

RESHAPING WIOA & BUILDING A MORE EQUITABLE WORKFORCE SYSTEM

REFLECTIONS & IMPLICATIONS FOR THE FIELD



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TABLE OF CONTENTS

| | |
|---|--------------|
| <u>Executive Summary</u> | 01 |
| <hr/> | |
| <u>Key Themes & Call to Action</u> | 02 |
| <hr/> | |
| <u>Historical Context</u> | 03 |
| <hr/> | |
| <u>Section 1: Centering Equity in WIOA: Challenges & Recommendations</u> | 04-05 |
| <hr/> | |
| <u>Section 2: Centering Equity in State and Regional Workforce Plans</u> | 06-09 |
| <hr/> | |
| <u>Section 3: Centering Equity in Workforce Development Board</u> | 10-13 |
| <hr/> | |
| <u>Section 4: Centering Equity in WIOA Budgets and Funding Allocations</u> | 14-16 |
| <hr/> | |
| <u>Section 5: Centering Equity in Service Design & Delivery</u> | 17-21 |
| <hr/> | |
| <u>Section 6: Centering Equity in Performance Measures, Indicators and Data Systems</u> | 22-25 |
| <hr/> | |
| <u>Considerations at the State and National Levels</u> | 26 |
| <hr/> | |
| <u>Acknowledgments</u> | 27 |
| <hr/> | |
| <u>Appendix A</u> | 28 |
| <hr/> | |
| <u>Appendix B</u> | 29 |
| <hr/> | |
| <u>About</u> | 30 |
| <hr/> | |

EXECUTIVE SUMMARY

In January 2021, President Biden signed the Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government. This Executive Order authorizes federal agencies and entities to “pursue a comprehensive approach to advancing equity for all”. Inspired by this federal commitment to advance equity and eager to be in service of its goals, Sandra Grace LLC, with support from the Kresge Foundation’s Human Services Program, designed and implemented the “Reshaping WIOA: Building a More Equitable Workforce System” Learning Community.

This learning community of public workforce professionals working in state government from four different regions in the country spent time examining core components of the public workforce system and specifically the Workforce Innovation and Opportunity Act (WIOA) for examples of racism and structural barriers embedded within its policies and practices. Through this examination, policy and practice recommendations that center equity were identified and are included in this brief with the hope of planting seeds of transformation in the workforce system.

Over the course of one year (July 2022 - July 2023), professionals working in the public workforce system met bi-monthly to discuss and examine the following workforce components:

- The History of Workforce Development Policy and WIOA & The Four Titles;
- Local, State & Federal Plans and The Role of the Workforce Board;
- WIOA Budgets and Funding Allocations;
- Eligibility, Intakes & Assessments, Case Management, Referrals & Partnerships and Education, Training, Employer Engagement and Supportive Services;
- Performance Measures, Indicators, Data Tracking, Program Evaluation & Determining Success

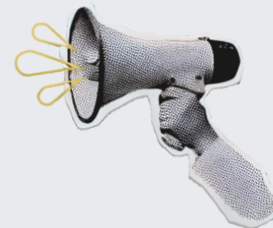
KEY THEMES

With an eye towards centering and advancing equity in the public workforce system, five core themes were identified by the Reshaping WIOA Learning Community:

1. **Center workers and job seekers** in all decisions and practices related to designing and implementing WIOA.
2. **Foster a culture of creativity and innovation** in service design and delivery, client engagement and funding decisions and allocations.
3. **Provide professional development and capacity building** support to better equip WIOA practitioners to center equity in their work
4. **Create opportunities for ongoing learning** among staff, board and community members about the purpose, use and benefits of the public workforce system
5. **Recognize the opportunity to build meaningful, long-term and complimentary partnerships** with policy makers, community based providers and community members through the state planning process.

A CALL TO ACTION

Equity¹ is a societal goal which means that it will take everyone in the workforce development ecosystem working together to examine systems for inequitable and discriminatory practices and collectively working together towards a shared vision of workforce equity².



This brief encourages public workforce professionals to participate in an intentional examination of the workforce system, its core components and identify practices and policy recommendations that will center equity and yield equitable outcomes for all workers in the labor market.

It is organized in six sections and each section includes a brief overview, a list of challenges to equity and recommendations to center and advance equity. It is not an exhaustive list of recommendations, nor are there recommendations included for each challenge identified, however the recommendations highlighted are ones that align with the areas of focus during the Reshaping WIOA Learning Community.

¹ <https://bmoreantiracist.org/resources/our-definitions>

² <https://www.seattle.gov/human-resources/about-us/workforce-equity>

HISTORICAL CONTEXT

The Workforce Innovation Opportunity Act (WIOA) is the federal government's premier and primary workforce policy that drives state and local workforce development programming. WIOA assists jobseekers with accessing employment, education, training and support services that meet employers' requirements and succeed in the labor market. WIOA requires each state to develop a workforce plan, describing strategic and operational elements across its four titles:

- Title I Adult, Dislocated Worker, and Youth programs administered by Department of Labor (DOL);
- Title II Adult Education and Family Literacy Act (AEFLA) program administered by Education Department (ED);
- Title III Employment Service program under the Wagner-Peyser Act administered by DOL; and
- Title IV Vocational Rehabilitation (VR) program under the Rehabilitation Act of 1973 administered by ED.

Across these four titles, WIOA has three primary goals:

1. **Increase access** to education, training and employment – particularly for people with barriers to employment;
2. **Reduce welfare dependency**, increase economic self-sufficiency, meet employer needs, and enhance the productivity and competitiveness of the nation;
3. **Increase the prosperity** of workers and employers.

While WIOA offers a platform for a workforce strategy at the federal, state and local levels it is not without its flaws. Unfortunately, WIOA along with the majority of workforce policy was developed and has been implemented using a universalist, race-neutral approach which does not account for the structural, race-based barriers impacting individuals of color. This policy has driven practices at the state and local level that have aided in widening the racial wealth gap in American society.

As stated by Dr. Alex Camardelle: *“WIOA is a colorblind or race-neutral policy; that is, although its purpose is to provide opportunities to previously marginalized adults, it seeks to apply solutions without consideration for race or the existence of past or present racial discrimination”*.

Without intentional and thoughtful examination of these policies and their oft unintended impacts on people of color, social and economic inequities will persist for generations to come. Informed by practitioners and developed for practitioners, advocates and policymakers alike, this brief discusses the challenges to and potential solutions for advancing equity in the public workforce system.

³ Universalist: universal policies assume a universal social norm, which has historically been white, male, and able-bodied. Broadly conceived universal programs are more likely to exacerbate inequality rather than reduce it. SOURCE: John A. Powell, “The Importance of Targeted Universalism”, Poverty and Race, March/April 2009.

⁴ Race Neutral = As an approach, race neutrality denies the reality of a racially constructed society, one where people are advantaged or disadvantaged because of their race. In particular, it denies privileges associated with whiteness and disadvantages/exclusion experienced by Black and non-Black people of color.

SECTION 1

CENTERING EQUITY IN WIOA: CHALLENGES & RECOMMENDATIONS



While a critical lever with the potential to fund and coordinate adult education and employment activities, WIOA has significant challenges and its implementation has not yielded the types of results needed to achieve equity in our society.



Key pieces of WIOA would need to work more effectively and efficiently in order to achieve its desired results, specifically increasing the ability for organizations to easily access and use the funding, reducing and eliminating unnecessary monitoring & auditing and reducing or eliminating unnecessary requirements, paperwork and restrictions for residents in need of services.

As the learning community discussed key components of WIOA's programs and policies, we began with understanding the current context including the ways the current context may be unintentionally upholding inequities and shifted to identify ways to more intentionally center equity in its processes, policies and practices.

CHALLENGES

The following challenges were identified as barriers to realizing the hope of equity through the public workforce system:

1. **Stereotypical and harmful narratives** about recipients of the public workforce system and specifically about People of Color;
2. **Negative narratives about the economic burden** of job seekers (e.g. job seekers are “wasting our tax dollars”);
3. **The role of compliance** in cultivating a compliance driven system that upholds structural barriers and limitations while stifling innovation;
4. **Unrealistic and urgent timelines** for planning and service delivery which limit opportunities to make substantive and systematic changes;
5. Internal and external **resistance to changes** that seek to center equity;
6. **Lack of courage and patience** among decision makers and leaders to address the structural barriers and work at the systems level on long-term change efforts.

RECOMMENDATIONS

The learning community members identified the following overarching recommendations to address the current flaws and actively center equity in the policy and implementation of WIOA:

1. **Address the training and career pathway practices** that lead to occupational segregation and improve data systems to ensure data disaggregation and long-term outcomes tracking
2. **Address the biases and mental models** embedded within the current dual customer approach and design that often unintentionally reinforce unequal power dynamics between employers and workers
3. **Reshape the culture of compliance** and the compliance driven mentality that limits creativity and creates barriers to effective service delivery and systems innovation
4. **Reimagine the existing governance structure** of WIOA at the state and local levels to ensure more representation from those most impacted by the system, young people and other professionals invested in workforce equity
5. Identify the opportunities to address individual and interpersonal bias through service delivery and **ensure there is a more racial, ethnic and gender representation** of service providers
6. **Implement a systematic approach to sharing knowledge about equity** and inequities in the system by educating, informing others and making the necessary modifications along the journey (e.g. implement ongoing professional development opportunities for practitioners to examine their internalized beliefs, biases and interpersonal behaviors).

SECTION 2

CENTERING EQUITY IN STATE AND REGIONAL WORKFORCE PLANS



As outlined in the WIOA Statute, in order for a state to be eligible to receive funding allotments for the core programs, the Governor must submit a unified or combined state plan to the Secretary of Labor.



State plans are key to the implementation of WIOA and are a key, strategic lever for advancing equity or maintaining the status quo.

Identifying gaps and barriers to advancing equity in the planning process can provide a roadmap for real systems changes in the implementation of WIOA.

CHALLENGES

When asked to examine and identify barriers to equity in the State planning process, learning community members identified the following barriers and challenges:

- **Silos impacting Partnerships** - there is often a siloed approach to addressing challenges. For e.g. practitioners and policy makers are often working at the “corners” rather than coming together in the “center” to collectively and collaboratively address challenges they all face.
- **Limited and insufficient timelines** - Completing the required state and regional plans in the allotted time given requires a lot of staff and human capacity that is often lacking particularly when there are competing priorities. This limitation in time and staffing serves the current system and not a reimagined system.
- **Local control** - not all local areas have the same interest or commitment to equity which can negatively impact and limit efforts to advance equity by way of the State plan.
- **Lack of equity standards** - there are limited standards related to equity outlined in the guidance and expectations for state plans which make it easy to keep the system functioning as it is and harder to hold regions, states and local areas accountable to and for equity.
- **Scope of the plan** - the existing scope and requirements of the State plan limits the ability to focus on systems and structures and instead focuses on programs and service delivery
- **Transactional vs. Transformational approaches⁵** - there is an overemphasis on transactions that help people navigate existing structures rather than an emphasis on transformational approaches that remove the existing structures so that people no longer have to navigate them
- **Staff & Consultant knowledge** - some states dedicate staff and hire consulting partners to support with the plan development process however there is not always a requirement that these staff members or consulting partners have an understanding of equity or a commitment to ensure that the plan has an explicit focus and strategies that will address equity.

RECOMMENDATIONS

Learning community members identified the following opportunities and recommendations to embed equity practices and goals within the plan development process.

1. Staff & Team Knowledge (Capacity building)

- a. Ensure the team working on the plan has a working and practical understanding of equity and knows how to apply equity practices to their respective and collective work

⁵ <https://www.racialequityalliance.org/wp-content/uploads/2016/11/GARE-Racial-Equity-Action-Plans.pdf> (pg. 8)

-
- b. Implement a staff onboarding process with a specific focus on WIOA for all staff members not just the team working on the plan to ensure that all staff have the same information related to WIOA
 - c. Document every piece of the plan development process and ensure its shared cross-functionally among a team

2. Board & Stakeholder Engagement (pre-plan writing)

- a. Engage in regular and ongoing conversations with key partners about WIOA, the role of equity in WIOA planning and the role of each partner in the ecosystem to advance equity via the WIOA plan
- b. Identify opportunities to engage in courageous conversations to name and addresses systems challenges that impede equitable outcomes
- c. Identify partners who are aligned and willing to use the plan as a tool or lever to address deeply embedded policy and structural inequities
- d. Identify and engage stakeholders to be willing advocates for equity while ensuring that stakeholders are equipped to effectively communicate with partners about the need for an equitable plan and system

3. Worker Input & Feedback

- a. Create opportunities to better understand the Customer Journey as an opportunity to see the experiences of individuals receiving services and surface inequitable treatment and experiences (e.g. Journey Maps)
- b. Implement individual surveys among participants to learn about their experiences in WIOA programs and use this feedback to create better experiences for customers and clients

4. Standard Setting

- a. Ask equity specific questions in the plan development process with partners and local areas. This aids in setting equity standards throughout the process.
- b. Create a rubric for equity within the plan particularly for local areas who will submit their plans to the state plan
- c. Create opportunities to build a discipline and practice of equity in the planning process. For example, include equity assessments or rubrics as part of the planning process
- d. Ensure that the input from local areas is inclusive of a specific equity focus and if it's not, provide resources to local areas to support their growth in this area

5. Recognize the plan as a strategic lever

- a. Identify the levers within the plan for transformational change with a recognition that the plan can be a tool to address systemic inequities

Acknowledging that tools are a helpful resource for practical application, below are a few examples of “Rubrics” or Equity Assessments that can be used to support practical application as identified in the recommendations above.

1. [The Racial Equity Impact Assessment](#)
2. [City of Boulder Racial Equity Instrument and Guide](#)
3. [Racial Equity Impact Analysis](#)

THE RACIAL EQUITY IMPACT ASSESSMENT

EXAMPLES OF RACIAL JUSTICE EQUITY IMPACTS

Equity and Social Justice Initiative
King County, WA

The county government is using an Equity Impact Review Tool to intentionally consider the promotion of equity in the development and implementation of key policies, programs and funding decisions.

Race and Social Justice Initiative
Seattle, WA

City Departments are using a set of Racial Equity Analysis questions as filters for policy development and budget making.

Minority Impact Statements
Iowa and Connecticut

Both states have passed legislation which requires the examination of the racial and ethnic impacts of all new sentencing laws prior to passage. Commissions have been created in Illinois and Wisconsin to consider adopting a similar review process. Related measures are being proposed in other states, based on a model developed by the Sentencing Project.

Proposed Racial Equity Impact Policy
St. Paul, MN

If approved by the city council, a Racial Equity Impact Policy would require city staff and developers to compile a “Racial Equity Impact Report” for all development projects that receive a public subsidy of \$100,000 or more.

Race Equality Impact Assessments
United Kingdom

Since 2000, all public authorities required to develop and publish race equality plans must assess proposed policies using a Race Equality Impact Assessment, a systematic process for analysis.

RACIAL EQUITY IMPACT ANALYSIS

Racial Equity Impact Analysis

1. Are all racial/ethnic groups who are affected by the policy/practice/decision **at the table**?
2. How will the proposed policy/practice/decision **affect** each group?
3. How will the proposed policy/practice/decision **be perceived** by each group?
4. Does the policy/practice/decision **worsen or ignore** existing disparities?
5. Based on the above responses, **what revisions** are needed in the policy/practice/decision under discussion?

CITY OF BOULDER RACIAL EQUITY INSTRUMENT & GUIDE

- STEP 1** **Establish Outcomes**
Identify desired community outcomes toward achieving racial equity.
- STEP 2** **Collect Data**
How the issue benefits or burdens the community in terms of racial equity.
- STEP 3** **Determine Benefit & Burden**
Analyze the issue for impacts and alignment with racial equity outcomes.
- STEP 4** **Advance Opportunity/Minimize Harm**
Develop strategies to make progress toward racial equity and reduce unintended consequences.
- STEP 5** **Implement & Evaluate**
Track impact on communities of color; communicate and involve stakeholders. Document unresolved issues.
- STEP 6** **Report Back**
Share information learned from analysis and unresolved issues with project leadership.

SECTION 3

CENTERING EQUITY IN THE WORKFORCE DEVELOPMENT BOARD



Workforce Development Boards (WDB's)⁶ have a critical role to play in contributing to a healthy regional economies that serve the needs of business and workers. They function in multiple roles:

- A steward of Federal and non-Federal funds,
- Overseeing a myriad of operational systems and processes, and
- The primary architects of the State's overall workforce strategy.

As a critical lever for change, the workforce board is uniquely positioned to advocate for equitable policy and practice changes, however not all workforce boards have explicitly engaged in the work of understanding equity and its applicability and necessity for the workforce system.

⁶ <https://ion.workforcegps.org/resources/2019/06/14/16/43/State-and-Local-Workforce-Development-Board-Resources>

CHALLENGES

Staffing & Organizational Structures

- In some states the board is staffed by three different entities all under contract to the Title I agency and if these entities aren't coordinated it can have negative impacts on the efforts of the board.
- WIOA titles are administered in different state entities and the State board is predominantly Title I focused. If these state entities aren't required or encouraged to coordinate and expand beyond Title I, duplications and inefficiencies may exist.
- Lack of staff support and capacity to carry-out board priorities and ideas limit the effectiveness of the board.
- When staffed, oftentimes the staff is from Title IB and therefore prioritizes the Title IB agenda rather than a more comprehensive focus on all of the Titles and their efforts.

Board Knowledge & Education

- Many board members do not have an understanding of WIOA and the workforce system, limiting their ability to be strategic and guide the staff. In cases where knowledge exists among board members, it can still be limited to Title IB.
- Some boards also lack an understanding of their true purpose and charge as outlined in the statutes, requiring the staff and administrative teams to spend more time educating the board rather than in strategic thought partnership with the board.
- The pace of change at the board level is not always commensurate with the pace of need. Many times the board moves slower than it needs to, impacting its ability to be responsive to immediate and strategic needs.

Board Structure & Board Culture

- Related to board engagement and buy-in, some board members are more involved and connected to the Board work than others creating an imbalanced board.
- Board members can feel disempowered to enact change, especially if their focus is not aligned with the Governor's and/or State Workforce agency's priorities.
- Oftentimes board members and the staff have little to no control over board recruitment and appointments, creating a culture of passion & knowledge vs. no passion and limited knowledge of workforce development and the public workforce system.

RECOMMENDATIONS

Learning community members identified the following opportunities and recommendations to embed equity practices at the Board level.

1. Reimagine the Board Composition and Engagement

- a. Create a reimagined “super board” that oversees all strategic elements i.e. moving away from multiple boards and councils that splinter the work.
- b. Create cross-sector alignment opportunities for this reimagined “super board” for example an interagency technical assistance group
- c. Update the board recruitment and selection criteria to include leaders with demonstrated commitments to equity and leaders who demonstrate evidence based models within their own respective organizations
- d. Create a sustainable and neutral leadership structured so that it has policy & funding levers to create real accountability to state’s vision, goals, outcomes, WIOA structures and programs are tools
- e. Be intentional with inclusion of partners (WIOA, CBOs) as part of the Board work. For example, include partners on board committees, request partner input on key policies, and create space for partners to present to the Board when applicable
- f. Create a board recruitment process that ensures the workforce board, regional leadership and partners reflect BIPOC and historically marginalized communities

2. Board Learning & Education

- a. Create opportunities and tools for shared definitions and shared learning across key stakeholder partners. For example [this Career Pathways Dictionary](#) offers a unified framework and dictionary for college and career readiness for the State of Illinois.
- b. Include continuous education on the workforce system and equity as part of the Board meetings and board engagement. For example, implement a quarterly learning opportunity for board members to deepen their knowledge and understanding of a key WIOA statute, funding or programmatic area.
- c. Educate boards regarding the value of each workforce program as well as the benefits of all programs working together as a workforce system. Consider working in partnership with the board to cast a vision for a comprehensive system where all public and nonprofit partners work together to achieve equitable outcomes for all eligible residents.

3. Legislative & Policy Changes

- a. Create a specific role on the board that ensures workforce efforts are sustained through gubernatorial shifts and changes. Consider legislation or policy that can support this type of board role.
- b. Audit the current board memberships and create new policies that require more inclusiveness and representation on the board. For example policies that require community members, worker representation and youth representation on the board such as worker boards.
- c. Ensure that the role of board is established by the needs of state and local areas versus those specifically outlined in the federal WIOA statutes. Consider conducting a state or local needs assessment to get input from community members and other stakeholders who can more accurately inform the role of the board based on the state and local context and needs.

4. Shared Understanding & Strategic Partnerships

- a. Be intentional about alignment with related groups and councils to bolster each other's work and amplify marginalized voices. For example, consider requiring board members to participate in local or state economic development council meetings, regional workforce meetings or other related strategic economic groups in the state.
- b. Clearly define and outline the roles of the state and local boards so that there is a clear expectation of cohesive partnership with a goal of aligning workforce system efforts at all levels.
- c. Ensure that private sector business involvement is designed to get specific assistance from those with specific competencies in addition to having representation from large or well known private sector leaders

SECTION 4

CENTERING EQUITY IN WIOA BUDGETS & FUNDING ALLOCATIONS



Workforce Development activities cannot be implemented without funding. While the federal legislation provides funding for state workforce development activities, workforce development funding has been on a steady decline and does not cover the full cost of workforce services.

Realizing the hope of economic equity for millions of American workers, requires a commensurate level of investment through the public workforce system. The learning community members identified challenges and opportunities to ensure more equitable distribution of workforce funding.

CHALLENGES

- **Race neutral approach to funding allocations** - historically the funding allocations have not factored in the impact and role of race and racism in workforce training and labor market participation, thus underestimating the cost of services specifically for workers who are unemployed, underemployed and are People of Color.
- **Federal definition of unemployment** - the definition of unemployment poses limits to who can be “counted” as eligible for services, limiting access to services for those who may be unemployed but don’t meet the formal definition for unemployment.
- **Inaccuracy of state’s unemployment rate** - as noted above, the state’s unemployment rate does not accurately reflect the number of people who are in need of workforce services and support.
- **Title II: Flat Funding structure** - this flat funding structure doesn’t account for variations in population which can be regressive in states where there has been historic divestment in public education or public education financing structures which are beholden to property taxes or in places where there are larger immigrant or non-English speaking populations.
- **State match requirements** - state matching requirements favor states that have significant shares of non-federal resources and leaves states who do not have significant shares of non-federal resources behind and underfunded.
- **Inability to be creative and innovative** - because of the need to plan two years in advance, states are limited in their responsiveness to immediate or arising needs and do not have flexibility in funding particularly if they are more dependent on federal resources.
- **Misalignment between funding formulas and outcomes** - funding formulas and allocations aren’t always aligned with the outcomes that are expected of the system. Measures and metrics aren’t aligned with funding formulas in a way that can yield equitable outcomes.

RECOMMENDATIONS

1. **Funding allocations & decision making** - Redesign the funding decision making process to allow for more local decision making and flexibility in funding to meet local specific needs. For example, encourage Governors to leverage their funding authority and increase their allocation of funding to various services based on state and local needs and priorities.
2. **Partnership and alignment** - provide professional development opportunities with staff members to share historical and institutional knowledge about short term and long-term budgeting processes and planning with departmental partners. For example, partners in one of our regions work intentionally with their Vocational Rehabilitation partners to craft a budget that meets the needs of all WIOA titles.
3. **Board Training** - provide training to the board to increase their knowledge of the finances and funding structures so that they are better equipped to advocate for additional resources at the local and state levels. In particular, ensure that board members understand how the current funding structures reinforce inequitable service delivery and limit the hope of economic equity for the community.
4. **Incentives** - Embed incentives for alignment and partnerships with other system actors, especially budget offices. Identify ways to incentivize partnership and with other agency actors who can support, advocate and/or leverage funding to meet the needs of those accessing workforce services.
5. **Aligning funding and metrics** - Develop policy requirements that align funding formulas with measures, metrics and overall “success” outcomes. Consider recommendations for aligning funding and metrics such as those outlined in this Moneyball for Workforce Development report.

SECTION 5

CENTERING EQUITY IN SERVICE DESIGN & DELIVERY



Service delivery, training, employer engagement and supportive services are core components of the implementation of WIOA. They are vital to the individuals who rely on the public workforce system to receive training, support and access to employment.

In a race-neutral system, one that does not acknowledge the role and impact of one's race in determining life and economic outcomes, each of these practices fall prey to a denial of the ways that individual and interpersonal biases manifest in daily interactions between clients and providers.

Regular examination of implementation process and service delivery is necessary to uproot discriminatory practices and embed equity into the service delivery component of WIOA.

CHALLENGES

Tools & Assessments

- The current tools being used for intakes and assessments are often biased, not culturally relevant and there is not always a clear process to assess and mitigate these biases. For example educational assessment tools are normed based on standards that do not account for differences in educational and learning experiences due to structural and institutional barriers in the education system.
- Assessments don't capture the full complexity of people's skills and experiences which leads to weeding people out or creaming for those who are perceived to have "less barriers" to employment.
- Providers and leaders aren't always equipped with the tools and skills to address bias when it shows up in service delivery. For example, implicit bias trainings isn't offered as standard training for direct service staff and therefore don't have access to materials and resources to identify and address biases.

Eligibility & Intake Processes

- The intake and eligibility process is a by-product of performance measures with a focus on system success rather than participant success.
- Customers often need to return multiple times with the correct documentation and little to no consideration is given to their ability to access the centers or other barriers.
- Without adequate information of the customer's need, service providers are making decisions about who eligibility is for and what eligibility means based on preconceived notions and unconscious biases about customers and clients.
- The language and process of determining "program suitability" is racially coded and reinforces harmful and negative stereotypes of people accessing services, particularly for Jobseekers of Color.

Costs & Return On Investment

- The coupling of performance measures and service delivery limit the depth of services needed for individuals navigating multiple and persistent systemic barriers.
- More education is needed to help leaders understand that there is a higher cost to making substantive impact in the lives of those accessing services.
- The over-emphasis on "low costs" and Return on Investment (ROI) limits the type of investments needed for long-term and generational changes especially if the true costs for quality service delivery are higher than what is currently allocated.

Biases in Service Delivery

- Providers often use insider speak or terms that may not be understood by the customer which creates a non-welcoming environment for those receiving services.
- Emphasis on digital services and resources reinforces inequities for those living in communities without regular access to technology and internet.
- Many biases show up in direct service experiences, such as the day to day interactions between staff and customers. This is reflective of the interpersonal level of racism, where internalized biases manifest in interactions with other people. E.g. Figure A.

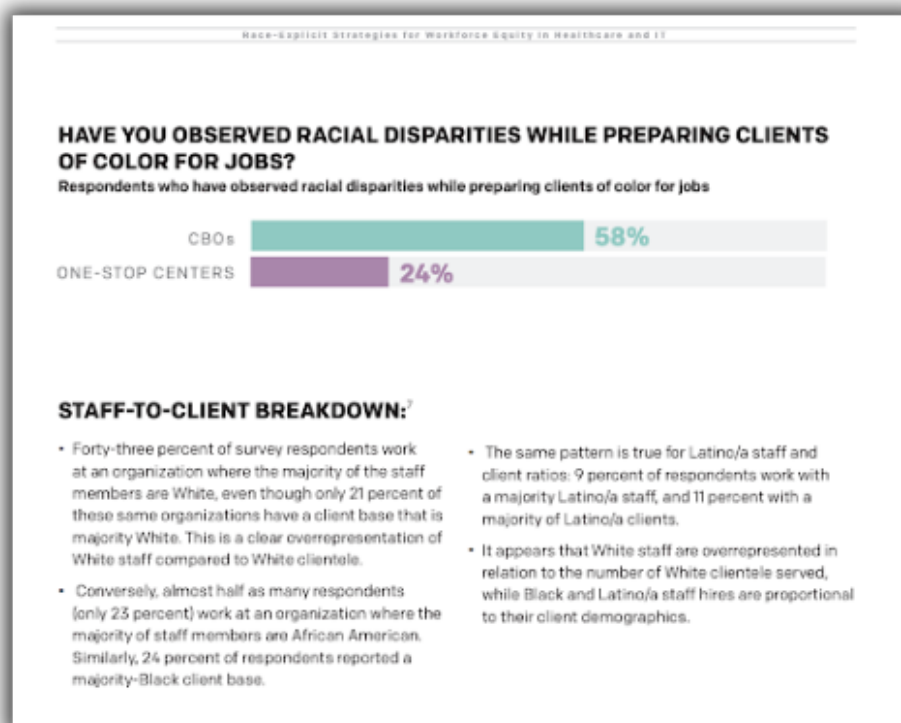


Figure A. displays responses from a workforce development survey that was disseminated to practitioners and advocates around the country about barriers that exist for job seekers looking to enter the Healthcare and IT fields, from [this report](#).

RECOMMENDATIONS

1. Biases in Service Delivery

- a. Require data report cards on training providers to monitor and track community representation. [This report](#) includes a similar recommendation for tracking disparities and service delivery.
- b. Implement tailored and client-specific approaches to understand individual capabilities and talents with an acknowledgement of the specific skills that the individual is bringing to the client-coach relationship. Figure B offers an example of how practitioners can partner in tailored and client-specific ways.
- c. Implement [2GEN models](#) and approaches to the work that acknowledge the person's whole life and family context into service delivery models
- d. Client outcomes that are tracked should include long term economic security metrics such as career advancement and economic mobility.

2. Client Voice

- a.
 - . Develop processes to understand and learn from the client journey and develop solutions that enhance the client experience. For example, consider implementing a [human-centered design](#) process such as journey mapping that allows providers to understand the experience of a client and make adjustments to service delivery accordingly. [This case study](#) offers an example of how this process can be implemented and used to support clients and customers.
 - b. Create avenues for voice and choice from BIPOC candidates and employer partners. For example, consider implementing [feedback loops](#) and surveys that capture candidate and employer input and feedback on their experiences working with the workforce partner.

3. Training & Education

- a. Provide tools for direct service staff in centers to do their jobs with an equity framework. These tools can include equity assessments, questionnaires and equity guides. Sample resources and tools are provided in Appendix B of this brief.
- b. Increase staff knowledge to support and meet individual needs to ensure that staff is working in partnership with people to make sure they have access to what they need. Consider implementing regular and on-going training for staff in service delivery, equity and implicit bias.

4. Engaging Employers

- a. Provide support to employers to become the “employer of choice” with a specific focus on employers who are prioritizing equity and job quality.

- b. Work intentionally and explicitly with employers on Job Quality and workplace culture to reduce bias and increase inclusion and belonging. States such as Colorado have frameworks and technical assistance for employer partners that can be replicated in other places.
- c. Revise and update job requirements to ensure that they're not intentionally excluding people and are laden with biases for example: removing degree requirements that are not necessary for the job and prioritizing skills-based hiring efforts.
Have specific conversations with employers about the specific skills and experiences needed for the job rather than relying on legacy hiring requirements (e.g. de-emphasizing degrees and emphasizing skills and experience)
- d. Training, tools & resources for staff working with employers to have hard conversations and provide supports for workplace shifts and changes. This report offers insight and examples on how to effectively engage employers in this wa

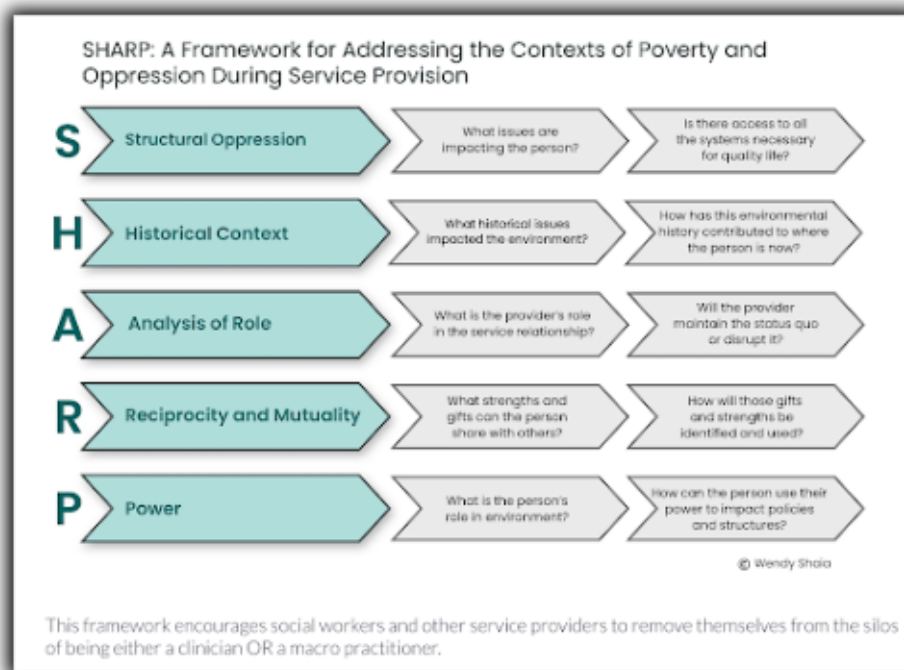


Figure B. SHARP Framework for client engagement and service delivery grounded in equity

SECTION 6

CENTERING EQUITY IN PERFORMANCE MEASURES, INDICATORS AND DATA SYSTEMS



Being able to measure success is a key component to ensuring that the system is doing exactly what it said it would do. Public Workforce Systems have a responsibility to track outputs and outcomes of the services they are offering to determine the impact of these services at the state and local levels. Like the other components of the system, data tracking, performance measure and program evaluation are key levers for the workforce system and are also flawed and inequitable by design.

CHALLENGES

1. Data Systems & Data Collection

- a. Performance is typically measured using data that is 18-24 months old, creating a system where there is not a real time understanding of the outcomes.
- b. WIOA Statistical Adjustment Model (SAM)⁷ - the statistical adjustment model that is used to generate performance outcomes doesn't account for the client interventions that are happening in communities and aren't easily quantifiable.
- c. The Data Systems for the four WIOA Titles and the agencies responsible for implementation are separate and siloed thus not capturing outcomes for the whole system. These individual data systems only capture the data for their specific program or title, not for everyone participating in the systems across the four titles.
- d. There is pushback on data transparency from stakeholders in and outside of the system which limits accountability for disparities in outcomes.

2. Making the case: Metrics and Economics

- a. Many local areas are reliant on meeting performance metrics in order to continue to receive funding and provide services e.g. “I have to be successful here or we may not be viable” supporting a compliance and quantity driven mindset over a quality, client-centered mindset.
- b. In places where there is not buy-in for robust workforce development investments, making the case for investment requires an emphasis on economics making it challenging to focus on upward mobility for workers and jobseekers.

3. Data Analysis

- a. Employers, Industry and Local partners are not equipped to review and analyze equity gaps in data, especially those that show shortfalls. When employers, industry and local partners do not have the skills and capacity to disaggregate and analyze data, equity gaps may persist.

⁷ <https://nrsweb.org/policy-data/sam>

RECOMMENDATIONS

Recommendations are embedded within the responses to three key questions.

Responding to the question

“**if we saw the data collected from the public workforce system as critical to disrupting occupational segregation, what indicators would we measure**”

learning community members said:

- Number of enrollments compared to services that lead to employment outcomes
- Title III - a structure for looking at equity along different dimensions (e.g. comparing farm workers quantitatively and qualitatively to nonfarm workers)
- Identify indicators from the Reemployment Services and Eligibility Assessment program
- Indicators that help us to understand our impact (e.g. did we actually help people make progress, did our interventions lead to outcomes)
- Disaggregate data by demographic cohorts (race/ethnicity, educational attainment, gender, etc) and crosstab employment indicators such as jobs and earnings
- Capture individual employment outcomes
- Examine services vs. actual enrollment (e.g. historically excluded communities typically receive more low touch services)
- More information about the jobs that employers served by the system offer
- Earnings trajectory over time
- The measurements of success that are important for the individual and their employment journey and how did each partners and the collective provide the interventions
- Comparing data (e.g. gender, race) to the types of occupations the providers push individuals towards
- Tracking the type of occupations that people are moving into
- Disaggregating the data to determine which groups are most successful after participating in the workforce system
- Long-term and longitudinal wage data
- Entrepreneurship data
- Responding to the question “what data systems and mechanisms would you need in place to better track and measure long-term equity outcomes”, learning community members said:
 - Real time data along with public and partner data at the state level [in real time]
 - Data Governance bodies and data review processes at the staff and board levels
 - Data Sharing models and practices for example:
 - Shared statewide system alignment and practices
 - Federal model for data sharing practices and agreements
 - Data sharing agreements e.g. [Baltimore City Data Sharing policies](#)
 - Data mechanisms that allow you to track outcomes at different programs
 - Employment data related to hiring, wages, benefits and working conditions
 - Data standards around engaging employers
 - Power mapping: a data system that can help you map the power and influence in your community
 - Data visualization tools that helps data stand out for those who are receiving the information
 - Data analysis and understand the value of the data in proportion to the work
 - Data usability: take the data we have and use it to inform the entire system not just parts of the system
 - Qualitative data and information collected from system users (job seekers, claimants, workers, employers) that is regular and aligned with and relevant to the goals that the system sets

Responding to the question

“**what data systems and mechanisms would you need in place to better track and measure long-term equity outcomes**”

learning community members said:

- Real time data along with public and partner data at the state level [in real time]
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Responding to the question

“**how are you supporting a data culture in your organization and system**”

learning community members said:

- Guidance on healthy use and analysis of data
- Helping people identify specific trends around who is being served and who is not being served, which leads to strategies for support
- Evidence portfolio of data across agencies while also including how to access/share/collaborate using data from those agencies
- Sharing data outcomes transparently
- Share data with partners in the ecosystem and participate in conversations about data and apply it to employment services in a way that is relevant
- Moving from compliance to culture of centering continuous improvement
- Messaging to staff about why and how we're collecting the data

CONSIDERATIONS AT THE STATE AND NATIONAL LEVELS

NATIONAL CONSIDERATIONS

- There is a need at the national level for more opportunities to fund innovations in addition to funding the traditional service delivery models.
- There are historical funding limitations in the public workforce system that dictate how to spend the allocated funds. This often translates into “using your money to do what you have to do and not what you want to do”.
- There is a need to continue to examine federal, state and local policy through an equity lens. Using tools such as the [10 Essential Questions for Policy Review, Development and Evaluation](#) can help states ensure that racial equity is embedded in policy decisions.
- There is a predominant deficit and scarcity mindset about funding which limits the courage to be innovative with funding to meet client needs.
- The current system is performance based and compliance driven, fostering a culture of quantity over quality. This culture rewards short-term fixes rather than deep, long-lasting and quality work needed to realize equity at the societal level.
- There is a recognized need to change the culture of the public workforce system from compliance to innovation.
- There is a need to shift from a politically motivated and influenced system to one that has policies and practices that can withstand political shifts and changes.

STATE CONSIDERATIONS

- **Resistance to equity** - some states are large demographic areas that are opposed to implementing anything related to diversity, equity, inclusion or racial equity. Developing a racial equity analysis that is nuanced can support public workforce professionals in advocating for changes that meet the needs of all people who have been historically left behind by the workforce system.
- **Local control** - in states that are heavily controlled by the local areas, state-wide efforts to advance equity can have limited impact and/or may be completely ignored. Building intentional and authentic relationships with local partners may provide an opportunity to advance equity imperatives at the local level.
- **Data Culture** - some states have begun the work of shifting to a data culture that implements data sharing agreements, prioritizes and values qualitative data and implements a practice of continuous improvement. However, there is still a need to shift the culture and invest in data systems that enable these data culture elements while centering racial equity. Consider reviewing [this report](#) for examples of what it means to center racial equity in measurement and evaluation.
- **Political Cycles** - the cyclical nature of public office can leave the public workforce system in a state of limbo during gubernatorial elections. As was suggested in the recommendations above, there is a need to consider how to create policies that ensure continuity in the work in light of leadership changes and transitions.

ACKNOWLEDGMENTS

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Julie Sanon, Agape Children and Family Services

Tracy Bell, Public Consulting Group

Deputy Cherrell Campbell-Street, TN Department of Human Services

APPENDIX A

Throughout the learning community a myriad of resources were provided to the members to enhance their learning and provide them with a set of tools they can use to advance equity in their respective systems. These resources are included below:

- [Human Services Value Curve Paper](#)
- [Principles to Support Black Workers in WIOA](#)
- [Waters of Systems Change](#)
- [10 Essential Questions for Policy Review, Development & Evaluation](#)
- [A Racial Equity Framework for Workforce Development Funders](#)
- [WIOA 101](#)
- <https://equityinthecenter.org/aww/>
- https://www.policylink.org/resources-tools/for_the_love_of_country
- [NAWB Article – President’s Budget for WIOA](#)
- [SHARP: Framework for Addressing the Contexts of Poverty and Oppression During Service Provision in the United States](#)
- [White Fragility by Robin DiAngelo](#)
- [The BIAS of 'Professionalism' Standards](#)
- [The Color of Law A Forgotten History of How Our Government Segregated America](#)

APPENDIX B

Below are links listed throughout the report for reference.

- **Executive Order on Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (pg. 1):** <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/executive-order-advancing-racial-equity-and-support-for-underserved-communities-through-the-federal-government/>
- **Workforce Innovation and Opportunity Act (pg. 1):** <https://www.dol.gov/agencies/eta/wioa>
- **Race Forward: Racial Equity Impact Assessment (pg. 9):** https://www.raceforward.org/sites/default/files/RacialJusticeImpactAssessment_v5.pdf
- **City of Boulder Racial Equity Instrument (pg. 9):** https://drive.google.com/file/d/18QL8PXKag2Nm_Q2O5ag37ndeekta1QkB/view?usp=sharing
- **The Power of a Racial Equity Impact Analysis (pg. 9):** <https://nirn.fpg.unc.edu/sites/nirn.fpg.unc.edu/files/imce/documents/The%20Power%20of%20Using%20a%20Racial%20Equity%20Impact%20Analysis.pdf>
- **Career Pathways Dictionary (pg. 12):** <https://www.isbe.net/Documents/IL-Career-Pathways-Dictionary.PDF>
- **Workers Boards Across the Country Are Empowering Workers and Implementing Workforce Standards Across Industries (pg. 13):** <https://www.americanprogress.org/article/worker-boards-across-the-country-are-empowering-workers-and-implementing-workforce-standards-across-industries/>
- **Should the federal government spend more on workforce development? (pg. 14):** <https://www.brookings.edu/articles/should-the-federal-government-spend-more-on-workforce-development/>
- **How Governors Can Execute Their Vision For Workforce Development: Policy Levers Available Through The Workforce Innovation And Opportunity Act (pg. 16):** <https://www.nga.org/publications/how-governors-can-execute-their-vision-for-workforce-development-policy-levers-available-through-the-workforce-innovation-and-opportunity-act/>
- **Moneyball for Workforce Development (pg. 16):** <https://results4america.org/tools/moneyball-workforce-development/>
- **Race-Explicit Strategies for Workforce Equity in Healthcare and IT (pg. 19,20):** https://www.raceforward.org/system/files/pdf/reports/RaceForward_RaceExplicitStrategiesFullReport.pdf
- **2Gen Models (pg.20):** <https://nextgenhumanservices.org/2gen>
- **Design Kit (pg. 20):** <https://www.designkit.org/human-centered-design.html>
- **Feedback Fundamentals: Learn about the Loop (pg. 20):** <https://feedbacklabs.org/tools-and-training/learn-about-the-loop/>
- **Colorado Workforce Development Council (pg. 21):** <https://cwdc.colorado.gov/job-quality>
- **Enhancing Conversations Between Employers and Workforce Professionals (pg.21):** <https://www.aecf.org/blog/enhancing-conversations-between-employers-and-workforce-developers>
- **Data Sharing Policies and Practices in Baltimore City, MD (pg. 24):** https://www.ssw.umaryland.edu/media/ssw/collaborative/Data-sharing-report_UMSSW_July-2022.pdf?&

ABOUT



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ABOUT SANDRA GRACE LLC

Sandra Grace is a change management consulting firm that specializes in coaching and consulting services to individuals, non-profit organizations, public and private institutions. We work at the intersection of talent, workforce development and racial equity examining the manifestations of racism in the workforce development field and offering practical solutions to individuals and organizations.

WHAT WE BELIEVE

We believe that people and organizations are the experts in their lives and communities and possess a unique understanding of the intricacies of their local, state and regional context. We believe that our job is to create the space, provide the tools and empower individuals and organizations to lead a transformative life for themselves and the world around them.

OUR IMPACT

At Sandra Grace, we are working to impact the entire talent development ecosystem. Our goal is to ensure that every actor and stakeholder in each of the sectors connected to the talent development ecosystem are equipped to practically apply a racial equity lens to their sector.

