

# Questions to Consider When Reviewing Draft WIOA State Plans

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As states release draft Workforce Innovation and Opportunity Act (WIOA) state plans for public comment, advocates and other stakeholders have an important opportunity to improve them. CLASP is offering a list of questions to consider when reviewing state plans. These questions will help strengthen the implementation of key provisions of WIOA that can improve economic and career success for low-income youth and adults.

While the list includes many topics important to serving low-income people, it is not exhaustive and covers only WIOA titles I and II. You will find links to additional CLASP resources related to many of the topics below. We hope this list of topics and related resources will be helpful as you read through a lengthy state plan. It may also serve as a handy guide as you search the text of the plan for key concepts that may be found in multiple sections, such as “career pathways” or “TANF” (i.e., using the “find” or “control + f” function).

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## 1) WIOA State Plan Type

- Is the draft state plan a Unified Plan, covering only six WIOA core programs, or is it a Combined Plan that includes at least one other program identified in the law?
- If it is a Combined Plan, does it include TANF and/or SNAP Employment and Training (SNAP E&T) to focus on low-income adults and youth?

## 2) Reaching Communities of Color

- Is the economic and workforce analysis provided in the state plan reflective of your community?
- Does the draft state plan include disaggregated data by race, gender, age, and immigrant status regarding workforce development needs?
- Does the state describe ways to use this data to improve services for communities and individuals of color?
- Does the draft state plan encourage local workforce development boards to partner and/or contract with organizations that serve and are led by people of color?
- Does the draft state plan include education and training interventions and strategies that are culturally responsive?

### 3) Career Pathways

- Does the draft state plan describe how the state will implement career pathways? Does the state adopt the WIOA statutory definition of career pathways?
- Is there a description of how the state will ensure career pathways are accessible to high-need adults and out-of-school youth, including supportive services and entry paths for individuals with low basic skills?
- Does the draft state plan advise local boards regarding the requirement that local areas use youth funds to conduct an objective assessment “for the purpose of identifying appropriate services and career pathways for participants?”

Resource: [\*Career Pathways: State Plan & Policy\*](#)

### 4) Co-Enrollment and Leveraging Funding Streams for Integrated Services

- Is co-enrollment encouraged for specific populations and specific service models? For example: WIOA Title I Youth and WIOA Title II Adult Education & Literacy; WIOA Title I Adult and WIOA Title II Adult Education & Literacy; and WIOA Title I Youth and WIOA Title IV Vocational Rehabilitation?
- How does the draft state plan describe the coordination, alignment, and non-duplication of core WIOA services with employment and training activities provided through human services programs (such as TANF and SNAP)?
- How does the draft state plan describe the coordination, alignment, and non-duplication of core WIOA services with employment and training activities provided under other employment, training, and education programs (including career and technical education)?

### 5) Work-Based Learning

- Does the draft state plan identify work-based learning— such as on-the-job training, incumbent worker training, pre-apprenticeships, registered apprenticeships, and transitional jobs—as a strategy?
- Is the work-based learning targeted to those in most need?

Resource: [\*Transitional Jobs: Expanding Opportunities for Low-Income Workers\*](#)

### 6) Tying Incumbent Worker Training to Employer Job Quality Standards

- Does the draft state plan establish criteria for job quality standards for employers participating in WIOA-funded incumbent worker training or on-the-job training?
- Does the plan encourage local workforce boards to set such job quality criteria?

Resource: [\*WIOA and Job Quality\*](#)

## 7) Priority of Service for High-Need Adults

- Does the draft state plan describe how the state will implement and monitor the priority for public assistance recipients, other low-income individuals, and individuals who are basic skills deficient in accordance with the requirements of WIOA sec. 134(c)(3)(E), which applies to individualized career services and training services funded by the Adult Formula program?
- Does the draft state plan set a benchmark (e.g., 51 percent or 70 percent) for the share of adult participants who are in these groups?

Resource: [\*Priority of Service for High-Need Adults\*](#)

## 8) Allocation of Funding for Training

- In the WIOA Title I Adult program, does the draft state plan suggest or require a minimum amount be used for “training” (as opposed to “career services”)?
- Does the draft state plan set a goal for the share of adult participants receiving “training” services who are low income?

Resource: [\*Priority of Service for High-Need Adults\*](#)

## 9) Youth Eligibility and Planning

- Does the draft state plan require local workforce development boards to create standing youth committees? If so, who are the required members?
- Does the draft state plan reference how the state and/or local board will facilitate co-enrollment of youth participants across core programs, in particular for youth ages 18-24 who can be served through titles I, II, and IV?
- Does the draft state plan outline implementation of specific provisions related to career pathways—such as the requirement that local areas use youth funds to conduct an objective assessment “for the purpose of identifying appropriate services and career pathways for participants?”
- Does the draft state plan address how the procurement processes and requests for proposals will, when possible, be adapted and aligned across the core programs to encourage longer-term and more intensive services for out-of-school youth?
- Does the draft state plan include or address eligibility policies beyond what is required from the U.S. Department of Labor? For example, is self-attestation acceptable for upfront eligibility determination for out-of-school youth in high-risk categories (e.g., those who are pregnant or parenting, subject to the juvenile or adult justice system, homeless and/or runaway, or youth without a secondary credential)?
- Do the required definitions of “attending school” and “not attending school” limit access to WIOA services for out-of-school youth who are in high-risk categories but may be enrolled in an education service or intervention that the state considers to be a “school?”
- Does the required definition of “basic skills deficient” utilize criteria that encourage services to youth who have low basic skills, lack a secondary credential, and/or are limited English Skills proficient?

Resources: [\*Youth Governance: Strengthening and Maintaining Youth Committees to Improve Services for Youth\*](#)

[\*Eligibility Determination for Out-of-School Youth: Making it Easier for Out-Of-School Youth to Access Services\*](#)

## 10) Title II Alignment and Capacity Building

- Does the draft state plan address title II alignment and capacity building?
- Does the draft state plan address the alignment of multiple title II providers with the local and/or regional workforce board structure?
- Does the draft state plan build the capacity of title II providers to serve on local workforce boards?
- Does the draft state plan build the capacity of title II providers to implement content standards?
- Does the draft state plan build the capacity of title II providers to use Integrated Education and Training models?

Resource: [\*WIOA Title II Adult Education & Family Literacy\*](#)

## 11) Temporary Assistance for Needy Families

- Has the Governor opted out of making TANF a mandatory partner?
- If this is a combined plan including TANF, will TANF workforce services be provided through the one-stop or in another way?
- How does the draft state plan say that one-stop clients will be provided access to TANF and other human services?
- How will connections be made with TANF partners at one-stops to ensure policy and programmatic alignment for the young adult population under age 25, who may receive a different set of services if they are not served through Title I – Youth?

Resource: [\*WIOA-Human Services Collaborations\*](#)

## 12) Performance Management Provisions

- Does the section with proposed performance targets for accountability include a discussion of the participant characteristics of who will be served? States may have greater success in negotiating adjusted targets if their state plan outlines, in advance, specific initiatives to increase the number of high-need adults and youth who receive services, in recognition of the possibility that participants in these groups take longer on average to achieve performance goals.

Resource: [\*WIOA Performance Negotiations\*](#)

Please send suggested additional questions to [acielski@clasp.org](mailto:acielski@clasp.org).