



# Navigating Federal Programs to Build Sustainable Career Pathways in the Health Professions: A Guide for HPOG Programs

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The Health Profession Opportunity Grants (HPOG) support career pathways programs in high-demand healthcare occupations for Temporary Assistance for Needy Families (TANF) recipients and other low-income individuals.

This report was written to help programs funded under HPOG understand the requirements and performance accountability systems of the major funding streams that support their partner agencies, specifically TANF and the workforce and adult education programs supported under the Workforce Investment Act (WIA) Titles I and II. By understanding the policies, constraints, and pressures affecting key partners, grantees will be more able to align programs and policies, and overcome barriers to successful and lasting partnerships. The information in this report will also be of value to others building programs that blend funding from different federal programs.

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## By Elizabeth Lower-Basch and Neil Ridley

Healthcare is one of the fastest growing sectors in our economy, and there are many jobs in this sector that require fewer than 4 years of college education, have high demand, and offer good pay. However, low-income workers often face barriers to accessing the education and training they need to enter these jobs, including lack of information, poor basic skills, confusing and poorly aligned training programs, cost of training, and need for supportive services, such as child care and transportation. The Health Profession Opportunity Grants (HPOG), authorized by section 5507 of the Affordable Care Act (ACA; Public Law 111-148), address this issue by supporting models for providing education, training, and support services to enable recipients of cash assistance under Temporary Assistance for Needy Families (TANF) and other low-income individuals to obtain well-paying jobs in high-demand healthcare occupations. The HPOG program is one of several provisions of ACA aimed at supporting training for the healthcare workforce of the future.

Programs funded under HPOG must coordinate with a range of other public agencies. Grantees are required to coordinate with the State agency responsible for administering the TANF program, the State and local Workforce Investment Boards (WIBs), and the State apprenticeship agency. To ensure sustainability, HPOG programs need to leverage the strengths and resources of a range of partners.

This report is designed to help programs funded under HPOG understand the policies, constraints, and pressures affecting key partners. The goal is to equip grantees with information needed to clarify roles and responsibilities of partners, align programs and policies, and measure system change and performance in order to develop successful and lasting partnerships. Specifically, this report describes key differences between Federal welfare, workforce, and education programs, with a focus on performance accountability, and provides essential information about these programs that HPOG-funded organizations should have as they approach their partner agencies. It also lays out strategies for building partnerships in light of conflicting and challenging performance accountability systems.

Each partner brings its own capacities. Educational institutions, such as community and technical colleges, have primary responsibility to develop curricula and programs and assist with financial aid. Workforce agencies, such as local WIBs, are equipped to engage employers, assist with placement, and provide information about the local labor market. Human services agencies, including TANF agencies, can assist with recruitment and referral of participants and provide support services. Community-based organizations may have strong connections to underserved communities and understand their particular needs. While most HPOG programs are being implemented in particular communities, the support of State-level partners and agencies may be needed to provide policy flexibility or funding to support career pathways.

HPOG-funded organizations are charged with helping TANF recipients and other low-income individuals acquire skills and credentials that are valued by employers so that they can advance to better jobs over time. This approach is often referred to as “career pathways.” Career pathways offer a clear sequence of education coursework or training

credentials aligned with employer-validated work readiness standards and competencies.<sup>1</sup> Each education step in the pathway is generally connected to specific job opportunities in an industry or sector. For example, a participant might start with a 3- to 4-month training program to become a Certified Nursing Assistant (CNA) and later return to get additional training to become a Dialysis Technician, or the participant might start as a Dental Office Assistant and progress to become a Dental Assistant. The opportunity to start working in the sector early on is particularly critical for low-income parents, who often need immediate income in order to support themselves and their families. While specifically aimed at programs funded under HPOG, this report may be of interest to other entities operating career pathways programs.

To meet the needs of low-skilled individuals, career pathways should incorporate bridge programs which provide the basic skills and English language skills needed for postsecondary education or occupational training. They also should provide access to supportive services, such as child care, transportation, and other services that enable low-income participants to complete programs. While the career pathways framework is not exclusive to healthcare professions, many career pathways initiatives have focused on this sector.

HPOG is administered by the Administration for Children and Families (ACF), within the U.S. Department of Health and Human Services (HHS), which also administers the TANF grants. ACF made HPOG awards to 32 entities located across 23 States, including 4 State agencies, 9 local workforce investment boards, 12 institutions of higher education, and 2 community-based organizations. An additional five awards were given to Tribal applicants, including one Tribal council and four Tribal colleges.

## Overview of Major Funding Streams

HPOG-funded organizations are required by statute to work with social services agencies and a range of education and workforce partners in their communities. This section offers a brief introduction to the key provisions of TANF, which provides cash assistance and other supports to low-income families with children, and Workforce Investment Act (WIA) Title I and WIA Title II programs, which support workforce training and adult education services. This information will help HPOG programs understand the types of services that each program may offer, as well as the individuals who may be served. It will also help them understand the pressures and concerns that each partner agency brings, so that programs can make a case for why both the HPOG-funded organization and its partners will benefit from collaboration. The features of these major funding streams are summarized in Figure 1, below.

## Overview of TANF

The statutory language in the ACA authorizing the HPOG program specifies that it is designed to provide services to “TANF recipients and other low-income individuals,” and grantees are required to coordinate with agencies administering TANF. TANF recipients are defined as individuals receiving *assistance* under a State or tribal TANF program. By statute, TANF recipients must be members of a low-income family with minor children. States have the authority to set the income limits and other eligibility rules for TANF (or to devolve these choices to the sub-state level), but in practice, assistance is limited to very low-income families; in many States, new applicants for TANF must have incomes under half the Federal poverty level. Because of the low income limits, time limits, and work participation requirements, only a fraction of poor families with children receive TANF assistance in any State.<sup>2</sup> Therefore, except in large urban areas, it may not be

feasible to design and operate training programs that serve exclusively TANF recipients. HPOG programs may need to help participants who are not eligible for TANF identify other sources for income support and services that they need to succeed.

**Assistance** is a technical term in the TANF program. It includes cash and near-cash payments designed to meet families’ ongoing basic needs.<sup>3</sup> This definition is important because many TANF requirements, including the time limits and work participation calculation, as well as most data reporting, only apply to individuals in families receiving assistance. As discussed below, States may also use TANF funding and State funds used to meet the maintenance of effort requirement to provide a wide range of other services—such as child care, training, case management, and car repairs—to low-income families with children.<sup>4</sup> Members of families receiving these services are not considered “TANF recipients,” but HPOG programs may include them in their definition of “other low-income individuals.”

Because of the very low income limits, even part-time work at a minimum wage job will result in case closure in many States; TANF recipients are generally more disadvantaged than the average person seeking workforce services. However, even within that context, TANF recipients are very diverse. Many have recent work history, while others have multiple barriers to employment and very limited work experience. Common barriers to employment include low educational levels and lack of basic skills, logistical challenges such as lack of child care or reliable transportation, physical and mental health issues, and histories of domestic violence. Most adult TANF recipients are single mothers, but single fathers and married parents may also receive assistance. In some States, the number of two-parent families receiving assistance grew sharply during the recent recession.<sup>5</sup>

**Figure 1: Major Funding Streams**

<b>Provisions</b>	<b>TANF</b>	<b>WIA Title I</b>	<b>WIA Title II</b>
Federal Agency	Administration for Children and Families, U.S. Department of Health and Human Services (HHS)	Employment and Training Administration, U.S. Department of Labor (DOL)	Office of Vocational and Adult Education, U.S. Education Department (ED)
Services delivered by	State or county human services agencies or their contractors (may be WIBs or private entities)	Local WIBs oversee American Job Centers, also known as one-stop career centers; training is provided by colleges and other providers	Community colleges, community-based organizations, local education agencies, and others
Funding levels	\$16.5 billion annually, plus more than \$10 billion in State spending counted toward maintenance of effort requirement	\$2.8 billion in FY 2012, with approximately \$771 million for adult activities	\$595 million in FY 2012 plus non-Federal contributions that count toward a 25% match requirement
Funding structure	Fixed block grant to States; States choose whether to pass funds through to the sub-state level	Formula grants to States based on measures of unemployment, with the bulk of funds passed through to local workforce areas by formula	Formula grants to States based on the number of adults aged 16+ years without high school diplomas who are not enrolled in high school, with most funds distributed to local providers on a competitive basis
Target population	Members of low-income families with children	Job seekers, low-income adults, disadvantaged youth, dislocated workers	Adults without a high school diploma or its equivalent, adults functioning below the 12 <sup>th</sup> -grade level and those with limited English proficiency
Use of funds	Very flexible within four broad purposes of TANF	Wide range of services to help participants find jobs, prepare for work, and build skills	Adult basic education and literacy services, including English-language services

One of the primary purposes of TANF is to promote “job preparation, work, and marriage” among needy parents. All States provide employment-related services to TANF recipients, but they do so through a variety of administrative structures. Employment-related case management may be provided by TANF agencies directly, by workforce agencies, or by private nonprofit or for-profit contractors. HPOG-funded organizations typically work closely with employment services providers on an ongoing basis, interacting over client referrals, monitoring of participation, and provision of supportive services. However, the State or county TANF agency is more likely to set policies, such as the list of activities to which participants may be assigned.

Participation in work-related activities is mandatory for TANF recipients unless they meet the State’s criteria for exemption. Recipients who fail to comply with the requirements imposed by the State often lose some or all of their benefits. In the majority of States, the entire family can lose TANF benefits if adults do not comply with their work requirements for an extended period of time.

Individuals who are required to participate in a program to receive benefits may be less committed than individuals who have chosen to participate. Programs serving mandated participants should be clear about expectations and may wish to screen for motivation and commitment before enrolling clients. However, it is important to recognize that low-income parents often face logistical challenges around child care and transportation. HPOG-funded programs should be prepared to assist clients in overcoming these challenges and should not mistake these external issues for lack of motivation. Because participation is mandatory, and because hours of participation must be documented for the work participation rate (discussed below), programs serving TANF recipients must have a means to track and report hours of attendance on a daily basis.

While cash assistance and the accompanying work activities are the most well-known use of TANF funds, TANF is a flexible block grant that can be used for a wide range of benefits and services for low-income families with children. In recent years, basic monthly assistance payments—what most people think of as welfare—accounted for less than 30 percent of TANF and TANF-related State spending. TANF funds can pay for services including education and training, job search assistance, job retention assistance, child care and transportation, and case management. TANF can also be used for “short-term non-recurrent benefits” such as incentive payments or one-time payments to purchase textbooks or uniforms or to repair cars. Such benefits do not count as “assistance” and therefore do not trigger time limits or the work participation rate.<sup>6</sup> These services are not limited to families receiving cash assistance, and States may establish higher income eligibility limits for services than the limits used for assistance. HPOG programs may want to explore with their TANF agencies the possibility of using TANF funds to provide supportive services to HPOG participants who are members of low-income families with children, even if they are not receiving cash assistance.

However, HPOG programs should recognize that because TANF funding is so flexible, States face many competing demands in allocating it. During the early 2000s, with the strong economy and declining caseloads, many States found themselves with unallocated funds in TANF and were open to investing in innovative projects that offered the promise of long-term gains in economic security. However, most States are in a different economic and fiscal climate today. In nearly all States, the TANF block grant is fully committed, and funding can only be obtained for new projects by cutting elsewhere. HPOG-funded organizations seeking additional TANF funds will need to demonstrate how their programs help move low-income workers into

family-supporting jobs. With some notable exceptions, such as the Arkansas Career Pathways Initiative (described below), most TANF agencies have not been engaged in career pathways efforts to date. Therefore HPOG programs will need to educate the TANF agencies about the career pathways model and how it can benefit TANF recipients and the broader low-income population.

## **Pell Grants: A Critical Source of Funding for Career Pathways**

Pell Grants authorized by Title IV of the Higher Education Act are the largest Federal grant program supporting postsecondary education and training, and they can help low-income students have access to career pathways leading to the acquisition of a credential. Because not all students may be aware of their potential eligibility for financial aid, HPOG programs should identify participants who may qualify and provide assistance with completing the Free Application for Federal Student Aid (FAFSA).

The Pell Grants program distributes need-based awards to students through postsecondary institutions to pay for the costs of attendance, including direct costs, such as tuition and fees, and indirect costs, such as living expenses. The maximum Pell Grant for the 2012–2013 academic year is \$5,550.

To be eligible, students must demonstrate financial need (as calculated using information on the FAFSA), be a U.S. citizen or eligible noncitizen, have a high

school diploma or its equivalent (or be an eligible home-schooled student),<sup>7</sup> have resolved any issues related to drug convictions, not be in default on a Federal student loan, make “satisfactory progress” in his/her academic program, and not have completed requirements for or earned a Bachelor’s degree or higher. Many States have need-based student aid programs which mirror Federal Pell Grant eligibility criteria or simply use Federal aid eligibility to trigger State aid eligibility.

Pell Grants are generally used to support students enrolled in a degree program or a certificate program at least 1 year in length. However, students enrolled in certain certificate programs shorter than 1 year can still be eligible for Pell Grants and other student aid. Pell Grants also can cover up to 1 year of remedial coursework (30 semester hours) if the student has been admitted to an eligible program and the remediation is part of, or required for, that program. As of July 1, 2012, students cannot receive more than 12 full-time semesters of Pell Grant awards, and the cap is applied proportionally to enrollment for students who are less than full time. (That is, students attending part time would have longer than 12 semesters.)

**The Arkansas Career Pathways Initiative (CPI)** provides a comprehensive set of academic and support services designed to enable low-income, low-skill individuals to acquire the degrees and/or credentials required to obtain and hold jobs in selected high-demand, high-wage industries. CPI is located at all of Arkansas’ 22 two-year colleges and 3 technical centers. CPI is funded with approximately \$12 million each year from the State’s TANF block grant and serves about 7,000 students

each year. Students are eligible if they are adult caretakers of children under 21 and have incomes below 250 percent of the Federal poverty line. CPI pays up to \$1,500 a year per participant for tuition and support services and provides benefits for up to 18 months. Each incoming student is assigned a counselor and a tutor who remain available throughout the student's time in CPI. CPI contracts with private vendors to provide child care and transportation services, and counselors ensure that students receive these services. Counselors also work with local Department of Workforce Services offices to ensure the smooth delivery of other available support services. The tutors provide academic support and track academic progress.

## Overview of WIA Title I

The WIA authorizes an array of programs that provide unemployed and underemployed individuals with education, training, and information about job opportunities. WIA consists of Title I (adults, dislocated workers, and youth), Title II (adult education and literacy), Title III (labor exchange-related activities), Title IV (vocational rehabilitation), and Title V (general provisions).

HPOG-funded organizations are expected to coordinate with State and local WIBs that oversee the use of WIA Title I funds. State WIBs, which are appointed by the Governor and include a majority of business members, develop the State WIA plan, develop and oversee statewide activities, and designate the local workforce investment areas where services are delivered. Local WIBs are responsible for developing local policies and overseeing service delivery in their areas.

Program funds can be used for a wide range of services, from job search assistance to case management and training. WIA services are delivered through a network of American Job

Centers, also known as one-stop career centers, which provide core services, including job search assistance, placement, and labor market information, to any adult job seeker. In many areas, a consortium of public agencies runs American Job Centers; in other areas, for-profit or nonprofit organizations administer them by contract. Other workforce programs, including vocational rehabilitation, adult education, and Wagner-Peyser Act employment services, are mandatory partners in the one-stop system and must be co-located or provide access through a “no wrong door” approach. Under Federal law, TANF is an optional partner in the American Job Center network, and some States have made it a statewide partner.

Participants in HPOG programs are likely to benefit from additional “intensive” and “training” services that go beyond the core level of the American Job Center because these services are designed for individuals who need more assistance in preparing for and seeking work. Intensive services include assessment, case management, and counseling. Training services include occupational skills training and adult education and literacy activities in combination with training. In addition, WIA can fund supportive services, such as child care, transportation assistance, housing assistance, and needs-related payments, for participants who need these services and are unable to access them through other programs. The services available under WIA Title I include the following:

- **Core services** include job search and placement assistance, provision of labor market information, and outreach.
- **Intensive services** available through WIA include comprehensive assessments, development of individual employment plans, counseling, and case management.

- **Training services** include occupational training, adult education and literacy in combination with occupational training, and employer-based training, and they are typically offered by public, nonprofit, and private institutions.
- **Supportive services** include child care, transportation assistance, and needs-related payments, which are available to participants in WIA activities who are unable to access other sources of supportive services.

If funds are limited, public assistance recipients and other low-income individuals are expected to receive priority for intensive and training services under the WIA adult program. In program year 2010, TANF recipients represented less than 4 percent of those receiving intensive or training services, and low-income adults represented about half.<sup>8</sup> Local areas with a strong priority of service policy are more likely than other areas to partner with HPOG programs to provide training services for TANF recipients and low-income adults.

Participation in WIA services is voluntary. Training can be delivered in two ways: by an Individual Training Account (ITA), which allows participants to select a course of study and training provider, or by contract with colleges or other eligible providers. In general, ITAs are the default option under WIA. However, use of contracts for training may be more appropriate for disadvantaged groups (including those served by HPOG programs). Contracting allows for customization of content and services to meet the needs of participants, while ITAs are generally used for participation in programs that already exist in the community.<sup>9</sup>

Employer engagement in the design and delivery of workforce services is an important function of local WIBs and American Job Centers. WIA Title I funds can support customized training and on-the-job

training to prepare newly hired individuals to meet specific employers' job requirements. Some WIBs have established business liaisons within American Job Centers that can work with employers on workforce solutions such as the development of career pathways. For example, WIBs can analyze local industries and occupations that are likely to add jobs or collaborate with employers to determine their anticipated skill needs and an appropriate curriculum for addressing them.

American Job Centers are likely to be an important source of referrals to HPOG-funded programs. WIA Title I may also provide assessments, case management, training, and supportive services. Many WIA agencies are already actively involved in developing and supporting career pathways. However, HPOG programs should recognize that in a tight budget environment, State and local WIA administrators face many competing demands for use of WIA Title I funds. WIBs must maintain American Job Centers, serve a broadly defined population, and provide comprehensive services. As a result of these pressures, the share of WIA Title I funds going to training services varies greatly, ranging from nearly zero to more than half in some localities. Moreover, many local areas may be unable to offer supportive services or have limited budgets for those activities.

## Overview of WIA Title II

The Adult Education and Family Literacy Act (WIA Title II) provides States with funding for a variety of services to help adults develop basic skills such as reading, writing, math, English language competency, and problem solving. Unlike WIA Title I, which allocates funds by formula to local areas, WIA Title II requires States to conduct a competitive process to grant most of the funds to local providers, including local educational agencies, community-based organizations, and post secondary educational institutions. In order to receive Federal funds, States

are required to provide at least a 25-percent non-Federal match in cash or in kind.

Eligibility for adult education services is limited to adults who are at least 16 years of age and are not currently enrolled, or required to be enrolled, in high school. In addition, participants must either lack a high school diploma or its equivalent or lack sufficient mastery of basic skills to enable them to function effectively in society (even if the student has a high school diploma), or be unable to speak, read, or write the English language.

Local funds must be used to establish or operate one or more of the following programs:

- **Adult Basic Education (ABE)** is instruction in basic skills designed for adults functioning at the lower literacy levels to just below the secondary level.
- **Adult Secondary Education (ASE)** is instruction for adults whose literacy skills are at approximately high school level and who are seeking to pass the GED<sup>®</sup> test or obtain a secondary school equivalency degree.
- **English as a Second Language (ESL)** is instruction for adults who lack proficiency in English and who seek to improve their literacy and competency in English.

States and local programs are increasingly using Federal adult education funds to develop and implement pathways to post secondary education and employment for students. These funds can be used to develop and pay for the operational costs of basic skill and English-language components of career pathways, as long as the services are below the post secondary level. For this reason, adult education programs may serve as important partners for HPOG programs that are trying to incorporate basic skills or English-language services in a healthcare pathway.

However, because these funds must be used for instruction below the postsecondary level (not for occupational skills training), providers offering integrated education and training programs must rely on multiple funding streams with different administrative requirements that must be tracked separately.<sup>10</sup>

HPOG programs should be aware that funding for adult education and English-language services is very limited relative to the number of individuals who need these services. Many States and localities have programs with waiting lists for adult education/ESL services.<sup>11</sup>

## **Carl D. Perkins Career and Technical Education Act (Perkins IV) Funds and Career Pathways**

Some HPOG programs or their partners may receive Carl D. Perkins Career and Technical Education Act (Perkins IV) funds, which support secondary and postsecondary programs that build the academic, career, and technical skills of young people and adults. Perkins IV funds are distributed to secondary and postsecondary institutions, such as area career and technical education schools, technical colleges, and community colleges, and can be used to develop career and technical education programs and curricula, including a multiyear sequence of courses known as a program of study, and provide support services for participants. Funds may also be used to develop programs for special populations, which include individuals with disabilities; individuals from economically disadvantaged families,

including foster children; individuals preparing for nontraditional fields; single parents, including single pregnant women; displaced homemakers; and individuals with limited English proficiency. For more information, see CLASP's Funding Career Pathways and Career Pathway Bridges toolkit.

## Performance Accountability Under Multiple Systems

HPOG grantees—colleges, human services agencies, or workforce agencies—are likely to encounter different performance accountability systems required by Federal programs. Conflicting accountability systems pose significant challenges for local partners; however, recent Federal policy changes have begun to address some of these issues. For example, the Office of Vocational and Adult Education (OVAE) in the U.S. Department of Education (ED) recently modified the adult education accountability system to track the performance of a larger number of learners based on their characteristics and employment status, rather than only on their stated goals. Since July 1, 2012, States must report on entered employment, retention in employment, attainment of a secondary credential, and entry into postsecondary education and training for many more participants. This is a key policy change that helps address some of the differences in performance accountability between Title I and Title II programs. The Employment and Training Administration (ETA) at the U.S. Department of Labor (DOL) has implemented the use of regression-adjusted performance levels to account for economic conditions and participant characteristics as one factor in the performance negotiations process between ETA and the State.

This section reviews key features of different performance accountability systems and highlights strategies for serving TANF recipients and other low-income adults. The central performance measure for States under TANF is the work participation rate (WPR), a process measure that considers hours of attendance at specified work-related activities. WIA Title I relies on a set of outcome measures for both State and local performance and a set of incentives and sanctions tied to the attainment of negotiated performance levels. The accountability system for WIA Title II, the National Reporting System, incorporates core indicators of State performance that are used to gauge the performance of local programs.

In addition, performance-based contracts and performance-based funding are widely used in each program to hold service providers accountable for reaching or exceeding the targeted levels established at State or local levels. These contracts and funding formulas incorporate performance goals or interim goals, such as program completion, and may reserve some or all funding for attainment of those goals. The table in Figure 2, below, describes key features of the performance accountability systems used by each program.

## Performance Measurement Under TANF

The primary performance measure under TANF is the WPR, a process indicator which shows how successful States are at engaging their adult recipients in work-related activities. States that fail to meet their WPRs can lose a portion of their funding, and many use the WPR to measure the performance of local offices or contractors. States must engage at least 50 percent of adult members of families receiving assistance and 90 percent of their two-parent families in a specific list of countable work activities. The list of activities and restrictions on the

**Figure 2: Summary of Performance Provisions in TANF and WIA Title I and II**

Provisions	TANF	WIA Title I <sup>12</sup>	WIA Title II <sup>13</sup>
Employment-related outcome measures	None (at Federal level)	Entered employment Employment retention Average earnings	Entered employment Employment retention
Skills-related measures	None	Data on credential attainment are collected but are not used for accountability purposes	Educational gain Receipt of secondary school diploma or recognized equivalent Entry into postsecondary education or training
Process measures	WPRs	Demographic characteristics and participation indicators	Demographic characteristics, status, and participation indicators
Setting performance levels	Fixed by law; credits earned by States can reduce required levels	Negotiated between DOL and States and between States and local areas	Negotiated between ED and States
Incentives	None	Incentive grants for States that exceed targets in both Title I and Title II	Incentive grants for States that exceed targets in both Title I and Title II
Penalties	Financial penalties for States failing to meet participation rates; States have option to go through corrective compliance process before penalty is imposed	Technical assistance or corrective action applied if States miss performance targets; DOL may impose financial sanctions if a State fails to meet targets for 2 consecutive years; States must take corrective action, including possible financial sanctions, if local areas fail to meet targets for 2 consecutive years	No penalties for States; failure to meet performance targets may put contracts for local programs at risk

times when some of them may be counted are prescribed by statute, and the activities are defined by regulation.<sup>14</sup> States receive credit toward this rate for caseload reduction since 2006 and for spending more State funds than required. To count toward the WPR, recipients must participate in activities for a minimum number of hours per week,<sup>15</sup> averaged over a month; no partial credit is available for participants who fall short of the minimum levels of participation. Only actual (not scheduled) hours of participation can be counted, and attendance must be verified and documented.

Paid and unpaid work, including on-the-job training, can count toward meeting a State's WPR.

Participation in education and training can also count, but it is subject to several restrictions depending on the federally countable activity under which the State reports it. Activities reported as "vocational educational training" can be counted toward all the hours needed to meet the WPR, but can only be counted *for a period not to exceed 12 months in a recipient's lifetime*. Participation in "job skills training directly related to employment" and "education directly related to employment, in the case of a recipient who has not received a high school diploma" or equivalent, are not time limited, but may only count toward the WPR after the first 20 hours of work per week (30 hours per week for the two-parent families rate). These initial hours (often referred to as core hours) must be met by participation in another activity, such as employment, work experience, or community service. A third WPR limitation is that vocational education and education for teen parents are capped at a combined 30 percent of individuals counted toward the WPR.

The definitions of vocational educational training and job skills training are broad enough to cover most education and training activities that are supported under WIA Title I or are part of an HPOG

program. The 12-month limit is a cap on how long the program may be counted, but it is not a limit on the *type* of programs that may be counted; States may approve a program of any duration, including 2- or 4-year programs.<sup>16</sup> Some States and localities have adopted policies that restrict approved training to programs that are expected to be completed in 12 months or less, but this is not mandated by Federal law. HPOG programs may wish to discuss this flexibility with their partner TANF agencies.

"Education related to employment" is the main category for reporting stand-alone basic education, ESL, and preparation for high school equivalency exams, when required as a prerequisite for employment. However, because "education related to employment" cannot be counted unless combined with 20 hours per week of core activities, some States have sought to include such activities under "vocational education training." According to HHS regulations, "vocational educational training" may include embedded basic skills education or vocational ESL as long as they are "a necessary or regular part of the vocational educational training,"<sup>17</sup> such as under the Integrated Basic Education and Skills Training (I-BEST) model (further described below).

One area of flexibility that is highly relevant to HPOG programs is that "on-the-job training" or "work experience" activities are countable without restriction and can also count as core hours. Apprenticeships and paid or unpaid practicum courses meet these definitions. Therefore, if an HPOG program combines 20 hours a week of practicum courses with 15 hours a week of career-focused classroom courses, the practicum can be reported as on-the-job training or work experience, and the classroom time can be reported as job skills training. Under this scenario, the participant is engaging in countable activities for 35 hours a week, is not using up the 12 months of countable vocational

education training, and does not count toward the 30-percent cap of individuals participating in vocational education training. A summary of the restrictions on countable activities is shown in Figure 3, below.

Finally, some HPOG programs may include pre-training activities that can qualify as WPR “job search and job readiness assistance,” defined as “the act of seeking or obtaining employment, preparation to seek or obtain employment, including life skills training, and substance abuse treatment, mental health treatment, or rehabilitation activities.”<sup>18</sup> For example, a pre-training program that focuses on work readiness, skills assessment, and understanding the expectations and opportunities under different occupations could be counted in this category. However, an HPOG program should work closely

with its TANF partners to ensure that such a program meets the Federal requirements to count in this category, as some activities that may commonly be considered job readiness, such as basic education or obtaining housing or child care, cannot be counted here.

Under the TANF law and regulations, participation in “job search and job readiness assistance” may be counted toward the WPR for no more than 4 consecutive weeks, and for up to a total of 6 or 12 weeks per calendar year, depending on the economic situation in the State. As of the first quarter of Federal fiscal year 2012, all States except Wyoming met the conditions for job search and job readiness assistance to count for 12 weeks per year.<sup>19</sup>

**Figure 3: Summary of Restrictions on Countable Activities**

Activity	Time Limits	Counts Toward the WPR	Caps
Unsubsidized employment Subsidized employment On-the-job training Work experience Community service	None	Yes	None
Vocational education training	Limited to 12 months in a lifetime	Yes	Limited to 30% of counted individuals (along with education for teen parents)
Job skills training Education related to employment Secondary school attendance or GED® classes for recipient without HS degree or equivalent	None	Yes	None
Job readiness and job search assistance	Limited to 4 consecutive weeks and 6 or 12 weeks total per year	Can only be counted when combined with core activities	None

## Special rules for tribal TANF

Federally recognized Indian tribes have the option to operate their own tribal TANF programs, distinct from the State programs. Tribes have the option to negotiate with ACF to establish WPR targets, countable activities, and minimum hours of participation. In contrast, ACF has no authority to modify the required WPR for States. Tribal HPOG-funded organizations should consider whether their programs can be counted as work activities under the relevant tribal TANF programs; if not, such activities could be included in future tribal TANF plans so that participants could be counted.

While the WPR is a State-level performance measure, in practice, most States require TANF recipients to participate in work activities that are countable toward the Federal rate unless they meet exemption criteria established by the State. States have the option to allow individuals to participate in non-countable activities when they believe that the activities are in the families' best interest. Many States are currently achieving participation rates significantly above their targets and have the flexibility to allow some recipients to engage in non-countable activities. For example, since 1999, Nebraska has allowed students to work toward an Associate's degree for up to 36 months while receiving assistance, even though they will only count toward the WPR for 12 months. This has had little effect on Nebraska's WPR, which is above 50 percent, because the number of students involved is small compared to the overall caseload.<sup>20</sup> However, this policy has had a big effect on those students' lives. Allowing recipients who are successfully participating in a training program to attend full time so that they can complete their education more swiftly and start working in their new professions is consistent with the TANF goal of promoting self-sufficiency.

In some cases, TANF restrictions on education and training are the result of State choices, not Federal requirements. States may require recipients to participate for more hours than federally required, or they may limit access to some activities that are federally countable. In FY 2009, the most recent year for which participation rate data are available, only 11 States were taking full advantage of the ability to count recipients toward the WPR based on vocational education and training or secondary school completion. In six States, fewer than 10 percent of those counted toward the WPR were engaged in these activities.<sup>21</sup> When policies are the result of State choices, a State may be open to revising them. If an HPOG program is located in a State that is under the 30-percent cap for counting recipients as participating based on vocational education, the program can explain that the State could improve its WPR by engaging more recipients in education and training.

Some States use their own performance measures, including measures of employment and earnings, in addition to the WPR for monitoring local office, staff, or contractor performance.<sup>22</sup> However, all States pay attention to their performance on the WPR. Therefore, an HPOG program reaching out to TANF agencies must be prepared to make the case that its program will improve participants' long-term employability and earnings *and* that allowing recipients to participate will not put the TANF program at risk of failing to meet the required WPR.

## Pathways Strategies for Maximizing the TANF Work Participation Rates

Because the WPR is central to TANF programs, HPOG-funded programs should be sure to collaborate with TANF agencies to maximize the degree to which participants can be counted toward the WPR. If TANF employment case managers

believe clients are capable of participating in activities that count toward the WPR, they are less likely to make referrals to programs where they are not counted. They may not approve the program in an employment plan, even when a client finds the program and self-enrolls. TANF agencies are much more likely to collaborate with HPOG programs if they understand that their WPRs will not be adversely affected.

This section discusses strategies that education and training providers and TANF agencies can use to maximize the extent that participation can be counted toward the WPR. The first set of strategies explains how to align program activities with what is countable as a work activity for the WPR. The second set explains how to help an agency report participation to take full advantage of the flexibility allowed under Federal law. HPOG programs should not assume that the agency providing employment services to TANF recipients is aware of these options. They may need to educate case managers or facilitate a discussion with State or local agencies and contracted employment service providers to make sure that everyone understands the options and knows how to report activities for maximum impact.

The following are strategies that education and training providers can undertake to align their activities with what is federally countable under the WPR:

- **Minimize the duration of any up-front activities.** Incorporate information from any assessments that may have already been completed by partner agencies.
- **Minimize breaks in participation.** Programs that are designed primarily for TANF recipients should minimize breaks between classes, rather than following the traditional academic calendar. Some programs have transformed introductory

courses into a series of modules that can be taken in any sequence so that students do not need to wait until the start of a new term to enroll.

- **Consider wrap-around activities.** When TANF recipients are participating in mainstream programs, it may be necessary to develop wrap-around activities that can count toward the WPR when classes are not in session or when a client is referred to the program after a course has already begun. For example, one activity might be a community service project where students are engaged as health outreach workers to conduct education and basic screenings in their communities. Alternatively, selected classes could be provided in shorter, more intensive formats during periods between academic terms.
- **Maximize use of apprenticeships, practicum courses, or work-study to allow students to meet core hours requirements.** For example, Kentucky's Ready to Work program provides TANF-funded work-study slots for community and technical college students at who receive TANF cash assistance. While traditional work-study jobs are usually only 10 to 15 hours per week, Ready to Work work-study is designed to meet the core work requirement and is funded for 20 hours per week. Many health professions programs include practical work experience components, but these might need to be redesigned in order to meet the core hours requirement.
- **Make sure that all hours of participation are documented** so that they are claimed. If at all possible, HPOG programs should develop a process for program coordinators or case managers to document hours so students do not need to self-identify to instructors that they are welfare recipients. HPOG programs should provide TANF caseworkers with information on

the hours of homework expected because up to 1 hour of unsupervised homework time can be counted for every hour of class time, as long as this much study time is expected of the student.

Strategies that States can adopt to take full advantage of the flexibility under Federal law include the following:

- **Take advantage of the full 12 months for which vocational educational training can be counted as a stand-alone activity.** Some TANF programs routinely assign all recipients to job search or work experience programs without exceptions for students enrolled in education and training. Because TANF recipients, by definition, are also parenting, this can be extremely challenging. Research shows that full-time work and part-time schooling are each independently related to lower rates of persistence and degree attainment.<sup>23</sup> If recipients are allowed to attend school for a year without other participation requirements, they will accrue more credits quickly, and are more likely to graduate.
- **Whenever a participant has sufficient core hours from other activities, report education and training as job skills training, rather than as vocational education.** Many health professions require work experience or practicum courses as part of the training curriculum. These can count as core hours, as community service, work experience, or on-the-job training. Work-study positions, community service, and part-time jobs can also be counted as core hours. States can develop systems to check whether a student can be claimed under a different category before using up vocational education time allocations.
- **Don't waste months of participation.** When a student does not have enough hours of activity to

be counted toward the WPR (such as during a break in classes or while dealing with an extended family illness), the State can choose not to report the hours of participation for that period. Reporting such hours uses up a month of eligibility for vocational education but does not increase the State's WPR.

## Performance Measurement Under WIA Title I

WIA Title I holds States and local areas accountable for a set of outcome measures for adults, dislocated workers, younger youth, and older youth, and for indicators of employer and participant customer satisfaction. States negotiate expected levels of performance with DOL; local areas, in turn, negotiate levels of performance with States.<sup>24</sup> In 2006, DOL introduced a streamlined set of common measures that States can choose to apply to adults and youth participants in order to align the performance accountability system with that of other Federal job training programs. The adult common measures are the following:

- **Entered employment:** Of those who are not employed at the date of participation—the number of adult participants who are employed in the first quarter after exit divided by the number of adult participants who exit during the quarter.
- **Retention in employment:** Of those who are employed in the first quarter after exit—the number of adult participants who are employed in both the second and third quarters after exit divided by the number of adult participants who exit during the quarter.
- **Average earnings:** Of those adult participants who are employed in the first, second, and third quarters after exit—total earnings in the second quarter plus total earnings in the third quarter

after exit divided by the number of adult participants who exit during the quarter.

Attainment of or failure to attain negotiated performance levels may trigger incentives or sanctions under WIA Title I. A State may qualify for an incentive grant if its performance levels for WIA Title I and WIA Title II exceed the targets, or it may be subject to sanctions for failure to attain performance targets (for Title I only). Governors, in turn, are required to apply corrective action, including sanctions, if local areas fail to reach negotiated performance levels.

Local WIA administrators are very focused on achieving performance goals, qualifying for incentives when available, and avoiding possible sanctions for failing to meet performance goals.<sup>25</sup> Because of the strong focus on labor market outcomes in WIA, HPOG programs should be prepared to make the case that participants who progress through healthcare pathways are likely to find stable jobs with good earnings.

DOL also collects data on credential attainment and has a goal of increasing by 10 percent the number of participants in WIA and other programs who earn industry-recognized credentials. This goal could provide a further opportunity for HPOG programs seeking to build partnerships with local WIBs.

To make the case with WIA administrators, it is important to understand what triggers inclusion of participants in the WIA Title I performance calculations. According to WIA statute and DOL guidance, participants in WIA Title I services that require a significant level of staff involvement (beyond self-service or informational activities) are included in the performance measures. The point at which significant staff involvement is provided and the steps leading to enrollment in WIA services may vary by State or locality. Under one scenario, HPOG

participants who receive case management or other staff-assisted services provided by WIA and who use a Pell Grant or other source of funding for community college training would be included in the WIA performance measures.

The point of exit from WIA services is also an important point in the WIA performance measurement system. It is used to calculate performance outcomes and is defined as the date after which a participant has not received a service funded by the program or funded by a partner program for 90 consecutive calendar days and is not scheduled for future services.

## **Pathways Strategies for Addressing the Challenges of WIA Title I Performance Measures**

The pressure for workforce programs to meet performance thresholds and the emphasis on job placement can create incentives to serve individuals who are highly prepared and likely to succeed in the labor market with minimal assistance rather than those who can succeed with a greater investment in training and comprehensive services. For example, the Government Accountability Office found that high performance goals were frequently cited as a factor in local decisions about whom to serve,<sup>26</sup> with access to training services restricted to those with the skills and qualifications needed to succeed.

In spite of these challenges, many local WIBs, including some receiving HPOG funds, already use strategies to serve individuals with low education or skill levels or limited work experience in WIA despite the pressure to meet high performance standards. Local WIBs and American Job Centers can adopt the following strategies for serving TANF recipients and other individuals who are less prepared to enter the labor market:

- **State and local WIA partners can use data on likely participants as a factor in performance negotiations.** When the State and local WIA partners serve TANF recipients or other low-income adults as part of HPOG or a similar initiative, the data on expected participants can be used during negotiations to set performance levels. Some local areas use tools for planning and assessing the performance impact of trying out new training projects or career pathway initiatives. The planning and evaluation tools demonstrate that the likely impact is a function of the size of the project in relation to the balance of activity in the local area.<sup>27</sup> HPOG programs can assist local WIBs and American Job Centers by providing information on TANF recipients and other likely participants and can help to estimate the number of individuals who are likely to complete programs and enter jobs over time.

- **WIA Title I funds can be used to support individuals in career pathway bridge programs that prepare individuals at different education and skill levels for entry into employment or postsecondary education.**

Some HPOG-funded organizations have developed and implemented bridge programs that integrate basic skills instruction (or English language acquisition) with occupational skills training and prepare participants for postsecondary education and training or jobs. WIA funds can be used to support individuals in different types of bridge programs. Some bridge programs are designed to provide basic skills instruction in combination with work readiness preparation or with an introduction to specific occupations, leading to employment or entry into further education and training. Other programs combine basic skills content with occupational content and lead to a credential with labor market value. Placing individuals into the latter type of bridge program or helping individuals progress

through a series of bridge programs leading to employment is likely to carry the least performance risk when using WIA Title I funds.<sup>28</sup> HPOG programs should work with local WIA partners to identify an appropriate bridge program based on WIA performance requirements, with requisite supports, for participants.

**Washington State's I-BEST program** is one model for a career pathway bridge program. The goal of the I-BEST model is to help basic skills students earn an occupational certificate and raise their basic skills levels to what is needed for the next step in a career pathway. All I-BEST programs, including those in healthcare, must be part of a 1-year certificate program or other occupational program with a proven ability to place graduates in higher-wage jobs. I-BEST contextualizes basic skills to the career pathway. Basic skills instructors team with career and technical education instructors to teach students. Students attend full time for one to three quarters, depending on the pathway.

- **If contracts are used, providers can be encouraged to serve individuals with low education, low skill levels, and limited work experience.** Local WIBs have the flexibility to contract with community-based organizations and other entities to deliver WIA intensive and, in some cases, training services.<sup>29</sup> If contracts are used, the request for proposals and contracts can identify the expected performance levels and the appropriate duration for services and require the use of bridge programs and other strategies that work for individuals with barriers to employment.<sup>30</sup> In addition, the performance levels established for training contracts can be adjusted based on participants' level of preparation and work experience. HPOG programs can work with local WIA partners to

address the needs of those with barriers to performance by helping set performance expectations for contracts involving HPOG participants.

Contracts can also be designed to include measures and incentives that encourage providers to help individuals with less education progress through various steps in a career pathway. Interim performance measures, such as completion of the first semester or initial component of a training program, can be adopted. Contracts may include performance incentive funding, in addition to cost reimbursement, to encourage providers to help individuals with barriers complete high-quality programs.

Another option beyond negotiation of performance standards is to seek a performance-related waiver under WIA Title I. The performance measurement structure is not specifically exempted from the Secretary's waiver authority. However, a request for a waiver of all or many of the core performance measures or an exemption of certain groups of participants from the measures would probably be rejected on the grounds that it would undercut accountability, one of the core WIA principles.<sup>31</sup> Despite these constraints, it may still be possible to frame a waiver request that would propose alternative measures without affecting outcomes accountability. For example, it may be possible to propose using a single set of measures from either Title I or Title II if participants are receiving services under both programs. It may also be possible to propose using the WIA youth measures (such as literacy and numeracy gains) for WIA adult participants who need basic skills services and who are on a pathway to occupational training and employment. Local partners interested in this option should work

with State-level WIA agencies to prepare and submit the request.

## Performance Measurement Under WIA Title II

While labor market outcomes are central to WIA Title I, the key outcome in WIA Title II is an educational gain measure that captures basic literacy gains resulting from instruction. Local programs assess students upon intake to determine their educational functioning level. There are four levels for ABE, two for ASE, and six for ESL. Each level describes a set of skills and competencies that students entering at that level can demonstrate in the areas of reading, writing, numeracy, speaking, and listening. There are also functional and workplace areas that are assessed. After a set period established by the State (typically a specific number of hours, weeks, or months of instruction), students are assessed again to determine skill gains. Participants who receive 12 or more hours of instruction are subject to the educational gain measure and other measures.

Additional follow-up measures are used for adult education programs. Since July 1, 2012, these are defined as follows:

1. **Receipt of a secondary credential**—for enrolled learners who take all GED<sup>®</sup> tests, are enrolled in adult high school at the high ASE level, or are enrolled in the assessment phase of the External Diploma Program, who exit during the program year
2. **Entry into postsecondary education or training**—for learners who passed the GED<sup>®</sup> tests or earned a secondary credential while enrolled in adult education, who have a secondary credential at entry, or who are enrolled in a class specifically designed for transition to

postsecondary education, who exit during the program year

3. **Entered employment**—for learners who enter the program unemployed, who exit during the program year
4. **Job retention**—for learners who were unemployed at entry and were employed in the first quarter after exit, and for learners who are employed at entry into the program who exit during the program year

States negotiate targeted levels of performance with the Federal government for each indicator of performance as part of the State Plan process and may receive incentive grants for exceeding these targets in both Title I and Title II, but are not subject to sanctions for failing to reach them. Local programs must report on these measures, and States must consider past performance in awarding competitive grants to providers. Many States use performance-based funding formulas that may result in reduced funding or non-selection in a competitive award process.

## Pathways Strategies for Serving HPOG Participants in WIA Title II

The recent adoption of entered employment and employment retention measures applying to a larger number of learners increases the alignment of WIA Title I and Title II performance measures. Because adult education programs are now responsible for tracking and reporting labor market outcomes for more participants than in the past, States and local programs are more likely to design adult education courses that help students achieve employment. This can provide an opportunity for HPOG programs, which can offer healthcare pathways as a way to meet the challenging new goals.

Local adult education programs have various options to work with local WIBs and American Job Centers to assist HPOG participants:

- **Title II funds can be used to support the basic skills component of bridge programs,** particularly for individuals who may need additional instruction before they are ready for training or postsecondary education.<sup>32</sup> Additional sources of funding, such as WIA Title I training funds or Pell Grants, can support occupation-focused education and training after the participant completes a bridge program or concurrently with basic skills services. HPOG programs should be aware of the educational gain measure and other measures applicable to local programs and help participants achieve learning gains and tangible outcomes.
- **Local adult education and workforce programs can coordinate use of assessments and agree on a protocol for referring participants between programs.** Some local programs have adopted strategies for identifying participants who may benefit from and can be referred to other services.<sup>33</sup> A cross-referral process will benefit workforce program participants who need basic skills or English-language services and adult education program participants who are seeking employment or further preparation for employment. HPOG programs can work with local workforce and adult education partners to identify an appropriate sequence of services across programs.

## Understanding the Local Policy and Service Contexts

Over the course of the 5-year HPOG project period, the 32 grantees plan to enroll more than 30,000 students. The grantees are diverse agencies, including TANF and workforce agencies, community colleges, and nonprofit organizations. In addition to TANF recipients, grantees propose to target a range of low-income populations, including individuals without a high school diploma or the equivalent, incumbent workers, Supplemental Nutrition Assistance Program (SNAP) recipients, and disadvantaged and at-risk youth. Each grantee faces a different labor market and economic context, and each will have to negotiate with a unique set of local partners. The following questions will help HPOG-funded organizations understand the constraints influencing their partners in order to build more successful relationships.

## Questions About TANF Policy and Service Context

**Who should I talk to?** It is not always obvious whom to approach in seeking to build a partnership with TANF programs. In a State-administered system, most policy decisions are made at the State level. In a county-administered system, many (but not all) decisions are made at the local level. Local offices may or may not have flexible funds that they can dedicate to providing work supports. Employment case management (including assessment, assignment to work activities, and verification of hours) may be provided by human services agency staff, workforce staff, or private nonprofit or for-profit contractors. In turn, these agencies may provide work activities directly, refer clients to other agencies, or use a combination approach. HPOG programs may need to build relationships with TANF agencies at multiple levels, depending on the specific issue to be addressed. For

example, a State agency may control the policy decision of whether TANF recipients may meet their work requirements by participating in an education and training program that is anticipated to last more than 1 year. At the same time, the HPOG-funded organization may need to educate local case managers about the training program to ensure that they allow their clients to participate.

**What are the pressures facing TANF administrators?** As discussed above, the WPR is one of the major factors driving TANF administrators. Before approaching a TANF agency, an HPOG program should find out whether the State has met the TANF WPR in recent years and, after applying the caseload reduction credit, what the State's target WPR is. A State that is easily meeting the WPR is likely to be more willing to consider allowing clients to participate in non-federally countable activities than a State that is facing significant fiscal penalties for failure to meet the WPR. HPOG-funded organizations should also understand any other performance measures the State uses in assessing local offices or contractors so that they can explain how they can assist in meeting these goals.

Financial concerns are another major issue for TANF agencies. When approaching a TANF agency, an HPOG program should understand the State's overall budget situation, whether the caseload is rising or falling, whether the State is receiving less Federal funding due to the end of the TANF supplemental grants, whether the State has any TANF carryover funds remaining from previous years, and whether TANF-funded services have been cut in recent years. If a TANF program is experiencing rising caseloads and has cut services deeply, it is probably not realistic to expect the agency to commit to providing support services for HPOG participants. However, if caseloads have fallen and funding is stable, there

may be more opportunity to make the case for use of TANF funds.

### **What are the rules that TANF recipients face?**

HPOG programs should also understand the current State or local policies for TANF recipients, which may comply with but differ from the Federal rules. Obviously, HPOG-funded organizations will need to know whether education and training can be used to meet the work requirements, and under what circumstances, but it is also helpful to understand the applicable eligibility rules and time limits. For example, it would be helpful to know whether a parent working a part-time, 20-hour-per-week job will earn too much to receive TANF assistance. In a State with a 2-year time limit on TANF assistance, HPOG programs may need to consider how to ensure that participants who exhaust their benefits before completing their training program do not drop out as a result.

### **Questions About WIA Title I Policy and Service Context**

**Who should I talk to?** While TANF agencies set policies related to work requirements, local WIBs and American Job Centers in most places receive the bulk of WIA Title I funds and make key decisions about access to training and other services. HPOG programs should initially contact the WIB director in the local area (who can be found in the WIA national directory accessible on DOL's Web site or America's Service Locator Web site, [www.servicelocator.org](http://www.servicelocator.org)). The WIB director or American Job Center staff should be able to share local policies and practices as described in this report and may have working relationships with key employers in the healthcare sector. Some States (typically, smaller States) do not have local WIBs; rather, the State workforce agency develops policies and operates the WIA programs. In a State-administered system, the appropriate contact is the

director of the State agency or the director of workforce services at the agency.

### **What are State and local policies and guidelines?**

Decisions about participation in WIA services are generally made at the local level. HPOG-funded organizations should understand the flow of participants through the American Job Center and WIA services, especially how individuals are likely to obtain training and supportive services. Most States have a managed enrollment process that includes in the performance calculations only WIA Title I adult participants who have received a staff-assisted service. A smaller group of States has begun to include WIA Title I adult participants and Wagner-Peyser Act (Employment Service) registrants in the pool subject to performance measures. This practice results in the enrollment of large numbers of individuals at an early stage of registration.

Policies on priority of service and access to training services are also largely determined at the local level. Local areas have different policies on whether or when a priority of service will be in effect. If a strong priority of service policy is in effect, a local WIB or American Job Center is more likely to partner with HPOG programs to provide training services for TANF recipients and low-income adults.

The types of training services, the maximum amount of an ITA, and the availability of supportive services for those participating in WIA services also vary widely. Some local areas use contracts with colleges to provide training; other areas primarily use ITAs. In some cases, State laws or policies determine the proportion of local funds that should be spent on training or make other policy choices concerning use of WIA funds. Each local WIB helps to maintain the eligible training provider list which identifies programs that WIA participants can attend. HPOG programs can check the list to ensure appropriate

bridge or healthcare training programs are included and therefore available to training participants.

**What are the pressures facing local administrators?** Budget pressures are likely to be a concern for most programs. For WIA Title I programs, it is important to determine whether the local area is enrolling new participants in training services or whether there is a waiting list for prospective trainees.

As discussed above, local areas are concerned about meeting performance goals. Before approaching a WIB director or American Job Center staff, HPOG-funded organizations can determine whether the local area has met negotiated performance levels in recent years. They should also be aware of the size of the pool of participants and the number of those exiting from WIA Title I programs. Large or midsize local areas—those with a sizable pool of people exiting from WIA programs—are more likely to have the flexibility to partner with HPOG programs to carry out new initiatives or to take innovative strategies for serving individuals who are less employable. If the area is suffering from high unemployment and a weak economy, American Job Centers and WIA services may be overwhelmed with unemployed workers seeking immediate job opportunities. If an area has an improving economy with increased hiring, especially in the healthcare sector, it may provide a better opening for HPOG programs to forge training partnerships.

## Questions about WIA Title II Policy and Service Context

**Who should I talk to?** Adult education providers vary by area (and are often found on the State adult education agency's Web site). They can be operated by local school districts, community colleges, community organizations, or a mix of providers. For HPOG programs, the most natural partner may be the

community college. When WIA Title II programs are delivered by or co-located with the community college or American Job Center, it may be easier to align WIA funds, career and technical education funds, and other sources to build pathways for low-income adults.<sup>34</sup>

**What are State and local policies and guidelines?** When HPOG-funded organizations reach out to adult education partners, it is helpful to know the focus or mix of services (GED<sup>®</sup> preparation, ESL, ABE, etc.) in the program. Some States use a performance-funding mechanism that awards a specified portion of funding based on performance, and they may institute performance measures in addition to the required Federal measures.

**What are the pressures facing local administrators?** A key question is whether local adult education programs have the capacity to serve more students. If the programs have slots and are seeking to increase enrollment, there may be good partnership opportunities. Even if there is a waiting list, it may be possible to use other funding sources to pay for adult education and literacy services or leverage in-kind resources or instructional expertise in serving adults with low basic skills.

As discussed earlier, since July 1, 2012, States and local programs are using measures that track entered employment, job retention, attainment of a secondary credential, and entry into postsecondary education and training for a greater number of participants. The introduction of the new measures may create better incentives for structuring programs to provide successful transitions for students. This may provide an opportunity for a partnership with the HPOG program focused on putting participants on a path to jobs in the healthcare sector.

## Examples of Local Coordination and Partnerships

### Local Examples of TANF–WIA Coordination

TANF and WIA agencies partner in many ways, depending on State or local policy choices. HPOG programs should understand the particular configuration of services in their local areas.

- **One approach is to seamlessly braid funding streams to provide universal services.** At Utah American Job Centers, the same staff work with customers funded under all three programs, with their time allocated to the different programs depending on the person they are working with. From the customer perspective, these funding choices are invisible. This approach allows the State to serve more workers with employment and training services than they would with WIA funds alone.<sup>35</sup> This arrangement is rare and is likely to be found where TANF and WIA are administered at the same governmental level (State or county).
- **A more common approach is for a workforce agency to provide employment-based services for TANF recipients through dedicated programming,** paid out of TANF funds. These services are located at the workforce office or the social services office, depending on local preference. This has been the model in Anne Arundel County, Maryland, since 2006. Participants in JobsWork! Arundel are not considered WIA participants, but they have access to the training programs operated by WIA and are connected to the employer network of the Anne Arundel Workforce Development Corporation.
- **TANF agencies, WIA administrators, and HPOG programs may also elect to share specific functions,** such as planning, client

assessment, employer outreach, or labor market surveys. For example, a local WIB can conduct a survey of employers to identify entry-level and mid-level job opportunities in healthcare fields that are accessible to HPOG participants. This can be a valuable way to save resources, even when it is not feasible to integrate services more deeply. By definition, career pathways require employer involvement to ensure that the training and credentials have real value in the labor market. Employers may be more receptive to participating in these efforts when agencies collaborate because they won't be receiving competing requests from multiple entities. For example, some American Job Centers have dedicated staff members who serve as the primary point of contact for employers and who identify job openings available in the community. In some cases, these teams focus outreach on particular industry clusters where jobs are being added.<sup>36</sup>

- **Co-location is another option for coordinating TANF, WIA, and educational programs.** Co-location of partners reduces the burden on clients receiving services from more than one program and creates additional opportunities for joint planning, case management, and shared services. For example, at the Job Center in Dayton, Ohio, the one-stop career center is co-located with the Ohio Department of Jobs and Family Services, and clients may access a range of public benefits and employment services in a single location. A “social service mall” in the same location rents space to a number of private agencies, including several job training providers, a community college, a charter school, a mentoring program, and a program that provides professional clothing to job seekers.<sup>37</sup>

## Local Examples of WIA–Community College Partnerships

HPOG programs can also learn how local WIBs, American Job Centers, and community colleges in their area are working together to provide training and support participants who enter training. The most common interaction is through provision of training. WIA participants can use ITAs to pay for tuition and other direct training costs at a community college. Local WIBs also help to determine which college programs should be included in the eligible training provider list maintained by the State workforce agency. The following are other examples of WIA–college coordination:

- **Local areas, in some cases, can contract with colleges or other providers to deliver training to groups of participants.** In Washington State, some local WIBs have used contracts to support groups of WIA participants in I-BEST programs run by community and technical colleges.
- **In some local areas, American Job Centers are housed on community college campuses,** giving participants increased access to education and training offerings. Another approach is to outstation WIA staff members on community college campuses where a significant number of participants are enrolled. For example, the City of Chicago used American Recovery and Reinvestment Act WIA funds to place counselors at City College campuses, where they resolved issues for training participants, offered guidance, and coordinated student supports.
- **It is also possible for colleges and local WIA programs to coordinate use of Pell Grants and WIA resources.** According to DOL guidance, WIA training services, such as ITAs, can supplement a Pell Grant award by covering the

full costs of attendance for a low-income student. While WIA training funds are used to pay for direct training costs, Pell Grants can be used for a range of other costs, such as living expenses. Students who are awarded Pell Grants may also receive WIA-funded case management or supportive services to help them stay in the program and complete it.<sup>38</sup> Such coordination requires strong relationships between college financial aid administrators and workforce staff.

## Conclusion

HPOG, with dedicated Federal funding and support, offers a unique opportunity to build healthcare pathways for TANF recipients and other low-income adults by deepening collaboration with community partners. To be sure, forming partnerships and managing the demands of multiple funding streams, including different performance accountability systems, are serious challenges for grantees. However, without the assistance of HPOG programs, low-income students are left to navigate complex systems by themselves. No one wants a disconnected education and workforce program where individual students must identify their own courses of study, select programs, and navigate the complicated admissions, eligibility, and financial aid systems. That's why the work of HPOG grantees is so important in making a difference in the lives of low-income students.

Time invested in understanding the requirements of different programs and the pressures faced by program administrators can pay off in mutually beneficial partnerships that may last well beyond the grant period. HPOG's focus on building healthcare pathways can be a catalyst for transformative coordination among community partners.

## End Notes

<sup>1</sup> Social Policy Research Associates, *Career Pathways Toolkit: Six Key Elements for Success*, September 2011.

<http://www.workforceinfodb.org/PDF/CareerPathwaysToolkit2011.pdf>

<sup>2</sup> In 2009–2010, in only 3 States did as many as half of poor families with children receive TANF, while in 25 States, less than a quarter did. Danilo Trisi and LaDonna Pavetti, “TANF Weakening as a Safety Net For Poor Families,” Center on Budget and Policy Priorities, March 13, 2012.

<http://www.cbpp.org/cms/index.cfm?fa=view&id=3700>

<sup>3</sup> For the full definition of assistance, see 45 CFR §260.31.

<sup>4</sup> Certain activities may be supported by TANF funds without regard to income. For a detailed explanation of the rules regarding use of TANF funds, see Elizabeth Lower-Basch, “TANF Policy Brief: Guide to Use of Funds,” Center for Law and Social Policy, March 1, 2011.

<http://www.clasp.org/admin/site/publications/files/Guide-to-Use-of-TANF-Funds.pdf>

<sup>5</sup> Caseload data are available at:

[http://acf.hhs.gov/programs/ofa/data-reports/caseload/caseload\\_current.htm](http://acf.hhs.gov/programs/ofa/data-reports/caseload/caseload_current.htm)

<sup>6</sup> Ongoing transportation and child care subsidies for non-employed individuals do count as assistance. TANF funds should only be used for these purposes for individuals who are already receiving ongoing assistance. See

<http://www.acf.hhs.gov/programs/ofa/polquest/assist.htm>

<sup>7</sup> Students without a high school diploma or equivalent previously could be eligible for student financial aid if they proved their “ability to benefit” from postsecondary education by either passing a federally-approved test or successfully completing six credits toward a certificate or degree with a C or

higher grade. Since July 1, 2012, newly enrolled college students without a high school diploma or equivalent are no longer eligible for Federal student aid due to the elimination of the “ability to benefit” options by Congress in December 2011. Students without a high school diploma or the equivalent who were enrolled in a student aid-eligible program prior to July 1, 2012, could still access “ability to benefit” options after that date. See

<http://www.clasp.org/admin/site/publications/files/Ability-to-Benefit-FAQs.pdf>

<sup>8</sup> Veterans also are a priority population as a result of the Jobs for Veterans Act of 2002. *PY 2010 WIASRD Data Book*, Social Policy Research Associates, November 2011.

<sup>9</sup> Recent appropriations legislation has permitted training by contract for groups of participants. The FY 2012 Labor, Health and Human Services, Education, and Related Agencies appropriations legislation allows local boards to contract with colleges or other providers to train groups of participants. If training contracts are used, administrators must ensure there is sufficient demand from employers in the field in which the group is trained. See

[http://www.nationalskillscoalition.org/resources/washington-updates/2011/nsc\\_washingtonupdate\\_2011-dec.pdf](http://www.nationalskillscoalition.org/resources/washington-updates/2011/nsc_washingtonupdate_2011-dec.pdf)

<sup>10</sup> For more information, see U.S. Department of Education, Office of Vocational and Adult Education, “Use of Funds Provided under the Adult Education and Family Literacy Act for Integrated Education and Training,” Program Memorandum FY 2010–2012, June 2010.

<sup>11</sup> Lennox McLendon, *Adult Student Waiting List Survey*, National Council of State Directors of Adult Education, 2009–2010.

<http://www.naepdc.org/publications/2010%20Adult%20Education%20Waiting%20List%20Report.pdf>

<sup>12</sup> This table includes the DOL common measures for adults which most States have adopted. Although the original measures in WIA included an employment and credential measure, most States are no longer accountable for this measure. However, DOL collects data on credential attainment and has a goal for increasing the number of participants in various programs who earn industry-recognized credentials. For more information on the common measures for adults and youth and the original categories of measures established by WIA, see U.S. Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter No. 17-05, Common Measures Policy, February 2006.

<http://wdr.doleta.gov/directives/attach/TEGL17-05.pdf>

<sup>13</sup> Since July 1, 2012, the entered employment, retention, receipt of secondary school credential and entry into postsecondary measures are being applied to specific subsets of learners instead of only those learners citing those outcomes as goals. See

<http://www.nrsweb.org/foundations/NRSChanges.aspx>

<sup>14</sup> The countable activities are unsubsidized and subsidized employment, work experience, on-the-job training, job search and job readiness assistance, community service programs, vocational educational training, job skills training, education directly related to employment, satisfactory attendance at secondary school, and providing child care services to an individual participating in a community service program. Definitions of all of these activities can be found at 45 CFR §261.2.

<sup>15</sup> To count toward the all-families participation rate, a single-parent family with a child under the age of 6 years must participate for an average of 20 hours a week; all other families must participate for an average of 30 hours a week. To count toward the two-parent family rate, a family not receiving federally-funded child care must participate for 35 hours a week, and a family receiving federally-

funded child care must participate for 55 hours a week. See

<http://www.acf.hhs.gov/programs/ofa/polquest/wkpart.htm>

<sup>16</sup> Interim final rules released in 2006 had precluded counting of programs leading to a baccalaureate or advanced degree. However, this provision was removed from the final rule published in February 2008.

<sup>17</sup> See preamble discussion of 45 CFR §261.2(i) as published in the Federal Register at 73 FR 6792 on February 5, 2008.

<sup>18</sup> For the full definition of “job search and job readiness assistance,” see 45 CFR §261.2(g).

<sup>19</sup> Administration for Children and Families, “States Qualifying for Counting Up To Six Additional Weeks of Job Search and Job Readiness, FY 2012.”

[http://www.acf.hhs.gov/programs/ofa/policy/pi-ofa/12wks\\_qualifiers12.htm](http://www.acf.hhs.gov/programs/ofa/policy/pi-ofa/12wks_qualifiers12.htm)

<sup>20</sup> Nebraska Appleseed, “Choosing Education in Nebraska,” February 2012.

[http://www.workingpoorfamilies.org/pdfs/tanf\\_Choo sing-Education.pdf](http://www.workingpoorfamilies.org/pdfs/tanf_Choo sing-Education.pdf)

<sup>21</sup> U.S. Department of Health and Human Services, Administration for Children and Families, “Work Participation Rates FY2009,” updated May 4, 2011. <http://www.acf.hhs.gov/programs/ofa/particip/2009/tab04b.htm>

<sup>22</sup> Heather Hahn and Pamela Loprest, “Improving State TANF Performance Measures,” Urban Institute, September 2011. <http://www.urban.org/UploadedPDF/412447-Improving-State-TANF-Performance-Measure.pdf>

<sup>23</sup> Ali Berker and Laura Horn, *Work First, Study Second: Adult Undergraduates Who Combine Employment and Postsecondary Enrollment*, National Center for Education Statistics, U.S. Department of Education, Institute of Education Sciences, 2003.

<sup>24</sup> There is a different set of employment-related and skills-related measures for youth. See U.S.

Department of Labor, Employment and Training Administration, Training and Employment Guidance Letter No. 17-05, Common Measures Policy, February 2006.

<sup>25</sup> Government Accountability Office, Workforce Development: Community Colleges and One-Stop Centers Collaborate to Meet 21<sup>st</sup> Century Workforce Needs, May 2008,

<http://www.gao.gov/new.items/d08547.pdf>

<sup>26</sup> An Overview of the WIA, in Douglas J. Besharov and Phoebe H. Cottingham, *The Workforce Investment Act: Implementation Experiences and Evaluation Findings*, Upjohn Institute Press, 2011.

<sup>27</sup> Illinois Department of Commerce and Economic Opportunity, *Using WIA Title I to Support Bridge Programs: A Technical Assistance Guide*, August 2009.

<sup>28</sup> Illinois Department of Commerce and Economic Opportunity (August 2009).

<sup>29</sup> The FY 2012 Labor, Health and Human Services, Education and Related Agencies appropriations legislation allows local boards to contract with colleges or other providers to train groups of participants. See page 2,

[http://www.nationalskillscoalition.org/resources/washington-updates/2011/nsc\\_washingtonupdate\\_2011-dec.pdf](http://www.nationalskillscoalition.org/resources/washington-updates/2011/nsc_washingtonupdate_2011-dec.pdf)

<sup>30</sup> Illinois Department of Commerce and Economic Opportunity (August 2009). Also, U.S. Department of Labor, Employment and Training Administration, “Improving Literacy and Numeracy Gains of WIA Youth Program Participants,” Training and Employment Guidance Letter No. 18-11, March 2012.

<sup>31</sup> CLASP, *Integrating TANF and WIA into a Single Workforce System: An Analysis of Legal Issues*, February 2004.

<sup>32</sup> U.S. Department of Education, Office of Vocational and Adult Education, *Use of Funds Provided Under the Adult Education and Family Literacy Act (AEFLA) for Integrated Education and*

*Training (IET)*, Program Memorandum FY 2010–12, June 2010.

<sup>33</sup> Judith Alamprese, *Final Report: Shared Goals, Common Ground: State and Local Coordination and Planning to Strengthen Adult Basic Education Services*, Abt Associates Inc., June 2009.

<sup>34</sup> Career and technical education funds authorized under the Carl D. Perkins Career and Technical Education Act are distributed to secondary and postsecondary institutions and can be used to support critical components of career pathway initiatives, including curriculum development, program development and support services.

<sup>35</sup> Utah Department of Workforce Services, *Utah’s Job Connection*, WIA/Wagner Peyser State ARRA Plan,

[http://jobs.utah.gov/edo/stateplans/wiawpstateplan.p](http://jobs.utah.gov/edo/stateplans/wiawpstateplan.pdf)

[df](http://jobs.utah.gov/edo/stateplans/wiawpstateplan.pdf). See also Allison Rowland, *Utah’s Economy: The Future is Here*, Voices for Utah’s Children, January 2009,

[http://www.workingpoorfamilies.org/pdfs/Utah\\_Assessment\\_Report.pdf](http://www.workingpoorfamilies.org/pdfs/Utah_Assessment_Report.pdf)

<sup>36</sup> Government Accountability Office, “Workforce Investment Act: Exemplary One-Stops Devised Strategies to Strengthen Services, but Challenges Remain for Reauthorization,” June 2003.

<sup>37</sup> See Job Center Partner Organizations,

<http://www.thejobcenter.org/about-us/partner-organizations.html>

<sup>38</sup> U.S. Department of Labor, “Supporting UI Claimant Training Needs in One-Stop Career Center System,” Training and Employment Notice No. 11-09, October 15, 2009.