



A Litmus for Legislation

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Criteria for Evaluating Proposals to Restructure Federal Workforce Programs

During the past year, a number of bills have been introduced in the House and Senate to reduce the number of federal workforce programs, consolidate programs in some cases and to improve the efficiency of the workforce system.¹ These bills seek to address fragmentation, overlap and potential duplication among 47 federal workforce programs identified in a Government Accountability Office (GAO) report that was released in 2011.²

CLASP recognizes the need for a more coherent and effective workforce development system. However, it is wrong to assume that the federal government's support of multiple workforce programs necessarily amounts to or results in duplicative services. Many of these programs provide different types of services at varying levels of intensity to different populations. For example, three of the largest programs cited in the GAO report differ in meaningful ways. The Employment Service provides job search assistance and job matching services to any job seeker. The Workforce Investment Act (WIA) provides three levels of services, including assessment, counseling and training services for individuals in need of intensive assistance with employment and skill development. The Temporary Assistance for Needy Families block grant provides a broad range of assistance and services to low-income children and families. Other programs cited in the GAO report provide specialized services that address the unique needs of certain populations, such as individuals with disabilities and veterans. In addition, declining funding has meant that major federal workforce programs do not have sufficient resources to serve more than a small fraction of individuals and families in need of assistance.³ Far from having the resources to provide the same services to the same people, administrators piece together funding and programs to reach as many individuals as possible.

For all of these reasons, the problem is not how to reduce the total number of programs at the federal level. Rather, the challenge is how to bring to bear the strengths and resources of multiple delivery systems to create pathways to postsecondary and career success for those in the workforce, especially low-skilled, low-income adults and youth.

To help advocates and other stakeholders, CLASP has developed a set of criteria with which to evaluate proposals that consolidate or restructure programs offering workforce services to low-income families and individuals. These criteria are informed by debates about block grants, program consolidation and super-waivers that have taken place during the past three decades. The experience of implementing WIA also sheds light on the likely results of further consolidation. For example, since the enactment of WIA, states and local areas have struggled to find the right balance between providing universal access to services for any job seeker and meeting the needs of low-income and other individuals who face difficulties in the labor market.⁴ After declining since 2000, low-income adults now represent only about half of those receiving intensive or training services with adult employment and training funding.

The following criteria provide the lens that CLASP, as well as advocates and other stakeholders, will use to examine the merits and problems with current proposals as reauthorization proceeds:

- **Purpose/Goals**—Is there a purpose or goal statement that lays out a vision and provides sufficient direction for improving outcomes for low-income adults and youth?
- **Impact on Funding**—Does the proposal support a stable funding stream that will be responsive to changes in economic conditions and demand for services? Does the proposal shift formula-driven programs to competitive funding? Does it convert mandatory to discretionary funding? Does it prevent supplantation of non-federal funds, as appropriate?
- **Access**—Is the proposal likely to ensure equitable access to services for populations currently targeted for services? Is it likely to maintain or increase the level of services available to different populations?
- **Focus on Most in Need**—Does the proposal include strong safeguards or incentives to ensure that high-intensity services are focused on those most in need? Does it have adequate mechanisms to direct program resources to areas with high unemployment and poverty?
- **Adequate Capacity to Administer and Deliver Services**—Does the proposal establish a set of expectations for the appropriate capacity needed to serve disadvantaged individuals effectively? Does it maintain or build the strengths and capacity of organizations or networks of organizations that serve disadvantaged individuals? Does it support a richer mix of services, a more comprehensive continuum of services and services of different levels, intensity and duration for different populations?
- **Data and Performance Metrics**—Are performance metrics and accountability provisions designed to ensure equitable service provision and robust outcomes, such as helping individuals attain postsecondary and career success? Do the metrics encourage provision of appropriate services to those most in need? Are there provisions for collection of comparable data to report on activities, services and individuals served?

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¹ These bills include Rep. Foxx's Streamlining Workforce Development Programs Act and Senator Brown's Learn to Earn Reemployment Training Improvement Act.

² *Multiple Employment and Training Programs: Providing Information on Collocating Services and Consolidating Administrative Structures Could Promote Efficiencies*, Government Accountability Office, January 2011.

³ Evelyn Ganzglass, Testimony before the Subcommittee on Higher Education and Workforce Training, Committee on Education and the Workforce, May 2011.

⁴ Burt S. Barnow and Christopher T. King, *The Workforce Investment Act in Eight States*, U.S. Department of Labor, Employment and Training Administration, 2005.