



**MASSACHUSETTS
WORKFORCE BOARD
ASSOCIATION**

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September 12, 2012

Joanne Goldstein
Secretary
Executive Office of Labor and Workforce Development
One Ashburton Place, 21st Floor
Boston, MA 02108

RE: Massachusetts State Integrated Workforce Plan Program Years 2012 – 2016

Dear Secretary Goldstein:

We are writing to provide comments on the draft Massachusetts State Integrated Workforce Plan Program Years 2012 – 2016. Our responses were reviewed by the workforce board directors and approved by the Association Executive Committee.

We appreciated the meeting in August between members of our Executive Committee and your leadership team to demonstrate our support for increasing skills training, clarifying the training threshold policy and to discuss implementing regional planning for FY 2014. We were pleased that we agreed upon a process to plan the launch of the regional planning initiative.

We applaud the leadership of Governor Patrick, your department and the Executive Offices of Education and Housing and Economic Development at this critical time. The plan to better coordinate and integrate administration efforts concentrated on putting Massachusetts' residents back to work with the skills needed for the 21st century economy, is critical.

We believe that the draft State Plan provides a comprehensive blueprint to address the ongoing challenges of both high unemployment and the skills mismatch. We agree with the overarching strategic goals the plan outlined. We provided comments as part of the 21st Century Workforce Initiative at the August 17, 2011 hearing and submitted written comments in December 2011.

We would request that additional recommendations previously made by the Association be included in the final Massachusetts State Integrated Workforce Plan Program Years 2012 – 2016. Specifically we suggest:

- **Aligning Education, Economic & Workforce Systems**

1. *First, the majority of WIBs have achieved certification as high performing workforce boards. Lessons from this process should be replicated by state agencies and incorporated into a more strategic workforce system design. Local WIBs should be provided the resources, support and authority to manage the complex local workforce system in their regions and be held accountable for data driven outcomes.*
2. *We agree with your strategy to foster innovation and greater regional collaboration at the local level. We understand that various strategies for state and/or local consolidation are under consideration and alluded to in the State Plan. All decisions at both the state and local levels should be data driven. The proposed Regional Planning Process through “super regions” should be led by the local WIBs which currently convene all the relevant stakeholders. The support of the State agencies is essential to foster effective regional planning and analysis of the regional labor market, employer and jobseeker needs, service delivery costs, alternative governance models and benefits/drawbacks of any new models and should be a goal articulated in the State Plan. The goal would be to develop and empower local decision making and control at the point of the delivery of services including identifying the core functions of the state and local organizations responsible for workforce development, education and economic development.*
3. *The Plan makes scant mention of the Department of Transitional Assistance (DTA) and education and training services to DTA customers. As we have previously recommended, DTA resources for training TANF recipients should be managed by EOLWD through the local workforce system. The Administration and the Legislature have decimated funding under the Employment Service Program from \$27.7 million in FY 2009 to \$7.9 million in FY 2013. This cut of more than 70% speaks volumes to the management problems of the program, not the needs of the more than 50,000 TANF recipients. Despite repeated discussions there has been no movement on this, nor any mention of the special needs of the TANF population in the State Plan. We believe this program needs to be targeted to both subsidized employment and direct job placement through One-Stop Career Centers.*
4. *The Adult Basic Education system should be aligned and part of the overall workforce development system with regional funding allocations integrated with WIA Title I and other education and workforce funding. This past year, the Department of Secondary Education (DESE) discontinued funding to One-Stop Career Centers. Rather than reduce collaborative efforts, DESE should look to local WIBs to make funding decisions and manage resources that integrate ABE strategies with those of the workforce system along the Career Pathways model currently being operationalized for 12% of the local allocations.*
5. *The youth employment, education and training system is spread across several secretariats. We think that strategies for youth employment, STEM and in school internships (connecting activities), dropout prevention and recovery, anti-violence initiatives and career pathways should be unified under the EOLWD.*

- **Increase Job Placement Results**

1. *We strongly agree. This was the focus of the collaborative proposal WIBs and One-Stops made to USDOL. We have consistently proposed that Division of Career Services allocate resources to “test” new employer focused approaches in one-stops. Guidelines and evaluation criterion should be developed and the While the State Plan shares this goal, we think that there needs to be a concrete action plan to redesign the BSR staffing model and job seeker services beginning with piloting these efforts in FY 2013 and beyond.*
 2. *We believe that it is essential that regions have timely wage record matching data and real time labor market information. For time immemorial we have requested that this information be provided. While the State Plan references what regions now receive (and don't) in terms of this data, there must be a commitment to implement regular reporting of this wage record and LMI data to regions in order to facilitate and track job placements.*
- **Do More with Less**
1. *The regional workforce system knows firsthand the dramatic reductions in funding over the past decade. We need to both more efficiently target the use of the resources we currently have, continue to demonstrate the need for support both from Federal and State sources, and allocate resources equitably based upon regional needs and performance.*
 2. *There are multiple administrative models in the 16 regions to manage state and federal funding. Regions where the WIB manages the fiscal resources, administrative costs have been reduced and increased resources have been made available for direct services (Specifically, where the WIB is also the Title I administrative entity, as in Hampden, Metro North, New Bedford, Brockton, and in effect in North Shore, more has been done with less). Other regions have continued to implement various models to reduce costs. Developing a more consistent and streamlined administrative and workforce development organizational structure under the leadership of high-performing WIBs should be included in the State Plan.*
 3. *We concur with the State direction of reviewing infrastructure costs at One-Stop Career Centers. We believe that the State Plan should outline a process of one-stop certification as the second phase in the system improvement strategy to be led by high performing WIBs. Each WIB should be required to do a complete audit of its one-stop activities including customer flow, populations served, types of service most successful, locations of centers in relation to customers, jobs and regional transportation networks, evaluation of currently models of service delivery and resource allocations between labor exchange and training, review infrastructure costs and alternative models of service delivery (mobile one-stop, use of libraries or other sites, etc.).*
 4. *We believe that the State agencies should do a comparable analysis of agency program and staffing levels and provide a transparent report on how resources are being allocated and managed. We believe that the State is not operating at maximum*

effectiveness and that there is a dilution of efforts with workforce development resources spread over multiple secretariats. State level consolidation should occur prior to any local level consolidation with cost savings allocated to regions for more direct services. The State Plan provides performance measurement goals for the local workforce system; we believe that the State Plan should include comparable performance indicators for State agencies.

▪ **Increase Job Seeker Credentialing to Meet Job Demand**

1. *This is a priority we have consistently advocated for with targeted resources for sector strategies through the Workforce Training Fund Trust and Workforce Competitiveness Fund; and we have supported the alignment of the community college system with workforce development and governance and operational changes to transform the mismatch between the needs of employers and workers at the community colleges. We believe that it is imperative that program evaluations be completed for all workforce and education programs, in particular the Workforce Training Fund, which has not had a systematic evaluation since its inception more than a decade ago.*
2. *We need to maximize the use of both WIA and non-WIA resources for skills training and not rely solely on WIA funds to support training. The State Plan should outline all additional resources (across secretariats) that are or will be made available to increase the number of individuals receiving training.*

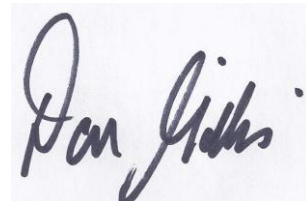
In conclusion, we believe that the Massachusetts State Integrated Workforce Plan Program Years 2012 – 2016 is comprehensive and forward thinking on the one hand; however the State Plan suggests an over-reliance on the central decision making of State agencies and organizations. We fundamentally believe that the success of the efforts to better integrate workforce, education and economic development strategies will be best accomplished by State agencies setting goals for regional partnerships to formulate and implement with adequate resources and accountability.

We look forward to working with you and our State partners in implementing this bold plan.

Cordially,



Stanley J. Usovicz
Chair



Donald A. Gillis
Executive Director

Massachusetts State Workforce Plan
2012 – 2016
Statewide Conference Call
September 11, 2012

Representation from 14/16 local workforce regions
State staff: Jennifer James-Price, Marilyn Boyle, Diane Hurley

Jenn James provided a brief overview of the five-year State Workforce Plan, 2012-16, explaining the new format, streamlined by DOL and the information represented within each of the sections.

Three major elements of the MA State Plan reflected discussions and input from workforce partners and the Governor's strategic goals:

- Focus on increasing job placement rates
- Do more with less
- Increase access to skills and education for today's job market

The conversation was opened up for the field representatives to provide their thoughts on the document.

Comment: It appears clear that the state's intention is integration across "super-regions" and across Secretariats. The commenter requested more specificity regarding what the Secretariats are doing to facilitate this process. There is a proving ground within the current WIB system to begin the regional collaboration; attempting the work across Secretariats will be a difficult order.

Response: These are good points. The process itself will be built with input from the public system as well as input from other Secretariats. The proposed structuring during the FY14 regional planning process will not eliminate the 16 regions, rather, planning will be done jointly with other Secretariats (skill development, service delivery, job development) and with other regional partners. There is no detailed description in the Plan because there have been no decisions made regarding super structures or what the super regions will be or the specific planning requirements. The MWIB will take a lead role in convening a committee over the next 12 months to conduct an open dialogue on process and requirements. We will review the Plan to see if more can be added around what the other Secretariats are doing. There is a definite interest in planning within a bigger regional structure. Ideas are welcome as we pull the committee together.

Comment:

- I have a copy of the regional profile with boundaries for economic development; I cannot locate the higher education boundaries.
 - Response: This information will be available as part of the dialogue.

Comment:

- What does super-region vs. leaving intact the 16 regions mean?
 - Response: Several boards are already working with regional economic development organizations; we could marry the new work to what we've already been doing, that way we would all be working on the same set of questions, discussing strategic issues

Right now, the goal is to create a public process through the MWIB committee to determine the best ways to gain input from everyone in the system. It will take time to include the everyday work.

Comment:

- The MWPA is crafting a commentary letter regarding the draft State Plan. Page 16 refers to self-services in the resource rooms. This paints and inaccurate picture; staff interacts with the customers in the resource room; it is not totally self-service.
- Please reexamine the terminology: “one-time orientations.” This sounds shallow, and is not accurate across the board.
- “Job coaching until placement” loses context of core/intensive services. There is not enough staff; not every customer receives intensive services only.
- Youth should be more prominent up front in the plan. A lot of work is being done around youth employment; look at where we can bring more of that out.
 - Response: The Governor’s focus is on youth violence and public safety. We will describe more of that work. Also, locals have received state contracts for youth services.
- There should be more robust discussion re: LMI tools, program development, career counseling, modernization...
 - Response: We will include more.

Comment:

- Page 17, Job Seeker and Employer Services: the language sounds top-down re: redesigning the job of the BSRs, etc. As we move forward, we need to work together to institute this concept.
 - Response: we are happy to do that. This section is purposefully light on detail – we haven’t begun. Not having a 100% agreed-upon way, we want to leave the detail for later.

Comment:

- The proposed performance goals for EE and WP are very high. We are all for striving but these seem impossible.
 - Response: These are only proposed goals to DOL. DOL is utilizing a rigorous regression model against our WIASRD report - % of goal vs. actual performance. It is very clear from ETA feedback to performance staff that they are looking for “reach” goals and for us to step up our game. Once the proposed goals are accepted by DOL, you can request an adjustment. This is a starting point. One of our main efforts stated in the Plan is to increase placement rates. This is reflective of our intent to focus on job placement.
 - Response: We are looking at existing wage record analysis and whether people should be in the denominator. If you have specific comments, issues – please provide commentary.

Comment:

- Our Innovation Grant changed how we do business with DOE; the state should consider something akin...kids staying in school and graduating. We provide services to dropouts...are we working at cross-purposes?
 - Response: If you send our model to me, I’ll think about ways to incorporate into the Governor’s Youth Readiness Cabinet; we’ll incorporate into the plan if possible, as well.

- We are gearing toward middle skills, are we creating the impression that kids can get by without a high school education?
 - Response: Regions play a different role in the K – 12 system; we’ll think about it again within the context of the State Plan.

Comment:

- The section on branding seems wish-washy; this initiative seems to be a step backward (One-Stop Career Center vs. American Job Center) – it sounds like labor exchange.
 - Response: This is an initiative of the President and ETA – a uniform branding tag line for every career center in the country. It is voluntary, but clearly intended to eventually be mandatory. We have said that we will incorporate “as possible,” and we are figuring out what we have to do in the context of the TEGL while we evaluate the seriousness of the impact.

Comment:

- We like the focus on credentialing, but have concerns about the training “floor.” You discuss the potentially of raising it above the 30% over time...will local boards have some influence over that? If we do increase over the next several years, will we have the flexibility to do more group training? We’d appreciate the ability to have input and describe our local experiences with the affect of the training floor.
 - Response: We’ll examine the actual impact regarding the changes that occur in services as a result of meeting the floor. We’ll review before changing it again and expand the examination of what is included as training.

Comment:

- We compliment you on the emphasis on coordination at the Secretariat level (economic, workforce and education). We’d love to help you operationalize this. We wish there was a program for state staff to work locally to experience the issues first-hand and visa-versa (local to state). It would help people to think out of the box and see how the other person lives.
 - There is a political and operational will to look at joint planning in a real way.

Comment:

- The Plan talks about increasing the placement rate from 55 to 60% for the universe of customers. Is it understood that there is a relationship between the ability to increase placement rates and the training floor?
 - Response: We understand that we cannot do everything for everyone; we’ll need to examine customer services with the knowledge that credentialing leads to higher placement rates. Is the work history/skill set out of line with labor market demands; better tools; examine how to connect with a credential even if it is not our fund stream that pays for it. The point is well-taken – the training floor affects centers’ ability to provide fact to face customer service. Community colleges have been provided new funding opportunities...how to imbed.



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September 12, 2012

Secretary Joanne F. Goldstein
Executive Office of Labor and Workforce Development
One Ashburton Place
Boston, MA 02108

Dear Secretary Goldstein,

Thank you for the opportunity to provide input and comments on the Commonwealth's Five Year WIA Plan.

We applaud the Governor's plan to realign and coordinate workforce, education and economic development. The unprecedented coordination efforts at the highest levels of the Administration will provide advocacy and support and will strengthen local efforts and initiatives to provide services to our customers in all aspects of workforce development. We look forward to participating at all levels, to turn this vision into a working plan. Given the short timeframe in which to offer comments before the plan is submitted, we are limiting ours to a few general concepts in the plan.

The Massachusetts Workforce Professionals Association (MWPA) members consist of the WIA Fiscal Agents and the Career Center Directors. These members are integral to the workforce system. Many report to the Chief Elected Officials for WIA regions, and it is imperative that they be part of the planning and implementation of this plan. We request that members of the MWPA be part of the regional Pathways planning committees and the FY 14 regional planning process. What may appear to be reasonable groupings of geographic areas may not be effective because of local development plans and partnerships, transportation availability, etc. The local leaders in workforce development understand the needs of the residents and businesses located in their areas and will make significant contribution to this effort.

The 34 Massachusetts One Stop Career Centers are the cornerstone of the system as noted in the plan, and as such are the local points of access to workforce development services for job seekers and businesses. In FY' 12, the Career Centers enrolled 196,000 job seekers, providing a wide variety of individualized assistance, referral to training, workshops, counseling, and one on one services. The Career Centers also provided

13,000 employers with services ranging from labor exchange to business development and support. Career Centers work together with their Workforce Investment Boards to develop and enhance relationships with local communities, training and educational providers, economic development agencies, business groups, and transportation providers. They know and understand the needs of their customers and the resources in their areas.

The use of technology and on-line services is beneficial to some customers, but others still need and want personal interactive contacts and assistance. Customers who have lost their jobs are at a vulnerable point in their lives and cannot organize an effective training or work search plan without understanding the available services or how to access them. People come to the Career Centers for support and motivation as well as job search assistance. It is wrong to assume that a customer who possesses middle skills or technological savvy does not need the personal attention which Career Centers provide. Technology provides additional tools to aid in job search efforts, but is not a substitute for the excellent customer services which are a hallmark of the Career Centers. What resources will be made available to help support the development and implementation of increased technology tools?

The call for coordination of efforts and initiatives in local areas has strong merit. However the formation of “Super Regions” is fraught with difficulty. Labor markets, populations and the needs of businesses and job seekers should be the drivers of coordination, rather than a re-drawing of regional boundaries. Significant value is added by the formation of industry clusters which cross regional boundaries. Deeper expertise is developed and enhanced through cross training, and sharing of best practices and resources. WIA regions, businesses and job seekers will gain far more benefit from need-driven coordination, rather than from a geographical, artificial construct.

The theme of increased performance outcomes in WIA services also merits additional discussion and planning at the state and local levels. Redesigning services within the Career Centers, whether it involves who the targeted customer is, what service is being delivered, or in what method, will necessitate looking at the expected performance outcomes. However, without consistency across the local regions, it is difficult to measure successes. To that end, the implementation of the DOR Wage Match state-wide is extremely critical to quality workforce development services and accurate feedback. This essential matrix and tool will capture the outcomes we aim for with the job seeker and employer customers, and provide the system with accurate measures of the efficacy of the programs and services being delivered. We appreciate the opportunity we’ve had to participate in the field based workgroup on performance management and look forward to having ongoing active MWPA representation in this effort.

The branding initiative refers to the theme of consistency, but it is unclear what that branding would look like and how it will support the system. The “job center” phrasing implies a labor exchange focus rather than a comprehensive approach to career services, and has no connection to Career Centers. It fosters separateness, rather than coordination. It is unclear how this branding effort will support not only the Career

Centers but the overall workforce system, and seems counterproductive to local marketing and coordination initiatives. Development of a Career Center website which links all of the centers and other resources would be far more beneficial to coordination and collaboration in the system. MWPA members must be included in any planning and strategy discussion involving branding.

The plan states that the Career Centers with 'high infrastructure' costs will be addressed. We respectfully do not understand why the State would single out the Career Centers to review their infrastructure costs, as it presumes some control over funds that are the responsibility of the local Workforce Investment Boards and Chief Elected Officials (CEOs) who follow Section 30-B (procurement) procedures. It is the purview of the local Workforce Investment Boards and the Chief Elected Officials to determine how their WIA allocations and other funding are used to support Career Centers and the services provided in their regions, and they have the full responsibility and liability for those funds. The State has removed itself from holding leases for Career Centers, and determined that the locals must cover the infrastructure and support costs for their Career Centers from local budgets. Why then are these costs being questioned at all? What is the measure for 'high infrastructure' costs? What costs are included? Why are Career Centers the only entities mentioned in this section? How are local costs of living including property rental rates taken into consideration? How will the State 'address' Career Centers which they determine to have high costs? Other workforce development partners have infrastructure costs as well. Again, MWPA Fiscal Agents, Career Center Directors, local WIBS and CEOs are critical to this issue and must be included in any further discussion on the matter.

Thank you in advance for your consideration of our comments. The workforce development partnership in Massachusetts is strong and effective and the MWPA Fiscal Agents and Career Center Directors are proud of their contributions to the many successes which have resulted in the system, and look forward to many more.

Sincerely,

Louise J. Meyer, MWPA Manager
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Cc MWPA Members
Don Gillis, WIB Association

Greater Lowell Feedback/Comments - State Plan

The following are ideas/comments on the Commonwealth's DRAFT State Plan. Thank you for taking the time yesterday during our conference call to provide us the opportunity to bring forth questions and issues.

- Section 1: Analysis of the State Workforce System – should include more emphasis on manufacturing sector and increase manufacturing job growth-ways to increase manufacturing job growth and what we are doing to accomplish this in Massachusetts.
- Pathways Committee – pages 12 and 13 – WIBs should take a leadership role in this initiative including identification of “super regions”
- Pages 14 and 15 – “process will align the 16 Workforce Investment areas under “super regions”....” and “Workforce Investment Areas will maintain their reporting under the 16 regions”. What are the implications? Does this mean change without or prior to, WIA reauthorization?
- P 17 – Redesign BSR staffing model and redesign of Job seeker services –Create sector experts. This is a progressive idea that should be implemented through a pilot project the MWIB Association has advocated for in the past with no response from the Commonwealth.
- P 17- The plan mentions a specific population to be served face to face at One Stop Centers while others with higher ed levels s/b directed to on line services. This statement does not reflect universal access to centers. Not stating we are opposed to this, however how will the locals improve entered employment rate while working one on one with only the HARDEST to serve? It could impact performance outcomes.
- P 18 – Short and Long-term changes in 16 Workforce Investment Area Structure –remains unknown. Definition of super regions. How will it be coordinated with Econ Dev and Higher Ed. The current map is based on geography. Will the future structure of WIA areas take into account population, economy and demographics?.
- P 18 – Address OSCC with Highest Infrastructure Costs. Address how? Does the state plan on mandating total costs associated with One Stops? What will be the comparison for the analysis of costs?

Other:

- DOR Wage Match data- it is difficult to go forward without some type of agreement and time line. This will allow the locals to produce a correct analysis of entered employments. The outcomes will never be accurate without Wage Match data.
- LMI – need for current/real-time LMI data. We agree with this section and encourage the Commonwealth to pursue all avenues.
- One-Stop Line Item-The state needs to review this line item for equitable allocations. The Commonwealth, WSG, MWIB, MWPA must ALL actively engage the legislature to increase this line item to the level required for doing business. We should try to bring all areas up to a level that will increase business partnerships and participation.
- 30% threshold-the Commonwealth's plan states the 30% threshold may be adjusted after review of performance levels and funding levels. This should be done with local WIB input.
- During the conference call on Tuesday, 9.11, it was stated the local regional plans for FY 14 will not only be for WIB's, but for our education (including Voke Tech), economic development and DTA partners. We feel this is a good step towards collaboration and engaging partners. This step could also break the funding and regulatory barriers that have been an issue within the workforce development system.