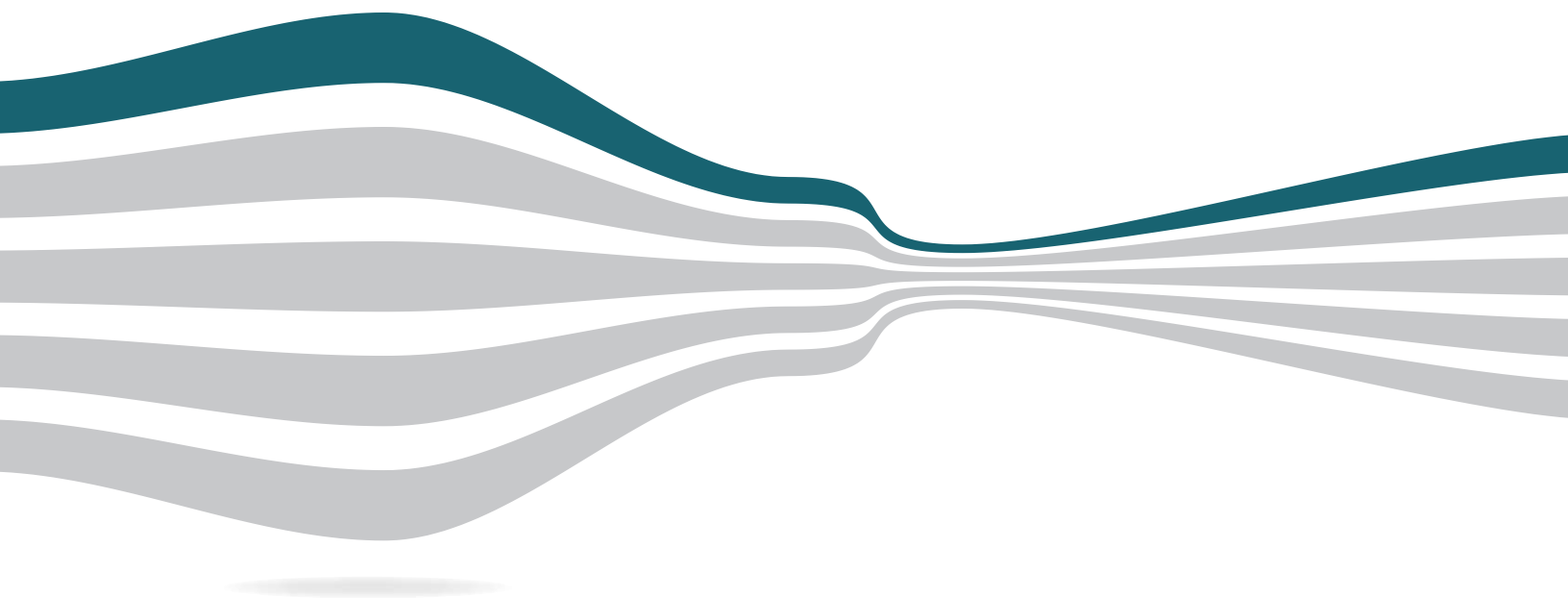# MAXIMIZING WIOA'S POTENTIAL:

A Regional Analysis of the State Plans of
Maryland, Virginia, and Washington, DC

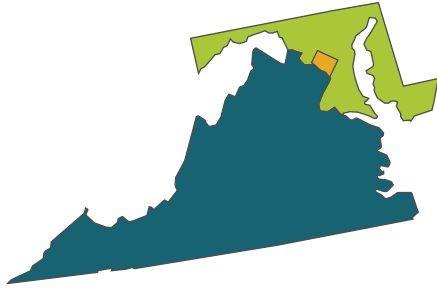## Vulnerable Subpopulations

March 2017

Authored by:

The Commonwealth Institute for Fiscal Analysis ▪ DC Appleseed
DC Fiscal Policy Institute ▪ Job Opportunities Task Force
Maryland Center on Economic Policy

Vulnerable Subpopulations

A. BACKGROUND AND INFRASTRUCTURE

Promising practices in barrier remediation for vulnerable subpopulations include:

✔ **Maryland:** Efforts to improve barrier remediation infrastructure include continuous staff training, improved coordination to reduce duplication, and information sharing.

✔ **Virginia:** The state plan includes an "integrated resources" team to determine strategies for helping multiple-barrier clients.

✔ **DC:** For child care barrier remediation, the state plan identifies federal funding resources to be utilized, and includes strategies to make subsidies more accessible.

In this section, we first we compare the overall infrastructure of each of the three jurisdictions' strategies and activities to address the needs of vulnerable subpopulations, per the WIOA state plans. Next, we outline the strategies for six specific subpopulations. WIOA Section 3(24) defines an extensive list of subpopulations that face barriers to employment. From this list, we have selected key subpopulations of interest and aggregated them into six categories for easier comparison between the jurisdictions. (Of course, we acknowledge that in many cases, these populations can and do overlap.) The subpopulations of interest are:

1. Adult Learners
2. Returning Citizens
3. Individuals with Disabilities
4. Youth
5. English-language Learners and Immigrants
6. Low-Income Individuals

i. Priority of Service

WIOA provides a focus on serving "individuals with barriers to employment," defined in WIOA section 3(24) and seeks to ensure access for these populations on a priority basis.

WIOA establishes a priority requirement for funds allocated to a local area for adult employment and training activities. One-stop center staff responsible for these funds must give priority to recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient in the provision of individualized career training services. Under the Workforce Investment Act (WIA, the predecessor of WIOA), priority was required to be given to public assistance recipients and low-income individuals when States and local areas determined that allocated funds were limited. Under WIOA, priority must be provided regardless of the level of funds. WIOA also expanded the priority to include individuals who are basic skills deficient as defined in WIOA section 3(5). In addition, the law stipulates that Temporary Assistance to Needy Families (TANF) is a required partner in the WIOA one-stop system, unless the governor affirmatively opts out. These two provisions are intended to increase the number of higher-need adults in job training services.[1]

Veterans and eligible spouses continue to receive priority of service for all DOL-funded job training

programs, which include WIOA programs. However, when programs are statutorily required to provide priority for a particular group of individuals, such as the WIOA priority described above, priority must be provided in the following order:

   i.   First, to veterans and eligible spouses who are also included in the groups given statutory priority for WIOA adult formula funds. This means that veterans and eligible spouses who are also recipients of public assistance, low-income individuals, or individuals who are basic skills deficient would receive first priority for services provided with WIOA adult formula funds.

   ii.   Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA adult formula funds.

   iii.   Third, to veterans and eligible spouses who are not included in WIOA's priority groups.

   iv.   Last, to non-covered persons outside the groups given priority under WIOA.

Maryland and DC identify in their plans the above list of populations that face barriers to employment, as well as the new WIOA priority of service requirements. Virginia also states priority of service for veterans and eligible spouses, and also plans to implement a policy addressing priority for public assistance recipients, other low-income individuals, and those who are basic-skills deficient.

ii. Barrier Remediation

All three jurisdictions speak to barrier remediation for key vulnerable subpopulations though none contains what might be considered a comprehensive approach. From a best practice perspective, the plans would either describe in sufficient detail—or direct local boards to describe—how they will address the most common barriers to participation in education and employment programming, such as child care, transportation, criminal history, health/mental health issues, and basic skills deficiencies. In addition, plans should include, or require local boards to include, analysis of their intake, assessment, and referral processes for individuals with barriers, including describing the capacity of the community-based organizations and

other resources that will be called upon to remediate those barriers throughout training and employment. Equally important, plans should describe how the state or its regions will ensure program and physical accessibility for individuals with disabilities for all WIOA funded activities and how the state will manage the ongoing collaboration required to address education and employment barriers. The general approach of each jurisdiction to barrier remediation is discussed here, whereas barrier remediation strategies of each jurisdiction that pertain to specific subpopulations are discussed in the relevant subsections below.

DC's plan includes a comprehensive goal but is non-specific on implementation. The plan states as a goal that all residents including people with disabilities and those with multiple barriers to employment, as well as youth, regardless of education or skill level, can access the education, training, career, and supportive services necessary to move forward in their career pathway. It also includes general goals like increasing "earn and learn" opportunities, such as supporting apprenticeships and on-the-job training. It does not include specifics about what funding sources will be deployed to implement them, or how they will be expanded. The strategy to "strengthen partnerships" among agencies to better address barriers is named but is also lacking in specificity.

Maryland's plan expresses intent to braid funds to provide supportive services including transportation and child care, but doesn't specify implementation details. Various programs (Reemployment Services and Eligibility Assessments and EARN Strategic Industry Partnerships, for example) provide barrier identification and remediation services, but efforts are largely disjointed and program-specific. However, Maryland's plan does list several general strategies to facilitate barrier removal and more effective service provision to populations facing barriers to employment including continuous staff training, improved coordination to reduce duplication, and information sharing. Maryland will also be conducting focus groups with jobseekers to understand the barriers they face, and to solicit their input in streamlining operations and services, including existing programs, to better help jobseekers overcome any barriers to

employment. Local plans may include additional barriers that local areas may wish to address through local service delivery. In addition, while not included in the state plan, in September 2016, Maryland issued draft performance benchmarks for public comment, which specifically seek to track and improve access and use of supportive services in each of the following areas: child care, transportation, substance use, behavioral health issues, housing issues, child support issues, criminal background issues, and domestic violence issues. Though not specifically focused on barrier remediation, Maryland was awarded $2 million under the federal ApprenticeshipUSA initiative, which will be utilized to grow Registered Apprenticeship opportunities for populations that face barriers to employment: low income individuals, youth, women, communities of color, and persons with disabilities.[2]

Virginia's plan proposes that the state form an "integrated resources" team to determine strategies for helping multiple-barrier clients. The team will design a plan for broader dissemination that records best practices in serving these groups.

iii. Child Care

Child care is one of the most common barriers faced by low-income parents trying to access and complete education and training. In addition to simply trying to find, arrange, and pay for child care, low-income parents are faced with many additional challenges, including balancing education/training with work, changing or unpredictable class and work schedules that don't align with formal child care options, and insufficient supply of quality child care options.[3]

The newly passed WIOA and Child Care and Development Fund (CCDF) laws present key opportunities to support low income parents to access workforce development services.[4] Not only does WIOA give priority for individuals with barriers to employment, including single parents and young parents, but key strategies highlighted in the law offer opportunities for serving low-income parents, such as the emphasis on individual assessment, career plan development, and career pathways, which can and should include provisions for child care. WIOA's focus on partnerships also points to opportunities to engage state child care partners and have child care programs be active in service delivery.[5] A reauthorized CCDF, which provides vouchers to low-income populations, also provides opportunities around partnership and consumer education.[6]

Child care is mentioned in each of the state's WIOA plans, but overall, little detail is provided.

DC's plan has the most specific language with respect to addressing the child care needs of low-income parents. DC already integrates child care services at its youth re-engagement center, and aims to integrate child care services more fully into American Jobs Centers (AJCs) as well, allowing staff in these locations to assess eligibility and issue vouchers for child care subsidies. DC provides public preschool and prekindergarten for all three- and four-year-olds, which leverages federal Head Start funding. This alleviates the cost of care for families, but summers and before- and after-care are not included. DC has increased the number of nontraditional slots in recent years, but this increase is still insufficient. Similarly, many of DC's child care services offer nontraditional hours, but these are not necessarily within convenient proximity to parents' work or home.[7] The DC plan has identified two child care resources for the WIOA service population—WIOA supportive services funding and CCDF subsidies—and includes strategies to make CCDF subsidies more accessible to young parents and those seeking employment services.[8]

The Virginia plan mentions the availability of transitional child care for one year for clients of the Virginia Initiative for Employment not Welfare (VIEW)[9] who are no longer eligible for TANF benefits, but this is only for those who are working. The Maryland plan provides the least detail, but has some discussion of child care for TANF recipients. Maryland and Virginia should consider making more explicit in their WIOA materials the resources available to adult learners and jobseekers to remediate barriers related to child care.

All three states (and local WDBs[10]) should plan to integrate into their WIOA implementation teams the agencies, organizations, and/or experts who can assist with child care planning in their

communities, and in particular those who can provide expertise on the child care subsidy system. Local providers around the country have incorporated innovative strategies for addressing these issues, which DC, MD, and VA can look to as models.[11] As a starting place, implementation teams can pose the following questions:

1. To what extent do intake processes at AJCs or local programs inadvertently screen out parents, for example by requiring parents to have child care in place before allowing enrollment in the program?

2. Do AJC or local WIOA funded providers assess the child care needs and barriers of adult learners interested in participating in education and training at intake? Are child care needs part of the client's employment plan? Is any help provided to adult learner parents who need help finding child care so they can participate in education and training?

3. What are the likely hours and schedules of the education and training services being offered to adult learners in your state/community— including for related activities such as homework or internships? How compatible are the overall time demands of education, training, and/or work with schedules of child care providers (which tend to operate more during traditional work hours and require regular attendance)? Could the education and training schedules be adjusted to make it easier for parents to access child care—such as block scheduling?

4. To what extent are child care options available to adult learner parents who need care on evenings or weekends? If the supply is inadequate, are there steps that can be taken to expand available options for this population?

5. If activities are short-term, can the adult education and training providers provide drop-in care during the activity? What licensing or other requirements need to be considered to ensure the health and safety of the children?

6. Can WIOA supportive service funding be used to meet child care needs (as is specified in the DC plan)? Under what conditions? States can set their own criteria for how these funds should be used, including how much will be paid to providers, whether there are requirements, etc.

7. Are eligibility requirements for CCDF consistent with the programming that is being promoted through career pathways and sector partnerships, such as apprenticeships or adult basic education? Are there hidden barriers, such as minimum hour requirements? How easy or difficult is it for parents to enroll and do they need help? Is there a sharp "cliff" at which parents are cut off from CCDF eligibility because they are earning too much, but are unlikely to be able to pay for child care at the current local rates?

iv. Transportation Assistance

Another very common barrier faced by participants in job training programs is access to reliable, affordable transportation. In addition, the integration of transportation assistance is a key barrier remediation strategy to ensure that adult learners can fully access and complete adult education programs.[12]

Each of the state plans notes that limited access to reliable and/or affordable public and private transportation is a key barrier to employment. However, none of the state plans provide concrete plans for expanding transportation assistance programs. While DC's Department of Employment Services and all three jurisdictions' vocational rehabilitation (VR) agencies do provide some transportation funding,[13] this assistance does not cover the full need, since the cost of local public transit is high, and many programs and individuals don't have access to these funds. As with child care, all three jurisdictions should integrate a comprehensive transportation assistance program into their WIOA implementation plans.

B. ADULT LEARNERS

Promising practices in services for adult learners include:

✔ **Maryland:** The state's oversight of adult education is housed within a DOL rather than DOE, which may enable greater integration of adult education with workforce development activities. The MI-BEST and ACE integrated education and training pilot programs include job placement staff and integrated wraparound services.

✔ **Virginia:** The Adult Learning Resource Center, dedicated to adult learners, provides professional development, technology integration, and technical assistance, and serves over 3,500 of Virginia's adult education administrators and practitioners annually. PluggedInVA provides career pathways specifically for adult learners through partnerships with community colleges and other post-secondary institutions.

✔ **DC:** The adult education and system performance dashboard, once fully developed, will outline key goals for the system with specific measures and targets to gauge performance.

Services for adult learners fall under Title II of WIOA, also known as the Adult Education and Family Literacy Act. Adult education is defined in WIOA as academic instruction and education services below the postsecondary level that increase an individual's ability to:

1) read, write and speak in English and perform mathematics or other activities necessary for the attainment of a secondary school diploma or its recognized equivalent;

2) transition to postsecondary education and training;

3) obtain employment.

The goals of WIOA Title II are to:

1) assist adults to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency;

2) assist adults who are parents or family members to obtain the education and skills that:

3) are necessary to becoming full partners in the educational development of their children; and

4) lead to sustainable improvements in the economic opportunities for their family;

5) assist adults in attaining a secondary school diploma and in the transition to postsecondary education and training, including through career pathways; and

6) assist immigrants and other individuals who are English language learners in:

   A) improving their:

      i. reading, writing, speaking and comprehension skills in English; and

      ii. mathematics skills; and

   B) acquiring an understanding of the American system of government, individual freedom, and the responsibilities of citizenship.

More information on adult learning opportunities, including career pathways and integrated education and training initiatives, can be found in the module on Sector Partnerships and Career Pathways. In addition, while English language learners are touched upon in this section, we feel that their needs are unique, and therefore we engage in a deeper discussion of the three jurisdictions' approach to serving this population in the English Language Learners and Immigrants section of the module on Vulnerable Subpopulations.

i. Defining Adult Learners

WIOA defines individuals eligible for Title II services as an individual:

1) who has attained 16 years of age;

2) who is not enrolled or required to be enrolled in secondary school under State law; and

3) who:
   - A) is basic skills deficient;
   - B) does not have a secondary school diploma or its recognized equivalent, and has not achieved an equivalent level of education; or
   - B) is an English language learner.

WIOA Title II does not define basic skills deficient, but instead follows the National Reporting System (NRS) educational functioning levels (EFLs) that provide standardized assessment benchmarks to define the various literacy levels for adult learning and English language instruction. The NRS has defined a set of six EFL descriptors for Adult Basic Education/Adult Secondary Education (ABE/ASE) and six for English Language Acquisition (ELA). WIOA requires standardized assessments to be utilized to determine the literacy levels of individuals seeking Title II services.

DC defines "Basic Skills Deficient" according to a single standardized assessment, the eCASAS test (the electronic version of the Comprehensive Adult Student Assessment Systems). In DC, a learner who tests at or below the eighth grade level in math and/or reading is considered Basic Skills Deficient. There are clear advantages to this strategy, especially as DC's shared intake data system is expanded, to use a clear and measurable standard across agencies and systems, as well as ensuring that the system focuses on learners least likely to succeed in most current vocational training opportunities. There may be disadvantages as well, however, insofar as testing may serve as a barrier to entry for some, and may exclude others based on skill deficits that the eCASAS is not designed to measure. It is too soon to determine whether the single assessment strategy is one to be emulated, or whether states that opt for providing a menu of options, including self-attestation and American Job Center (AJC)

staff observation, are best able to achieve their overall performance goals.

Though not specifically mentioned in their WIOA plans, Maryland and Virginia have issued separate policies to provide guidance on basic education skills and English language assessments. Maryland permits ABE/ASE assessments to be done using the CASAS and TABE tests, and ELA assessments to be done using CASAS, TABE, TABE CLAS-E and BEST Literacy and/or BEST Plus. Maryland has also released guidelines for assessment for Title I and Title II providers to reduce duplication and requires local partners to coordinate assessment.[14] Virginia permits the use of BEST Literacy, BEST Plus, CASAS Life and Work Series and TABE CLAS-E to be used for ELA assessment, and CASAS Life and Work Series and Life Skills, GAIN and TABE to be used for ABE/ASE assessment.[15]

ii. Barrier Remediation for Adult Learners

DC's plan mentions that gaps exist in the provision of support services to adult learners, such as transportation, housing, child care, counseling, coaching and income supports, which adult learners often need in order to fully access and complete education and training opportunities. Child care is stated to be one of the most persistent barriers for District residents in DC's adult education and workforce development system as a whole. The immediate need for income is also stated as a major barrier to participation in adult education. Thus, agencies in DC are working to increase access to "earn and learn" opportunities through expanding apprenticeships and on-the-job training opportunities.

In Virginia, adult education service providers are expected to help individuals assess their own skill levels, schedules, and potential barriers to successful participation in instruction as part of the application and orientation process.

The Maryland Integrated Basic Education and Skills Training (MI-BEST) program[16] and the Accelerating Connections to Employment (ACE) model[17] piloted in Maryland included wraparound support services to help adults overcome barriers they faced in completing the program, as well as in securing and maintaining employment.

iii. Adult Learning Approaches and Activities

The adult learning efforts of DC and Maryland align with Common Core State Standards (CCSS) and College and Career Readiness Standards (CCRS) and integrate CASAS competencies. In DC, all Adult and Family Education (AFE) grantees will be required to embed career awareness (lowest basic skills level) or Integrated Education and Training towards an industry certification (at the intermediate and secondary levels). In contrast, Virginia has not adopted the CCSS, but instead has adopted the Mathematics and English Standards of Learning (SOLs). There is alignment of CCSS with SOL.

All three jurisdictions have a primary oversight body for adult education. DC's oversight is conducted by the Office of the State Superintendent of Education (OSSE), Maryland's oversight is by the Division of Workforce Development and Adult Learning (DWDAL) within the Department of Labor, Licensing and Regulation (DLLR), and Virginia's Department of Education administers Title II of WIOA, with leadership and support from the Virginia Adult Learning Resource Center (VALRC). It is worth noting that Maryland's adult education (WIOA Title II) administration is within the Department of Labor rather than Education, which may facilitate greater integration and alignment of adult education with workforce development activities. The table below summarizes the adult learning programs and services offered within each jurisdiction. DC's adult education services are provided at the AJCs, as well as by providers subgranted through OSSE. Through competitive grants to ensure that services are available in every jurisdiction based on level of need, Maryland and Virginia offer services through subgranted providers only.

WIOA-FUNDED ADULT EDUCATION PROGRAMS

Program or Service	Maryland	Virginia	Washington, DC
Adult Basic Education (ABE)	X	X	X
Adult Secondary Education (ASE)	X	X	X
GED and NEDP (high school diploma preparation)	X	GED only	X
English as a Second Language (ESL) or English Language Acquisition (ELA)*	ESL*	ELA	ESL*
English Literacy (EL)/ Civics Education	X	X (called Integrated English Literacy/Civics)	X
Family Literacy	X	X	X
Correctional Education	X	X	X

WIOA-FUNDED ADULT EDUCATION PROGRAMS

Program or Service	Maryland	Virginia	Washington, DC
Other programs and services	N/A	Providers may also receive funding for workplace adult education and literacy activities, workforce preparation activities, or integrated education and training.	Occupational literacy, digital literacy, career essential boot-camp and postsecondary education, and workforce transition and ancillary services

*ESL (English as a Second Language) is no longer used in WIOA. The new term is ELA (English Language Acquisition). ESL is used in this table because it is the phrase used in the State WIOA plans of Maryland and DC.

In all three jurisdictions, adult education is supported by a combination of federal and local funding.

DC currently has 23 service providers, which include community-based organizations, faith-based organizations, and select DC Public Schools and DC Charter Schools that specialize in serving a diverse population of District residents. These providers serve nearly 4,000 residents annually.

In Maryland, adult education providers include a wide range of community colleges, local public school systems, community-based organizations, public libraries, and the state's Correctional Education program. Annually, Maryland serves approximately 35,000 to 40,000 adults through funded programs.[18] Students are wait-listed every year when classes reach their maximum capacity.

Virginia's adult education programs enrolled 20,221 individuals in 2015-16. This total represents enrollment in all adult education programs as well as PluggedInVA, the state career pathways program.[19] Virginia's Office of Adult Education and Literacy (OAEL) competitively awards funds to adult education providers in each of its 22 adult education regions. The funds will only be awarded to providers that serve the entire region and that address educational and workforce needs identified by local workforce development boards. Key factors in determining grantees include meeting federal requirements and demonstrating past effectiveness. Additional consideration will be given to applicants for the inclusion of career pathways, family literacy, corrections education, workforce preparation, and integrated education and training. Notice of funding will be provided to community colleges, community-based organizations, local workforce development boards, and workforce development system partners.

Virginia's CCRS strategic plan calls for the VALRC to lead and support efforts to develop and sustain instructional approaches in each of Virginia's 22 adult education regions. Virginia's Office of Adult Education and Learning (OAEL) will provide VALRC leadership funds to carry out WIOA Title II state leadership activities. VALRC provides opportunities throughout Virginia for professional development, technology integration, and technical assistance, and serves over 3,500 of Virginia's adult education administrators and practitioners annually.

iv. Other Efforts and Activities Related to Adult Learning

DC plans to develop an adult education and system performance dashboard, which will outline key goals for the system with specific measures and targets to gauge performance. It will be available to the public to ensure transparency and accountability. The District will also develop an instrument to evaluate the quality of service providers currently in the workforce system, including adult education providers. This tool will allow residents to search service providers and make informed decisions about which providers meet their needs.

After the submission of Maryland's WIOA plan, DLLR and DHR established a Skilled Immigrants Task Force (described in detail in the English Language Learners and Immigrants section of the module on Vulnerable Subpopulations), which includes a subcommittee focused on assessing the need for and connecting the skilled immigrant population to ESL/Adult Education and Literacy services.[20] Maryland also received $2 million under the ApprenticeshipUSA federal initiative to expand Registered Apprenticeships for populations that face barriers to employment. Maryland's Department of Workforce Development and Adult Learning is seeking to utilize this apprenticeship expansion to establish more partnerships between the adult learning system and apprenticeships in Maryland.

v. Summary and Key Takeaways

All three jurisdictions are facing a challenge in meeting the high demand for adult education services, as current investments in adult education and career pathways skill building are insufficient to meet demand.

None of the three jurisdictions seem to be particularly strong in providing barrier remediation or connections to apprenticeship opportunities for adult learners. Establishing strong barrier remediation strategies will be essential in ensuring that adult learners become and remain connected to career pathways and stable employment. The integration of supportive services, particularly transportation assistance, is a key barrier remediation strategy to ensure that adult learners can fully access and complete adult education programs.

DC's plan notes a need to increase capacity and better align adult education content standards, and various partners have begun work to provide professional development and technical assistance to adult education providers.

In Maryland, since 90 percent of participants enrolled in adult education test below high school proficiency in English and/or math, and English language learners represent approximately 49 percent of the adult education population, Maryland's plan notes the unique challenges it faces in serving adult learners, as this population has a variety of skill levels and a number of cultural challenges that must be addressed. Since the plan's submission, the establishment of the Skilled Immigrants Task Force may help address these specific challenges.

Virginia's strategic plan for VALRC to provide professional development, technology integration, and technical assistance seems promising. However, Virginia's plan states that the adult education system has numerous service providers, leading to a disjointed system. The state is seeking to achieve greater integration and coordination between partners and to expand the PluggedInVA model to adults with lower literacy levels (K-8). As provision of services to adult learners throughout the education spectrum is a strength of DC, Virginia may benefit from DC's expertise in this area.

C. RETURNING CITIZENS

Promising practices in correctional education include:

✔ **Maryland:** Programming includes ABE, vocational programs, post-secondary education, certifications, pre-apprenticeships, and apprenticeships.

✔ **Virginia:** The SNAP E&T ex-offender program is a partnership between state agencies and reentry organizations to help enroll returning citizens in employment and training services. The program is only active in one region of the state and could be further expanded in Virginia.

✔ **DC:** The Jail Work Reentry Program—a six week program located in DC's main correctional institution —links directly to transitional employment opportunities for participants upon release. DC also provides the strongest policy environment for employment of returning citizens with its "Ban the Box" policy, as it applies to both government and private employers.

i. Barrier Remediation for Returning Citizens

Correctional education is recognized as an effective strategy to reduce recidivism and can therefore be considered part of the strategy to remediate the barriers that many returning citizens face.[21] While vocational programs are reported to have the strongest correlation with post-correctional employment, those who participate in adult basic, secondary, and post-secondary education also experience a boost in employment outcomes.[22] But even with education and vocational training, those with criminal histories face discrimination in the workplace, as well as challenges that can come from trying to meet conflicting demands associated with community corrections (probation or parole). All three jurisdictions have programs to support offender reentry and address the barriers ex-offenders face in obtaining and retaining employment. The District is the only one of the jurisdictions that goes beyond programs to issue policies that impact all employers and all those with criminal backgrounds.

Virginia reports just over 12,000 residents were released from incarceration in 2014. The Virginia Department of Social Services, in partnership with the Department of Criminal Justice Services, utilizes funding from the SNAP Employment & Training (E&T) program to provide services for returning citizens. The program, specific to ex-offenders, requires state agencies to coordinate with reentry organizations to enroll returning

citizens in SNAP E&T services. These services include case management, job search, basic employment skills training (job readiness), community work experience, vocational training, education and job retention services. Educational services include basic skills training, career readiness leading to a Career Readiness Certificate (CRC), and preparatory courses for the General Educational Development (GED) certificate. The program is currently active in only one region—the Charlottesville area—due to turnover in reentry organizations in other areas of the state, though that region has served about 1000 clients each year. The state is currently pursuing expansion of the program to other areas of the state including Northern Virginia.

The Maryland plan acknowledges that more collaboration is required to better serve the needs of ex-offenders. Maryland's correctional system released close to 11,400 inmates in 2013, the last year for which data is publicly available.[23] DLLR has a number of programs to improve workforce outcomes for ex-offenders including: participation in a federal program that provides bonding and tax credits for employers who hire ex-offenders; the utilization of staff specifically trained in ex-offender employment; and, the establishment of workshops aimed at opportunities for record expungement. Maryland also supports partnerships that carry from incarceration through re-entry, such as pre-release meetings for inmates with local workforce organizations. One such

partnership exists with Vehicles for Change,[24] which not only provides additional training opportunities to ex-offenders who complete auto-mechanic certification while incarcerated, but also helps participants access vehicles for their personal use post-release to mitigate transportation barriers. Maryland also funds an Offender Workforce Transition Initiative which prepares and supports inmates' efforts to re-integrate into the community by supporting family reunification, promoting financial literacy, and providing work readiness coaching. This program starts in the correctional institution but, for select offenders, continues past release. Staff work with recommended offenders until job placement occurs and continues with post-employment follow-up.

No entity in Maryland currently carries out the functions of Section 212 of the Second Chance Act of 2007. However, Maryland recognizes that the ex-offender population is a priority population and, as such, plans to incorporate any non-profit entity, who receives Section 212 grant funds from the USDOL, within the next 4 years into the Maryland State WIOA Plan to ensure effective integration and service delivery. Maryland will update its plan if and when an entity exists to administer this program.

In the District, the Court Services and Offender Supervision Agency supervised more than 18,000 individuals in FY2015, including those on probation, parole and supervised release. The District's Office on Returning Citizens Affairs provided reentry services to just over 5,000 individuals, including referrals and support for housing, health care, job search and education, some programming for which is provided through WIOA Title II. The District has attempted to reduce barriers for returning citizens in a variety of ways, including passing "Ban the Box" legislation[25] which is designed to limit the impact of a criminal record on employers' hiring practices. DC also offers the federally-funded Work Opportunity Tax Credit program to encourage employers to hire returning citizens, as well as other targeted groups.

Programmatically, the District offers a Transitional Employment Program—also known as Project Empowerment[26]—which primarily serves returning citizens, and funds an "Earn While You Learn"

basic skills opportunity for young adults under supervision through Title II. It also supports pre-apprenticeship programming which, because of employer agreements to hire all successful completers, has been particularly effective in reducing the impact of a criminal background on participant success. The District's on-the-job-training (OJT) strategy, which the District proposes to expand, currently includes a 90 percent reimbursement rate to employers for ex-offender hires. Since the submission of the state plan, DC's Department of Employment Services and Office of Attorney General have announced that they will be collaborating on a diversion program for returning citizens; the details of this program are forthcoming.

ii. Changes to Correctional Education Under WIOA

WIOA Title II includes a requirement that states provide education to those who reside in correctional institutions, as well as other institutional settings. In addition to the correctional education activities allowed under WIA, WIOA includes additional allowable activities consistent with the overall WIOA focus, such as career pathways and transition to re-entry services, designed to reduce recidivism. WIOA increased the spending limit on correctional education to 20 percent of Title II funds (versus 10 percent under WIA), and requires that priority be given to those scheduled to leave prison within five years.

All three state plans include a commitment to correctional education, though Maryland offers the most robust statewide services.

Maryland's Department of Labor, Licensing and Regulation includes an Office of Correctional Education. That office is overseen by the Correctional Education Council and works in partnership with the Department of Public Safety and Correctional Services to provide both academic and vocational educational programs in Maryland's 22 state prisons and pre-release centers. Programming in local detention centers is provided by local adult education grantees, and focuses on improving basic academic skills and preparation for post-secondary or vocational programming. In the state prisons,

adult education is required for all inmates with 18 months or more to serve and no high school diploma or equivalent (unless exempted). Programming begins with adult basic education (ABE) and continues through post-secondary and vocational options. For those who enter with or complete a high school degree or equivalent, the Office of Correctional Education provides a choice of 23 pre-apprenticeship vocational programs or a limited selection of post-secondary courses. Students earn college credit at a four year liberal arts college or community college. Goucher College offers inmates the great chance to earn a 4-year degree. Certificates are available in occupations aligned with in-demand industry requirements and may be applied toward an associate's degree upon release. Incarcerated individuals may also participate in an apprenticeship program in meat cutting.[27] Maryland cites two American Job Centers that focus specifically on returning citizens.

As DC does not have a prison system, incarcerated individuals include those housed in the local jail and half-way houses. This typically includes those who are serving sentences of one year or less, and those being held pre-trial or pending transfer to another state or federal facility. The average length of stay for men in custody of the DC Department of Corrections (DOC) is about three months, and over 70 percent of male inmates spend six months or less. For women, the stays are even shorter: the average length of stay is two months, and over 80 percent spend six months or less (2014 figures). For this reason, DC's correctional education programming is focused on short-term intervention.

The DC Jail Work Reentry Program[28] was established in July 2015 as a partnership between the Department of Employment Services (DOES) and the DOC to provide intensive six-week job training for incarcerated persons with an impending release date. The program includes a dedicated housing unit for a 20 inmate cohort, and is designed to parallel and align with DOES's Project Empowerment, a transitional employment program that focuses largely (though not exclusively) on returning citizens. Classes in the Jail Work Reentry program are held Monday through Friday from 9 am to 4 pm, and include job readiness workshops, hands-on

computer training through a contracted computer instructor, case management for wrap-around services, and post-release services. Upon release, these individuals are eligible for immediate job placements through Project Empowerment.[29] It is not clear from the plan whether and how WIOA funds will be used in relation to the Jail Work Reentry Program. The plan makes reference to the possibility of using WIOA funding to provide civil legal services to further assist returning citizens with supports such as record expungement. WIOA funds are committed to be used, however, to fund at least one AFE grantee that specializes in providing services to returning citizens.

Virginia awards funds to adult education and literacy providers based on location, service area, scope of program, demographics served, demonstrated need, data collection, and fiscal management. The WIOA plan states that each of the 22 adult education regions will be required to fund one Title II program that serves incarcerated individuals. Virginia's Workforce Development Board will work with representatives from the Virginia DOC, local and regional jails and other education stakeholders to identify best practices to inform development of the Request for Proposals.

iii. Summary and Key Takeaways

Because of the proven link between correctional education, increased post-incarceration employment, and decreased recidivism, states should invest in a strong infrastructure to ensure institutionalized individuals have access to high-quality education and training services as well as strong linkages with post-incarceration reentry supports and services. Of the three state plans, Maryland's describes the most robust infrastructure for increasing availability of educational opportunities for incarcerated individuals, from ABE through post-secondary and vocational credentials, while DC has a state office dedicated to serving the reentry needs of returning citizens and has implemented a "Ban the Box" policy to reduce hiring discrimination against those with criminal records. DC also operates a subsidized jobs program, the Transitional Employment Program, which largely serves returning citizens. Because it runs a jail but not a prison system, DC faces the specific challenge of

only having access to incarcerated individuals for very limited periods of time. In this context, the Jail Work Reentry Program makes a great deal of sense, and efforts should be made to provide similar systematic linkages and supports for additional inmates to increase their education and employment capacities. Virginia should consider a more coordinated and systemic statewide effort.

D. INDIVIDUALS WITH DISABILITIES

Promising practices in services for individuals with disabilities include:

✔ **Maryland:** All WIOA implementation working groups include a VR representative, which improves inclusive governance. The state's apprenticeship program includes strong outreach to youth with disabilities. The plan includes good coordination with employers through a single point of contact model.

✔ **Virginia:** The plan includes a promising Common Needs Assessment tool; robust youth outreach activities; and good coordination with employers.

✔ **DC:** Programming includes promising outreach to youth with disabilities, including coordination with the Summer Youth Employment Program.

Each jurisdiction's state plan includes extensive discussion of the services available to workforce system participants who have disabilities. The majority of this discussion occurs in a section of each plan describing the implementation of WIOA Title IV, which concerns vocational rehabilitation (VR) services, although information concerning people with disabilities is present throughout each plan as well.

Each jurisdiction provides VR and other workforce services to people with disabilities through a different administrative structure. In DC, these services are provided by the Rehabilitation Services Administration, which resides within the District's Department on Disability Services. In Maryland, VR is provided by the Division of Rehabilitative Services, which resides within the Maryland State Department of Education. The Maryland Department of Disabilities also provides services such as assistive technology and performs a governance role. In Virginia, VR services are divided between two agencies: the Department for the Blind and Vision Impaired serves Virginians with visual disabilities, and the Department for Aging and Rehabilitative Services serves as the state's general VR agency.

i. Capacity and Priority of Service

Limited capacity is an issue affecting all three jurisdictions. Currently, the VR agencies in Maryland and Virginia do not receive enough funding to serve all eligible individuals. Between these two states, more than 5,000 eligible applicants are currently on a waiting list rather than receiving services that could put them back to work. Although DC currently serves everyone who is eligible, it is considering instituting a waiting list in response to budget constraints, according to the plan. This suggests that more resources—from the states as well as the federal government—are needed to meet the employment needs of residents who have disabilities.

When there are not enough resources to serve everyone who is eligible, VR agencies must establish an order of selection, in which applicants with the most significant disabilities are served first. All three jurisdictions have defined an order of selection, although they differ in the precise definitions used to assess applicants' disabilities. The order of selection is currently in use in Maryland and Virginia's general VR agencies. In addition, VR agencies may choose whether to deliver specific services to applicants who need these services to keep their current job, regardless

of their position in the order of selection. In states that choose this option, eligible individuals whose disabilities are deemed less severe may receive services before those whose disabilities are considered more significant, if these specific services are necessary to maintain employment. Each approach has strengths and weaknesses: specific, targeted services can be a powerful tool to prevent job loss, but it is important that VR agencies maintain a strong commitment to serving individuals with the most significant disabilities. Virginia and DC have indicated in their plans that they will prioritize these applicants, while Maryland has not.

ii. Barrier Remediation for Individuals with Disabilities

Many people with disabilities also face other barriers to employment, and removing these barriers is a necessary step to enable participants to find and keep jobs. Each jurisdiction's plan discusses efforts to address barriers to employment—such as access to transportation, assistive technology, housing, substance use, literacy, and assistance with Social Security benefits—although each jurisdiction does not address every barrier. No jurisdiction discusses in detail the child care needs of participants who have disabilities, for example.

Identifying the barriers to employment faced by program participants is a necessary first step in effectively addressing those barriers. While steps to identify barriers are a standard part of VR services, the DC and Virginia plans discuss several of these steps in detail, such as the development of intake assessments, hiring of re-engagement and retention specialists, and regional supportive service planning meetings.

Access to transportation poses a major challenge for many individuals with disabilities, with program participants and service providers in Maryland and Virginia naming this as an important barrier to employment. Maryland's VR agency has committed to exploring ways to expand transportation assistance through partnerships with other organizations, including other WIOA agencies, but has not developed detailed plans. Maryland does provide transportation-related assistive technology, including adaptive driving

and hand controls for cars. DC and Virginia's general VR agencies both provide transportation assistance to participants in supported employment, and in parts of Virginia, VR staff are helping participants obtain driver's licenses. While the ability of state agencies to provide transportation assistance is partly limited by the options available in each local jurisdiction, all three jurisdictions should develop more detailed plans to assist participants with transportation.

All three plans include substantial discussion of assistive technology services available to participants:

- » Each jurisdiction's VR agency trains the staff of other WIOA agencies in assistive technology, ensures that appropriate equipment is available at American Job Centers (AJCs), and helps participants determine what assistive technology they need.

- » Maryland provides transportation, mobility, and computer equipment through its Workforce and Technology Center.

- » Virginia provides devices to participants in supported employment.

- » Maryland and Virginia lend equipment to participants on a short-term basis, and Maryland helps people purchase assistive technology by offering them low-interest loans. Maryland's lending program is administered by the state's Department of Disabilities. Virginia has a separate authority that provides the low-interest loans for assistive technology.

- » Maryland and Virginia provide training and assistance to employers, including worksite assessments. The DC plan does not indicate whether any training on assistive technology is offered to employers.

The Virginia and DC plans also discuss other barriers that participants may face:

- » Individuals with disabilities in Virginia and DC cite the lack of affordable housing as a major barrier to employment. The District's needs assessment recommends addressing this barrier, but does not offer specific strategies.

- » The DC plan discusses coordination between the VR agency and other service providers to address the substance-related needs of some individuals considered to have the most significant disabilities. Virginia's general VR agency has agreements with the Department of Social Services as well as the Department of Behavioral Health and Development Services to help program participants who have both disabilities and substance-related needs find jobs.

- » According to the DC statewide needs assessment, many participants who receive Supplemental Security Income or Social Security Disability Insurance need assistance planning these benefits as they transition into employment. The plan recommends taking steps to address this need, but does not describe specific strategies.

- » DC plans to incorporate literacy assessments into its intake process for individuals with disabilities.

iii. Programmatic Integration

WIOA places a strong emphasis on the coordination and integration of workforce services, which allows participants to access all the supports they need to find a job while minimizing administrative hurdles. This goal is especially important for participants with disabilities, many of whom face multiple barriers to employment and have not always had equal access to services and opportunities.

The steps jurisdictions can take to coordinate services and ensure that the overall workforce system is accessible fall into three general categories: inclusive governance, system-wide accessibility, and program integration.

Inclusive governance includes efforts to ensure that policymakers in the workforce system consider the needs of people with disabilities. Maryland and Virginia have made progress on this front. Maryland's Department of Labor, Licensing, and Regulation has established several working groups charged with planning aspects of WIOA implementation. Each of these groups includes a representative from the state's VR agency, ensuring that at least one institutional voice for people with disabilities is present

in important policy discussions. In addition, Maryland's VR agency is represented along with the state's other WIOA agencies on Maryland's system-wide Alignment Group. Virginia has created an Executive Management Committee for advising and monitoring Department of Labor disability grants, as well as a task force on the accessibility of the one-stop service delivery system. Both groups are expected to make policy recommendations to enhance system accessibility. DC should look to the approaches taken in Maryland and Virginia in developing more inclusive governance structures.

System-wide accessibility concerns any concrete steps a jurisdiction takes to ensure that the entire workforce system, including programs that do not use disability to determine eligibility, is accessible to people with disabilities. Each state plan is required to include a section describing these efforts. Highlights from each jurisdiction include:

- » DC is working to eliminate discriminatory practices such as requiring that one-stop participants identify themselves using a driver's license. The District also plans to provide additional services to those who need them, such as assistance and extra time in completing intake forms.

- » The Maryland plan describes in detail the state's process for monitoring accessibility, which includes site visits and input from disability experts. After Maryland's plan was submitted in 2016, the state was awarded a $2.5 million Disability Employment Initiative grant to improve system-wide accessibility and expand career pathways for people with disabilities in Montgomery and Anne Arundel counties.[30]

- » The Virginia plan discusses the state's Common Screening Tool, a web-based assessment currently in the pilot stage, which is used to identify disabilities in one-stop participants. According to the plan, this tool has helped to identify disabilities in 17 percent of participants who have used it, and as a result may have enabled them to obtain additional services.

Finally, program integration ensures that participants who need multiple services are able to transition between them as seamlessly

as possible. Two concrete steps can promote program integration: co-location of services and data sharing.

When VR offices and other workforce programs share a physical location, it saves time and effort for participants who need multiple services. All three jurisdictions co-locate some services, but this process is not complete in any jurisdiction. Vocational rehabilitation services are available at all four of DC's AJCs, but at two of these centers they are currently offered only one day a week. Maryland co-locates six of its 22 VR offices at AJCs. Five out of 35 Virginia offices are co-located. While not co-located, Virginia does have VR staff and office space at other one-stop centers. Although all three jurisdictions conduct a geographic needs assessment to inform the allocation of VR resources, the plans do not state whether these analyses are used in making co-location decisions. Co-location efforts improve access to services, and more participants will benefit if these efforts are expanded. The Maryland and DC plans state that these jurisdictions plan to expand co-location as opportunities arise.

Data sharing is an important tool that workforce agencies can use to streamline service delivery. When service providers share participant data (with appropriate safeguards) they can determine eligibility for multiple programs at once, simplify referrals, and reduce unnecessary paperwork. Maryland and DC have begun integrating their workforce data systems in the form of the Maryland Workforce Exchange[31] and the DC Data Vault.[32] However, at the time the state plans were developed, neither of these systems included vocational rehabilitation services. This means that individuals with disabilities may face greater administrative burdens in accessing a suite of services than other workforce development participants. At this time, none of Virginia's WIOA partners have fully integrated data systems. All three jurisdictions plan to eventually create comprehensive workforce data systems. In the interim, Maryland plans to conduct a data inventory to determine what information is collected by each agency, to establish memorandums of understanding that would allow agencies to share data, and to create a standardized staff confidentiality form.

Virginia plans to scale up pilot resources, such as its Common Needs Assessment. All three jurisdictions should continue efforts to further integrate data systems, and should ensure that programs serving people with disabilities are fully incorporated into these systems.

iv. Students and Youth with Disabilities

WIOA increases state VR agencies' responsibility for serving students with disabilities, mandating that they spend at least 15 percent of their budgets on pre-employment transition services for this population and requiring these services to use broader eligibility rules than other programs. Each state plan discusses at length the institutional arrangements required for these services.

Each jurisdiction has established cooperative agreements between its VR agency and educational agencies that define each agency's operational and financial responsibilities for transition services, as well as how the agencies will identify and reach out to potentially eligible students. These agreements were in place before WIOA, and therefore do not currently address the changes mandated by the law. Maryland and DC are currently updating their agreements to incorporate these changes, and the Virginia Department for the Blind and Vision Impaired plans to do so when the current agreement expires. Virginia's general VR agency is working to develop agreements that incorporate changes from WIOA, but do not have a timetable for when that will be accomplished.

The three jurisdictions also differ in the outreach strategies described in their plans. All three jurisdictions place VR counselors in schools and produce outreach materials such as brochures. DC and Virginia's general VR agencies each describe additional steps that may help identify more eligible students. In the District, VR counselors participate in school staff meetings and provide information to school employees on the services available. The agency also meets monthly with school staff responsible for post-secondary transition planning services for students with disabilities to monitor referrals. Virginia uses its case management database to identify students turning 14 who have visual disabilities and may be eligible for VR or pre-employment transition

services. The agency sends letters to these families with a description of the services available as well as contact information for a nearby VR counselor, and then makes direct contact within 10 days. In addition, Virginia's Postsecondary Education Rehabilitation Transition (PERT) Program, identifies secondary-aged students with disabilities and provides a comprehensive career evaluation for each of these students. Services are provided at the Wilson Workforce and Rehabilitation Center[33] which provides intensive residential transition services to youth with disabilities, as well as medical rehabilitation and vocational services for youth and adults. The other agencies should adopt these comprehensive outreach strategies, as they may help in enabling more eligible students to access services.

Each jurisdiction also provides services outside of the school system to youth with disabilities. In DC, the Summer Youth Employment Program[34] coordinates with local community-based organizations that provide substantial outreach to youth with disabilities, and a "boot camp" is available a week before the summer program starts to provide work readiness training to youth considered to have the most significant disabilities, along with support and troubleshooting throughout the placement. This program is currently expanding.

Maryland's VR agency plans to coordinate with the apprenticeship program to ensure that youth with disabilities are aware of and can access apprenticeships. DLLR's youth and disability services program provides service coordination and technical assistance to local workforce areas and partners.

v. Coordination with Employers

As required under WIOA, each jurisdiction's VR agency has established an employer relations unit to coordinate workforce services for people who have disabilities. These units cultivate relationships with employers, gather information on businesses' workforce needs, host career fairs, identify qualified candidates for specific jobs, and coordinate with other WIOA agencies. The units also provide education, training, and technical assistance to employers. They encourage businesses to employ people with disabilities,

provide information on tax incentives, and offer assistance in developing and implementing reasonable accommodations as required by the Americans with Disabilities Act.[35]

In addition to the above universal practices, each jurisdiction's employer relations unit takes certain steps that some others do not:

» Maryland and Virginia's general VR agencies designate their employer relations units as a single point of contact for businesses interacting with the VR system, which streamlines communication and service delivery to employers. The Virginia Department for the Blind and Vision Impaired does not use this term, but this agency assigns project managers to business partners, a step that may deliver similar benefits. The District's employer relations unit should consider adopting a single point of contact model.

» Virginia's Career Pathways for Individuals with Disabilities grant and Maryland's Disability Employment Initiative grant (awarded after the state plan was submitted) include resources to expand career pathways for people with disabilities, enabling participating individuals to receive the workforce services they need to develop high-demand skills that will meet employers' needs.

» Virginia's general VR agency places a unique emphasis on developing partnerships with other state agencies to employ people with disabilities. This approach may have the advantage of producing especially stable opportunities, as there is little risk of these employers failing or relocating. However, it is important to ensure that these jobs, like any other, satisfy the WIOA standard of competitive integrated employment. VA also has five staff whose focus is outreach to business in a staffing solution approach to business engagement and approximately 20 counselors to assist in these efforts.

vi. Summary and Key Takeaways

Although the availability of federal funding is an important determinant of states' capacity to provide VR services, each jurisdiction should

take steps to identify the necessary resources to serve as many eligible people as possible and get them back to work. These steps could include supplementing federal funding with state and local resources, as well as braiding of funds to use resources as efficiently as possible.

Maryland has made important progress on inclusive governance by including its VR agency on the state's WIOA implementation working groups and Alignment Group. Virginia's Executive Management Committee and accessibility task force have the potential to deliver similar benefits. DC should emulate these efforts.

All three jurisdictions should increase their focus on removing the multiple barriers to employment that people with disabilities may face. It is especially important to address areas where participants and service providers have indicated that unmet needs exist, such as transportation.

All three jurisdictions should continue to expand co-location and data sharing efforts to ensure that people with disabilities can access all the services they need, while minimizing unnecessary hurdles. While full data system integration should be the end goal, steps like Maryland's data inventory can improve service integration in the short term.

Virginia's Common Needs Assessment is a promising tool for helping AJC users identify disabilities and access a full range of services. Virginia should continue to scale up this tool, and Maryland and DC should develop similar capabilities, with attention to the necessary safeguards and privacy protections.

Virginia's General VR agency places a unique emphasis on developing partnerships with other state agencies to employ people with disabilities. This approach may have the advantage of producing especially stable opportunities, as there is little risk of these employers failing or relocating.

The DC and Virginia Department for the Blind and Vision Impaired plans both include detailed plans on school outreach. The District's close cooperation with school officials and Virginia's multipronged outreach approach each have the potential to make services available to a greater

share of eligible students. These jurisdictions should learn from each other, and Maryland should explore similar outreach options.

Maryland's apprenticeship program[36] and DC's Summer Youth Employment Institute[37] for youth with disabilities participating in the Summer Youth Employment Program[38] provide strong examples of coordination with other workforce agencies to provide employment opportunities to youth who have disabilities. All three jurisdictions should continue to seek opportunities for this kind of cooperation.

Maryland and Virginia have taken important steps to streamline service delivery to businesses that employ people with disabilities by designating the employer relations units as a single point of contact or by assigning project managers to employers. DC should take steps in this direction as well.

E. YOUTH

Promising practices in services for youth include:

✔ **Maryland:** The plan includes a promising youth apprenticeship pilot program. Local management boards work to ensure coordinated services among agencies serving children, youth and families.

✔ **DC:** The plan includes an education-focused Re-engagement Center with a new virtual component.

Youth are a special population of focus under WIOA, as a large number of youth—some 5.5 million nationally[39]—are disconnected from school and employment. While a number of factors contribute to this problem, much can be done by the workforce system to affect change. Even youth who successfully obtain their high school diplomas are finding it difficult to transition to the workforce due to the lack of opportunities to explore various career paths; obtain hands-on experiences, internships, and entry-level job opportunities; and identify clear pathways for career progression. Youth who have prolonged periods of disconnection from work and school have far more difficulty building an economic foundation for independence. A 2012 study of collective community impact for disconnected youth by Foundation Strategy Group (FSG) found that disconnected youth need four things to be successful in school and career: re-engagement, educational momentum, connection to a career, and youth development.[40] Thus, youth require effective training in skills that lead to employment and careers delivered through youth-friendly strategies that meet the unique needs and challenges they face.

i. Barrier Remediation for Youth

All three jurisdictions identify youth as a population that faces significant barriers to employment. In DC, the Re-engagement Center[41] is now authorized to assess eligibility and provide child care vouchers for youth who want to pursue education. And DC plans to create a new cross-agency assessment to identify each young person's individual barriers to successfully completing education, training and employment. In Maryland, specific attention is given to youth

with disabilities and youth who have aged out of the foster care system, but no specific barrier remediation strategies are mentioned. Virginia does not specifically reference any barrier remediation strategies for youth in its plan.

ii. Emphasis on Out of School Youth

Within the youth subpopulation, the WIOA Title I Youth program stipulates that a minimum of 75 percent of Title I funds must be spent on out-of-school youth (OSY). As such, all three jurisdictions have plans to comply with this requirement.

DC is in a unique situation with regards to youth programs. The USDOL has considered DC a "High-Risk grantee" since 2010, having identified issues with WIOA Youth programs, WIOA implementation steps, and Workforce Board governance. In order to avoid sanctions, the District was required to design a Corrective Action Plan (CAP), which was approved by the USDOL in March 2016 and the Workforce Investment Council (WIC) has been reporting progress since then. The District's High-Risk designation will remain until CAP deliverables have been met, and/or three quarters of positive performance have been documented.[42]

Redoubling its efforts in light of its USDOL designation, DC has invested heavily in recent years in identifying and serving disconnected or out-of-school youth. The Re-engagement Center (REC) has been established with local funds to serve as an "educational one-stop" for youth where they can identify appropriate programs and support services that will allow them to return to school to complete a secondary credential. DC's stated goal is to provide increased opportunities

through the REC to connect youth with employment as well as education, but right now employment services are provided only if the lack of a job is identified as a barrier to educational success. DC is also using pre-apprenticeship as a key strategy for supporting youth with basic skill deficits to access a career pathway. To the extent that programs are eligible for WIOA funding, DC proposes to shift local funds away from OSY and into in-school youth, and WIOA funds to OSY.

Virginia's plan broadly indicates that the state will take into consideration the shift in priorities toward OSY in awarding grants for youth workforce investment activities. Both Virginia and Maryland will allocate Title I Youth funds to local areas based on identifying areas of substantial unemployment and data on the number of economically disadvantaged youth, and local areas must detail how they will serve out of school youth in their local plans. No additional details are outlined in Virginia's plan.

In Maryland, local management boards are established to ensure the coordinated implementation of a local inter-agency service delivery system for children, youth and families. Local management boards are able to apply flexible state funds through the Governor's Office for Children to provide supportive services for youth and fill in service gaps. Maryland's plan indicates interest in expanding youth apprenticeship opportunities for both in-school and out-of-school youth, and in engaging younger TANF recipients ages 18-24 who may also be out-of-school youth in workforce development services in order to help place them on a career pathway that will lead to self-sufficiency and earlier independence from public assistance. Beyond this, no concrete strategies are outlined

in the Maryland state plan for engaging out-of-school youth, as this is viewed as the responsibility of programs working in local areas.

iii. Work-Based Learning

WIOA requires that 20 percent of youth formula funds are spent on work-based learning. Both the DC and Maryland plans outline several initiatives to provide work-based learning opportunities for youth, with a particular emphasis on apprenticeships.

DC's plan commits to expanding a portion of the Summer Youth Employment Program (SYEP)[43] to be year-round, aligning Career and Technical Education (CTE) students with relevant work experience, and using the SYEP, Youth Earn and Learn, Pathways for Young Adults,[44] and DC High School Internship programs to recruit (primarily in-school youth) for WIOA programs in order to direct youth to credential-earning programs.

Maryland and Virginia have both mentioned CTE programs as a key strategy through which the needs of in-school youth will be supported. Maryland currently offers CTE programs to high school students. These include a work-based learning opportunity (e.g. internships, clinical experiences, or industry-mentored projects) tied to the student's area of interest. These programs are aligned to establish academic, technical, and employability skill standards, and are centered on ten career clusters. These career clusters connect educators and employers, and provide a framework that is responsive to industry demands, but which needs to be monitored to ensure alignment with WIOA activities in high-growth sectors and current industry needs.

MARYLAND'S CTE CAREER CLUSTERS

Arts, Media and Communication	Health and Biosciences
Business, Management and Finance	Human Resource Services
Construction and Development	Information Technology
Consumer Services, Hospitality and Tourism	Manufacturing, Engineering and Technology
Environmental, Agricultural and Natural Resources	Transportation Technologies

In addition to CTE, the Governor's STEM and Health Sciences Academies in Virginia are designed to expand options for the general student population to acquire STEM (Science, Technology, Engineering and Mathematics) and health science literacy and other critical skills, in order to prepare them for high-demand, high-wage, and high-skill careers. Each academy is a partnership among school divisions, postsecondary institutions, and business and industry. Students are required to earn at least nine dual enrollment college credits.

Maryland is committed to ensuring that at least 20 percent of Title I Youth funds at the local level are spent on work experiences that incorporate academic and occupational education. These funds will be used to support work-based training activities such as summer jobs, on-the-job training, and apprenticeships for in-school and out-of-school youth.

In particular, Maryland is dedicating much effort to increasing apprenticeship opportunities for youth. For in-school youth, starting in September 2016, Maryland's Department of Labor, Licensing and Regulation (DLLR), in partnership with the State Department of Education (MSDE), began piloting a program to establish youth apprenticeships in the STEM fields for high school juniors and seniors in two Maryland counties. Over the course of the next few years, DLLR hopes to build on best practices identified by this pilot to potentially expand this earn-and-learn model.

DLLR also established a Youth Apprenticeship Advisory Committee, a group of business, labor, and CTE experts and other stakeholders, which serves three roles: 1) Evaluate models for high school youth apprenticeship programs and prepare for implementation in Maryland; 2) Identify and secure funding sources such as tax credits, grants, other subsidies to support the establishment and operation of high school youth apprenticeship programs; and 3) Set enrollment targets for the number of apprenticeship opportunities for youth that the state should reach over the next three years. Through its work, the committee has prepared an initial report that outlines eight key recommendations for the state in order to establish apprenticeship opportunities for youth in both traditional and nontraditional apprenticeable fields.[45]

iv.   Other Initiatives

In DC, DOES is working to modify its existing Virtual One-Stop (VOS)—which provides access to employment opportunities, online training modules, available job training programs, and labor market information—to be more youth friendly. Core partners will also register youth in VOS through their universally shared intake system, as appropriate. DOES's Office of Youth Programs is piloting a badging program with next year's SYEP participants and some community-based organizations, with potential expansion to WIOA core programs based on pilot results. The badging program is a virtual way to engage young people in online learning where they earn a virtual badge for their knowledge and skills in topical areas. DC's Youth Re-engagement Center includes a virtual engagement platform for service providers and youth to connect to programming at the REC without the need to go to the brick-and-mortar location.

Virginia is considering engaging specialized agencies to serve disconnected youth. As WIOA requires 14 program elements to be provided for youth, Virginia's state plan has charged local areas to detail in the local plans how these program elements will be made available and implemented. Virginia's guidance for the youth program elements is under development.

In Maryland, TANF is referred to as Temporary Cash Assistance (TCA). Due to the new WIOA focus on OSY, as well as inclusion of TANF as a mandated partner, efforts will be made to co-enroll youth ages 18-24 in TANF and WIOA services, with the goal of placing individuals on a career pathway that will lead to self-sufficiency and earlier independence from public assistance. Additionally, the TCA summer youth employment program provides work subsidies for work placements focused on basic skills enhancement and the opportunity to learn marketable work skills.

Additionally, Maryland's Tomorrow[46] is a statewide dropout prevention program operating in 70 high schools across the state (all jurisdictions) and 23 middle schools (in 9 jurisdictions). In addition to preventing high school dropouts, goals of the program are to prevent teen pregnancies, promote academic and career success, and

encourage students to continue education and training. The program population includes 15-20 percent students with identified disabilities.

v. Summary and Key Takeaways

Among the three jurisdictions, DC and Maryland seem to be most actively engaged in efforts to meet the needs of out-of-school youth. DC's Re-engagement Center in particular provides key supports and resources that disconnected youth need in order to become reconnected to education, but needs to better develop its employment resources and supports. Neither Maryland nor Virginia mention a similar dedicated effort in their plans to serve out-of-school youth. Though both Maryland and Virginia require local areas to specify how they will serve youth, particularly OSY, in their local plans, Maryland has local management boards through the Governor's Office for Children, which work to ensure coordinated implementation of service for youth

at the local level. This adds greater consistency, infrastructure, and accountability at the local level.

Virginia's efforts focus on STEM and CTE education for in-school youth, and it is unclear from the plan the extent to which these programs involve work-based learning. Maryland is leading the charge in establishing youth apprenticeships. The recommendations issued by Maryland's Youth Apprenticeship Advisory Committee are likely to be useful as a guideline for other jurisdictions interested in developing youth apprenticeship programs. Indeed, DC has already developed plans to create a Youth Apprenticeship Council, modeled after Maryland. Maryland's youth apprenticeship pilot program in STEM fields will also likely yield useful lessons for other states.

F. ENGLISH-LANGUAGE LEARNERS

Promising practices in services for English-language learners and immigrants include:

✔ **Maryland:** Two new initiatives have begun to assist skilled immigrants in overcoming the barriers they face in accessing employment commensurate to their skills and experience: The Skilled Immigrants Task Force and a pilot apprenticeship program in health care.

✔ **DC:** All one-stops have a bilingual workforce development specialist; vital DOES documents are translated into six languages; and a language helpline is provided.

i. Transition to Postsecondary Education and Employment

WIOA expands services for English language learners beyond the programs in WIA by requiring that programs of instruction within the English Language Acquisition Program lead to postsecondary education and employment.[47] In addition, WIOA clarifies that English Language and Civics funds can be used for workforce training.[48] These additional requirements ensure that workforce development programs further the educational and career attainment of English language learners.

Maryland, Virginia, and DC propose similar strategies for providing these newly required

services to English language learners. Each jurisdiction proposes offering programs that provide education and literacy activities concurrently with workforce preparation and training. In addition, each region specifies that their integrated education and training programs will focus on a specific occupation or occupational cluster to transition participants into employment opportunities. Virginia's plan further specifies that these occupations or clusters must be aligned with the local labor market and be connected to "realistic, existing employment opportunities."

Maryland's Integrated Basic Education and Skills Training (MI-BEST) initiative[49] is modeled off of Washington state's I-BEST model.[50] This approach

provides supportive and wrap-around services to individuals while they are receiving adult literacy and workforce training.

ii. Language Translation Services

While WIOA expands services for English language learners, it does not remove many of the barriers that prevent individuals from participating in workforce development programs. Most importantly, translation services are not available at all American Jobs Centers (AJCs), and important documents may not be available in the native language of interested jobseekers. States can play a vital role in helping to remediate these barriers so that all English language learners and immigrants can receive services that help them pursue their career ambitions.

DC leads the way in offering important translation services that can overcome these language barriers and offers a model for Maryland and Virginia. Every AJC in DC has bilingual workforce development specialists. In addition, the Department of Employment Services (DOES) translates all of its vital documents into the top six languages identified for the demographic area and offers a language helpline that provides translation services. DC is different from Virginia and Maryland in that it enacted the DC Language Access Act of 2004[51] which requires most government agencies to provide oral translation services and written translation of important documents to non-English speakers. While the law shows promise for improving access to vital services for non-English speakers, reviews of its implementation show that many barriers still exist.[52]

The DC plan indicates that the District will be further expanding translation services. DOES will be partnering with the Office of Equal Employment Opportunity to ensure that workforce development materials across all programs are translated into identified languages and are made available in AJCs.

Maryland and Virginia have translated some of the informational material provided in their AJCs. Yet these efforts do not appear as comprehensive as DC's, and do not include dedicated staffing.

While Virginia does not yet have as comprehensive an approach as DC, the state is in the process of establishing a Limited English Proficiency (LEP) advisory committee that will provide guidance to the one-stops to better ensure that LEP individuals will have access to programs and services. The committee has not yet met, but it will work to develop an action plan that will develop tasks and timelines, key deliverables for one-stops, and resource requirements. Virginia revised its WIOA plan after receiving public comment to include details on this advisory committee. Some resources the committee may encourage one-stop providers to offer include:

» A list of translated documents, materials, and posters such as Your Right to an Interpreter Card and Language Identification Card

» A directory of available interpreter services

» Guidance on establishing partnering agencies to create a local database of interpreters using Refugee Resettlement, community based literacy organizations, and local bilingual staff of other organizations as appropriate

» List of regional adult education services for basic skills development, transition to post-secondary education and training, and credentialing

» Google translate widget for the website

» Staff training on providing services to English Language Learners

iii. Other Activities

Maryland's DLLR, in partnership with the Maryland Department of Human Resources (DHR) Office of Refugees and Asylees, established the Maryland Skilled Immigrants Task Force in June 2016. The Task Force is a consortium of public and private workforce development organizations that seek to leverage skills that foreign-trained immigrants bring to the United States to meet local job market demand. "Skilled immigrants" are individuals who have acquired extensive education and/or work experience abroad and are ready to work, but often face barriers to full employment, such as lack of written and spoken English language proficiency, lack of professional networks, lack of access to career pathways, undervalued education and

credentials, and expensive and difficult licensing evaluation and acquirement processes. Thus, the Task Force was established with the goal of helping this population overcome these barriers to employment, and aims to foster a win-win environment whereby immigrants secure jobs that match their professional and educational background, and businesses in Maryland have access to a skilled workforce to meet their needs.

The Task Force consists of representatives from the Maryland DHR, DLLR, community colleges, Refugee Resettlement Agencies, American Job Centers, the Governor's Office of Community Initiatives, and many non-profit organizations that help immigrants achieve integration in their U.S. communities. The Task Force is comprised of five subcommittees: Professional Licensing, ESL/Adult Education and Literacy, Financial Literacy and Assistance, Capacity Building and Best Practice, and Business Engagement and Marketing. It is important to note that this Task Force was developed after submission of Maryland's WIOA plan and was not legislatively mandated, but was created to respond to both the need observed by DHR and DLLR, and an opportunity from the White House to attend the National Skills and Credential Institute.[53] A report detailing the Task Force's activities and progress will be issued in July 2017.[54]

Under the Federal ApprenticeshipUSA initiative of the Obama Administration, Maryland has also recently received $2 million in funds to grow and diversify apprenticeship opportunities, $500,000 of which will go towards developing a pilot program to develop a pipeline for skilled immigrants to re-enter jobs in health care.[55]

iv.   Summary and Key Takeaways

DC leads the way in offering important translation services. Every AJC in DC has a bilingual workforce development specialist to facilitate access to services and resources for some non-English-speaking DC residents. In addition, DOES translates all of its vital documents into the six most common languages identified for the demographic area and offers a language helpline that provides translation services. The DC plan indicates that the District will be further expanding translation services. It is important to note, however, that advocates in DC have

identified as a problem a lack of vocational training and certification opportunities in languages other than English, and this issue is not explicitly addressed in the plan. Maryland and Virginia appear to have translated some of their informational material provided in their AJCs. Yet these efforts do not appear as comprehensive as DC's, and do not include dedicated staffing. Maryland and Virginia should work to expand their translation services.

Maryland's Skilled Immigrants Task Force represents an innovative approach to reducing brain waste and ensuring that skilled immigrants are able to successfully translate and apply their expertise and knowledge as members of Maryland's workforce. As this initiative is in its initial stages, it will be instructive to monitor the outcomes of the Task Force's activities in order to identify any best practices and assess suitability for replication in DC and Virginia.

G. LOW-INCOME INDIVIDUALS

Promising practices in services for low-income individuals include:

✔ **Maryland:** The state plan includes concrete strategies for TANF integration and jobseeker focus groups.

✔ **DC:** The Workforce on Wheels mobile AJC helps to ensure that individuals in targeted low-income communities are reached.

Low-income individuals, who often have limited employment skills, are a key population facing barriers to employment. Often, they are relegated to low-wage jobs that lack job security, and must work several jobs to pay their bills. These individuals are often referred to as the "working poor." Many rely on public assistance programs to supplement their income, as earned income alone is insufficient to make ends meet. Strategies to facilitate economic mobility for this population include providing opportunities for skill-building in order to qualify for middle- and high-skill jobs that pay a family sustaining wage, as well as providing wraparound support services to enable them to fully access training opportunities and succeed in employment. As such, WIOA mandates the integration of TANF and SNAP Employment and Training programs with WIOA, in order to more effectively assist individuals receiving TANF and SNAP benefits in securing stable employment and reducing dependence on public assistance.

i. Defining Low-Income and Establishing Priority of Service

DC's plan does not define low-income, though the analysis refers to "poverty" and "deep poverty" as well as eligibility for TANF and SNAP. Priority of service is based on the recommendation in the Training and Employment Guidance Letter 3-15 (defined at the beginning of this module).

Virginia's plan does not define a low-income subpopulation. The plan indicates that priority of service will be given to public assistance recipients, other low-income individuals, or individuals who are basic skills deficient, but the specific guidance for local Workforce Development Boards (WDBs) in implementing the policy is still under development. This policy will establish the priority of service requirement with respect to WIOA Title I formula funds allocated to local workforce development areas for adult employment and training activities. The local workforce development board will be required to direct its American Jobs Centers (AJCs) to adhere to the priority of service requirement and the participant selection process. This must be demonstrated through documentation maintained by the AJCs. The priority of service requirements must be included in the local plan approved by the Governor.

Maryland's plan includes the WIOA definition of low-income individual and priority of service follows the WIOA Title I priority of service guidelines. Veterans are given first priority of service, before recipients of public assistance, other low-income individuals, and individuals who are basic skills deficient. But under WIOA, low-income individuals must be served, regardless of available funds.

None of the three jurisdictions have set performance benchmarks or requirements for providing employment services to low-income individuals, nor for the share of adult participants receiving job training who are low-income. However, in DC, DOES has traditionally served predominantly low-income individuals and returning citizens. There is a concern that WIOA Title IV services tend to reach a more varied population and, as such, might be seen as bringing down the number of low-income individuals served. DC plans to develop performance measures for priority of service, including "percentage of people successfully moved off income support services through successful and sustainable activity."

ii. Barrier Remediation

DC's plan states that the Department of Human Services, which administers TANF and SNAP E&T, will seek to improve coordination in efforts to better serve the needs of low-income jobseekers. TANF has a barrier remediation component that is referenced in the plan: TANF participants are assessed to determine their readiness for work-related programming, and those with barriers such as active substance abuse will be placed in two categories of barrier remediation programming, one of which includes some work-readiness services.

Virginia's plan proposes that the state form an "integrated resources" team to determine strategies for helping multiple-barrier clients. The team will design a plan for broader dissemination that records best practices in serving these groups. For TANF clients, supportive and social services are provided to remove barriers to the individual's participation and to stabilize employment. Supportive services are provided as needed and available to support participation in orientation; assessment; approved self-initiated education, training, and employment activities; or to accept or maintain employment. Provided services include child care; transportation, including certain vehicle repairs; program and/or work related expenses; emergency intervention, such as provision of food, payment of utilities, or other items necessary for the participant to gain or keep employment or participate in other work activities; and medical and dental services.

Virginia plans to partner with SNAP E&T through provision of the following services to SNAP recipients: job search, basic employment skills training, community work experience, vocational training, education, and job retention services. Virginia also has agreements with Offender Aid and Restoration to provide specific services to re-entering individuals who are on SNAP that meet their unique needs and have a direct link to employment.

Maryland has several programs that seek to aid low-income individuals and families in overcoming the barriers they face in securing gainful employment. The Job Skills Enhancement for non-TCA Families Program[56] (i.e., families not receiving TANF) provides comprehensive job skills enhancement services to low-income working families whose employed members' lack of job skills consigns the family to inadequate income and little opportunity for improved earnings in the future. This programs seeks to reduce welfare dependence by enhancing the job skills of these wage earners, and to improve participants' incomes and their capacity for long-term financial self-sufficiency. It does not provide payments, but offers assistance, including child care support. Other programs designed to help low-income families include the Housing Counselor program, Electric Universal Service Program, [57] EITC, After School Programs, and Bridge to Excellence Program.[58] There are also a number of programs provided by local departments of social services to aid low-income individuals. These programs are sometimes stand alone, and at other times supplement some of the programs mentioned elsewhere in the plan. They provide eligible families with income under 300 percent of the poverty level with services considered to be non-assistance for TANF purposes.

iii. Integration of TANF and SNAP E&T into the Workforce Development System

All three jurisdictions operate job preparation services through their human services agency—including the TANF program for low-income families with children and the SNAP E&T program for certain SNAP recipients—but these programs are often not well-coordinated with other workforce development services. WIOA encourages states to do more to integrate these programs into the state's workforce development system.

Virginia has initiatives underway to increase coordination for co-location, co-enrollment, and common screening and assessment, but only for core programs. This does not include TANF or SNAP E&T. However, AJC staff will be trained to provide employment services to TANF and SNAP recipients. Additionally, the Virginia Department of Social Services (VDSS) was awarded a federal grant to pilot an effort to test existing and new employment and training initiatives to increase the number of SNAP work registrants who obtain unsubsidized employment, increase earned income, and reduce reliance on public assistance. Outcomes of this pilot will be informative.

Though DC submitted a unified plan, DC will be implementing co-location of TANF at AJCs and plans to integrate intake on their Data Vault. The Data Vault, one of the key efforts touted by the District, is a common intake process currently underway between WIOA Title I (DOES) and WIOA Title II (OSSE) agencies with plans to expand to DHS (TANF and SNAP) and DDS (WIOA Title IV). The plan also cites co-location at the AJCs, interagency agreements and MOUs, staff cross-training, and shared case management (of 33,560 individuals). The DC plan includes a Memorandum of Understanding that describes integration of SNAP with Title II and the awarding of funds to Title II grantees to serve SNAP recipients.

Maryland submitted a combined plan, integrating TANF[59] and WIOA. TANF will be integrated into WIOA services over the first 4 years of implementation. The plan outlines the specific steps that both DHR (which administers TANF) and DLLR (which administers WIOA) will take to achieve the WIOA and TANF partnership. Over the first four years of the plan, DHR will begin to integrate TANF into the WIOA system as a full partner, thus increasing meaningful access to WIOA services for TANF work eligible individuals (WEI) who are determined to be ready, supported, and eligible. DHR, in partnership with the 24 Local Departments of Social Services (LDSS) and the WIOA partners, will implement this partnership using a phased-in approach over the four year period of the plan in all of Maryland's 12 local workforce development areas. The specific duties and activities of DHR, LDSS, and DLLR to achieve the integration of TANF are also outlined in the plan, and include the provision of supportive services by LDSS, and provision of labor market information, recruitment, job development, and placement services by WIOA partners. The Maryland WIOA partners strongly encourage inclusion of local representation of TANF and VR programs on local boards as a way to ensure constant communication and alignment of programming at the local level.

Moreover, Maryland is seeking to move towards a universal performance management system, where TANF would be included along with data collected through AJCs for seamless data collection and integration. Maryland would like to baseline these TANF Common Measures data for two years to evaluate the effectiveness of the WIOA/TANF mandated partnership. The plan also sets a goal to develop an approach for industry-led programs to target special populations such as those served by DORS and TANF.

Additionally, due to the new WIOA focus on older, out-of-school youth, as well as including TANF as a mandated partner, Maryland views this as a prime opportunity to engage younger TANF recipients between the ages of 18-24 in local WIOA youth services. This earlier engagement in workforce development for young TANF recipients can place individuals on a career pathway that will lead to self-sufficiency and earlier independence from public assistance. Co-enrollment of youth in TANF, WIOA, and SNAP is encouraged in Maryland, but there is no formal integration or coordination of SNAP E&T with WIOA activities.

iv.   Outreach to Low-Income Populations

In Washington DC, DOES is relying heavily on its Workforce on Wheels mobile AJC to enroll more people from targeted neighborhoods. VR will be using its Youth in Transition Units[60] for in-school youth. DC's RSA established MOUs with the District's largest Local Education Agency (LEA) and many of the smaller LEAs that serve high school students to ensure effective identification, referrals and intake services for in-school youth with disabilities. MOUs with the remaining LEAs will be developed during SY2016-17. Though DC's high schools do not serve exclusively low-income students, many serve a predominantly low-income population. OSSE (Title II) depends on its service providers to conduct their own outreach.

Virginia State representatives say that outreach efforts will be detailed in local plans.

Maryland will be holding job-seeker advisory focus groups to seek input from jobseekers on the barriers they face, and advise the WIOA partners on how best to assist jobseekers in overcoming these barriers. Outside of these focus groups, there aren't any strategies to conduct outreach to low-income populations for service provision. Low-income individuals are expected to reach out to the system, or to be integrated into WIOA activities through the integration of TANF.

v. Other Initiatives

DC's plan mentions Community Services Block Grants but "integration" is vague. The plan also includes a discussion of adding legal aid services (record expungement, for example), but no commitment is made. The plan states that the addition of pre-apprenticeship programs will aid those with low basic skills. As much of DC's workforce system is locally funded, many programs are mentioned in the plan, though not in detail, because they are not funded through WIOA.

No other initiatives for low-income individuals are mentioned in Virginia's plan.

In Maryland, many of the EARN Maryland[61] strategic industry partnerships target specific underserved populations, including returning citizens, low-skilled workers, and the long-term unemployed. Additionally, the jobseeker advisory focus groups will advise the workforce system, help streamline processes, and improve reemployment efforts. Local areas will be encouraged to include in their local plans how they intend to engage jobseekers to use their services. Career pathway models will be integrated into competitive grant applications. There is also interest in expanding collaborative efforts to provide robust supportive services to customers, as well as to strengthen correctional education and provide greater programming to help returning citizens get hired by employers, though no specific commitments or plans exist.

vi. Summary and Key Takeaways

Maryland is leading the way in developing concrete strategies for TANF and WIOA integration, which can provide useful practices for DC. DC, however, plans to integrate TANF performance measures into a single performance measurement system. As Maryland is seeking to move towards a universal performance management system, DC's Data Vault may be a useful system for Maryland to learn from. Virginia does not have current plans to change any systems or practices for the integration of TANF or SNAP E&T beyond providing employment services at AJCs to TANF and SNAP recipients. However, the outcomes of Virginia's SNAP employment pilot program may lend lessons for the other jurisdictions.

DC is the only jurisdiction which has articulated a strategy to conduct specific outreach to low-income individuals. Virginia has required local areas to specify outreach strategies in their local plans. Maryland should also follow this lead, as no outreach strategies are mentioned in the plan. Maryland's utilization of jobseeker focus groups to engage low-income individuals and seek feedback to improve services is an innovative strategy. It will be important to see what type of information is obtained through these focus groups, and how the state uses it to improve the system and its ability to effectively meet the needs of low-income individuals. All three jurisdictions should consider developing performance targets for serving all low-income individuals to ensure that this population is adequately served. All three jurisdictions have concrete barrier remediation strategies for low-income individuals, though Maryland is the only jurisdiction that provides extensive support services for low-income individuals who are not TANF and SNAP recipients. ∎

End Notes

1 Cielinski, A., and D. Socolow. 2015. " 'Priority of Service' Provision in the Workforce Innovation and Opportunity Act: Targeting Funding to Serve More High-Need Adults." CLASP.

2 ApprenticeshipUSA State Expansion Grant Summaries.

3 Adams, G. S. Spaulding, and C. Heller. 2015. "Bridging the Gap: Exploring the Intersection of Workforce Development and Child Care." Urban Institute.

4 Urban Institute, 2014, "Child Care Assistance for Parents in Education and Training." And S. Spaulding. 2015. "The Workforce Innovation and Opportunity Act and Child Care for Low-Income Parents." Urban Institute.

5 S. Spaulding. 2015. "The Workforce Innovation and Opportunity Act and Child Care for Low-Income Parents." Urban Institute.

6 Adams, G., C. Heller, S. Spaulding, and T. Derrick-Mills. 2014. "Child Care Assistance for Parents in Education and Training." Urban Institute.

7 Phone conversation with staff at the Department of Employment Services, November 18, 2016.

8 See Adams, G. S. Spaulding, and C. Heller. 2015. "Bridging the Gap: Exploring the Intersection of Workforce Development and Child Care." Urban Institute for more information on each of these issues.

9 http://www.fairfaxcounty.gov/dfs/ss/view.htm

10 Under WIOA, WIBs (Workforce Investment Boards) have been renamed WDBs (Workforce Development Boards).

11 Adams, Gina, Teresa Derrick-Mills, and Caroline Heller. 2016. Strategies to Meet the Child Care Needs of Low-Income Parents Seeking Education and Training. Washington, DC: Urban Institute.

12 Bird, K., M. Foster, and E. Ganzglass. 2014. "New Opportunities to Improve Economic and Career Success for Low-Income Youth and Adults." CLASP.

13 DC's Department of Employment Services provides an hourly stipend for its "earn and learn" programs, which is meant to include transportation assistance. Each jurisdiction also provides some type of transportation services to individuals with disabilities, through their VR agencies. This is discussed in more detail in the Individuals with Disabilities section.

14 Maryland WIOA Policy Issuance 2016-05: Basic Education Skills and Language Assessments: http://www.dllr.state.md.us/employment/mpi/mpi5-16.pdf

15 Assessment policy for Virginia adult education and literacy programs: http://www.doe.virginia.gov/instruction/adulted/data_monitoring_evaluation/assessment/assessment_policy.pdf

16 For more information, see http://economicmobilitycorp.org/index.php?page=implementation-of-the-mi-best-initiative-in-maryland

17 For more information, see https://appam.confex.com/appam/2015/webprogram/Session6168.html and http://digital.graphcompubs.com/article/Partnering+For+Career+Readiness%3A+The+ACE+Model/2421111/0/article.html

18 Data provided by Maryland's Department of Labor, Licensing, and Regulation.

19 Data provided by Virginia Department of Education. PluggedInVA is currently a strong model for GED students and higher. The state plans to expand its reach to serve adult learners not yet at the secondary skill level. For more information on PluggedInVA, see the module on Sector Partnerships and Career Pathways.

20 DLLR and DHR internal document, "The Maryland Skilled Immigrants Task Force" Official Description, November 15, 2016.

21 Davis, Lois M., R. Bozick, J.L. Steele, J. Saunders, and J.N.V. Miles. 2013. "Evaluating the Effectiveness of Correctional Education: A Meta-Analysis of Programs That Provide Education to Incarcerated Adults." RAND Corporation.

22 Davis, Lois M., R. Bozick, J.L. Steele, J. Saunders, and J.N.V. Miles. 2013. "Evaluating the Effectiveness of Correctional Education: A Meta-Analysis of Programs That Provide Education to Incarcerated Adults." RAND Corporation.

23 Source: https://www.dpscs.state.md.us/publicinfo/publications/pdfs/DOC2013AnnualRpt.pdf

24 https://www.vehiclesforchange.org/

25 http://ohr.dc.gov/page/returning-citizens-and-employment

26 http://does.dc.gov/service/project-empowerment-program

27 Phone communication with Brandon Butler, Deputy Assistant Secretary, Division of Workforce Development and Adult Learning, Maryland Department of Labor, Licensing and Regulation (DLLR), November 14, 2016.

28 http://doc.dc.gov/page/re-entry-services-doc

29 http://www.dcfpi.org/making-a-good-jobs-program-even-better-how-to-strengthen-dcs-project-empowerment

30 DLLR internal document, "DEI 2016 Abstract", November 15th, 2016.

31 https://mwejobs.maryland.gov/vosnet/Default.aspx

32 For more information on the Data Vault, see the module on Performance Measurement.

33 http://wwrc.virginia.gov/

34 http://does.dc.gov/service/2016-mayor-marion-s-barry-summer-youth-employment-program

35 https://www.dol.gov/odep/

36 https://www.dllr.state.md.us/employment/appr

37 http://www.schooltalkdc.org/dc-summer-youth-employment-institute/ and http://www.schooltalkdc.org/programs-training-4/secondary-transition_v2-2/

38 http://does.dc.gov/service/2016-mayor-marion-s-barry-summer-youth-employment-program

39 According to Measure of America of the Social Science Research Institute, as of June 2015, there are 5,527,000 disconnected youth in America today, or one in seven teens and young adults (13.8 percent). http://www.measureofamerica.org/disconnected-youth/

40 Corcoran, M., F. Hanleybrown, A. Steinberg, and K. Tallant. 2012. "Collective Impact for Opportunity Youth." FSG.

41 http://osse.dc.gov/service/dc-reengagement-center

42 DC WIC Board Meeting Powerpoint Slides, April 12, 2016.

43 http://does.dc.gov/service/2016-mayor-marion-s-barry-summer-youth-employment-program

44 http://does.dc.gov/service/pathways-young-adults-0

45 The recommendations put forth by Maryland's Youth Apprenticeship Advisory Committee are available at: https://www.dllr.state.md.us/aboutdllr/youthapprrep.pdf

46 http://www.ncwd-youth.info/node/342

47 U.S. Department of Education. Jaunary 11, 2016. Program Memorandum OCTAE/DAEL 15-7. And Bird, K., M. Foster, and E. Ganzglass. 2014. "New Opportunities to Improve Economic and Career Success for Low-Income Youth and Adults." CLASP. pg.11.

48 Bird, K., M. Foster, and E. Ganzglass. 2014. "New Opportunities to Improve Economic and Career Success for Low-Income Youth and Adults." CLASP. pg.11.

49 For more information, see http://economicmobilitycorp.org/index.php?page=implementation-of-the-mi-best-initiative-in-maryland

50 http://www.sbctc.edu/colleges-staff/programs-services/i-best/

51 https://www.lep.gov/resources/2008_Conference_Materials/DCLanguageAccessActof2004.pdf

52 https://www.wcl.american.edu/news/documents/AccessDenied.pdf

53 https://www.whitehouse.gov/sites/whitehouse.gov/files/images/NSCICommunitiesFactSheet.pdf

54 DLLR and DHR internal document, "The Maryland Skilled Immigrants Task Force" official description, November 15, 2016.

55 See https://www.dllr.state.md.us/whatsnews/apprgrant.shtml and http://go.wh.gov/KmmRV7

56 http://law.justia.com/codes/maryland/2015/article-ghu/title-5/subtitle-3/section-5-318

57 http://webapp.psc.state.md.us/Intranet/aboutus/elecunivsvc_new.cfm

58 http://www1.pgcps.org/masterplan/

59 In Maryland, TANF is called Temporary Cash Assistance (TCA).

60 http://dds.dc.gov/page/youth-transition-programs

61 http://www.dllr.state.md.us/earn/

62 Wilson, B., and DeRenzis, B. 2015. "Realizing Innovation and Opportunity in WIOA." National Skills Coalition.

63 These program-level performance measures are not listed in the WIOA State Plan. They are taken from the Joint Legislative Audit and Review Commission, 2014. "Report to the Governor and the General Assembly of Virginia: Virginia's Workforce Development Programs," Appendix E.

64 WIOA language, see p. 56: https://www.congress.gov/113/bills/hr803/BILLS-113hr803enr.pdf

65 Email from Erin Roth, Policy Director, Division of Workforce Development and Adult Learning, Maryland Department of Labor, Licensing and Regulation (DLLR), November 16, 2016.

66 Phone conversation with Erin Roth, Policy Director, Division of Workforce Development and Adult Learning, Maryland Department of Labor, Licensing and Regulation (DLLR), November 14, 2016. These performance targets were included in the final Maryland WIOA State plan.

67 Implementation timetable retrieved from https://www.dllr.state.md.us/employment/wioa.shtml

68 Benchmarks retrieved from https://www.dllr.state.md.us/employment/wioa.shtml

69 http://www.elevatevirginia.org/wp-content/uploads/2016/11/VWL-16-04-LWDA-Performance-Goals-Negotiation-Process-for-PY-2016-and-PY-2017.pdf

70 Since the plan has been submitted, the monthly agency head meetings appear to have been replaced by several implementation groups on various WIOA-related issues, and are being led by agency staff, rather than the director. Meeting summaries are posted on the DCWorks website, available at http://dcworks.dc.gov/page/wioa-working-groups.

71 Wilson, B., and DeRenzis, B. 2015. "Realizing Innovation and Opportunity in WIOA." National Skills Coalition.

72 Wilson, B., and DeRenzis, B. 2015. "Realizing Innovation and Opportunity in WIOA." National Skills Coalition.

73 http://www.dllr.state.md.us/earn/

74 http://www.govirginia.org/

75 Workforce Development Technical Assistance Professionals Request for Qualifications, Solicitation No. DCEB-2016-Q-1001, Career Pathways Community of Practice. Issued July 5, 2016 by the Office of the Deputy Mayor for Planning and Economic Development.

76 According to the Maryland state plan, the state is home to over 10,000 businesses, but according to the state's Department of Commerce, there are nearly 170,000 businesses in Maryland (http://commerce.maryland.gov/about/workforce-and-education.) Either way, the point is that there is ample opportunity for EARN Maryland to grow.

77 Commonwealth of Virginia, Office of the Governor. 2014. "Executive Order Number 23: Establishing the New Virginia Economy Workforce Initiative."

78 http://www.govirginia.org/

79 Workforce Development Technical Assistance Professionals Request for Qualifications, Solicitation No. DCEB-2016-Q-1001, Career Pathways Community of Practice. Issued July 5, 2016 by the Office of the Deputy Mayor for Planning and Economic Development.

80 http://www.pluggedinva.com/

81 https://governor.virginia.gov/newsroom/newsarticle?articleId=12988 .

82 http://www.dllr.state.md.us/earn/

83 Business Administration and IT is listed twice for Washington DC, because the District combined two industries that were listed separately by Maryland and Virginia.

84 DC's living wage was $13.85 per hour for 2016. The wage is adjusted annually per any changes in the Consumer Price Index.

85 These criteria were used for the five high-demand sectors listed in the state plan. It is unclear whether the same analysis and criteria were utilized to identify the recently added high-demand sector of infrastructure.

86 https://www.vawc.virginia.gov/vosnet/Default.aspx

87 https://mwejobs.maryland.gov/vosnet/Default.aspx

88 http://does.dc.gov/service/american-job-center

89 https://www.dllr.state.md.us/lmi/lmaihotjobsbrochure.pdf

90 Maryland Department of Labor, Licensing and Regulation. "Hot Jobs Now."

91 http://www.elevatevirginia.org/

92 Virginia Board of Workforce Development. "What Is Elevate Virginia?" pg.60

93 http://open.dc.gov/economic-intelligence/

94 DC Office of the Deputy Mayor for Planning & Economic Development. Economic Intelligence Dashboard.

95 http://www.vccs.edu/vccsblog_post/financial-aid-for-non-credit-training-leading-to-industry-recognized-credentials/

96 ApprenticeshipUSA State Expansion Grant Summaries: http://go.wh.gov/KmmRV7

97 http://goc.maryland.gov/myac/

98 http://www.fairfaxcounty.gov/dfs/ss/view.htm

99 CapSTAT is a data-driven performance management tool administered by the Office of Performance Management (OPM) within the District's Office of the City Administrator. http://oca.dc.gov/page/oca-performance-management

100 DC Municipal Regulations and DC Register. June 2, 2016. Mayor's Order No. 2016-086, "Re-establishment: Workforce Investment Council."

101 https://data.virginialmi.com/vosnet/Default.aspx

102 Maryland Department of Labor, Licensing and Regulation. "Workforce Innovation and Opportunity Act (WIOA) Local Workforce Plan Guidance—Workforce Development & Adult Learning."

103 https://www.dllr.state.md.us/employment/wioa.shtml

104 Phone communication with Erin Roth, Policy Director, Division of Workforce Development and Adult Learning, Maryland Department of Labor, Licensing and Regulation (DLLR), November 16, 2016.