

**To:** Karin Norington-Reaves, CEO, Chicago Cook Workforce Partnership  
**From:** Nancy Phillips, co-chair, Employment Task Force of the Chicago Continuum of Care  
Ellen Ray, co-chair, Employment Task Force of the Chicago Continuum of Care  
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**Re:** Recommendations for implementation of the Workforce Innovation & Opportunity Act

June 17, 2016

The Employment Task Force (Task Force) of the Chicago Continuum of Care (Continuum) is tasked with increasing the numbers of individuals that exit the homeless services system with employment income. A main area of focus is improving the connections between housing-related services and workforce services. Because the new Workforce Innovation & Opportunity Act (WIOA) requires that priority be given to “public benefits recipients, other low-income individuals, and individuals who are basic skills deficient” when providing career and training services, Task Force members believe that we have a crucial opportunity to improve how the local WIOA system serves job seekers who have major barriers to employment.

We acknowledge that the state and local areas have always stated that individuals with barriers to employment have a priority for services; we know that the local service delivery system has affiliate agencies that specialize in serving individuals with barriers; and we know that WIOA performance measures (over which the state and local areas have no or very little control) are often a disincentive to providing services to individuals with barriers to employment. We believe that the following recommendations build from that context and encourage the Chicago Cook Workforce Partnership (Partnership) to take steps to improve and expand services to job seekers experiencing homelessness and housing instability. The spirit of WIOA is clear, with respect to prioritizing services to job seekers with barriers. Supporting the spirit of the law, Christine Quinn, U.S. Department of Labor/Employment and Training Administration (DOLETA) Regional Administrator, encouraged the Chicago Cook Workforce Innovation Board to think flexibly about how WIOA is implemented to serve those with barriers, despite the delay in final federal policy.

Although not all policy guidance is final, we think there is no reason to wait and that we owe jobseekers the earliest possible improvements to the systems serving them. There are three areas that we are asking you to consider:

- Process for setting local priority of service
- Investment in services and strategies appropriate for homeless job seekers
- Data collection, analysis, and performance measure strategies

## 1. Process for setting local priority of service

There are two components in the local planning guidance that are relevant to this area—first, a description of how the local board will determine priority populations and how best to prioritize services; and second, a description of how local plan modifications will be made in the future.

There is clear direction under WIOA to prioritize job seekers with barriers to employment and the law provides an opportunity for our local area to focus on service priorities in a meaningful way, allowing local boards to establish a process that gives priority to additional populations (§ 680.600). Given this, the Task Force recommends that the Partnership conduct a public process to inform local priorities of service. We recognize that this is a big departure from current practice, but given that the regional labor market is stronger and job seekers with fewer barriers are accessing jobs more quickly, and limited WIOA resources cannot serve all job seekers with barriers, this is an opportunity to focus on service priorities in a meaningful way. And there are many stakeholders who can contribute to a thoughtful process and enhance the decision-making process of the Partnership and its Workforce Innovation Board (WIB).

The Task Force recommends that the Partnership take steps in the first half of program year 2016 to conduct an inclusive stakeholder engagement process to collect meaningful input on priority populations and service strategies, build some consensus, and determine which priority of service strategies are actionable and how to implement them. Given that this is a large undertaking, the Task Force is willing to work with the Partnership to make it a truly inclusive and effective process and possibly find resources to support it. This requires the Partnership to both be fully committed to the process and to follow through on results. Task Force members have familiarity with the Technology of Participation (TOP) process that can be successfully used with large groups and is designed to build and gain consensus. At a minimum, we envision providing a broad set of stakeholders the opportunity to give input and then designate a smaller group of stakeholders (for example, members of WIB committees, the Task Force, and members of Suburban Cook Continuum of Care) to help the Partnership determine consensus.

After the stakeholder engagement process, meaningful next steps would include the following from the Partnership:

- Report results to the WIB and the Department of Commerce (DOC);
- Determine the implications for the current service delivery structure and what can and cannot be changed;
- Commit to implementation; and
- Modify the local plan in accordance with the changes. If the formation of a new WIB committee is a recommended next step, we advise that it have the power to make decisions that are actionable by the Partnership. We also recommend that the description of the extent of the committee's authority be included in any modification of the local plan.

In the new local plan, the Partnership can commit to revising the priority of service with a public process and has the ability to revisit the plan within the first year, if modifications are necessary. The Partnership can then collect public comments to plan modifications that they make, as detailed in the plan modification procedure.

The Task Force is also recommending that an individual with experience serving homeless youth be a member of the Youth Council.

## **2. Investment in services and strategies appropriate for homeless job seekers**

The Task Force recognizes that some adult and youth job seekers experiencing homelessness are served by the WIOA system at delegate agencies that specialize in serving that population. Given WIOA's emphasis on job seekers with barriers to employment, there is an opportunity to improve the WIOA system's ability to serve those individuals, especially because fewer than 20% currently leave the homeless services system with increased income due to employment earnings. The Task Force offers the following three recommendations to improve services for individuals experiencing homelessness:

### *Pilot an 'Employment Navigator' model*

The Task Force has had an opportunity to learn about a model in Seattle that uses an 'employment navigator' to increase access to employment and training services for individuals experiencing homelessness. Since 2010, Seattle/King County has contracted with provider organizations to serve as employment 'navigators' for adults and youth engaged in the homeless/housing services system. The 'navigator' works with homeless services providers to link referred individuals with employment and training services at three community-based organizations. The 'navigator' has the following responsibilities:

- Provides engagement, assessment, and employment navigation services, which are mobile and operate out of local One Stop sites;
- Serves as a resource within the WIOA system to link homeless households with needed assistance/services; and
- Co-enrolls and supports families in mainstream workforce services (i.e. WIOA, SNAP E&T) and captures data in HMIS and workforce data systems.

In order to pilot this model, we recommend that the Partnership:

- Partner with the Employment Task Force to design an 'employment navigator' pilot program that will leverage the strengths of the WIOA delegate agency system and commitment of the local Continuum of Care/homeless services system.
- Set aside local WIOA formula funds for a project and work with the Task Force to seek additional or matching funds.

### *Invest WIOA funds in Transitional Jobs (TJ) for job seekers experiencing homelessness*

WIOA prioritizes expanding work-based learning opportunities, including transitional jobs (TJ). Under WIOA law (§ 680.840), local boards are permitted to allocate up to 10 percent of combined Adult and Dislocated Worker formula funds for TJ programs. Under federal and state policy, TJ programs can count toward the requirement that 40 percent of local funding be spent on training. The Task Force has identified TJ as a best practice for helping homeless job seekers successfully reconnect to the labor market and has identified local provider experience and expertise, including some current WIOA delegates. Several workforce providers in Chicago have long-time experience and expertise providing TJ programs to job seekers with barriers to employment, including homelessness. New WIOA policy and guidance combined with a wealth of local expertise in the TJ model is an opportunity to improve WIOA services for job seekers experiencing homelessness with a proven model.

The Task Force recommends that the Partnership design an approach to funding TJ programs targeted to job seekers experiencing homelessness that also focus on improving basic skills and/or preparing for industry-specific skills. Designing and funding a skills component with a TJ program will ensure that participants are prepared for unsubsidized employment and skills gains. We recommend using the TJ program designed by the Three Rivers Workforce Investment Board, as an example of using WIOA funds for TJ programs (this is attached). A first step towards implementing this recommendation would be to convene local TJ providers to learn the current TJ landscape and how WIOA investments to support TJ programs can be maximized. The Task Force is currently conducting an asset mapping project that includes identifying existing TJ program to share with the Partnership.

#### *Additional Services that Address Barriers for Homeless Job Seekers*

The Task Force has identified three additional services that homeless job seekers, as well as the providers that serve them, need in order to be successful in employment. We ask the Partnership to take a role in improving the following services:

- Digital access and digital literacy services: There are a number of initiatives in the City and County that are intended to improve digital literacy amongst residents and reduce the digital divide. Given that the Partnership is very involved in some of these initiatives, the Task Force would like to explore how these could be leveraged to reach homeless job seekers that receive services through Continuum of Care providers. In particular: expand/replicate the Partnership/Chicago Housing Authority (CHA) digital skills training initiative for CHA residents to the Continuum providers, in order to increase digital literacy of homeless job seekers; fund basic digital skills training (Chicago Public Libraries' cyber navigators) for job seekers at Continuum providers—designating one or two WIOA delegates to provide the training with special funding; and work with the Partnership's employer partners to identify basic digital competencies by occupation and industry (using the targeted occupations list).
- Financial capability: Basic financial capability and asset building skills are necessary for employment retention and many of these basic skills are lacking for job seekers experiencing homelessness. The Task Force has identified many financial capability

curriculums in use across workforce providers, but the capacity of providers to implement them differs greatly. The Task Force recommends that the Partnership identify the existing curricula in use by its delegates (and any other best practices) and support building additional capacity (through funding and training) to deliver financial literacy training. In particular, the Partnership can partner with local experts on training frontline providers on how to utilize strengths-based, trauma-informed financial conversations with job seekers, and also how to educate employer partners on the cost (to them) of financial instability and their role in supporting employee financial literacy and asset building practices.

- **Employment Rights:** Most employees are not aware of basic workplace rights and economically vulnerable job seekers (including the homeless) are often at risk for abuse by unscrupulous employers and other predatory entities (pay day lending). The Task Force recommends that the Partnership support the training and implementation of “Workers’ Rights for Workforce Development” (<http://cjc.net/frontline-focus/tools-for-frontline-staff/>) across its delegate agencies. In addition to important information to prevent abuse, the curriculum helps to build job seeker skills, including negotiation and conflict resolution that improves retention and success in the workplace.

### **3. Data collection, analysis, and performance measure strategies**

We recognize that rules and guidance regarding performance measures have not yet been finalized by DOLETA and the DOC.

By codifying the new Statistical Adjustment Model under WIOA, Congress and DOLETA recognize that success for job seekers with significant barriers to mainstream employment, as well as success for any job seeker in a weak labor market, should be defined differently from the universal placement, retention and earnings gains under WIA.

From the experience of Task Force members, we offer the following to describe what employment success looks like for homeless job seekers and job seekers who are being served by providers in the Continuum of Care system:

- Multiple attempts at jobs or job training supports before attachment, understanding that job seeker resilience and persistence improve their long-term success
- Increased flexibility on length of service or gaps in services, so that we can re-engage participants who have stabilized their housing
- Tracking other evidence of persistence in job seeking process
- Part-time and contract employment which should be included in a definition of employment and identifying additional ways to recognize and reward agencies for provision of meaningful work

To the extent that the Partnership can increase flexibility and can exercise its discretion on performance—whether through monitoring, delegate agency selection or negotiation on

performance measures—we encourage the consideration of this information. The Task Force can assist in the development and collection of additional information.

Next, we recommend taking steps toward a better connection to the Continuum of Care’s HMIS data system managed by All Chicago. Currently the data systems do not “talk to each other,” but the work of the Task Force has already informed improvements to how each system tracks relevant information about housing and employment service data for individuals receiving services in each system. An important first step is to institute regular processes to:

- Share existing relevant information: Given that the Task Force has representatives from both All Chicago/Continuum and the Partnership, over the next year, schedule quarterly reports from each about relevant information (e.g. aggregate data on the WIOA systems’ service of homeless job seekers and their outcomes; data collection methods/options and data limitations; basic data that would be helpful to refer clients between the two systems). Ensure the quarterly report presentations from the WIOA and the Continuum systems are available to a broader audience—through the Partnership’s delegate agency meetings, All Chicago’s The Learning Center, CJC stakeholder meetings, etc.
- Determine the next steps needed to establish a data agreement between the two systems that:
  - Allow data sharing to answer critical questions related to homeless job seekers including: How many job seekers experiencing homelessness or unstable housing does WIOA serve? Which agencies serve them? What types of services do they receive? What outcomes do they experience? How many referrals are made to WIOA services from Continuum of Care providers?
  - We recognize that each system may not collect the data needed to fully answer these questions, and that consent/data privacy issues prevent sharing of certain information. The Task Force recommends that the Partnership and All Chicago/Continuum identify the barriers, limitations, options, and plans to be able to answer the questions. This joint project would also inform both the WIOA and Continuum systems about what is learned—we would recommend reviewing those updates on a quarterly basis.
  - Ensure that the Career Connect processes, currently being established, could interact with HMIS, when/if there is a more formal link with HMIS.
  - Develop client consent procedures that will allow data matching between the two data systems in order to support analysis.
  - Determine regular times to collect and analyze information across data systems and ensure this data is used to inform local planning on an ongoing basis.
- Make it a priority to collect information related housing status and related barriers in Career Connect/WIOA system, in order to support service delivery-- even if this information is not needed for WIOA eligibility.

Finally, we would like to work with the Partnership to advance WIOA policies and procedures at the state-level, in order to:

- Give local workforce areas the flexibility to capture additional data about housing status and related barriers, in such a way that it can appropriately adjust the performance requirements through the statistical adjustment model.
- Create incentives for WOIA agencies to capture all customer barriers beyond what is needed for eligibility, without requiring agencies to document additional barriers.

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