

# RAISING THE BAR



**A Report on  
Policies and Practices  
Related to Self-Sufficiency  
Standards in the Nation's  
Public Workforce  
Development System**



With Financial Support by the Rockefeller Foundation



## **RAISING THE BAR: A Report on Policies and Practices Related to Self-Sufficiency Standards In the Nation's Public Workforce Development System**

### **Executive Summary**

The dual goals of workforce development are to provide the talent and skills employers need to produce and deliver goods and services as well as to raise the living standards of working families in America. In order to achieve both of these goals, it is critical to give job seekers effective counseling and access to appropriate training.

The entities charged with that responsibility are the 650 state and local Workforce Investment Boards (WIB) that have been empowered by the federal legislation known as The Workforce Investment Act (WIA). Workforce Investment Boards are business-led, with a requirement that 51% of the membership, as well as the chair, be representatives of the employer community. As the body responsible for serving employers, workers and job seekers, WIBs have the opportunity and responsibility to establish policies that can shape the delivery of services to each of those customers. Developing standards and goals, such as ones related to wage-attainment, can have enormous implications for the economic vitality of their local communities.

The Workforce Investment Act established a three-tiered, sequential sequence of services for workers and job seekers—core, intensive, and training services. Under WIA, working adults who do not earn enough income to be self-sufficient are eligible for intensive and training services. Through WIA regulations, the Department of Labor placed the responsibility for defining self-sufficiency in the hands of state and local Workforce Investment Boards but provides as a minimum threshold for each board the Lower Living Standard Income Level (LLSIL), a Bureau of Labor Statistics calculation. The regulations actually direct local boards to develop their own standards, thus allowing them to target resources to those working families in need of additional investment to get the skills necessary to either obtain or retain jobs with family-sustaining wages. While there are many potential uses of Self-Sufficiency Standards by a WIB, eligibility for services is the most explicit use within WIA and is the first subject of this report.

With financial support from the Rockefeller Foundation, the AFL-CIO Working for America Institute recently completed a survey of over 80 Local Workforce Investment Boards in 45 of the largest metropolitan areas in the US. The survey assessed the extent to which boards used three techniques to raise community standards—high road community audits, expanded use of more realistic self-sufficiency standards, and subsidy accountability tools. This report analyzes the data collected through the section of the survey that deals specifically with use of self-sufficiency standards, providing a wealth of information on the use of innovative WIB practices related to self-sufficiency across the country.

**The primary finding from the survey is that the majority of local boards surveyed have already established higher-than-LLSIL local self-sufficiency standards.**

About *two-thirds* of the Workforce Investment Boards responding to this survey said that they have established self-sufficiency standards that are above and beyond the Lower Living Standard Income Level (LLSIL). Clearly many WIBs can—and do—take different approaches to establishing their own measure of self-sufficiency, finding it necessary to set a standard that more accurately reflects the real cost of living for workers in their communities.

A number of Workforce Investment Boards are also using self-sufficiency standards to shape their work in other ways. In addition to documenting the extent to which local boards across the country are setting higher self-sufficiency standards, as WIA envisioned, the survey also shows that Workforce Investment Boards are going beyond the WIA requirement in their use of these realistic measures of economic self-sufficiency. Boards are using self-sufficiency standards:

- As goals and performance measures to evaluate how WIA programs and services are actually working, which can encourage investment in the quality of placement wages and advancement opportunities in the public workforce system.
- To conduct strategic labor market analysis, to allow boards to develop strategic plans. This provides the opportunity for boards to focus on what constitutes a “good job” in that community.
- To establish job quality standards for publicly subsidized employment and training services. This enhances the broad authority of a WIB to set local standards and policies governing the funding streams under their control, which can incentivize increased attention to placement wages and advancement opportunities among WIA-funded programs.

## **Conclusion**

The findings of this survey suggest that Workforce Investment Boards in metropolitan areas have embraced the concept of setting more realistic self-sufficiency standards and using them for a variety of purposes to support their work. These include not only the Workforce Investment Act’s intention to use the concept of eligibility to extend services to low-wage workers to place them on a path to self-sufficiency, but also for other ways that serve to raise community standards. Use of self-sufficiency standards as a baseline provides a framework for evaluating local labor markets that is based on detailed, realistic information. Self-sufficiency standards are helping Workforce Investment Boards design programs and policies that address the unique short and long-term needs of their communities.

## Requirement for Workforce Investment Boards to Establish Self-Sufficiency Standards to Determine Working Adults' Eligibility for Intensive and Training Services

Workforce Investment Act-funded programs serve both unemployed job seekers and employed adults who are seeking different or better employment. WIA establishes three tiers of services for job seekers and workers—core, intensive, and training services—that must be accessed sequentially. Core services largely consist of self-service resources such as reviewing area job listings. Intensive services provide greater staff assistance for services such as developing career plans. Training services include placement-related training activities.

Under WIA, *working* adults who do not earn enough income to be self-sufficient are eligible for WIA-defined intensive and training services. Specifically, employed individuals are only eligible for intensive services under WIA if they "are employed, but ... determined by a one-stop operator to be in need of such intensive services in order to obtain or retain employment that allows for self-sufficiency" (WIA Title I Section 134(d)(3)(A)(ii)). Self-sufficiency is also an eligibility determinant for training for employed adults because of the sequential nature of WIA services. In the WIA final regulations, DOL placed the responsibility of defining self-sufficiency on state and local Workforce Investment Boards. Therefore, only those employed workers earning below the income level established by the WIB-determined *self-sufficiency standard* become eligible for intensive services and training when using WIA funds.

DOL did define a minimum *self-sufficiency standard*—the Lower Living Standard Income Level (LLSIL) as calculated by the U.S. Bureau of Labor Statistics—but directs Workforce Investment Boards to set their own, higher standard. The Lower Living Standard Income Level (LLSIL) is a poverty measure created by the Bureau of Labor Statistics. Although it is updated annually using the Consumer Price Index (CPI), the LLSIL is based on a formula that was last revised in the 1980s. The LLSIL uses a basic family budget approach—based on the prices of a market basket of goods—and like the poverty threshold, it is a poor indicator of the level of income necessary to realistically support a family.

While the LLSIL is a better floor than the federal poverty threshold for determining self-sufficiency, it is only a rough tool for determining self-sufficiency for working families. There are several methodological reasons for a WIB to adopt a self-sufficiency standard of their choosing rather than relying on the LLSIL.

- The LLSIL does not capture the costs of child care, and so it will underestimate the real costs of employment for working parents of young children, possibly disqualifying otherwise eligible families from receiving services.
- Using the CPI to update the LLSIL does not account for changing consumption patterns within the family budget, such as housing, food, and transportation, as their relative share of expense grows over time.
- Unlike the federal poverty threshold, the LLSIL does vary by four broad geographic areas as well as by metropolitan and non-metropolitan areas. In addition to these eight calculated areas, the LLSIL also provides different measures for 23 metropolitan areas and Hawaii, Alaska, and Guam. Nevertheless, the relatively crude geographic and metropolitan considerations are often considered inadequate for determining accurate local costs of living.

By ignoring some of the most significant expenses incurred by working families, such as childcare, the LLSIL often seriously underestimates their financial needs. There are many different ways to calculate the needs of working families, and many organizations around the country have developed tools for identifying and measuring the real costs they face. The following charts compare the results achieved by using three different measuring tools in Chicago, Illinois and Champaign-Urbana, Illinois. The first is the

LLSIL, as described above; the second, the *Basic Family Budget*, developed by the Economic Policy Institute; and the third is actually called the *Self-Sufficiency Standard*, developed by Wider Opportunities for Women and Dr. Diana Pearce of the University of Washington. (The Chicago Workforce Board, it is worth noting, adopted the WOW *Self-Sufficiency Standard*.) The chart also includes the Federal Poverty Guideline for an additional point of comparison.

As quickly becomes evident, each of these different measuring tools for self-sufficiency arrives at significantly different results that vary greatly by geographic location both because of local variation in expenses as well as because of how each tool measures family size. These metro areas are only hours apart, but the cost of living and working in each community varies greatly. Each tool reflects that difference in vastly different ways, depending on methodology.

Chart A

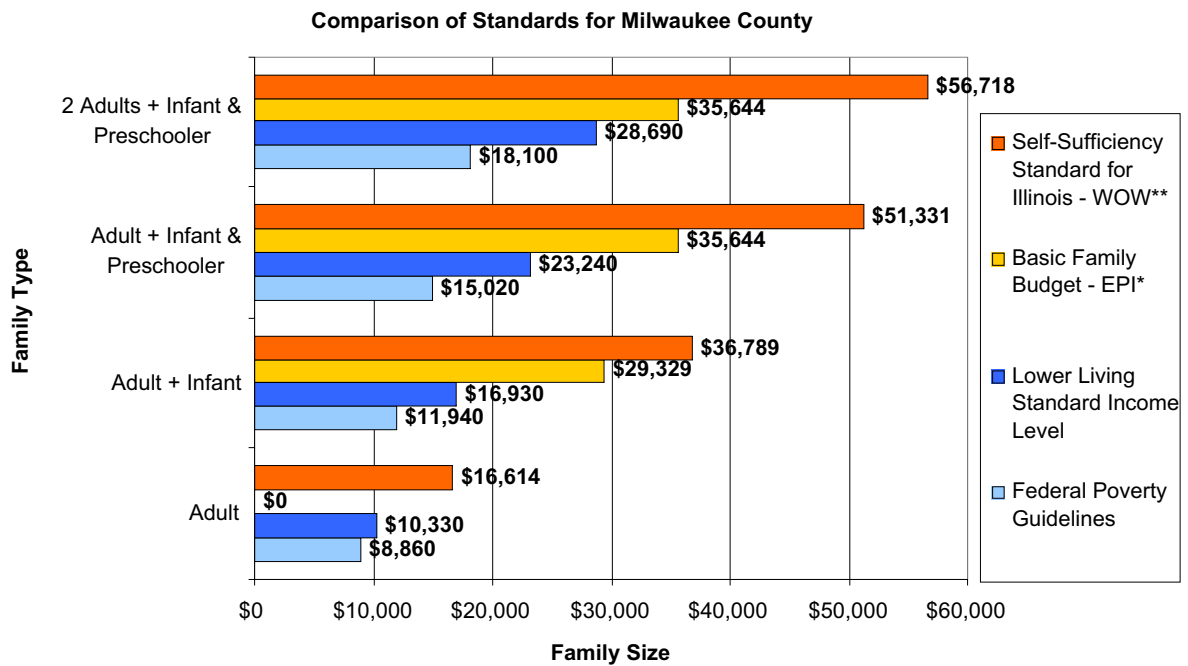


Chart B

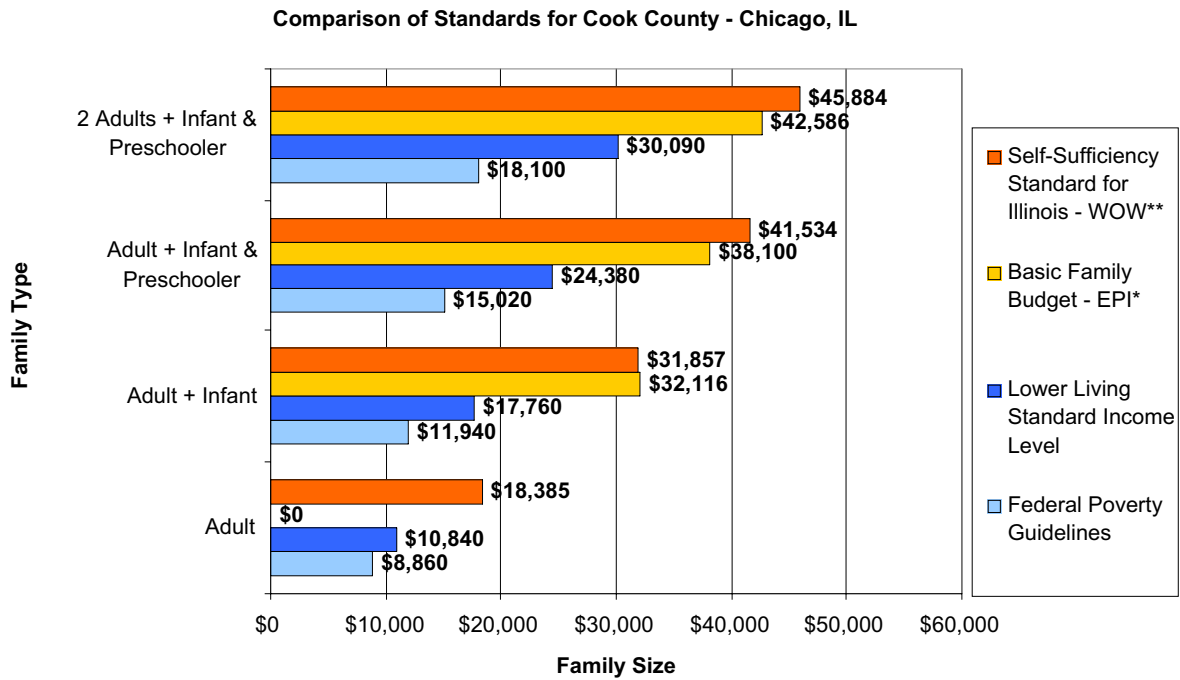
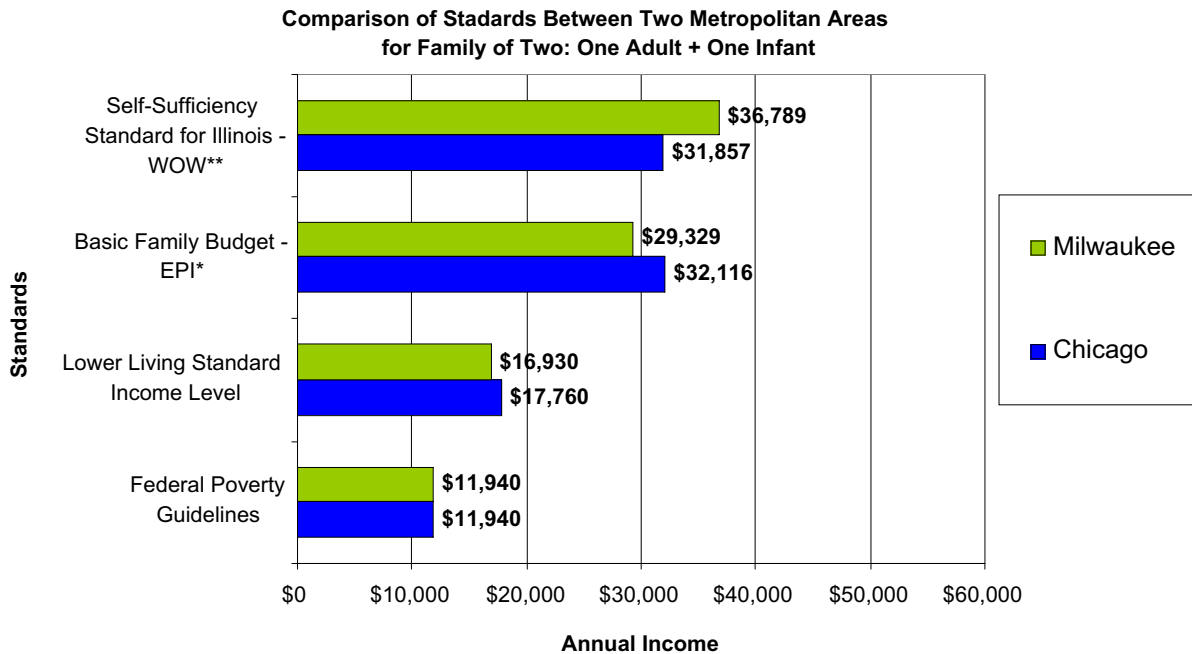


Chart C



\* Adjusted to 2002 dollars, using CPI-RS data.

\*\* Adjusted to 2002 dollars, using CPI-RS data. Also, excludes high cost areas (downtown and selected Northside areas), and includes south and west suburbs.

Note: Charts show standards applied to county level. Exact geographic region for which each standard is calculated varies by measure.

Workforce Investment Boards can—and do—take different approaches to establishing their own measure of self-sufficiency. Charts A and B show the wide variety of options available to boards in two particular metropolitan areas. Chart C shows not only the variety that exists within a metropolitan area but the variation often found between metro areas. From these and other possible measurements, each board must select a standard that they feel best reflects the reality of their workforce area. Regardless of the specific tool used or the result achieved, by establishing a more accurate measure of self-sufficiency, WIBs can direct resources to those families who are working but need additional investment in their skills through intensive and training services to help them access or retain jobs with family sustaining wages. The Institute feels that doing so increases the likelihood of long-term self-sufficiency for these members of their community.

### **Other Uses by Workforce Investment Boards of Self-Sufficiency Standards**

Determining incumbent worker eligibility is the most explicit use of self-sufficiency standards in WIA; however, many Boards have adopted other applications of these standards.

#### *Establishing Performance Benchmarks*

To borrow a phrase from the business community, "you can only manage what you can measure." The use of a self-sufficiency standard as a performance benchmark is an important tool for Workforce Investment Boards that want to know how well their local workforce investment is moving job seekers and workers towards economic self-sufficiency. These goals and performance measures are being used to evaluate how WIA programs and services are actually working. This benchmarking practice does not prevent people from taking or being placed in jobs below a certain wage level. Rather, they are used as an assessment tool to evaluate how well the WIB is performing relative to placement wage levels. WIBs are further establishing their own additional performance goals based on a self-sufficiency standard beyond primary goals negotiated between DOL and the state and any negotiated between the state and local boards. In combination with effective benchmarking, setting goals is a powerful vehicle for a WIB to drive the quality of job placements and training services in the long run.

#### *Conducting Strategic Labor Market Analysis*

Workforce Investment Boards are charged with conducting labor market analysis under WIA, which many boards use to develop strategic plans. While traditional labor market analysis might focus on growth industries and occupations, a WIB has the opportunity to focus on the quality of available employment for its customers. A self-sufficiency standard is the first step in defining what constitutes a "good job." In order to define job quality, self-sufficiency standards are used in conjunction with labor market analysis to strategically identify those occupations and career paths that lead to economic self-sufficiency. This strategic use of a self-sufficiency standard in labor market analysis allows a board to better meet its goal of moving workers and job seekers towards economic self-sufficiency by targeting those industries and occupations that are most likely to pay family-sustaining wages.

#### *Establishing Job Quality Standards for Publicly-Subsidized Training*

The government has long had a role in establishing standards for job quality and worker protection. Local WIBs are often referred to as a "board of directors" for the local labor market area. Under WIA, they have broad authority to set standards and policies for the funding streams under their control and can often influence standards for related programs. The primary ways in which employers can directly benefit from WIA funds are through "customized training" and "on-the-job training" (OJT). Customized training is training that is designed to meet the specified needs of an employer or group of employers and

requires a 50% match of funds. On-the-job training is training where the trainee is employed, the training is specific to the needs of the employer, and where the employer is reimbursed for up to 50% of the trainee's wages. Certainly when investing in customized or on-the-job training under WIA, boards have the authority to target how public resources are used.

Workforce Investment Boards are establishing wage quality and job quality standards for the employer-specific training they subsidize by using a self-sufficiency standard. Self-sufficiency standards are used to justify wage quality standards, which are often established as fixed dollar amounts (eg. \$10 an hour) that are lower than the self-sufficiency standard—but higher than the minimum wage—for their community. By attaching a certain level of accountability to public workforce investments, wage quality standards help a board guide how public investments move workers and their families towards economic self-sufficiency. Boards are establishing basic policies to limit customized training and OJT expenditures to those employers who will place their trainees in positions that pay or lead to self-sufficiency wages in a reasonable period of time. For a WIB, standards are an important means for distinguishing between jobs that offer low entering wages but provide a clear career ladder to high skill, high-wage jobs, and those jobs that merely offer low-wages with little opportunity for career development and wage advancement.

## **Results from Survey of Workforce Investment Boards in the Nation's Largest Metropolitan Areas**

### *Background and Methodology*

Through funding from the Department of Labor and private foundations, the AFL-CIO Working for America Institute provides training and technical assistance the labor representatives who are appointed to every state and local WIB in the United States.

Driven by the interests of the WIB labor representatives, the Institute has developed a High Road Workforce Development Agenda. One of the strategies in that agenda is the establishment and expanded use of more realistic self-sufficiency standards.

With financial support from the Rockefeller Foundation, the AFL-CIO Working for America Institute recently completed a survey of Local Workforce Investment Boards in many of the largest metropolitan areas in the US. The Survey assessed the extent to which Boards utilized three techniques to raise community standards – high road community audits, expanded use of more realistic self-sufficiency standards, and subsidy accountability tools. The survey results being released in this brief discuss the results that deal specifically with the adoption and use of more realistic self-sufficiency standards.

The Institute surveyed 82 Workforce Investment Boards from 45 of the nation's major metropolitan areas. The survey was distributed by mail to each board, and email reminders and phone calls were made to each non-responsive board. 84% of the boards surveyed (69 boards) responded to this survey, which was conducted as an open survey. While past surveys on this subject were blind, this open survey provided rich information on the use of innovative WIB practices across the nation. Surveys were completed by WIB Executive Directors or other staff, as assigned.

In each of the 25 largest metropolitan areas in the country, the Institute surveyed at least one local WIB, and frequently multiple boards in each metro area. Additional metropolitan areas were selected based on a combination of factors: size, union density, and the interest of the project's funder in particular communities, etc. Because of the volume of boards within each standard metropolitan statistical area, Institute staff identified one or more predominant Boards within each of the selected largest metropolitan areas but did not exhaustively survey all Boards within each metropolitan area. When considering which Boards to survey within particular areas, we were most inclusive in the metropolitan areas of specific

interest to the Rockefeller Foundation, resulting in broader target areas in California, New York, Illinois and Texas. Targeting of particular boards or communities was not based on prior knowledge of board policies or practices.

With 84% of the boards responding, the survey results offer a unique and useful baseline for understanding how and whether local WIBs have been utilizing realistic self-sufficiency standards in their work.

A full list of the Boards surveyed is available at the end of this report.

*Note: The percentages presented in this report are rounded to the nearest whole number. In some instances, this may make total percentages equal greater or less than 100%.*

### **Meeting Their Mandate: Workforce Investment Boards Adopting Their Own Standards of Self-Sufficiency**

***Responding Boards that adopted a self-sufficiency standard as the threshold for employed worker eligibility for Intensive and Training Services under WIA other than the (default) Lower Living Standard Income Level (LLSIL)***

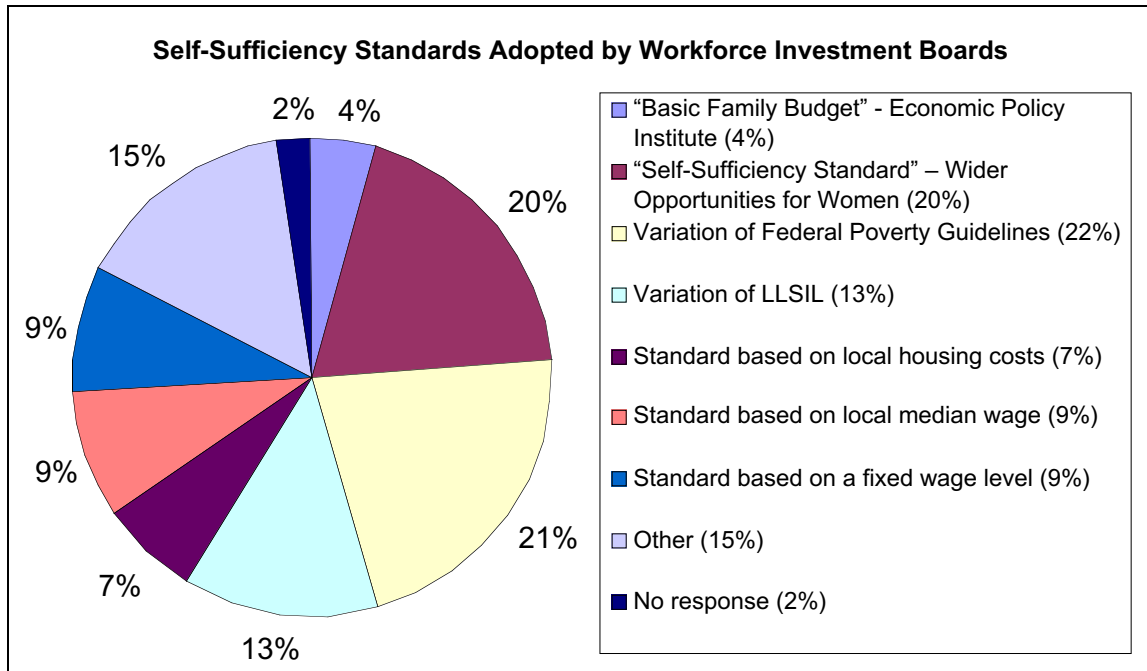
These responses are from among the 69 total survey respondents.	Number of boards	Percentage of boards
<b>Yes</b>	<b>46</b>	<b>67%</b>
<b>No</b>	<b>23</b>	<b>33%</b>

67% of the Workforce Investment Boards responding to this survey said that they have established self-sufficiency standards that more accurately reflect the real cost of living for workers in their communities. Clearly many WIBs in the nation’s metropolitan areas have found it necessary to set a more realistic standard in order to accomplish their mission. This suggests that these business-led boards recognize the value to employers, workers and their community as a whole of using a standard that more realistically estimates the local cost of living.

*Significant Variety in How WIBs Defined Self-Sufficiency for Their Local Area*

Boards that elected to establish a self-sufficiency standard greater than the LLSIL chose a wide variety of calculations. Roughly one-third chose simple variations on existing federal calculations—Poverty Guidelines or the LLSIL itself. Among those boards, some made modest increases, such as 125% of LLSIL, and others made dramatic changes, such as 350% of poverty. Roughly a quarter of the WIBs that adopted self-sufficiency standards other than the LLSIL chose family budget measures such as Wider Opportunities for Women’s Self-Sufficiency Standard or the Economic Policy Institute’s *Basic Family Budget* that take more specific living and working conditions into account. As discussed earlier, these resources are based on calculations that incorporate geography and family composition variables, as well as the cost of child care. Roughly another third chose other calculations, many based on a variety of local factors, such as local housing costs or area median wages. The wide variety of selections shows that local boards actively and creatively exercised their right to choose a standard that they feel is appropriate for meeting the workforce needs of their communities.

Chart D



*Implementation of More Realistic Self-Sufficiency Standards by WIBs*

In this still-new public system, established by the Workforce Investment Act in 1998, many boards and one-stops are still working out the details of governance and oversight. Despite these implementation problems, the survey showed that 80% of WIBs that adopted self-sufficiency standards were successful in making sure that the new standards were provided to One-Stop Career Center staff for use in employed worker eligibility determination.

***WIBs responding that their self-sufficiency standard has been given to One-Stop employment counselors to determine incumbent worker eligibility for services***

Among the 46 boards in this survey that indicated adopting a self-sufficiency standard	Number of boards	Percentage of boards
	37 Boards	80%

**Expanded Use of Self-Sufficiency Standards by Workforce Investment Boards**

*Employment Counseling in One-Stop Career Centers*

A realistic self-sufficiency standard can be a powerful resource for workers, job seekers and the system that serves them. Self-sufficiency standards can offer a more accurate view of how much a worker needs to earn in order to make ends meet. As employment specialists in the One-Stop System work with job seekers and workers, it can be an invaluable tool in setting employment goals. Self-sufficiency standards have been used to help women and girls consider nontraditional occupations that they might otherwise never explore. By clearly linking what it takes to support a family with occupational wages, an employment counselor can help a job seeker or worker better understand how their training and

employment choices not only relate to occupational growth but also to wages, benefits, and advancement opportunities.

48% of the boards that adopted new standards believed that their standard was being used by One-Stop staff beyond determining eligibility, for example as a career-counseling tool.

***WIBs responding that use of the self-sufficiency standard in any other way in the One-Stop, such as a career counseling tool***

Among the 46 boards in this survey that indicated adopting a self-sufficiency standard	Number of boards	Percentage of boards
	<b>22 Boards</b>	<b>48%</b>

*Other uses of a Self-Sufficiency Standard by local WIBs*

Beyond eligibility determination, measures of self-sufficiency can be used to support many other aspects of the WIBs’ work. Thirty-nine percent of the boards that responded to the survey had actually used a self-sufficiency standard for other purposes in addition to eligibility determination for working adults for intensive and training services. Respondents outlined some of the additional ways in which they are using self-sufficiency standards in the work of their board.

***Ways that Boards are utilizing Self-Sufficiency Standards, beyond eligibility determination***

25 WIBs, out of the 69 respondents, said that they are using a self-sufficiency standard in the following ways beyond eligibility determination.	Number of Boards	Percentage of Responding Boards
<b>Defining job quality for public investment</b>	<b>15 boards</b>	<b>22%</b>
<b>Establishing performance benchmarks or performance goals</b>	<b>14 boards</b>	<b>20%</b>
<b>Conducting labor market analysis</b>	<b>10 boards</b>	<b>14%</b>
<b>Any other purpose?</b>	<b>7 boards</b>	<b>10%</b>

**Boards had this to say about why they used a self-sufficiency standard to:**

***Establish performance benchmarks and performance goals***

- “We are starting benchmarking as it relates to moving [workers and job seekers] to better wages.”
- “[We are] assessing clients’ wage adequacy at intake [and using their] rate of improvement to measure success.”

***Conduct labor market analysis***

*Our board is using a self-sufficiency standard:*

- “to target higher-wage sectors of the economy.”
- “[in] targeting occupations for training.”
- “[as a] factor in development of customized training.”

***Define job quality for public investment***

*Our board is using a self-sufficiency standard to:*

- “[establish] placement wage goals for customized training and for the overall one-stop system.”
- “set priorities that prioritize job-training programs that lead to self-sufficiency wages.”
- “set minimum standards for on-the-job training and customized training.”

### ***Serve other purposes***

- “The Board uses a self-sufficiency standard as a goal for employment.”
- “[The Board uses it as a] benchmark in performance-based contracts with providers.”
- “[The Board uses it to] identify sectors to engage with.”

### **Conclusion**

The findings of this survey suggest that Workforce Investment Boards in metropolitan areas have embraced the concept of setting more realistic self-sufficiency standards and are using them for a variety of purposes to support their work. These include not only the Workforce Investment Act’s intention to use the concept of eligibility to extend services to low-wage workers to place them on a path to self-sufficiency, but also for other ways that serve to raise community standards. By providing a framework for evaluating local labor markets based on detailed, realistic information, self-sufficiency standards are helping Workforce Investment Boards to design programs and policies that address the very real short and long-term needs of their communities.

**Workforce Investment Boards Surveyed and Corresponding Metropolitan Areas (MSA & MPSA)**

<b>State</b>	<b>MSA/PMSA</b>	<b>WIB Board</b>	<b>Survey Response</b>
<b>Arizona</b>			
	<b>Phoenix-Mesa</b>	Maricopa County (AZ)	
	<b>Phoenix-Mesa</b>	Phoenix (AZ)	
<b>California</b>			
	<b>Los Angeles</b>	Carson Lomita Torrance Consortium (CA)	
	<b>Los Angeles</b>	Foothill Employment & Training Consortium (CA)	
	<b>Los Angeles</b>	Long Beach City (CA)	
	<b>Los Angeles</b>	Los Angeles City (CA)	
	<b>Los Angeles</b>	Los Angeles County (CA)	
	<b>Los Angeles</b>	SELACO Southeast Los Angeles Consortium (CA)	No Response
	<b>Los Angeles</b>	Verdugo Consortium (CA)	
	<b>Oakland</b>	Oakland City (CA)	No Response
	<b>Sacramento-Yolo</b>	Sacramento City/County Consortium (CA)	
	<b>San Diego</b>	San Diego Consortium (CA)	No Response
	<b>San Francisco</b>	San Francisco City and County (CA)	No Response
	<b>San Francisco</b>	San Mateo County (CA)	
	<b>San Jose</b>	San Jose/Silicon Valley (CA)	No Response
	<b>San Jose</b>	South Bay Consortium (CA)	
	<b>Santa Rosa</b>	Sonoma County (CA)	
<b>Colorado</b>			
	<b>Denver</b>	Adams County (CO)	
	<b>Denver</b>	Arapahoe and Douglas Counties (CO)	
	<b>Denver</b>	City and County of Denver (CO)	
	<b>Denver</b>	Tri-County (CO)	

<b>District of Columbia</b>			
	<b>Washington</b>	District of Columbia (DC)	
<b>Florida</b>			
	<b>Miami, Monroe not in MSA/PMSA in 1999</b>	Dade, Monroe Counties WDB #23 (FL)	
	<b>Tampa-St. Petersburg-Clearwater</b>	Hillsborough County WDB #15 (FL)	
	<b>Tampa-St. Petersburg-Clearwater</b>	Pinellas County WDB #14 (FL)	
<b>Georgia</b>			
	<b>Atlanta</b>	Atlanta/Region 3 (GA)	
<b>Illinois</b>			
	<b>Chicago</b>	Balance of Cook County LWA #7 (IL)	No Response
	<b>Chicago</b>	City of Chicago LWA #9 (IL)	
	<b>Chicago</b>	DuPage County WIB??? (IL)	
	<b>Chicago</b>	Lake County (IL)	
	<b>Chicago</b>	McHenry County (IL)	
	<b>Chicago</b>	Northwest Municipal Conference Consortium LWA #8 (IL)	No Response
	<b>Chicago</b>	President's Office of Employment & Training (South and West Cook)	
	<b>Chicago</b>	River Valley (Kane/Dekalb/Kendall Counties) (IL)	
	<b>Chicago</b>	The Workforce Board of Northern Cook County (IL)	
	<b>Chicago</b>	Will County (IL)	
<b>Indiana</b>			
	<b>Chicago</b>	Northwest Indiana (IN)	
	<b>Indianapolis</b>	Marion County (IN)	
<b>Massachusetts</b>			
	<b>Boston</b>	Boston (MA)	
	<b>Boston</b>	Metro North (MA)	
	<b>Boston</b>	Metro South/West (MA)	

<b>Maryland</b>			
	<b>Baltimore</b>	Baltimore City (MD)	
	<b>Baltimore</b>	Baltimore County (MD)	No Response
	<b>Washington</b>	Prince Georges County (MD)	
<b>Michigan</b>			
	<b>Detroit</b>	City of Detroit (MI)	
<b>Minnesota</b>			
	<b>Minneapolis-St. Paul</b>	Hennepin/Scott/Carver (MN)	No Response
	<b>Minneapolis-St. Paul</b>	Minneapolis (MN)	No Response
	<b>Minneapolis-St. Paul</b>	Ramsey County (MN)	
<b>Missouri</b>			
	<b>Kansas City</b>	Kansas City (MO)	
	<b>St. Louis</b>	St. Louis (MO)	
	<b>St. Louis</b>	St. Louis County (MO)	
<b>North Carolina</b>			
	<b>Charlotte-Gastonia-Rock Hill</b>	Charlotte/Mecklenburg Consortium #37 (NC)	
<b>Nebraska</b>			
	<b>Lincoln</b>	Greater Lincoln WIB (NE)	
<b>Nevada</b>			
	<b>Las Vegas</b>	Southern Nevada (NV)	
<b>New York</b>			
	<b>Albany-Schenectady-Troy</b>	Albany Rensselaer Schenectady (NY)	
	<b>Albany-Schenectady-Troy, Warren &amp; Washington are in Glens Falls</b>	Saratoga Warren Washington (NY)	
	<b>Buffalo-Niagara Falls</b>	Erie (NY)	
	<b>Buffalo-Niagara Falls</b>	Niagara (NY)	
	<b>Nassau-Suffolk</b>	Hempstead/Long Beach (NY)	
	<b>Nassau-Suffolk</b>	Oyster Bay Consortium (NY)	

<b>New York (Continued)</b>			
<b>New York City</b>	New York City (NY)		No Response
<b>New York City</b>	Westchester County (Balance) (NY)		
<b>Rochester</b>	Monroe (NY)		
<i>Not in 1999 MSA/PMSA</i>	Sullivan (NY)		
<i>Not in 2000 MSA/PMSA</i>	Ulster (NY)		
<b>Ohio</b>			
<b>Cincinnati</b>	Cincinnati Clermont Hamilton Counties (part of Balance of State Area 7) (OH)		
<b>Cleveland-Lorain-Elyria</b>	Cleveland Area 3 (OH)		
<b>Cleveland-Lorain-Elyria</b>	Cuyahoga Area 2 (OH)		
<b>Columbus</b>	Franklin County (part of Balance of State Area 7) (OH)		No Response
<b>Oklahoma</b>			
<b>Oklahoma City</b>	Oklahoma City (OK)		
<b>Oregon</b>			
<b>Portland-Vancouver</b> <i>Tillamook not in MSA/PMSA in 1999</i>	Multnomah, Washington, Tillamook Counties (OR)		
<b>Pennsylvania</b>			
<b>Philadelphia</b>	Philadelphia Workforce Investment Area SE090 (PA)		
<b>Pittsburgh</b>	Allegheny County SW005 (PA)		No Response
<b>Pittsburgh</b>	Pittsburgh Workforce Investment Area SW095 (PA)		No Response
<b>Texas</b>			
<b>Austin-San Marcos</b>	Capital Area WDB (TX)		
<b>Dallas</b>	Dallas County WDB (TX)		

<b>Texas (Continued)</b>	
<b>El Paso</b>	Upper Rio Grande WDB (TX)
<b>Ft. Worth-Arlington</b>	Tarrant County WDB (TX)
<b>Houston</b>	Gulf Coast WDB (TX)
<b>San Antonio</b>	Alamo WDB (TX)
<b>Washington</b>	
<b>Seattle-Bellevue-Everett</b>	Seattle-King County/Area #5 (WA)
<b>Wisconsin</b>	
<b>Milwaukee-Wakesha</b>	Milwaukee County WDA #2 (WS)

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