

ActionBrief

Requirements for WIA Local Plans: Process and Content

1. Process for Developing Local Plans

The following is a summary, so please read the actual documents yourself.

The relevant section of the Workforce Investment Act of 1998 is Section 118(a), (c) and WIA Final Rules and Regulations Section 661.350.

Sec. 118 (a): Each local board shall develop and submit to the Governor a comprehensive 5-year local plan in partnership with the appropriate chief elected official. The plan shall be consistent with the State plan.

Sec. 118 (c): Process—Prior to the date on which the local board submits a local plan, the local board shall—

1. Make available copies of the proposed local plan to the public through such means as local hearings and local media
2. Allow members of the board and the public, including representatives of labor organizations to submit comments to the local board, not later than the end of the 30-day period beginning on the date on which the proposed plan is made available
3. Include with the local plan submitted to the Governor any comments that represent disagreement with the plan

Final Rules and Regulations 661.350 (b): The Governor must review completed plans and approve all such plans within 90 days unless the Governor determines in writing:

1. There are deficiencies.
2. There is lack of compliance.



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2. Content of Local 5-Year Plans

Sec. 118 (b): The contents of the local plan are described in section 118b of the law and WIA Final Regulations as listed below.

Legislation — Section 118	WIA Final Rule	Union goals-a beginning
(b) (1) (A) An identification of the needs of businesses, job seekers, and workers in the local area	661.350(a) (1)	<p>Need for good, stable jobs, that pay a family-sustaining wage and provide benefits is identified.</p> <p>Communities, as well as job seekers and workers, want good quality jobs, rather than low wage, unstable jobs.</p>
(b) (1) (B) An identification of the current and projected employment opportunities in the local area	661.350(a) (2)	Employment opportunities at union companies and workplaces are identified.
(b) (1) (C) The jobs skills necessary to obtain such employment opportunities	661.350(a) (2)	Most jobs that provide a living wage require training. It needs to be made clear that the skills that are needed require significant amounts of training.
(b) (2) A description of the local One-Stop delivery system	661.350(a) (3)	<p>Wagner-Peyser funded activity must be provided by state merit staff. It is critical that no unionized jobs are lost due to the transition to WIA.</p> <p>Unionized providers who provide good jobs themselves should have an advantage in becoming part of the One-Stop.</p> <p>Be sure to think through how union training programs that want to receive public funding for training, intensive services, or core services in a specific sector will be able to. Do they need to be name now? Will they be eligible later?</p>
(b) (2) (A) How the local boards shall ensure continuous improvement and that providers will meet the needs of local employers and participants	661.350(a) (3) (i)	<p>What information will be needed to decide if the services are effective?</p> <ul style="list-style-type: none"> • Do participants receive benefits? • What is the wage per hour, not just the total weekly or monthly income that can be seen in UI (unemployment insurance) records? • Which employers are benefiting the most from placements and training funds? • How long do workers stay at these employers? • What else?

Legislation — Section 118	WIA Final Rule	Union goals-a beginning
(b) (2) (B) A copy of the MOU between local board and each of the One-Stop partners	661.350(a) (3) (ii) See page 49305 Re: transitional approvals <i>Federal Register</i>	Look for any impact on unionized workers who are delivering services. Will service delivery be worker-centered and be located in places where lower wage workers live, rather than just in higher income areas?
(b) (3) A description of the local levels of performance negotiated with the Governor and chief elected official	661.350(a) (4) See page 49324 <i>Federal Register</i> 8/11/2000	Should performance be tracked at multiple levels, including higher performance levels than those negotiated as minimums with the U.S. Department of Labor, to evaluate whether WIA funds are leading to family sustaining wages or just low wage jobs? Consider a goal that is some multiple of the Lower Living Standard Income Level (e.g., use 150% instead of the minimum 100% cited in WIA), or use a locally derived self-sufficiency standard that accounts for local costs Dislocated workers must make 90% of previous pay in a new job or be eligible for services. Does this mean that this wage level should be the performance measure?
(b) (4) A description and assessment of the type and availability of adult and dislocated worker employment and training activities in the local areas	661.350(a) (5)	<ul style="list-style-type: none"> • Do the services take into account the needs of different populations? • Do dislocated workers get immediate support so they can reenter the labor market quickly? • Does every person get the career counseling needed to create an effective individualized career plan? • Are programs worker-centered, rather than either training provider-centered or employer-centered?
(b) (5) How the local board will coordinate local activities with statewide Rapid Response	661.350(a) (6)	Make sure Rapid Response is still being run at the state level and that labor is as strong a player as under JTPA. Check if there are any labor Rapid Response program operators and if your One-Stop should have specific protocols for coordination with the Labor Rapid Response program.
(b) (6) Description and assessment of the type and availability of youth employment and training activities in the local areas including successful providers	661.350(a) (7)	Are there any union-connected programs in your local area?

Legislation — Section 118	WIA Final Rule	Union goals-a beginning
(b) (7) Description of the process used by the local board to provide an opportunity for public comment, including comment and input by representatives of labor organizations, into the development of the local plan, prior to submission of the plan	661.350(a) (8)	<p>It is required that unions be able to give input during the development of the plan. Did you have that opportunity?</p> <p>Does the plan have enough detail that you can make worthwhile comments or is it all vague assurances, or statements that everything is in transition?</p> <p>Does the process give sufficient time to make comments?</p>
(b) (8) Identification of entity responsible for disbursement of funds	661.350(a) (9)	
(b) (9) Description of the competitive process to be used to award grants and contracts.	661.350(a) (10) Including the process of procuring training services that are made as exceptions to using Individual Training Accounts	The competitive process must ensure that any union programs and community programs are able to receive funding-especially for people with barriers to employment or for programs that would connect people to good, union jobs (usually better than non-union jobs in the same industry.)
(b) (10) Other information the Governor shall require	661.350(a) (13)	
	661.350(a) (11) Criteria for setting priorities for funding	<p>Which groups of people most need support to be able to get good jobs if funding is limited?</p> <p>Levels for “low income wage rates” and “self-sufficiency” will be needed to define who is eligible to receive intensive and training services. If 150% of Lower Living Standard Income Level is used for the performance measure, does this mean that everyone below that should have priority for receiving services?</p> <p>You will need to set who is eligible for intensive and training services as an adult job seeker, who is eligible as an incumbent worker, and who is eligible as a dislocated worker.</p>
661.350(a) (12) Alternative entity information as needed		

Issues to consider in assessing local plans

- **Training budget:** Are funds allocated to (budgeted to) training, rather than just to core or intensive services?
- **Impact on unions in the local area:** Are any local unions currently using this funding to provide training, or are they anticipating using this funding? Are training programs for current or new entrants planned in any unionized firms or in non-union firms in the same industries as union firms (non-union competitors of union firms)?
- **ITA amount and characteristics:** Is the voucher amount per person sufficient to pay for training that can reasonably have a real effect on a person's skill level and job prospects? Is there a time limit to the voucher that will limit its effectiveness?
- **Prioritizing participants:** What priorities are established for providing services? Are certain populations or groups prioritized—for example people with barriers to employment, dislocated workers over a certain age, people in industries with declining employment?
- **Quality of jobs:** What job quality standards are set that define the jobs people can be placed in? Is there a minimum wage level before a person is required to accept a job? Is there a minimum wage level for meeting performance standards for programs? Is this the “self-sufficiency” standard or is that standard only used to define eligibility for incumbent worker training? Is there a minimum requirement for benefits, permanence, and hours per week before a job is considered good enough to place a participant in?
- **Trainer certification:** How will trainers and training programs be certified in the first year or cycle of certification? Will union-run programs that are not apprenticeships be able to be certified? Are trainers or programs certified?
- **Rapid Response connections to the One-Stops:** How does Rapid Response coordinate with the One-Stop? Does a worker who has received information or intake through Rapid Response services have to go through a similar intake process again at the One-Stop or can they be referred directly to services? Is there any follow-up from One-Stop staff to ensure that people who receive Rapid Response services come back in for further services?
- **Tracking employer subsidy:** Given the shift to ITAs, is there any mechanism in place to track where participants are employed? Is there any way to know which employers are the beneficiaries of the WIA subsidy?
- **Performance measures for job quality:** Is there any way to know whether participants find permanent, full time jobs with benefits? If UI wage records are used for follow-up monitoring, will some other mechanism, such as sample phone surveys, be used to find out if the jobs people are getting have benefits and are full time?



The AFL-CIO Working for America Institute works with unions and their allies to create and retain good jobs and build strong communities through promoting high road economic strategies for individuals; employers and industrial sectors; and public economic and workforce development systems.

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