

### Recommendations to Strengthen Title I of the Senate WIA Reauthorization Bill Passed by the 109<sup>th</sup> Congress

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The Workforce Investment Act (WIA) authorizes the nation's federally funded workforce development system, which provides employment and training services for youth, dislocated workers, and adults and helps employers find qualified employees. While authorization for WIA expired in 2003, Congress continues to appropriate funds, extending the program based on the current statute. The House and the Senate each passed WIA reauthorization bills during both the 108<sup>th</sup> and the 109<sup>th</sup> Congresses, but the bills never went to conference, and reauthorization was not completed. As the 110<sup>th</sup> Congress turns once again to WIA reauthorization, a new opportunity exists to ensure that our public workforce system is responsive to the diverse needs of low-wage workers and low-income populations.

This paper offers recommendations to strengthen the bipartisan Senate WIA bill that passed in the 109<sup>th</sup> Congress (HR 27 EAS, which incorporated S 1021), which the Senate may use as a starting point for a new bill. Title I of the Senate bill included a number of provisions to improve services for low-wage workers and low-income adults, for example by increasing services for hard-to-serve populations, modifying the existing performance management system (which has led to creaming), providing greater access to training, and supporting the development of career pathway programs and sectoral strategies. However, we believe that the Senate bill could go even further to improve outcomes for low-income individuals and low-wage workers. Our recommendations for strengthening the bill aim to further three critical goals:

- 1. Expanding access to training for low-income adults,
- 2. Promoting services for low-wage workers that support retention and advancement, and
- 3. Investing WIA funds strategically to help more workers enter high-quality jobs.

#### **Background on the Workforce Investment Act**

In 1998, WIA replaced the Job Training Partnership Act (JTPA) as the authorizing legislation for federally funded job training and employment related services. One of the goals of WIA was to bring together a fragmented group of workforce development programs to create a one-stop system in which employers and job seekers could easily access a wide array of employment and training services. WIA mandated universal access

to the one-stop system, with sequential eligibility for intensive and training services. Federal workforce development funds were no longer targeted exclusively toward serving low-income adults (as they were under JTPA). WIA also emphasized more private sector involvement in the public workforce system and a dual focus on employer and jobseeker needs. The law mandated a strong policy role for business-led state and local Workforce Investment Boards (WIBs) and stronger connections between workforce and economic development. WIA also promoted customer choice through the use of vouchers to purchase training.

WIA's new mandates for universal services, a one-stop system, and a dual customer focus on both workers and employers were not accompanied by a significant increase in funding. In fact, U.S. Department of Labor expenditures on training and employment assistance have suffered cuts that translate into a drop in expenditures per worker from \$63 in 1986 to \$35 in 2006, without an adjustment for inflation.<sup>1</sup> The workforce system has struggled to meet the law's various requirements, as appropriations have continued to decrease. Under WIA, training has declined for low-income populations. In addition, at many one-stop centers there is a lack of expertise and support services available to individuals facing barriers to employment. A Government Accountability Office (GAO) report on employer usage of the one-stop system found that one of the factors that hinders the ability of one-stops to serve employers is the limited number of staff available to serve business needs.<sup>2</sup>

### **CLASP Recommendations**

#### Expand Access to Training for Low-income Adults.

Research shows that education and training can significantly increase earnings for lowincome populations when programs are well designed, of sufficient duration, and linked to employment opportunities available in the local labor market. A study of welfare recipients who attended California community colleges found that by the second year out of school, median annual earnings of women with associate's degrees were 403 percent higher than before they entered training.<sup>3</sup> Two independent evaluations of the job training program Project Quest, in San Antonio, Texas, found wage gains of between \$5,000 and \$7,500 a year for program participants.<sup>4</sup>

Education and training should be at the center of the nation's workforce development system. However, WIA's new policy emphasis on universal access and multi-tiered services has led in many areas to a focus on lower-intensity core services, at the expense of training and skill development. A GAO study found that local workforce boards spend only about 40 percent of available WIA funds on training for WIA participants.<sup>5</sup> CLASP analysis has pointed to a sharp decline in the provision of training following the transition from JTPA to WIA.

While the number of adults receiving training declined during the transition to WIA, there has also been a decline in the share of adults receiving training who are low income

or have barriers to employment.<sup>6</sup> In 1998, the last full year of the JTPA program, 96 percent of trainees were low income.<sup>7</sup> This fell to 82.4 percent in 2000, the first full year of WIA data, and has continued to decline each year since, falling to 65.5 percent in 2004.<sup>8</sup>

### CLASP recommends the following modifications to HR 27 EAS to help expand access to training for low-income adults:

• Eliminate the sequence of service. After receiving core services, eligible participants can immediately receive any intensive or training service.

*Rationale:* Under current law, individuals who qualify for the adult and dislocated worker programs can access three tiers of services at one-stop centers: (1) core, which includes basic services, such as job search assistance; (2) intensive, which includes comprehensive assessment and case management; and (3) training, which includes occupational skills or on-the-job training. These services are provided sequentially—meaning that individuals must first receive core services to gain access to intensive services and must receive both core and intensive services before accessing training services. Under JTPA, individuals were assessed for their skill levels and interests and then placed in a job-related activity.

The adoption of sequential eligibility rules has caused confusion in the field and delays and denials of services to those who could benefit from them. Many states and local areas initially interpreted WIA's sequential requirements to mean that the system should encourage "work first"—rapid job placement—instead of job training and a focus on placement only in higher-quality jobs.<sup>9</sup> Eliminating the bill's sequential provisions would send a clear message to the system that WIA is a training program and not a work-first program, and it would allow local boards and one-stop centers the flexibility to provide appropriate services to customers in a timely manner.

# • Require states to include the process that the state will use to ensure that local areas implement the priority system for training services in the state plan.

*Rationale*: Under WIA, public assistance recipients and low-income individuals have priority of service for training when funds are limited. However, the law does not provide specific guidance on what prioritization involves; and the drops in training services to low-income adults under WIA suggest that in many places, it is not being properly implemented. The law requires that "the appropriate local board and the Governor shall direct the one-stop operators in the local area with regard to making determinations related to such priority."<sup>10</sup> In order to ensure that this provision is adhered to, states should include in the state plan the process for monitoring local areas to make certain priority of service requirements are implemented.

• Require that local areas requesting approval from the governor for a transfer of funds between the adult and dislocated worker program that exceeds 30 percent provide an explanation, subject to public comment, of how both target populations will be adequately served through the transfer.

*Rationale:* Under current law, the governor can authorize local areas to transfer up to 20 percent of funds between the adult and dislocated worker funding streams.<sup>11</sup> The Senate bill increased that amount to 100 percent.<sup>12</sup> While it is important to afford local areas the flexibility to transfer funds, it is also important to ensure that the populations Congress intended to receive services through each funding stream actually receive those services.

Requiring that the local area provide a written explanation (subject to public comment) of how both target populations will be served through a transfer exceeding 30 percent will result in greater accountability, and it will help ensure that funds are used in the most appropriate manner.

## • Direct the Secretary of Labor to award incentive grants to states that have demonstrated an expansion of access to training for low-income individuals through the one-stop partner programs.

*Rationale:* The Senate WIA reauthorization bill directs the Secretary of Labor to award incentive grants to states that have demonstrated an expansion of access to training through the one-stop partner programs.<sup>13</sup> Because of the drop in training services to low-income adults since the enactment of WIA, Congress should require that incentive grants target states that successfully expand training specifically for *low-income individuals*, to encourage states to increase training opportunities for this population.

### • Clarify that WIA funds for training can supplement Pell grants when necessary.

*Rationale:* In order to ensure that low-income students can receive the supports that they need to succeed in training, it is important to make clear to the system that WIA funds can be used in conjunction with Pell grants. When making determinations about how much funding an individual needs to participate in training, caseworkers should take into account the full costs of participation, including child care, transportation, and wages lost due to a reduction in work hours.

• Allow training to be provided through Individual Training Accounts (ITAs) or through contract training. Maintain provisions that support customer choice and ensure that there is an open and fair process for awarding contracts.

*Rationale:* WIA mandates that training be provided through ITAs and allows for contract training through the following exceptions: on-the-job training (OJT) or customized training, when a local area has an insufficient number of eligible training providers, or for a training program run by a private or community-based organization that has been demonstrated as effective at serving special populations with barriers to employment.<sup>14</sup> The Senate bill adds another exception, allowing contract training to be used for institutions of higher education to provide training to multiple individuals in high-demand occupations.<sup>15</sup>

The law's focus on training primarily through ITAs unnecessarily discourages the use of contract training, which in certain cases may be better suited to the needs of individuals with barriers to employment. For example, a 2004 evaluation of the U.S. Department of Labor's Individual Training Account/Eligible Training Provider demonstration project found that one of the advantages of purchasing training on a classroom rather than individual basis is the mutual support that dislocated workers enjoy by participating in training in the same class with peers.<sup>16</sup>

A GAO report found that although the vast majority of local boards use ITAs, most have faced challenges in managing their use. Fifty-two percent of local boards responding to the GAO survey encountered challenges linking ITA systems to local economic and business strategies.<sup>17</sup> Nearly two-thirds of the local boards reported that the lack of performance data on providers was a challenge, since it hindered their ability to determine which providers served participants most effectively.<sup>18</sup>

In order to ensure that states and local areas have maximum flexibility to provide the most appropriate type of training to program participants, WIA should be amended to allow for training to be provided through ITAs *or* contract training whenever necessary. This change will send a message to the system that contract training is an allowable activity, and it will facilitate the coordination of training with local economic development strategies and the development of training programs geared at participants with barriers to employment. It is important that customers have choice, so we recommend preserving language supporting customer choice.

## Promote Services for Low-wage Workers that Support Retention and Advancement.

In 2005, 24.5 percent of U.S. workers earned poverty-level wages.<sup>19</sup> Workers frequently are stuck in these low-wage jobs. An analysis of the Survey of Income and Program Participation found that among prime-age workers (ages 25-54), the probability of staying in a low-wage job for more than three years is 36.6 percent.<sup>20</sup> In addition to insufficient pay, low-wage jobs are often characterized by unpredictable hours; a lack of health benefits, child care, training, and sick leave; and little control over scheduling.<sup>21</sup>

These characteristics make it difficult for low-wage workers to retain employment or advance to better jobs. For example, without job training, it is difficult for workers to advance. If workers do not have paid leave or control over their own schedule, any illness or family emergency can quickly result in job loss. A lack of quality child care also creates barriers for retention; research shows that the availability of quality child care helps women to maintain employment.<sup>22</sup>

The prevalence of low-wage work means that our nation's job training system must not only focus on making job placements but also make retention and advancement a central part of its mission. This will require the system to work on both the supply and demand sides of the labor market. On the supply side, the workforce system must focus on connecting workers and job seekers to good jobs, helping incumbent workers build skills to advance to better jobs, and facilitating the receipt of work supports for low-wage workers that promote attachment to the labor market. On the demand side, the workforce system must work with employers to improve job quality and to develop workplace practices that support retention and advancement.

- **Connect workers to good jobs.** Research suggests that helping low-income adults obtain higher-quality jobs than they would find on their own can lead to better job retention and larger long-term wage growth.<sup>23</sup> Thus it is critical that the nation's workforce investment system focus on identifying high-wage and high-quality jobs and on connecting job seekers and low-wage incumbent workers to these jobs.
- **Provide skill upgrading opportunities for low-wage workers.** Research shows that training can increase low-skilled workers' earnings exponentially and that increasingly, education and skills are more important determinants of wages than experience.<sup>24</sup> Among the 30 jobs with the most openings, the jobs offering high wages typically go to workers with degrees or to those who have had significant on-the-job training through apprenticeships or community colleges.<sup>25</sup> Low-wage workers often have few opportunities to receive training, since employers provide more training to more-educated workers. Researchers studying employer-provided training found that "workers with some college were twice as likely as workers with a high school degree or less to receive employer sponsored training in 1995, and this gap grew somewhat by 2001 as the percentage of workers with high school education or less who received training declined."<sup>26</sup> The public system can collaborate with employers to provide training and skill upgrading opportunities for low-wage workers.<sup>27</sup>
- Help employers implement supportive workplace practices. Low-wage employers often utilize human resource practices that make it hard for low-wage workers to advance in a firm. These practices include a lack of training, outsourcing of lower-skilled work (which removes low-wage jobs from a firm's internal labor market), and the breakdown of internal mobility paths.<sup>28</sup> However, there are several human resource practices that can help to retain and advance low-wage workers. These include creating internal career ladders, offering

competitive wages and benefits, providing OJT and informal apprenticeships, linking training to advancement, cross-training employees, implementing a mentoring program, creating employee stock option plans, developing supervisory training, offering elder care and/or child care, providing assistance with transportation, offering an Employee Assistance Plan (EAP), providing flextime, and providing flexiplace.<sup>29</sup> These types of improvements benefit businesses by increasing retention, decreased absenteeism, and increasing productivity.

• Focus on retention. Frequent turnover has negative impacts for workers. It results in lower wages, due to more frequent periods of unemployment, and a lack of work experience and job tenure, which are associated with increased earnings over time.<sup>30</sup> The workforce system should work with participants after job placement to promote retention—by providing ongoing career counseling, helping connect low-wage workers to work supports, and helping workers address barriers that may affect their ability to keep a job. Some workforce agencies have already recognized the importance of providing retention services to workers and employers. For example, the SF Works program provides one year of retention services (which include online skills upgrading, mentoring, support, brown bag seminars, and professional development planning) to individuals who are placed in jobs.<sup>31</sup>

If the system focuses on retention, it will be more responsive to the needs of employers. Turnover is expensive for businesses because of costs associated with job vacancies; recruiting, hiring, and orienting new employees; and downtime of new employees as they learn the job. However, many employers do not measure these costs and therefore do not recognize the positive effects reducing turnover would have on the bottom line. A study of businesses by the Center for Workforce Preparation found that only 25 percent of respondents measured the cost of turnover.<sup>32</sup> WIBs are in a unique position to help businesses recognize the costs associated with turnover and identify new human resource practices to reduce it. Working with employers to reduce turnover will also improve the performance of the workforce area, since retention is a WIA performance measure.

### CLASP recommends the following modifications to HR 27 EAS to promote retention and advancement for low-wage workers:

• Add retention and advancement of low-wage workers to the purposes of WIA.

*Rationale:* MDRC—a nonprofit, nonpartisan social policy research organization—is currently conducting a federally funded demonstration project to build the capacity of the workforce and welfare systems to provide employment retention and advancement services. MDRC has found that "most public workforce development programs offer no—or only very limited—advancement services to low-wage, incumbent workers and their employers."<sup>33</sup> To reverse this

trend, it is important to make retention and advancement one of the purposes of WIA. This will signal to the system that it must focus on longer-term self-sufficiency outcomes for workers, provide retention and advancement services to participants after placement, and conduct outreach to low-wage workers not yet connected to the system.

• Allow business liaisons to provide technical assistance to employers about how to improve the quality of existing jobs and increase employment retention.

*Rationale:* The Senate bill requires local areas to designate a dedicated business liaison to establish and develop relationships with the business community.<sup>34</sup> It is important that, in addition to informing area businesses about services at the onestop and helping them access these services, business liaisons work with employers to improve job quality. For example, the business liaison can provide technical assistance to employers and information about the benefits of creating internal career ladders, allowing release time for training, providing OJT, implementing flexible scheduling, providing paid leave, and improving access to work supports. This type of technical assistance can help employers improve their bottom line—employers who implement programs and policies to support low-wage workers report increased recruitment and retention rates, improved customer service, increased productivity, and decreased absenteeism.<sup>35</sup>

## • Expand upon the language in the Senate bill that requires one-stops to provide information about work supports so that it also requires them to assist customers with the submission of applications for such programs.

*Rationale:* One-stops should better facilitate connections to work supports, in order to help low-wage workers and other low-income populations advance and succeed in the labor market. As increasing numbers of low-income individuals have entered employment, significant attention has been placed on connecting low-income workers to work supports (government-funded benefits available to working individuals or families). Such supports include public benefits (such as subsidized child care), health care, the earned income tax credit, and other income supports—all of which can raise family income, address other family needs, and reduce economic burdens on families. One-stop centers are in a unique position to connect eligible low-income working adults to these benefits, and some one-stops have pulled resources together under one roof to make it simpler for individuals to access work supports. <sup>36</sup> However, facilitating these connections has not been a clear or universal priority for the one-stop system.

The Senate bill recognizes the importance of connecting low-income workers to work supports for which they may be eligible. It requires one-stops to include, as part of core services, referrals to work supports and supportive services.<sup>37</sup> However, one-stops should do more than provide information and referrals—they should be an access point for low-wage workers to apply for work supports.

• Explicitly state that funds spent on services provided to low-wage workers under Section 134(d) of WIA (Required Employment and Training Activities) do not count towards the 10 percent cap on the federal share of the incumbent worker training program established in the Senate bill.

*Rationale:* The Senate bill authorizes the use of federal funds for an incumbent worker training program.<sup>38</sup> Currently, eligible incumbent workers can receive intensive and training services under the required activities for adult and dislocated workers. Adding a paragraph clarifying that the cap on funds used for the incumbent worker training program is *not* a cap on training services for incumbent workers provided through Section 134(d) will ensure that services to incumbent workers are expanded by the addition of this new program.

### • Allow funds dedicated to the incumbent worker training program authorized in the Senate bill to be used to promote advancement for low-wage workers.

*Rationale:* The incumbent worker training program authorized in the Senate bill is for "assisting such workers in obtaining the skills necessary to *retain employment or avert layoffs* [italics added]."<sup>39</sup> Expanding the purpose of this program to include advancement will ensure that low-wage workers are eligible to receive training services that will help them move into better jobs. This is an important addition, since many workers lack the necessary skills to advance to better jobs.

• Change the definition of "low-income individual" to refer to those earning 100 percent or less of the lower living standard income level (LLSIL), to ensure that more low-income individuals and low-wage workers are eligible for intensive and training services.

*Rationale:* Under WIA, the definition of a low-income individual is an individual who has not received (or is not part of a family that has received) an income that exceeds the poverty line or 70 percent of the LLSIL during the six-month period prior to his or her request for services.<sup>40</sup> The law mandates that the Secretary of Labor annually determine the LLISL, which is defined as "that income level (adjusted for regional, metropolitan, urban, and rural differences and family size) determined annually by the Secretary based on the most recent lower living family budget issued by the Secretary."<sup>41</sup> Expanding the qualifying percentage of the LLSIL from 70 to 100 percent will result in more low-wage workers being eligible for services.

• Require state and local areas to include in the state and local plans detailed information about strategies that will be used to make one-stop services more accessible to low-wage workers.

*Rationale*: Research shows that many low-wage workers are not aware of the public employment and training services available to them or do not know how to

access them. A 2003 survey of low-wage workers found that although many workers are interested in receiving more education and training, many are not taking advantage of the public resources available. The survey researchers concluded that workers are not accessing training services because "three barriers are at play: lack of awareness of public resources, lack of confidence in public resources, and, to a lesser extent, lack of access to public resources."<sup>42</sup> Therefore, it is important for states and local areas to have strategies in place to engage low-wage workers. Many one-stops are open only during regular business hours, limiting access to services for many low-wage workers. Requiring state and local areas to provide detailed information about how one-stop services will be made accessible to low-wage workers will ensure that WIBs make policy changes to increase access for this population. Changes could include modifying the hours of operation to enable working adults to access services during non-work time, along with doing outreach and providing services at job sites.

#### Target WIA Funds Strategically.

Over the past decade, the public workforce system has rightly moved to a more demanddriven system, in order to increase training programs' relevance and responsiveness to labor market requirements and thus to better serve the needs of employers and workers. Developing a workforce system that can meet employer needs is critical to helping workers succeed in the labor market; however, it is important that limited WIA funds be used strategically to support employers who provide good jobs. Several WIBs have designed creative ways to do this. One is to require that employers who benefit from WIA training investments provide employment opportunities that meet certain state or locally defined job quality standards. Such standards might include certain wage levels, availability of benefits (such as healthcare, paid leave, or retirement plans), reliable hours, workplace training, opportunities for advancement, and release time for training.

# CLASP recommends the following modifications to HR 27 EAS, to ensure that the system invests WIA funds strategically to help more workers enter high-quality jobs:

• Require the inclusion of job quality standards in the development of OJT, customized training, and incumbent worker training contracts.

*Rationale:* Under WIA, some WIBs have developed rating schemes for employers and grant OJT contracts only to employers who meet certain job quality standards.<sup>43</sup> Requiring all local boards to include job quality standards in OJT and customized training contracts would ensure that limited funds are targeted at good employers and that taxpayer investments do not support low-paying, low-quality jobs.

• When WIA funds are being used for economic development purposes, require WIBs to collaborate with economic development entities to establish job quality standards.

*Rationale:* The Senate bill eliminates the current law's prohibition on using WIA funds for economic development activities.<sup>44</sup> Therefore, it is critical to ensure that when WIA funds are used for such purposes, investments are targeted at high-quality jobs. It is becoming more common in the field of economic development to attach such standards. A research report by Good Jobs First found that as of 2003, at least 43 states, 41 cities, and five counties had job quality standards in place for economic development subsidies. While the most common job quality standards were wage standards and health benefit requirements, many jurisdictions also had requirements that jobs be permanent and full-time and that they have training and career advancement opportunities, paid sick leave, and/or vacation and personal leave.<sup>45</sup>

#### • When WIA funds are being used for economic development activities, require state and local WIBs and economic development authorities to have formal agreements in place that specify how low-income individuals will be trained for and have equitable access to jobs created.

*Rationale:* A study of cluster-based development—which has become the organizing framework for much economic development work—found that it in most cluster-based initiatives, equity is not a big concern.<sup>46</sup> WIA Title I Adult funds have been designated by Congress to serve low-income individuals, and it is important that these individuals have access to jobs being created through WIA funds. When WIA funds are used for economic development, WIBs should be required to demonstrate that this will be the case.

CLASP believes that the recommendations outlined above will help to ensure that the Senate bill passed in the 109<sup>th</sup> Congress is more responsive to the diverse employment and training needs of low-wage workers and low-income individuals, by ensuring that they can more easily access training, are placed in high-quality jobs, and are provided with retention and advancement services. Our recommendations will also help to ensure that limited WIA funds support high-quality employers and that the system helps employers, when possible, to utilize human resource practices that benefit both the business and the worker. As we confront the challenges of globalization, it is more important than ever to have a strong workforce development system that supports employers and helps low-income and low-wage workers build the skills necessary to succeed and compete.

*The legislative language for these recommendations is available at* <u>http://www.clasp.org/publications/wia\_title\_i\_senate\_leg\_language.pdf</u>.

<sup>&</sup>lt;sup>1</sup> Joan Fitzgerald and Andrew Sum, "What Can Worker Training Do?" in "*Ending Poverty in America:* A Special Report for the Council on Foundations Annual Conference," Demos and The American Prospect, 2007.

<sup>2</sup> Government Accountability Office, Employers Found One-Stop Centers Useful in Hiring Low-Skilled Workers; Performance Information Could Help Gauge Employer Involvement. 2006.

<sup>3</sup> Anita Mathur with Judy Reichle, Julie Strawn, and Chuck Wiseley, From Jobs to Careers: How California Community College Credentials Pay Off for Welfare Participants, Center for Law and Social Policy. May 2004.

Paul Osterman, "Employment and Training Policies: New Directions for Low-Skilled Adults," in Reshaping the American Workforce in a Changing Economy, ed. Harry Holzer and Demetra Smith Nightingale, Urban Institute, 2007.

<sup>5</sup> Government Accountability Office, Substantial Funds Are Used for Training, but Little is Known Nationally about Training Outcomes, 2005.

<sup>6</sup> Abbey Frank and Elisa Minoff, Declining Share of Adults Receiving Training under WIA are Low-Income or Disadvantaged, Center for Law and Social Policy, 2005, http://www.clasp.org/publications/decline in wia training.pdf.

Data on JTPA participants are drawn from the SPIR database. This data can be found in the Social Policy Research Associates WIASRD Databook, PY 2002.

The definitions of "terminees" and "exiters" are comparable under the two programs. Abbey Frank and Elisa Minoff, Declining Share of Adults Receiving Training under WIA are Low-Income or Disadvantaged, Center for Law and Social Policy, 2005,

http://www.clasp.org/publications/decline\_in\_wia\_training.pdf; Social Policy Research Associates, 2004 WIASRD Data Book, February 2, 2006.

<sup>9</sup> Burt Barnow and Chris King, *The Workforce Investment Act in Eight States*, The Nelson A. Rockefeller Institute of Government, 2005.

<sup>10</sup> PL 105-220 Section 134 (d)(4)(E).

<sup>11</sup> PL 105-220 Section 133 (b)(4).

<sup>12</sup> HR 27 EAS Section 121(b)(2).

<sup>13</sup> HR 27 EAS Section 161(1).

<sup>14</sup> PL 105-220 Section 134 (d)(4)(G).

<sup>15</sup> HR 27 EAS Section 121(c)(2)(D)(v)(III).

<sup>16</sup> Ron D'Amico and J. Salzman, An Evaluation of the Individual Training Account/Eligible Training Provider Demonstration, Final Report, Social Policy Research Associates, 2004.

<sup>17</sup> GAO, Substantial Funds.

<sup>18</sup> Ibid.

<sup>19</sup> Lawrence Mishel, Jared Bernstein, and Sylvia Allegretto, *The State of Working America* 2006-2007, Economic Policy Institute, 2007.

<sup>20</sup> Heather Boushey, "No Way Out: How Prime Age Workers Get Trapped in Low-Wage Jobs," in WorkingUSA: The Journal of Labor and Society, December 2005: 659-70.

<sup>21</sup> Beth Schulman, The Betraval of Work: How Low-Wage Jobs Fail 30 Million Americans and Their Families, 2003.

<sup>22</sup> Hannah Matthews, Child Care Assistance Helps Families Work: A Review of the Effects of Subsidy Receipt on Employment, Center for Law and Social Policy, 2006,

http://www.clasp.org/publications/ccassistance employment.pdf.

<sup>23</sup> Nan Poppe, Julie Strawn, and Karin Martinson, "Whose Job is It? Creating Opportunities for Advancement," in Workforce Intermediaries in the 21st Century, ed. Robert P. Giloth, 2003.

<sup>24</sup> Julie Strawn and Karin Martinson, Built to Last: Why Skills Matter for Long-Run Success in Welfare Reform, Center for Law and Social Policy, National Institute for Literacy, and National Adult Education Professional Consortium, 2003.

<sup>25</sup> Amy-Ellen Duke, Karin Martinson, and Julie Strawn, Wising Up: How Government Can Partner with Business to Increase Skills and Advance Low-Wage Workers, Center for Law and Social Policy, 2006.

<sup>26</sup> Kelly Mikelson and Demetra Smith Nightingale, *Estimating Public and Private Expenditures on* Occupational Training in the United States, prepared for the U.S. Department of Labor, December 2004.

Duke et al., Wising Up.

<sup>28</sup> Osterman, Employment and Training Policies.

<sup>29</sup> Jobs for the Future, Hiring, Retaining, and Advancing Front-Line Workers: A Guide to Successful Human Resource Practices, 2003.

<sup>30</sup> Harry Holzer and Karin Martinson, *Can We Improve Job Retention and Advancement among Low-Income Working Parents?* Urban Institute, 2005.

<sup>31</sup> Center for Workforce Preparation, *Completing the Workforce Puzzle: How Chambers Can Help Businesses Find, Keep and Advance Employees*, US Chamber of Commerce, 2002.

<sup>32</sup> Ibid.

<sup>33</sup> MDRC, Web page for National Worker Advancement and Support Center Demonstration policy framework, <u>http://www.mdrc.org/project\_14\_40.html</u>.

<sup>34</sup> HR 27 EAS Section 121 (c)(2)(A)(iv).

<sup>35</sup> Corporate Voices for Working Families, *Model Workplace Supports for Lower-Wage Employees*.

<sup>36</sup> Elise Richer, Hitomi Kubo, and Abbey Frank, *All in One Stop? The Accessibility of Work Support Programs at One-Stop Centers*, 2003. This report is the result of interviews with 33 one-stop directors to examine the level of access to seven work support programs (Earned Income Tax Credit, subsidized child care, food stamps, publicly funded health insurance, cash assistance, child support, and transportation assistance).

<sup>37</sup> HR 27 EAS Section 121(c)(2)(B)(vi).

<sup>38</sup> HR 27 EAS Section 121(c)(3)(B).

<sup>39</sup> HR 27 EAS Section 121(c)(3)(B).

<sup>40</sup> PL 105-220 Section 101 (25).

<sup>41</sup> PL 105-220 Section 101 (24). The 2006 LLSIL is available at

http://a257.g.akamaitech.net/7/257/2422/01jan20061800/edocket.access.gpo.gov/2006/pdf/06-5000.pdf <sup>42</sup>Lake Snell Perry & Associates, for Jobs for the Future, *Getting Ahead: A Survey of Low-Wage* 

Workers on Opportunities for Advancement, Jobs for the Future, 2003.

<sup>43</sup> Wider Opportunities for Women, *Reality Check: Promoting Self-Sufficiency in the Public Workforce System. Reality Check Report.* 

<sup>44</sup> HR 27 EAS Section 151.

<sup>45</sup> Anna Purinton with Nasreen Jilani, Kristen Arant, and Kate Davis, *The Policy Shift to Good Jobs: Cities, States and Counties Attaching Job Quality Standards to Development Subsidies*, Good Jobs First, 2003.

<sup>46</sup> Stuart Rosenfeld, Just Clusters: Economic Development Strategies that Reach More People and Places, Regional Technology Strategies, 2002.