program provided funding for an OJT for a disabled person, while VR connected the

**Historically we had real difficulty getting people with disabilities into OJT because the messaging was... people with disabilities aren’t a good bet for the outcome, so don’t invest in them.”**

—Local adult program staff member

In interesting collaboration in Weld County, Colorado, is the Work Based Learning leadership team, which includes members from all partners who get together to discuss work-based learning, employer contacts, and possible OJTs or work experience opportunities for their caseloads. Through this collaboration, they were able to create a generic brochure for employers about work-based learning programs in Weld County.
participant with targeted coaching and support needed to succeed in the job. In a local area in another state, the partnership was at the business services level, with a unified message around OJT being shared by business services staff from different programs. A local AEFLA staff member in one state noted they would like their life coaches to be able to work with participants on their resumes and identify opportunities for work experience, but that they would like to leverage Title I funding for the OJT contract.

C. Customized training and transitional jobs

WIOA also encourages customized training\textsuperscript{29} and transitional jobs\textsuperscript{30} as work-based training strategies, but interview data from states in the study as well as national data indicate very little movement in their use as a workforce development strategy. Respondents identified challenges to implementing these strategies, but no promising approaches had emerged to expand their customized training and transitional job offerings.

1. Perceptions of WIOA’s influence on customized training and transitional jobs

Adult and Dislocated Worker program respondents from nine states in the study reported that they did not offer customized training; WIOA had not changed their use of customized training; or they only offered it using another funding source. Local Adult and Dislocated Worker staff in one state did describe developing a new customized training program.

Transitional jobs are a new service promoted under WIOA, and local workforce boards are allowed to spend up to 10 percent of their total Adult and Dislocated Worker funds on these services. Adult and Dislocated Worker program respondents across study states and local areas indicated that progress on implementing this strategy has been minimal so far, and none reported providing this service to any of its participants.

2. National data on customized training and transitional jobs under WIA and WIOA

National data show little difference in the amount or number of customized training or transitional jobs provided at the end of WIA versus at the beginning of WIOA. Across the United States, only 1,285 adults and 345 dislocated workers exiting either the Adult or Dislocated Worker program in PY 2017 were reported to have participated in a transitional job.\textsuperscript{31}

3. Challenges implementing customized training and transitional jobs services

Adult and Dislocated Worker program respondents from at least two states or local areas indicated that the cost of customized training was a key challenge. For example, one local workforce board director

\textsuperscript{29} Customized training consists of training tailored “to meet the specific requirements of an employer or group of employers with the commitment that the employer(s) hire an individual upon successful completion of the training” (TEGL 19-16).

\textsuperscript{30} DOL defines transitional jobs as “time-limited and wage-paid work experiences that are subsidized up to 100 percent” (TEGL 19-16). Importantly, they can only be used with “individuals with barriers to employment who are chronically unemployed or have an inconsistent work history, as determined by the Local WDB” (TEGL 19-16). Unlike an OJT, employers are not required to hire the participant after the transitional job ends, and the service includes career and supportive services from the workforce system (TEGL 19-16).

\textsuperscript{31} PY 17 Databook (PIRL).
noted that it can be hard to spend the necessary resources required to develop customized training for just one employer.

Other Adult and Dislocated Worker program respondents had more conceptual challenges with transitional jobs as a service. A few were unclear on what transitional jobs entailed, with two respondents asking for a definition of the service during the interview. At least one local respondent thought WIOA was not the right funding source for transitional jobs because other organizations already provide similar services in the community. In general, Adult and Dislocated Worker program respondents appeared to need more clarity about what exactly the transitional jobs service entails and how they could best fit it into their menu of services.
III. Job seeker services: career pathways

Career pathways are defined as “articulated education and training steps between occupations in an industry sector” so that job seekers can “enter and exit at various levels and advance…to higher skills, recognized credentials, and better jobs with higher pay” (Sarna and Strawn 2018). Although not a well-developed approach when WIA was enacted, the concept of career pathways evolved over the years into a major strategy that DOL and other agencies—including the Department of Education and the Department of Health and Human Services—have embraced. WIOA reaffirms the importance of the career pathways approach by giving it national prominence and providing a definition that articulated key elements that every career pathway strategy should include.

According to DOL, career pathways are “a combination of rigorous and high-quality education, training, and other services” that include seven key elements listed in the legislation (see box).

In addition to delineating what career pathways entail, WIOA also requires state and local WDBs to develop and implement career pathways.32 This encourages coordination across WIOA core partners and draws in secondary and postsecondary education programs. The legislation also specifically requires that career pathway planning consider the needs of those with barriers to employment.

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32 WIOA Sec. 101(d)(3)(B) and Sec.107(d)(5).
A. Perceptions of WIOA’s influence on career pathways efforts

Although WIOA clarified what career pathways must include, Adult and Dislocated Worker program respondents from all but one state felt that they were already participating in career pathways efforts of some kind under WIA. State respondents from half of the states in the study mentioned previously receiving funding to support career pathways, including Trade Adjustment Assistance Community College and Career Training grants or Workforce Innovation Fund grants. Many Adult and Dislocated Worker program staff also stated that their programs had always been focused on helping people understand the types of jobs available within the local labor market as well as the connections between those jobs, and that career pathways were thus nothing new. This suggests that to some, the concept of career pathways is as simple as connecting a person to a job with the potential for upward mobility, rather than a process of developing an articulated path with concrete milestones. At least one local Adult and Dislocated Worker program respondent thought of career pathways as trendy terminology: “It’s another one of those things that’s a buzz word for us that we use a lot. I think that when we have opportunity to develop those, we do.”

Respondents in four states indicated that the legislation had been a factor in helping them better define and promote their approach. These respondents talked about how WIOA enabled them to refine their language and strategy around career pathways. Because career pathways have been promoted by the workforce, education, and human services systems (Elsey et al. 2015), respondents appreciated how WIOA’s definition of career pathways was helping them get on the same page. However, this process was also described as still in progress, especially given the complexity of the strategy and the number of players involved.

Respondents also noted the legislation was the impetus for core programs taking a fresh look at how states and local areas were implementing career pathways and gave new urgency to related committees at the state level. For example, a state workforce agency staff member said that the state had an ad hoc career pathways committee before WIOA, but that the state gave that committee more oversight following WIOA’s passage in 2016. The committee changed its focus to one on defining career pathways and how they benefit the state.

Adult Education program respondents from at least three local areas believed that WIOA caused them to think more about the needs of the community and whether their career pathways targeted in-demand sectors. A VR staff member from one local area reported that staff were having more individual sessions with participants focused on potential pathways and that they were more focused on credential attainment and higher wage jobs under WIOA.

B. Challenges to implementing career pathways

Respondents highlighted a number of challenges associated with implementing career pathways strategies, including ongoing challenges with terminology and the long-term nature of the strategy.
**Hesitation around the term.** Respondents from two local areas and two states reported that they hesitated to use the term “career pathways” because either they or others were unsure of the definition. A local VR staff member noted that the term was “very much the buzz right now” but that she could not actually define it herself. A staff member from a different local area acknowledged not using career pathways language because “businesses don’t care about career pathways.” Others mentioned that partners had trouble working together on career pathways efforts without a shared definition.

> “It’s like, ‘Yeah, that’s awesome. I could be a nurse, but that’s four years away and as a single mom.’ I don’t know about the realities of career pathways from the customer perspective.”
> —Local Adult and Dislocated Worker program staff member

**Barriers to keeping participants on the pathway.** Local- and state-level respondents from at least three different states noted that the length of career pathways could be a problem for job seekers. Although they might complete an eight-week certified nursing assistant training as a first step, they might struggle to advance further on the pathway, in a sense getting stuck on the lowest rung of the ladder.

**Special needs for individuals with barriers to employment.** Multiple respondents from AEFLA or VR programs were concerned about their participants’ specific needs being addressed in broader career pathways plans. They noted that these job seekers might need more time or other accommodations to advance along a pathway. One VR staff member in a local area worried that career pathways frameworks might not be individualized enough for participants who have such unique needs.

**C. Promising strategies for expanding career pathways**

Two states developed strategies to address the challenges of career pathways, including increasing understanding of the term, training staff on how to implement the strategy, and incorporating services that would make career pathways more accessible to individuals with barriers to employment.

**Educating partners on the concept of career pathways.** To make sure all partners were clear about what career pathways meant, Oklahoma’s career pathways committee spent three years helping others in the state understand exactly what a career pathway is, how it functions, and how it benefits the state. The committee also focused on how career pathways aligned with the state’s strategic goals and helping local areas and businesses see the value of career pathways.

**Training workforce professionals.** Respondents in one state described a new sector strategies and career pathways training course they developed under WIOA to train workforce professionals on the topic. Multiple respondents also discussed their efforts to create visual career pathways lattices or maps, although it was unclear how much of this work could be attributed to WIOA.

**Expanding access to career pathways.** Several AEFLA program respondents described advocating for the needs of English language learners and those with low basic skills when broader career pathways plans were being developed by the workforce system. For example, they recommended including low enough entry points and having integrated basic skills or language learning available within a pathway. The local area in the Pikes Peak region of Colorado has an abilities coalition that works to ensure that people with different abilities all have an equal chance when it comes to accessing career pathways.
IV. Job seeker services: access for people with barriers to employment

WIOA includes a stronger focus on increasing access to services for job seekers with barriers to employment than WIA. For example, unlike WIA, WIOA includes this emphasis in its opening Purposes section (Section 2), stating, “The purposes of this Act are the following: (1) To increase, for individuals in the United States, particularly those individuals with barriers to employment, access to and opportunities for the employment, education, training, and support services they need to succeed in the labor market.” Further, WIOA explicitly defines those people as falling within 14 specific populations, including the following:

- Low-income people
- People with disabilities
- Older adults
- Ex-offenders
- People experiencing homelessness
- People experiencing long-term unemployment
- People who are English language learners, have low levels of literacy, or are facing substantial cultural barriers
- People within two years of exhausting lifetime TANF benefits
- Single parents (including single pregnant women)

In addition to this overall emphasis on people with barriers to employment, WIOA added people with deficiencies in basic skills to the group of individuals with barriers to employment who must be prioritized in the adult program to receive more than basic services. Under WIA, this group already included recipients of public assistance and other low-income people. WIOA also eliminated WIA’s language that priority was required only when funding for the adult programs was limited, leaving the determination of what percentage of adult participants needed to fall within priority populations entirely up to states and local WDBs.

A. Perceptions of WIOA’s influence on serving more people with barriers

Respondents in more than half of the states and local areas in the study reported that WIOA had increased the focus within their Adult and Dislocated Worker programs on individuals with barriers to employment. This was due to WIOA’s explicit emphasis on those individuals and designation of priority populations, and the focus on coordination with other core programs that serve some of these populations, including AEFLA and VR.

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33 WIOA also identified displaced homemakers; Indians, Alaska Natives, and Native Hawaiians; youth who have or are aging out of foster care; eligible migrant and seasonal farmworkers; and other groups identified by a state’s governor as individuals with barriers to employment.

34 WIOA Final Rule 680.600.
Emphasis on specific populations. Seven state- and local-level Adult and Dislocated Worker program respondents reported that WIOA’s own emphasis on serving people with barriers and the specific naming of 14 different populations had influenced how they served individuals with barriers to employment under WIOA. Respondents noted that numerous governors and workforce boards had cited WIOA as a reason to focus on serving these populations despite the impression that they might not do as well as would other people in meeting performance goals. For example, a counselor in one local area specifically compared WIA, with its heavy focus on meeting performance requirements, with WIOA’s emphasis on serving individuals with barriers to employment and “meeting those customers where they’re at.” Respondents from five other local areas stated that another of WIOA’s changes—the elimination of the requirement that Adult and Dislocated Worker program services occur in a certain sequence—had helped them to be more effective in serving people with barriers to employment. This change allowed staff to immediately provide participants with access to whatever service the participant needed, and staff are able to focus better on removing those barriers.

Emphasis on coordination with core partners. Respondents from Adult and Dislocated Worker programs in six local areas cited the push to develop partnerships with other core programs within their states and local areas as a key influence. These respondents cited stronger partnerships with VR and AEFLA—as well as increased co-location with those partners—as reasons for why they were serving more people with employment barriers related to having a disability or being deficient in basic skills.

Prioritization of certain groups. Adult and Dislocated Worker program respondents from five local areas attributed their increase in serving individuals with barriers to employment to WIOA’s changes to the prioritization of specific groups (participants receiving public assistance, low-income people, and people who are deficient in basic skills) for more than basic services, regardless of the availability of funding for the Title I Adult Program. Respondents from one of these local areas noted the effect of the priority changes had been particularly strong because their state had further mandated that 70 percent of the adult participants they serve had to fall into one or more of those groups.

Stronger labor markets and influence on population served. Respondents from four local areas reported serving a greater number of individuals with barriers to employment, but this was a result of low unemployment in the local labor market and not because of WIOA. People with fewer or no barriers were finding jobs on their own more easily, and program staff were finding themselves serving mostly people with significant barriers to employment. Employers were also finding it more difficult to fill open positions, and program staff reported having to conduct more outreach to recruit participants.

B. National data on individuals with barriers to employment served by the Adult and Dislocated Worker programs

Among the states and local areas that reported a greater focus under WIOA on serving populations with barriers to employment in their Adult and Dislocated Worker programs, the most commonly served were those with disabilities, low basic skills, or who had been involved with the criminal justice system. Other
populations that were identified by respondents included people experiencing homelessness, people with substance abuse problems, older workers, and TANF recipients.

National data on adult and dislocated worker exiters during the last years of WIA and the first years of WIOA suggest that the percentage of exiters with these characteristics stayed fairly flat (see Exhibit IV.1 and Appendix A). However, some of these barriers were only reported under WIA for participants who received intensive or training services, and the raw numbers from WIA are not comparable to those collected under WIOA. Data on some populations (people with low basic skills, people with substance abuse problems) were not captured in either WIA or WIOA data.

**Exhibit IV.1. Changes in the percentage of adult exiters with selected barrier-related characteristics**

![Graph showing changes in percentage of adult exiters with selected barrier-related characteristics]

**Sources:** For PYs 2013–2015, WIASRD; for PY 2016 and 2017, PIRL.

**Notes:** This exhibit uses percentages rather than numbers because there was an overall decline in adult and dislocated worker participants, and using raw numbers would show a decline in individuals with barriers to employment.

**C. Challenges to serving a greater number of individuals with barriers to employment**

State and local area Adult and Dislocated Worker program respondents reported facing a number of challenges when they attempted to serve a greater number of individuals with barriers to employment. These challenges included a steep learning curve for frontline staff, performance targets that seem unattainable, difficulty identifying barriers to employment, and barriers in access to services.
Lack of staff expertise in how to serve individuals with barriers to employment. Adult and Dislocated Worker program staff lacked the experience and special knowledge needed to successfully address some barriers, according to respondents from at least three local areas. For example, a workforce board staff member in one local area reported that his program counselors sometimes referred people with substance abuse problems to jobs when they were not yet far enough along in their treatment to be able to maintain steady employment. Working with justice-involved people involved understanding detailed information such as the vocational licenses for which they were ineligible, and those crimes that could be expunged and those that could not.

Appropriateness of performance targets. Adult and Dislocated Worker program respondents from three local areas noted a concern about meeting their areas’ negotiated performance targets if they were to serve a greater number of individuals with barriers to employment. These respondents argued that the WIOA indicators of performance and their negotiated targets made it unrealistic to serve large numbers of individuals with barriers to employment, who were less likely to be able to be successful on those indicators than other participants.

Lack of access to services. Local Adult and Dislocated Worker program respondents in two rural areas noted that they faced serious challenges in serving individuals with barriers to employment because of a lack of strong public transportation systems and vehicle ownership. As one of these respondents noted, “It’s not about them coming here; they can’t get here. They don’t have transportation.” Some of the target populations also have limited access to the Internet and limited digital literacy skills, making online services difficult to access.

Determining eligibility and relevant barriers. Although people with low basic skills must be given priority to receive individualized career and training services from the Adult program, respondents from several local areas noted that they have often faced a specific challenge in determining whether an individual meets the criteria for having low basic skills. They explained that to determine whether an individual falls into that priority group, they need the individual to complete an assessment of basic skills such as the Test of Adult Basic Education (TABE). However, such assessments themselves are typically considered an individualized career service, and so are not available to individuals unless they have been determined eligible for such services, and in these areas, being a member of a priority group is requirement for eligibility. As one local area program manager stated, “That has presented challenges…because you’re not supposed to administer that [TABE] assessment prior to eligibility certification [for the Adult program], so it’s kind of like the chicken or the egg. Which can we do first?”

Difficulties with referral processes. Local Adult and Dislocated Worker program staff who referred participants with barriers to other partners noted that such individuals often failed to follow through on referrals, particularly when the other program was not co-located in the same building as the AJC. These staff members reported that even being located on a different floor caused some
people to “fall through the cracks and not receive needed services.”

D. Promising practices for serving more people with barriers to employment

State and local Adult and Dislocated Worker program respondents identified several strategies to effectively serve more individuals with barriers to employment. These strategies included leveraging partner expertise and services as well as fine-tuning some aspects of the services such individuals received. Examples included the following:

**Braiding services across partners using co-enrollment.** Local Adult and Dislocated Worker program respondents provided a host of examples where they were able to leverage the specialized services available from partner programs by co-enrolling participants in the other programs. For example, several programs described co-enrolling participants in the VR program so that VR could provide those participants with specialized equipment related to their disabilities. Another local Adult and Dislocated Worker program reported that it co-enrolled some of its participants in an adult education partner program so that partner could provide the participants with free basic skills testing.

**Training staff on how to best serve participants with barriers to employment.** Respondents from at least seven local Adult and Dislocated Worker programs reported that they provided specialized training to their staff on how to serve individuals with barriers to employment. Topics covered during these training sessions included strategies for working with individuals with extremely low incomes, substance abuse challenges or disabilities, diversity and inclusion, motivational interviewing, and trauma-informed practice. Training sessions were provided by specialized consultants in some instances, and in others by partner agencies, such as VR or substance abuse treatment providers, that specialized in serving specific subgroups.

In the local area in the Pikes Peak region of Colorado, the local Title I Adult program was part of a pilot with the state Department of Human Services. This pilot, funded by TANF, provided co-enrolled participants with access to specialized counseling on whatever issue the participant was facing, whether addiction or anger management. At the same time, the participant received job coaching from the local AJC’s Adult program.
Reaching participants at nontraditional locations. Adult and Dislocated Worker program respondents in ten local areas reported sending staff out to meet with participants at libraries or other locations in the community—including adult education centers, jails, and homeless shelters—due to participants’ lack of access to transportation. In one local workforce area, the Adult and Dislocated Worker programs funded a mobile workforce “navigator” who visited libraries in rural sections of three counties to meet with program participants. Adult and Dislocated Worker program staff also enrolled participants and provided workshops at other locations to help ensure follow-up for individuals who were referred to their programs for services.

Using shorter basic skills assessments. Adult and Dislocated Worker program respondents from one local area reported that they had begun administering a shorter basic skills assessment instead of the TABE, to make their program more accessible to individuals with barriers to employment. As a staff member from this local area noted, “[Adults] can also take the WIN assessment or use Work Keys if they have previous Work Keys scores for that benchmark. And that has proven to be somewhat more attractive for the adult population because it is...three hours [instead of] five hours.”

Using cohort trainings. In one local area, Adult and Dislocated Worker program respondents reported that they had found providing training to a cohort or group of participants to be a promising strategy since it offered peer support to individuals with barriers to employment. As a result, the local board then required that the majority of its Adult program training be provided to cohorts rather than providing individuals with ITAs. As one Adult and Dislocated Worker program staff member in that local area noted, “There really is a value of peer-to-peer learning, and all that [we] can offer with that. We’re moving to 80 percent of our training [being] done through a cohort model.”

"Under WIOA, given the targeted populations and the increased diversity of the populations that we are serving, it's critical that the individual partners with that expertise be brought to the table."
—Workforce board staff member
V. Job seeker services: coordinating and aligning services across core programs

WIOA strengthens WIA’s focus on aligning services for Adult and Dislocated Worker program participants with the core and other public workforce system programs. First, WIOA—unlike WIA—specifically requires states to use Adult and Dislocated Worker program funds to provide assistance related to “coordinating and aligning data systems” and explicitly allows states to spend Adult and Dislocated Worker program funds on “developing and disseminating common intake procedures.”

Further, WIOA requires that Adult and Dislocated Worker program career services at the local level include the “provision of referrals to and coordination of activities with other programs and services,” which was not explicitly required under WIA.

A. Perceptions of WIOA’s influence on the coordination and alignment of services for adults and dislocated workers

WIOA was perceived by most state and local respondents to have increased alignment at least somewhat between the Adult and Dislocated Worker programs and other core programs, particularly VR. Respondents credited a stronger emphasis on alignment and program coordination in the language of WIOA, as well as an increased emphasis on co-location at AJCs, joint planning across core programs, and AJC certification, among other changes, as bringing partners together and resulting in efforts to streamline services. These efforts appeared to continue the progress that respondents stated they had made under WIA to integrate services with at least some of their partners, especially ES. Adult and Dislocated Worker program respondents from eight local areas also reported trying to increase co-enrollment across programs. In most areas the focus was on increasing co-enrollment with VR, adult education, and TANF programs, because many states and local areas had already developed extensive co-enrollment between the Adult and Dislocated Worker programs and ES under WIA.

B. National data on streamlining of services

The national data on WIOA participants do not provide enough information to assess whether services are more streamlined for adult and dislocated worker customers. We would assume that with more streamlined services, most customers would be co-enrolled across programs or receiving referrals to other partner programs. The available data for the Adult and Dislocated Worker programs show that co-enrollment with ES remained high in the third year of WIOA at 71 percent, but had declined about 20 to

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35 WIOA Sec. 134(a)(2)(B)(i) and (3)(A)(xiii).  
36 WIOA Sec. 134(2)(A)(b)(v).  
37 This finding is supported by prior research on collaboration among AJC partners during the last years of WIA that showed a high level of coordination between the Title I adult and dislocated worker programs and the ES program. See Koller and Paprocki (2015).  
38 For more information on how these changes influenced AJC operation and workforce system planning, see [will insert names of governance and planning and AJC operations reports once finalized]
25 percentage points lower than it had been in the last years of WIA (see Exhibit V.1 and Appendix B). The data on co-enrollment of adult and dislocated worker participants in other core and required partner programs are not of sufficient quality to report. In addition, no national data are available on the number of referrals made between programs. The lack of data is likely due to the absence of shared data systems or formal referral processes, which we discuss later in this chapter.

Exhibit V.1. Co-enrollment between the Adult and Dislocated Worker programs and ES

<table>
<thead>
<tr>
<th>Program year</th>
<th>Adult program</th>
<th>Dislocated worker program</th>
</tr>
</thead>
<tbody>
<tr>
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<td>96.0</td>
<td>91.6</td>
</tr>
<tr>
<td>2014 WIA</td>
<td>96.0</td>
<td>91.6</td>
</tr>
<tr>
<td>2015 WIOA</td>
<td>96.0</td>
<td>91.6</td>
</tr>
<tr>
<td>2016 WIOA</td>
<td>71.5</td>
<td>71.3</td>
</tr>
<tr>
<td>2017 WIOA</td>
<td>71.5</td>
<td>71.3</td>
</tr>
</tbody>
</table>

Sources: For PYs 2013–2015, WIASRD; for PYs 2016 and 2017, PIRL.

C. Challenges in aligning and coordinating services and systems

State and local Adult and Dislocated Worker program respondents reported facing a number of challenges in attempting to align and coordinate services and systems. Some of these challenges included partner programs not having the same motivation for change, as well as structural challenges related to a workforce system that was still relatively siloed.

**Differing perceptions among program partners regarding the value of integration and coordination.** Respondents from four local areas reported that new procedures for integrating services and systems were more likely to be resisted or imperfectly implemented when partner managers and staff did not perceive that such changes would be of value for their participants. In addition, implementing WIOA-related changes was even more challenging in areas with a history of conflict between programs. For example, respondents from one local area reported that ES staff were resisting implementing shared intake and co-enrollment. Respondents felt that ES staff were concerned about the new processes taking more time and lacking additional value, but also voicing opposition because of previous conflicts. As one respondent noted, “It’s
a long history here, but we’ve always kind of butted heads [with ES, and] I think that’s really why [they are unhappy].”

**Lack of knowledge about partner program services and eligibility.** Adult and Dislocated Worker program respondents from six local areas also stated that coordination was difficult when staff did not understand partner programs. Referrals to partner programs were difficult if staff had not been trained on the eligibility requirements for the other programs, or what services were offered by them. In three local areas that reported providing training to staff on partner programs, respondents noted it was still hard to retain that information, especially for complicated programs like TANF and Trade Adjustment Assistance. As one respondent stated, “To know everything about all the programs is just too much.”

**Physical separation of partner staff.** Numerous state and local Adult and Dislocated Worker program respondents noted that when they were not co-located in the same building with other partner programs, it was generally more difficult to align services with those programs. In some states, VR and adult education programs were often not co-located at AJCs, which made it more difficult for staff to learn about them, as well as to get to know and trust staff from those programs. A few respondents noted that even being in the same building was not sufficient to bring about alignment or coordination, especially if the programs maintained separate spaces. One local area’s staff described their AJC as “almost like a mall,” where individual agencies ran their programs out of separate spaces.

**Absence of a common data system.** While not specifically required under WIOA, respondents stated that the lack of a common data system across programs made it difficult to share information on participants that would help align services, and developing such a system was both difficult and costly. As one VR program staff member stated, “It would be so much easier…if we all had one system where we can track the individual and see that this case manager or career developer has been doing this, and this is what the WIOA [Adult and Dislocated Worker program] counselor has been doing.” Without shared case management systems, staff reported that they could not easily share data collected at intake, make and track referrals, or see the services provided by partner programs to co-enrolled participants. This challenge was reported to be more common with programs other than ES, because most states had already integrated case management systems for the ES and Adult and Dislocated Worker programs under WIA (Koller and Paprocki 2015).

At the same time, developing a single electronic system that meets the varying needs of different programs was also reported to be very difficult, especially given the structural differences across programs. For example, the VR program typically has many contracted vendors providing different types of services, which is less common in the Adult and Dislocated Worker programs. In fact, the manager of data systems for one state doubted that such a system was even possible. Such systems were also described as extremely expensive, and programs that had recently invested in their own system were unlikely to contribute to the purchase or development of yet another data system.
Complicated referral and co-enrollment procedures. Even when partners did share an electronic case management system, respondents noted that staff did not always know how to access shared information. Some local respondents attributed this to a lack of training, including how or when to access participant records during intake. One local Adult and Dislocated Worker program staff member commented on the need for guidance: “I want a handout. I want a desk aid guide that all of us could utilize. Like, let’s be on the same page.” In addition, local Adult and Dislocated Worker program staff members reported that the amount of data that might be collected for the purposes of referrals could be extensive and perceived as overly invasive to job seekers. In one local area, staff reported not using the referral process for ES because it was too slow and bureaucratic.

D. Promising practices to better align and coordinate services

States and local areas reported using a variety of strategies to improve intake, referral, and co-enrollment, with the hopes of aligning services for adult and dislocated worker participants and reducing the duplication of services across programs. Although some states reported facing considerable hurdles in these efforts, as discussed previously, other states reported a number of promising approaches. In most cases, states and local areas stated that they were building on efforts begun under WIA and still ongoing under WIOA.

Improving understanding and knowledge of partner programs. A number of local areas offered examples of strategies that could encourage the sharing of information across partner staff to improve coordination and integration of services.

- **In-person meetings for partner staff.** Regular in-person meetings were reported to be used in 21 local areas to cross-train staff across partner programs and facilitate more communication. Several respondents noted that in-person cross-training had occurred at some point under WIA but had re-started under WIOA. These meetings were reported to be held at various intervals across the local areas visited, from annually or quarterly to weekly. Respondents stated that these meetings were mainly used to share program information, conduct team building activities, and brainstorm about service delivery or other issues. Respondents reported that these meetings also helped build trust between staff from different programs and helped leadership identify staff concerns about changes. For example, Adult and Dislocated Worker program managers in one area became aware of a concern from ES staff through partner meetings: “[The center’s] Wagner-Peyser team was afraid that they were doing all of the work and support for the WIOA Title I team’s performance. And so the communication had to be that that wasn’t the case…and then we had to demonstrate that.”

In three local areas, respondents reported that center managers arranged for Adult and Dislocated Worker program line staff to meet with their co-located colleagues—primarily ES staff—as often as multiple times a week (see box). They were able to arrange these sessions by holding them at times when the centers were not open, such as from 8 to 9 a.m.
• **Collaborative development of reference materials.** Respondents from a few local areas also reported supplementing their meetings by working together to develop simple reference tools. Adult and Dislocated Worker program staff in one local office in Utah stated that they worked with partners to develop one-page summaries of the services each partner program provided as part of the AJC certification process. One respondent noted the relationships built during that process were almost as important as the documents themselves: “It’s not about the one-pager. It’s about that contact, and it’s about that relationship and being able to pick up the phone.”

• **Off-site visits and shadowing of partner staff.** Adult and Dislocated Worker program respondents from two local areas reported promising strategies for knowledge-sharing between program staff. In one local area, cross-training occurred by “embedding” a partner staff member, who shadowed an Adult and Dislocated Worker program staff member for an entire day. In another local area, frontline Adult and Dislocated Worker program staff visited other partner locations to hear about their programs, meet staff, and tour their facilities. A manager from this area reported that all staff who help Adult and Dislocated Worker program participants enroll in training had recently visited the local technical college “so that they could see the various programs and certificate programs that [the college was] running out there, what the campus looked like, and meet new counselors, and get to know them on a name-to-face basis.”

**Increasing partner engagement in the referral system.** Adult and Dislocated Worker program respondents from 19 local areas and five states reported that they had made efforts to improve their referral processes under WIOA. These respondents described adopting approaches to increase engagement between staff in the referral process.
• **Warm handoffs involving personal contact with partner staff.** Adult and Dislocated Worker program respondents in two states and two local areas reported changing their referral procedures to require warm handoffs when referring customers to partner programs for services. Instead of simply handing a customer an address for a partner office where they could access services, the staff member would call the partner staff contact while job seeker was present. In some areas, the warm handoff also included following up with the partner staff to see whether the customer had actually showed up. Respondents stated that this approach helped develop relationships between staff working with common customers, increased the likelihood that partner staff would know when an individual was referred to them, and encouraged customers to follow through because they perceived there to be a personal connection with the referral partner.

• **Access to Adult and Dislocated Worker program case management systems for partners to make and receive referrals.** Respondents from three states reported establishing or updating the referral capabilities of Adult and Dislocated Worker program case management systems by providing access to programs that did not use the system already. In two of these states, partners could make and receive referrals within the system (see box). In a third state, the state system could generate referrals via email to external partners for which the system had a valid email address. Additionally, after WIOA’s passage, two states with existing but underused referral systems pushed to have those systems used more regularly.

**Integrating intake for customers.** Respondents from 12 local areas described implementing a new intake approach across the Adult and Dislocated Worker programs and one or more partner programs so that customers would not have to provide the same information multiple times.

• **Common intake form.** Respondents from six of these local areas adopted a new paper or electronic common intake form that all programs used to capture information on customers. One of the six local areas created its own intake form for Adult and Dislocated Worker program, TANF, and Supplemental Nutrition Assistance Program Employment and Training participants. The other local areas implemented common intake forms developed by the state workforce agency to collect information across its various programs.

• **Unified intake interview.** Respondents from six local areas reported implementing a single intake and orientation process to channel participants into multiple programs. Respondents explained that these processes involved staff from multiple programs conducting one-on-one intake for all of the participating programs, helping customers to complete basic intake into a state system and then either assisting them with accessing basic services in the resource room or referring them to a more specialized service (see box on Chester, Pennsylvania’s Welcome Center for an example).
Implementing functional alignment of staff. Respondents from five local areas described implementing functional alignment among staff to improve service delivery. Respondents in three of these areas described assigning teams of staff across different programs (including the Adult and Dislocated Worker programs) to carry out specific functions in the AJC, such as greeting customers or conducting orientations. In all five areas, supervision was also by function rather than by program. It should be noted that functional alignment was already in place under WIA in a majority of the other areas visited for the study.

The “Welcome Center” in Chester, Pennsylvania’s AJC was open every day from 9:30 a.m. to 3 p.m. The Center was the first point of access for new customers to the local area’s comprehensive AJC. Customers would meet with a Center representative (jointly funded by the Adult and Dislocated Worker programs and ES) for a one-on-one orientation to all the services and programs available at the center (the center is planning for this process to eventually occur via a video). The representative would then answer questions, conduct an assessment to determine what services the customer needed, and make appropriate referrals. The job seeker would also be registered into the Pennsylvania state workforce management information system. The intake meeting could last from 45 to 90 minutes.
VI. Employer services under WIOA

WIA included a requirement that Adult and Dislocated Worker programs “assist employers in meeting hiring needs.” However, that legislation’s focus was primarily on serving job seekers. WIOA, by contrast, clearly and consistently emphasizes that the programs have two primary customers: job seekers and employers. Further, WIOA’s strong focus on partnerships, particularly among core programs, was expected to lead to a more “seamless system of high-quality services” for employers. With its emphasis on serving employers, WIOA includes new and more explicit requirements for the Adult and Dislocated Worker programs. These include the following:

- States must use Adult and Dislocated Worker program funds for “disseminating information on effective outreach to, partnerships with, and services for, business.”

- Adult and Dislocated Worker program funds must be used “to establish and develop relationships and networks with large and small employers and their intermediaries; and to develop, convene, or implement industry or sector partnerships.”

- The Adult and Dislocated Worker programs must provide “appropriate recruitment and other business services…” as one type of career service.

- One or more primary indicators of performance must be developed to “indicate the effectiveness of the core programs in serving employers.”

As discussed in Chapter III, WIOA also heavily emphasizes work-based learning, including OJT, apprenticeships, customized training, and incumbent worker training, all of which can directly benefit employers as well as job seekers and workers. WIOA provides greater flexibility for local programs to offer some of these types of work-based learning. For example, WIOA allows local adult and dislocated worker programs to use up to 20 percent of their funds to provide incumbent worker training; under WIA, incumbent worker training could only be provided with state-level funds.

Respondents from about half of states (7) and two-thirds of local areas and offices (17) reported that WIOA’s greater emphasis on employer services had influenced the delivery of those services by their Adult and Dislocated Worker programs. However, most respondents noted that WIOA’s influence was limited because they had already developed reasonably strong and integrated employer services under WIA, particularly with ES. For example, two-

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39 20 CFR, Parts 603-688, Executive Summary.
40 WIOA Section 134(a)(2)(B)(v)(III).
41 WIOA Section 134(c)(1)(A)(iv-v). These partnerships are defined in WIOA as workforce collaboratives that include key stakeholders related to the industry or sector of focus, including employers, core and required programs, and workforce development board representatives.
42 WIOA Section 134.(c)(2)(A)(iv)(II).
43 WIOA Section 116(b)(2)(A)(iv).
thirds (19) of local areas and offices reported that, before WIOA’s passage, they had developed cross-program business services teams with staff funded by the Adult and Dislocated Worker programs as well as by ES. Similarly, most states (12) and local areas and offices (21) reported developing industry and sector partnerships under WIA. Indeed, prior research on employer services and sector partnerships under WIA found that such services were fairly common by the last years of WIA (Dunham 2015; Ziegler 2015).

Most respondents felt that WIOA enhanced their employer services in three key areas: partnerships with VR, industry or sector partnerships, and incumbent worker training. Implementation challenges and promising practices in each of these key areas are discussed below.

A. Providing employer services in partnership with Vocational Rehabilitation

Respondents reported a range of experiences implementing partnerships with VR to provide employer services.

Stronger partnerships with VR. About half of state (7) and local (10) Adult and Dislocated Worker program respondents reported that, under WIOA, they had stronger partnerships with the VR program to provide employer services. Multiple respondents stated that this was a result of WIOA’s changes to the VR program as well as its emphasis on increasing partnerships among core programs. WIOA’s emphasis on placing more VR participants in work-based training and unsubsidized employment was specifically cited as encouraging stronger partnerships for employer services.

Leveraging employer services staffing. VR program respondents in four states reported increasing the number of their staff who focused on working with employers. This made it easier for these VR staff to partner with their Adult and Dislocated Worker program business services peers, such as by joining existing cross-program business services teams at the state and local levels. VR employer services staff in six local areas joined their local areas’ cross-program employer services teams. These teams comprised staff funded by the Adult and Dislocated Worker programs and other core and required programs. The teams met regularly to share information on employer contacts and services.

Respondents from seven states described staffing challenges, indicating that both the VR and the Adult and Dislocated Worker programs had too few employer services staff to effectively coordinate. VR respondents, in particular, typically reported that they could afford only a handful of dedicated employer services staff to cover their entire states. These VR staff had to spend a lot of time traveling, and therefore had limited availability to collaborate with other employer services staff, such as those from the Adult and Dislocated Worker program.
Although Adult and Dislocated Worker program respondents reported that their programs could typically afford more employer services staff than could the VR program, they still reported having insufficient employer services staff to effectively collaborate. They attributed this to declining program funding and the lack of dedicated funding for employer services under WIOA. Without dedicated funding, employer services have to come out of the same funding used to serve job seekers. For example, a state workforce agency respondent noted that “most local areas are still…having to…carve out of their formula funds—which are really directed towards participants—resources to address business-employer needs.” To help overcome this challenge of limited funding for employer services staff, two states reported that they had supplemented local Adult and Dislocated Worker funding for employer services with Adult and Dislocated Worker state set aside funds.

To share information on employer contacts despite limited staffing, the VR program in one state agreed to input data into the employer services module of the state’s Adult and Dislocated Worker program management information system. Similarly, at the time of the site visits, the VR program and the state workforce agency (which operated Adult and Dislocated Worker and ES programs) were in discussions to have Adult and Dislocated Worker program and ES employer services staff use the VR program’s Customer Relations Management system to coordinate outreach to employers.

One ES-funded member of a local employer services team that also included Adult and Dislocated Worker and VR program members described competition among VR placement contractors as limiting collaboration among team members. Because the contractors were paid per job placement, they were unwilling to collaborate and share their employer contacts. The respondent noted that although this was understandable from a financial perspective, “it’s not conducive for a team.”

**Lack of experience and staff training in working with employers.** Some respondents identified lack of experience among VR staff in working with employers as another motivation for partnering. For example, one VR respondent stated that because his employer services staff were not as experienced at working with employers, especially in setting up work-based training such as OJT, he was very interested in partnering opportunities, so that his staff could benefit from Adult and Dislocated Worker program expertise. One local Adult and Dislocated Worker program employer services staff member noted that VR employer services staff had backgrounds in case management and were not effectively trained on how to best engage employers in a way that would lead to job placements. This respondent explained, “They’ll go talk to an employer and say you should really give [this person] a job. Well no, that’s not how we do that. We have to make [the person] marketable…and then let him sell himself.”
B. Building industry and sector partnerships

WIOA continued efforts to create partnerships with industries and sectors that began under WIA and encouraged the Adult and Dislocated Worker program to work together with other core partners on these efforts.

**WIOA supported existing efforts to develop industry and sector partnerships.** More than half of the states (9) and local areas (19) reported that WIOA’s requirement to spend Adult and Dislocated Worker program funds to “develop, convene, or implement industry or sector partnerships” had influenced their efforts to develop such partnerships to meet the needs of employers.

This new requirement encouraged six of these states and eight of these local areas to support industry and sector partnership efforts that began under WIA. Three of these six states reported using state-level Adult and Dislocated Worker program funds or other funding sources to provide grants for staffing local or regional partnership efforts. Respondents from a fourth state stated that they had invested in developing an online training about these partnerships for local staff, and respondents from a fifth reported using state funding to develop sector summits (see box).

Respondents from the sixth state reported that WIOA’s requirement had helped it better coordinate industry and sector partnerships that had been under way for years. This led to the development of a charter that enabled the state to speak with a common voice when participating in such partnerships.

Respondents in one of these eight local areas noted that WIOA had allowed it to broaden its sector efforts. As one respondent said, “WIOA allowed the workforce board to implement sector strategies at a system level instead of just Title I.” This respondent added that the local area was able to use the legislation to encourage participation among partners “who in the past maybe didn’t feel as accountable to us.”

**WIOA’s influence on major new industry and sector partnership efforts was limited.** Respondents from only one state and three local areas reported that WIOA had motivated them to undertake major new efforts to develop industry and sector partnerships as they did not have such partnerships under WIA. For the state, this effort involved hiring specialized consultants and organizing
Some states aligned WIOA planning regions with industry and sector partnerships. Respondents from three states reported that they had made the development of industry and sector partnerships a key element of their WIOA regional planning efforts, primarily because many large employers work across multiple local workforce areas. Because industry and sector partnerships might not fully align with WIOA regions, respondents from these three states reported that they were willing to be flexible and allow partnership efforts to stretch outside regional boundaries. One respondent described continued monitoring of whether partnerships “wiggle outside” regional boundaries. The respondent noted that partnership leaders “know that they have the permission to do that when necessary and appropriate.”

Industry and sector partnerships involve a learning curve. Adult and Dislocated Worker program staff members in three local areas for whom such partnerships were new reported that they had had a hard time understanding what such partnerships involved. One of these staff members described industry and sector partnerships as “nebulous” and questioned, “what’s the ‘it’ of sector strategies?” A state-level respondent concurred that her employer services staff had difficulty understanding what it meant to work with employers using a sector-focused approach.

Providing leadership and staffing for partnership efforts could be difficult. Respondents from five states and four local areas commented that industry and sector partnerships were hard to maintain because they required a lot of staff time. Others reported that successful partnerships also required support from key industry leaders, which was difficult to find and maintain. For example, one respondent related that their local area had tried to develop manufacturing and health care sector partnerships under WIA, but those efforts had just “dwindled away” without strong industry leadership. Other respondents noted that in most cases employers were too busy running their businesses to lead such efforts. Respondents from one state reported that engaging employers in partnerships was also difficult when employers faced multiple competing partnership efforts or refused to collaborate with their competitors. To address such challenges, Colorado developed a “small wins” approach to engaging employers (see box).

C. Promoting incumbent worker training

WIOA allows local Adult and Dislocated Worker programs to spend up to 20 percent of their funding on incumbent worker training; under WIA, such training could generally only be provided with funds that states set aside (Dunham et al. 2004). Respondents from eight local areas reported that WIOA’s changes...
to incumbent worker training had influenced whether or how they provided or were planning to provide such training for employers. In six of these areas, respondents reported that the local WDBs had authorized the use of local Adult and Dislocated Worker program formula funds ranging from $30,000 to the full 20 percent of their total Adult and Dislocated Worker program allocations for incumbent worker training. Some respondents stated that their WDBs thought this training was a good use of their funding because it prevented workers from being laid off or assisted them with moving up a career pathway.

High employer demand for training. One of the key reasons respondents from these local areas reported funding incumbent worker training was because local employers were “knocking” on their doors asking for this assistance. An Adult and Dislocated Worker program respondent from one of these areas said that WIOA’s allowance of incumbent worker training for upskilling as well as for layoff aversion had helped make it more popular among employers. In this local area, employers in the ship building and repair industries were “very much hurting for skilled employees…a lot of them have come to the realization that [they] may not be able to hire them.” This respondent further asserted that incumbent worker training had been very useful to these local industries for training their current employees, and that the ability to pay up to 90 percent of training costs for small companies had also helped attract more employers. However, respondents in another area believed that even though employers were asking for such training, they did not need it to stay in business and were just looking for a way to increase profits by saving money on training.

Job retention through incumbent worker training
In the Middlesex, New Jersey, local workforce area, local Adult and Dislocated Worker program funds were used to fund a Six Sigma training for an entire manufacturing plant of 100 people. Six Sigma is a data-driven methodology for process improvement. In Middlesex, the training was intended to help the plant increase efficiency and speed up the changing of production lines from one hour to just 10 minutes. According to local area respondents, the increased efficiency resulting from this training led the company to reconsider closing the plant, keeping those jobs in Middlesex County.

Limited funding availability. Respondents from all 14 states and 17 of the local areas stated that although they recognized the value of incumbent worker training, they felt that limited local Adult and Dislocated Worker program funds should be spent on helping unemployed participants. Eleven of these local areas reported that this decision had been easier to make because of the availability of other state funding for incumbent worker training. Of the five local areas that had used funds for incumbent worker training during the first three years of WIOA, three reported that, due to recent funding cuts, they had significantly decreased what they would spend on incumbent worker training in PY 2019 or might eliminate all such spending. A state workforce agency staff member expressed a common sentiment that “if we had more money, we would set aside some of the adult and dislocated worker money for incumbent [worker training].”

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44 WIOA, Section 134(d)(4). 20 CFR Section 680.780 further defines incumbent workers as people who “meet the Fair Labor Standards Act requirements for an employer-employee relationship; and have an established employment history with the employer for six months or more”; unless the training is being provided for a group of employers, in which case only the majority of workers need to meet the six-months requirement.

45 In one of these local areas, despite the WDB's authorization of the use of Adult and Dislocated Worker program funds on incumbent worker training, as of the time of the site visits, none of those authorized funds had yet been spent on incumbent worker training.
Lack of state guidance. Respondents from three other local areas in two states reported being ready to use local Adult and Dislocated Worker program funds to provide incumbent worker training; however, they had not done so pending guidance from their states. Given delays in receiving state funding guidance, one of the local areas released funds it had allocated to incumbent worker training to other purposes. Another planned to move forward with funding the training without state guidance, with the respondent noting that “I’ve had businesses knocking on my door that they’re wanting to upscale people…and I have to serve business, so I’m going to.”

Excessive paperwork and reporting requirements. Respondents from two local areas reported that employers were unwilling to complete all the paperwork required to receive incumbent working training paid by local Adult and Dislocated Worker program funds. Another local area noted that some employers had declined to receive funding for such training because of reporting requirements, since information on incumbent worker trainees must be reported to DOL.

Need for rebranding and marketing. Respondents from the one local workforce area found that employers were put off by the “incumbent” label; employers associated this word with political candidates. To overcome this challenge, the workforce area rebranded its incumbent worker training as “Employee Development Grants” and was thereafter successful in encouraging employers to participate. This local area also developed videos based on recent trainings to help them market to additional employers.

Pee Dee’s two-page form
To overcome employers’ reluctance to complete the paperwork required for incumbent worker training, staff from the Pee Dee local area in South Carolina shortened its required forms from 10 pages to just 2.
VII. Looking ahead

The Adult and Dislocated Worker program respondents in the states and local areas visited for the WIOA Implementation Study believed that WIOA strengthened efforts that began under WIA and helped shift their orientation toward serving the broader needs of job seekers—particularly those with barriers to employment—and employers. The emphases on work-based learning, career pathways, employer services, and industry and sector partnerships in WIOA, as well as on the need for greater collaboration across programs, served to renew efforts to push for a more integrated workforce system that incorporated these strategies, was more responsive to the needs of individual participants and employers, and included new or reinvigorated partnerships to achieve these goals.

This report explored the experiences of a relatively small sample of states and local areas, and findings cannot be generalized to other states and local areas. However, the report does offer a detailed snapshot of efforts that states and local areas undertook to implement WIOA’s requirements for the Title I Adult and Dislocated Worker programs and to achieve WIOA’s vision for the workforce system. In this chapter, we identify some of the broader takeaways from these states’ and local areas’ implementation experiences and areas for possible additional technical assistance.

Respondents identified some areas where additional or enhanced technical assistance or guidance might be helpful. DOL has developed and made available a number of technical assistance products on career pathways, work-based training, and sector strategies, including a toolkit on OJT, on WorkforceGPS. DOL also issued guidance on building collaboration across core and required partners. DOL has also funded grant opportunities to support states’ efforts to develop apprenticeship programs aligned with WIOA’s objectives.

The experiences of states and local areas in implementing requirements for the Title I Adult and Dislocated Worker programs, 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:

**Targeted training and resources.** The development of work-based learning and career pathways opportunities, as well as industry and sector partnerships, requires market demand, staff resources, and expertise. State and local area respondents noted the need for additional targeted guidance and training to help strengthen their efforts in these areas. In addition, states and local areas indicated that they need

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46 See the toolkit for OJTs ([https://ion.workforcegps.org/resources/2017/12/01/11/19/On-the-Job-Training-Toolkit](https://ion.workforcegps.org/resources/2017/12/01/11/19/On-the-Job-Training-Toolkit)), an enhanced guide and workbook on developing career pathways ([https://careerpathways.workforcegps.org/resources/2016/10/20/10/11/Enhanced_Career_Pathways_Toolkit](https://careerpathways.workforcegps.org/resources/2016/10/20/10/11/Enhanced_Career_Pathways_Toolkit)), and multiple resources on registered apprenticeships ([https://apprenticeshipusa.workforcegps.org/](https://apprenticeshipusa.workforcegps.org/)), and industry and sector partnerships ([https://olderworkers.workforcegps.org/resources/2016/09/20/11/33/Sector_Strategies_Resources](https://olderworkers.workforcegps.org/resources/2016/09/20/11/33/Sector_Strategies_Resources)). Further, DOL has provided a number of TEGLs on these topics, including TEGL 19-16, TEGL 13-16 (on apprenticeships and WIOA).


48 See, for example, TEGLs 15-19, 17-18
additional resources to fully develop and nurture employer relationships and support participants in their long-term career goals.

**Building staff skills to better serve jobseekers with barriers to employment.** While Adult and Dislocated Worker programs are focusing more on serving participants with barriers to employment, staff feel ill-equipped to serve these participants and leverage partner programs effectively. To successfully meet the needs of these job seekers, program staff reported that they needed to become more skilled in working with these populations. They also indicated that closer partnerships with programs that specialize in serving individuals with barriers to employment—especially VR and AEFLA—can mutually benefit staff across programs.

**Technical assistance on sharing participant data.** Respondents reported working on formalizing local procedures to facilitate referrals, co-enrollment, and follow-up to help ensure participants are connected to the right services at the right times. However, additional guidance on building collaboration across partner program staff, and technical assistance and to develop effective procedures for sharing information, was also requested to help states and local areas better serve employers and job seekers, including those with barriers to employment.

In addition to these suggestions for additional guidance and technical assistance, the study findings point towards potential areas for future research. Future research topics could include:

- Integrated intake, case management, and data systems currently in use; and
- Innovative strategies identified by respondents to improve referrals and case management, and their relationship to outcomes.
References


Appendix A:

National data on the Title I
Adult and Dislocated Worker programs
## Exhibit A.1. Number and percent of Title I Adult and Dislocated Worker program exiters with selected barriers PYs 2013–2017

<table>
<thead>
<tr>
<th></th>
<th>WIA</th>
<th></th>
<th>WIOA</th>
<th></th>
<th></th>
<th>Change PY 13 – PY 17</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PY 13</td>
<td>PY 14</td>
<td>PY 15</td>
<td>PY 16</td>
<td>PY 17</td>
<td>Number</td>
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<tr>
<td><strong>Total adult exiters</strong></td>
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<td>931,306</td>
<td>836,507</td>
<td>871,421</td>
<td>630,013</td>
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<td>43,603</td>
<td>5.8</td>
<td>50,161</td>
<td>7</td>
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<tr>
<td>Homeless individual or runaway youth</td>
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<td>2.0</td>
<td>--</td>
<td>2.1</td>
<td>--</td>
<td>--</td>
</tr>
<tr>
<td>Ex-offender</td>
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<td>7.8</td>
<td>--</td>
<td>8.1</td>
<td>--</td>
<td>--</td>
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<td>Low income</td>
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<td>404,414</td>
<td>45.1</td>
<td>359,819</td>
<td>41.6</td>
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<td>1.3</td>
<td>15,016</td>
<td>1.8</td>
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<td>13.2</td>
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<td>11.2</td>
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<td>TANF recipient</td>
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<td>3.6</td>
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<td>3.5</td>
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<tr>
<td>Older worker (aged 55+)</td>
<td>152,141</td>
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<td>138,928</td>
<td>14.9</td>
<td>143,193</td>
<td>16.4</td>
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<tr>
<td><strong>Total dislocated worker exiters</strong></td>
<td>671,510</td>
<td>502,375</td>
<td>426,480</td>
<td>402,328</td>
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<td>Individual with a disability</td>
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<td>Older worker (aged 55+)</td>
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<td>21.2</td>
<td>106,423</td>
<td>21.2</td>
<td>92,731</td>
<td>23.0</td>
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</table>

Source: Workforce Investment Act Standardized Record Data (WIASRD) and Participant Individual Record Layout (PIRL).

Notes: Some characteristics were only reported in the WIASRD for participants who received certain services (intensive or training services), and thus the raw numbers in the WIASRD are not comparable to those collected in the PIRL. TANF = Temporary Assistance for Needy Families.
Exhibit A.2. Number and percent of Title I Adult and Dislocated Worker program exiters co-enrolled in Employment Services or other Title I programs PYs 2013–2017

<table>
<thead>
<tr>
<th></th>
<th>WIA</th>
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<th>WIOA</th>
<th></th>
<th></th>
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<td>PY 14</td>
<td>PY 15</td>
<td>PY 16</td>
<td>PY 17</td>
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<td>Number</td>
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<td>Percent</td>
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<td>Number</td>
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<tr>
<td>Total dislocated</td>
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<td>486,712</td>
<td>773,103</td>
<td>718,788</td>
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<td>workers co-enrolled</td>
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<td>Adult</td>
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<td>Number</td>
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<td>&lt;1.0</td>
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<td>Employment Service</td>
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Source: WIASRD and PIRL.
Appendix B:

WIOA Implementation Study Sites
## Exhibit B.1. WIOA Implementation Study: Site visit states, regions, and local areas

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<tr>
<th>State/Region</th>
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<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>State workforce agency</th>
<th>Local workforce area</th>
<th>Local workforce board</th>
<th>American Job Center</th>
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<tbody>
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<td></td>
<td></td>
<td></td>
<td>NJ Department of Labor and Workforce Development</td>
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<td>Gloucester County Workforce Development Board</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>Middlesex County</td>
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<td>Florida Department of Economic Opportunity</td>
<td>North Florida</td>
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<td>Pee Dee</td>
<td>Pee Dee Workforce Development Board</td>
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<td></td>
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