CLASP’s Opportunities for Action is a series of short memos with recommendations for state and local areas to fully realize the options in the Workforce Innovation and Opportunity Act (WIOA) to help low-income and lower-skilled youth and adults achieve economic success.

WIOA requires local workforce boards to convene their education partners to develop and implement career pathways\(^1\). Section 3(7) of WIOA includes the first-ever federal definition of the set of core activities that are required in career pathways (see appendix).

**State Plan**

It is important that the WIOA State Plan foster understanding and adoption of WIOA’s robust definition of career pathway programs at the local level. States should determine whether partners have built career pathway programs that meet this definition and offer infrastructure and guidance on defining and tracking participants who are on a "state-recognized" career pathway. These considerations are especially critical:

- The State Plan should define a state process for recognizing local/regional career pathway programs, including how they'll verify that a program meets all required elements of the WIOA career pathway definition (see career pathway template on page four).
- The State Plan should define target populations for career pathway programs to include out-of-school youth, individuals with disabilities, non-native English speakers, individuals with basic skill deficits, and others.

**Focus Your WIOA Career Pathways and Leverage Multiple Systems**

WIOA career pathway plans do not have to articulate pathways for every youth and adult population in the state (although these systems should be more closely coordinated over time). **WIOA career pathways simply need to represent the intersection of these systems’ efforts to serve individuals with barriers to employment in specific occupational sectors that are in demand in regional labor markets.** In other words, partners should focus on in-demand credentials for target populations—youth and adults—as they define their shared work. WIOA’s required set of career pathway core activities have both enough structure and enough flexibility to describe the intersection of partnership activities across key public systems (see chart on page two).

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\(^1\) CAREER PATHWAYS DEVELOPMENT: The local board, with representatives of secondary and postsecondary education programs, shall lead efforts in the local area to develop and implement career pathways within the local area by aligning the employment, training, education, and supportive services that are needed by adults and youth, particularly individuals with barriers to employment. [Sec. 107(d)(5)]
Policies & Guidance

Supporting local development and implementation of career pathways will necessitate state policy and guidance in key areas:

- The State should build pathway identifiers into administrative data systems so that individual participants can be “flagged” as participating in a particular state-recognized program (see CLASP’s Opportunities for Action memo on Career Pathways: Using the State Eligible Training Provider List to Support Quality & Coordination).
- The State should issue a co-enrollment policy that clearly endorses an individual being served by multiple WIOA titles and explains how to track the variety of services received through the different providers.
- The State should define concurrent enrollment strategies with postsecondary career and technical education providers to ensure robust use of Integrated Education and Training—the balanced, simultaneous provision of adult literacy, workforce preparation, and training (see CLASP’s Opportunities for Action memo on WIOA Title II Adult Education).
- The State should give guidance to human service providers on enrolling and supporting human service recipients in these state-recognized career pathways.
- The State should ensure that state-recognized career pathway programs are on the state’s Eligible Training Provider List, making them eligible for title I-B training funds.

Collaborative Leadership

Of course, it’s easier said than done. To develop a robust career pathway that includes multiple aligned programs for target populations, that is funded by a variety of sources, and that can be tracked through multiple data systems, partners will have to implement significant changes in practice and policy and—perhaps most critically—use a
A collaborative, distributed leadership model based on respect and a shared vision. To learn from practitioners across 10 leading career pathway states, see the Alliance for Quality Career Pathways’ Shared Vision, Strong Systems framework.

To support local boards in their mandate to develop and implement career pathways, the state can provide the following guidance on identifying and reporting on career pathway participants within WIOA program data.

**STEP 1:** Providers define their career pathway program(s) by completing a template for each pathway and submitting it to designated state staff. This form requires naming the pathway program, identifying the intended target population, and identifying how the WIOA-defined elements exist in the pathway. State staff will use this document to learn about the career pathway models providers are implementing and will retain these forms to allow for consistent reporting, information sharing across providers, and responses to requests for information. (See text box on page four for an example.)

**STEP 2:** Designated state staff will add the career pathway program to the list of projects in the management information system (MIS). The career pathway will only be available in the MIS to the provider who submitted the form (i.e., other providers cannot select it).

**STEP 3:** The provider identifies individual customers as participants in a career pathway by assigning the activities to that individual customer’s record, regardless of funding stream.

**Budget Choices**

**The State should use the Governor’s set-aside to support building career pathways systems for out-of-school youth and adults with low literacy.** States can leverage WIOA funding with discretionary state funding and TANF and other human service funding to jump-start integrated education and training pilot programs across the state while sustained funding opportunities are identified and encouraged through policies and procedures.

Additionally, braided funding—the use of multiple, diverse funding streams to pay for specific components of a career pathway program—is the effect of co-enrolling participants who are “attached” to particular WIOA programs, human services, or financial aid awards. States will need to develop explicit guidance on “counting” individuals who are co-enrolled across WIOA programs, TANF, CTE, and other partner programs. While individuals have always participated simultaneously or sequentially—either intentionally or unintentionally—in multiple programs, co-enrollment guidance would establish this practice as an intentional strategy for aligned service and reassure local providers that the approach is supported and rewarded.

Co-enrollment will lead to individuals being supported by a variety of funding streams that are attached to their programs. Partners need to understand the opportunities and limitations of each of the federal funding streams. CLASP’s updated Career Pathway Funding Toolkit describes federal funding opportunities and limitations within a career pathway framework, with special emphasis on funding support services.
## WIOA Career Pathway Template

**Name of the career pathway program:** ______________________________

**Target Population:** Describe the group(s) of individuals this pathway model will target, including individuals with barriers to employment and priority of service populations.

*Describe how this pathway embodies the required elements for state-recognized WIOA career pathway programs.*

**Sector identification:** Describe how this career pathway aligns to the skill needs of your local/regional employers, including sector strategies and Labor Market Information (LMI).

**Stackable education & training for recognized postsecondary credentials with labor market value:** Describe the range of education & training activities across systems, including secondary diploma or its equivalent and at least one recognized postsecondary credential. Are these programs on the Eligible Training Provider List?

**Integrated Education & Training (IET):** Describe 3 IET components: academic, workforce preparation, and workforce training. Note balanced, simultaneous components organized for accelerated education and career advancement. Attach the combined set of learning outcomes.

**Career services & supportive services:** Describe counseling, employability skill development, work experience, and placement and retention services for education and employment success.

*Describe navigation/career counseling and participant supports, especially individuals with barriers to employment.*

**Opportunities to enter and advance:** Describe entry/exit points, flexible scheduling/delivery model that allows for the combination of work experiences, work-based training, and other employment and education/training combinations.

**Related CLASP resources:** [Comments on proposed regulations; Shared Accountability in WIOA and Career Pathways.](#)

**Questions?** Contact [Judy Mortrude](#), director of CLASP’s Alliance for Quality Career Pathways.

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Appendix: WIOA Definitions

CAREER PATHWAY: a combination of rigorous and high-quality education, training and other services that (A) aligns with the skill needs of industries in the economy of the State or regional economy involved; (B) prepares an individual to be successful in any of a full range of secondary or postsecondary education options, including apprenticeships…; (C) includes counseling to support an individual in achieving the individual's education and career goals; (D) includes, as appropriate, education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster; (E) organizes education, training, and other services to meet the particular needs of an individual in a manner that accelerates the educational and career advancement of the individual to the extent practicable; (F) enables an individual to attain a secondary school diploma or its recognized equivalent, and at least 1 recognized postsecondary credential; and (G) helps an individual enter or advance within a specific occupation or occupational cluster. [WIOA, Sec. 3(7)]

CAREER SERVICES include—at a minimum…(i) eligibility…; (ii) outreach, intake…; (iii) initial assessment of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities (including skills gaps), and supportive service needs; (iv) labor exchange services, including—(I) job search and placement assistance and, in appropriate cases, career counseling, including—(aa) provision of information on in-demand industry sectors and occupations; and(bb) provision of information on nontraditional employment; and(II) appropriate recruitment and other business services on behalf of employers… (v) referral…;(vi) labor market information and occupations in demand…(vii) performance information and program cost information on eligible providers of training…; (viii) information and referral to benefit programs…; (x) unemployment compensation information…; (xi) FAFSA assistance…;(xii) services, if determined to be appropriate in order for an individual to obtain or retain employment, that consist of—(I) comprehensive and specialized assessments of the skill levels and service needs of adults and dislocated workers, which may include—(aa) diagnostic testing and use of other assessment tools; and (bb) in-depth interviewing and evaluation to identify employment barriers and appropriate employment goals; (II) development of an individual employment plan, to identify the employment goals, appropriate achievement objectives, and appropriate combination of services for the participant to achieve the employment goals, including providing information on eligible providers of training services pursuant to paragraph (3)(F)(ii), and career pathways to attain career objectives; (III) group counseling; (IV) individual counseling; (V) career planning; (VI) short-term prevocational services, including development of learning skills, communication skills, interviewing skills, punctuality, personal maintenance skills, and professional conduct, to prepare individuals for unsubsidized employment or training; (VII) internships and work experiences that are linked to careers; (VIII) workforce preparation activities; (IX) financial literacy services, such as the activities described in section 129(b)(2)(D); (X) out-of-area job search assistance and relocation assistance; or (XI) English language acquisition and integrated education and training programs; and (xiii) follow-up services, including counseling regarding the workplace, for participants in workforce investment activities authorized under this subtitle who are placed in unsubsidized employment, for not less than 12 months after the first day of the employment, as appropriate. [WIOA, Sec. 134(c)(2)]

ELIGIBLE TRAINING PROVIDER LIST: career pathway programs should be included on the ETPL through demonstration of “the degree to which the training programs of such providers relate to in-demand industry sectors and occupations in the State;…the ability of the providers to offer programs that lead to recognized postsecondary credentials; the quality of a program of training services, including a program of training services that leads to a recognized postsecondary credential; the ability of the providers to provide training services to individuals who are employed and individuals with barriers to employment,” and more. [WIOA Sec. 122(b)(1)(D-I)]
INDIVIDUALS WITH BARRIERS TO EMPLOYMENT: A member of 1 or more of the following populations: (A) Displaced homemakers; (B) Low-income individuals; (C) Indians, Alaska Natives, and Native Hawaiians…; (D) Individuals with disabilities, including youth who are individuals with disabilities; (E) Older individuals; (F) Ex-offenders; (G) Homeless individuals …; (H) Youth who are in or have aged out of the foster care system; (I) Individuals who are English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers; (J) Eligible migrant and seasonal farmworkers…; (K) Individuals within 2 years of exhausting lifetime eligibility …; (L) Single parents (including single pregnant women); (M) Long-term unemployed individuals; (N) Such other groups as the Governor involved determines to have barriers to employment. [WIOA Sec. 3(24)]

INTEGRATED EDUCATION AND TRAINING: a service approach that provides adult education and literacy activities concurrently and contextually with workforce preparation activities and workforce training for a specific occupation or occupational cluster for the purpose of educational and career advancement. [WIOA Sec. 203(11)]

PRIORITY OF SERVICE: With respect to funds allocated to a local area for adult employment and training activities … priority shall be given to recipients of public assistance, other low income individuals, and individuals who are basic skills deficient for receipt of career services … and training services. [WIOA Sec. 134(c)(3)(E)]

RECOGNIZED POSTSECONDARY CREDENTIAL: a credential consisting of an industry-recognized certificate or certification, a certificate of completion of an apprenticeship, a license recognized by the State involved or Federal Government, or an associate or baccalaureate degree. [WIOA Sec. 3(52)]. See Credential Resource Guide, Attachment 2 in TEGL 15-10.

SUPPORTIVE SERVICES: services such as transportation, child care, dependent care, housing, and needs-related payments, that are necessary to enable an individual to participate in activities authorized under this Act. [WIOA Sec. 3(59)]

TRAINING SERVICES - (i) occupational skills training, including training for nontraditional employment; (ii) on-the-job training; (iii) incumbent worker training in accordance with subsection (d)(4); (iv) programs that combine workplace training with related instruction, which may include cooperative education programs; (v) training programs operated by the private sector; (vi) skill upgrading and retraining; (vii) entrepreneurial training; (viii) transitional jobs in accordance with subsection (d)(5); (ix) job readiness training provided in combination with services described in any of clauses (i) through (viii); (x) adult education and literacy activities, including activities of English language acquisition and integrated education and training programs, provided concurrently or in combination with services described in any of clauses (i) through (vii); and (xi) customized training conducted with a commitment by an employer or group of employers to employ an individual upon successful completion of the training. [WIOA Sec. 134(c)(3)(D)]

WORK-BASED TRAINING: On the job training, customized training, incumbent worker training, registered apprenticeship, and transitional jobs. 20 CFR 680.700 – 680.850

WORKFORCE PREPARATION: Workforce preparation activities include activities, programs, or services designed to help an individual acquire a combination of basic academic skills, critical thinking skills, digital literacy skills, and self-management skills, including competencies in: (a) Utilizing resources; (b) Using information; (c) Working with others; (d) Understanding systems; (e) Skills necessary for successful transition into and completion of postsecondary education or training, or employment; and (f) Other employability skills that increase an individual’s preparation for the workforce. [RIN 2015-05540, proposed Sec.463.34]