

Comments Received Regarding the Unified State Plan and Sections Pertaining to Programs Administered by CDLE

Sources: Independent submissions
 Public Hearings
 Meetings with Workforce Region Directors

General comments	
	<p>All in all, the plan addresses all of the issues, though in some places too exhaustively. I personally would be inclined to strive for more brevity. And I'm not sure how the Perkins plan, which is already a given, fits into the scope of the vision for a one stop system.</p> <p>What is the benefit to the state for WIA? How much money will the state receive? How much will go to the local regions?</p>
Comments directed toward specific sections of the plan	
Vision and Goals	<p>Convene a group to look at UI policies and procedures in the field and develop recommendations to address issues such as:</p> <ul style="list-style-type: none"> - Ways to reduce the average duration of benefits - Ways to engage local boards and employers - Identify what can and cannot be done in terms of local flexibility (e.g. putting additional requirements on claimants that aren't overturned on appeal) - How to get claimants into the One-Stops faster - Funding for dedicated worksearch positions in One-Stops - Enhanced services for UI claimants
One-Stop Delivery System	<p>Add the following:</p> <ul style="list-style-type: none"> - Add local decision making as a key principle <ul style="list-style-type: none"> - Include persons with disabilities under "Universality" OR "including those with unique needs" - Locally driven system - Partner systems and their systems - Access, same level of services, access to information on all partner services regardless of where you live - How state agencies will support local service delivery <p>Full integration of Wagner-Peyser with WIA, including allocations. Need to look at all funding streams collectively. Broaden core services to allow the use of both WIA and Wagner-Peyser funds</p> <p>Change discussion of regions to clarify how Colorado is organized.</p> <p>I really don't see the guidelines for the selection of One-Stop Operators by local Boards, nor the process for local boards and CEOs to certify existing one stop operators. Seems to need some further development.</p>

<p>Needs Assessment</p>	<p>Training needs – State will encourage, provide TA, identify best practices</p> <p>Reference state policies & support for coordination of local services, including training, child care, support services, funding</p> <p>Address issue of the working poor</p> <p>Educational and job-training needs - The section seems to ask for a description of educational and job training needs, and the response provides a description of the strengths of our workforce.</p> <p>WIA Title I and Wagner-Peyser Act and/or Veterans Programs - The response does not really address the types and availability of workforce investment activities, other than colleges and universities. So it focuses more on training services than on core and intensive services which might be available.</p> <p>Key trends - I think this section is done very well.</p> <p>Key trends – add aging workforce</p>
<p>State and Local Governance</p>	<p>Boards - Is there anything defined regarding the role of local boards and the relationship between partners? Boards need to do more than rubberstamp – they need a meaningful role. How are boards empowered to influence workforce development. How will the State Council continue to support local boards?</p> <p>How does an existing operator get approval from the Governor to be grandfathered in as the one-stop operator in a region? The plan does not explain the actual process.</p> <p>MOUs - If a One-Stop has a contract with an agency who is a local partner, should not have to have a MOU with that agency</p>
<p>Funding</p>	<p>UI needs to share costs in the field (e.g. worksearch, phones for claimants to call in)</p> <p>TAA/NAFTA – reevaluate admin funds to see if it makes sense to allocate it to the One-Stops instead of keeping it at the state level</p> <p>How will the state’s 25% set aside for Rapid Response be allocated to the One-Stops? Should not have the state provide services in the Front Range and metro area instead of receiving rapid response funds like the rest of the state.</p> <p>Amend “county merit system” to read “county merit-based system”</p> <p>It is indicated that each workforce region is required to ensure that all facilities, programs and services are fully accessible to persons with disabilities. I know that all of our offices are accessible, but what does "fully" mean? We do not, for instance, have electric doors.</p> <p>I have problems with the section that states local WIBs and their Youth Councils will award contracts. This has not been determined yet, and I think it should say “may”. We're not planning on contracting out services and don't want something mandated like that.</p> <p>Not enough funding for adult literacy and basic education.</p>

<p>Activities to be Funded</p>	<p>Concern that the training focus will be on high tech because of the demand in the Denver metro area. Construction workers need training, too, and the construction industry is in all parts of the state.</p> <p>Strengthen language regarding local involvement – “will be involved” instead of “seek input from”</p> <p>Change section on Wagner-Peyser merit system – no legal basis. Counties should be able to attest that they adhere to merit principles, and not be required to have one. Use language from the IGA instead of what USDOL has requested. Amend “local merit staff” to read “local staff”</p> <p>Provide a definition/description of “functional supervision”. Need better coordination with One-Stop when there are disciplinary issues, include the One-Stop director in the follow-thru. One-Stop input in employee evaluations. Include vet staff in the One-Stops organizational structures. Local input in how vet resources are allocated to the regions.</p> <p>Use of WIA 15% discretionary funds need to be discussed. Need to address statewide mandatory activities, statewide optional activities.</p> <p>Have to provide internships and mentors to help entry level IT workers become successful.</p> <p>Need more employer involvement. Employers want something “quick and dirty” that lists what is available and how to access it. What is being communicated to employers? Employers need to know it (hiring entry level workers) will involve some work on their side.</p> <p>Youth -- I have a couple of other comments on the youth. After each breakout of youth, such as 14-18 younger youth, it should state that at least 1 must be attained for both groups of youth. The "and" should be taken out. I looked through the federal definitions and can't find the answer to my next question. Am I to assume that an older youth who enters the military or an apprenticeship is considered employed? It may be hard to track on UI records, but it should be a positive outcome.</p> <p>I'm not sure it's appropriate to mandate Youth Council's have private sector representation on it. That should be a local decision. We plan to have them represented, but our board decided that.</p> <p>Welfare-to-Work – Need to emphasize academic needs to make people competitive for training. Program should provide for straight academic training, not community service. Just spinning your wheels if you don't emphasize academic requirements.</p> <p>WIA Title I and Wagner-Peyser Act and/or Veterans Programs - Not to confront the obvious, but which County (other than Denver) has a merit system? I understand that Colorado is going to be grandfathered in, or considered a demo state, or something with respect to this issue, but would it not be more accurate to say that those counties involved will assure adherence to personnel standards which are in conformity with the merit principles?</p>
<p>Coordination and Non-Duplication</p>	<p>Excited about WIA and pulling people/agencies together, but partnerships that include nonprofits haven't been happening – and some are being disbanded. WIA is an opportunity for a public-private partnership that targets a special population (i.e. older workers). Government shouldn't fund or provide everything. Nonprofits have a lot to bring to the table (e.g. ability to apply for foundation grants).</p>

Special Populations and Other Groups

Need to ensure that welfare recipients and low income people have access to services, and are getting jobs that pay enough to enable them to become self sufficient.

Older Workers - How will WIA funds be funneled down for senior training? Older workers are not as easy to train as youth. How can senior programs interact with WIA? Training/funding to work with older workers. Large gaps, especially for women (not on TANF and are not old enough for senior programs)(e.g. displaced homemakers). Want some of the 15% state discretionary funds earmarked for older workers. Need to focus more on older workers.

Older Workers – Don't forget older workers. (Older worker) service providers want to be part of the WIA system, but need funding. The loss of dedicated JTPA funds for older workers means that service providers will lose a significant percentage of their funding in June. Request that part of the set aside funds be used to fund older worker services. There is concern that older workers will not be protected or have their needs met. Older workers have special needs, and will lose out if they have to compete with younger workers because of age discrimination. Need specialists who can work with older workers. 99% of older workers who are trained get jobs. In La Junta, employers are calling and asking for "mature" workers (45+) because they want dependability and work ethic.

Rural and older workers – People feel that Colorado ends at Pueblo. There aren't a lot of jobs in the rural areas, but there are a lot of older people and they deserve attention. Technology is bypassing them. In Southern Colorado, the traditional jobs have been with the railroad, coal mines, farms, schools or county government. Rural government in Southern Colorado has never had to be involved in human services programs – these programs have always been state or federal – and don't have any experience in running human service programs. Now the state is throwing these programs at the local communities, but the local government doesn't have the expertise or interest in providing these services. People need a lot of training/retraining, but there aren't any jobs so a "work first" approach won't work.

Adult education and literacy – The state plan is missing statistics on people who are undereducated, just stats on the number of college and high school graduates. Need services for family literacy – funds are being cut. There is a growing number of second language learners, but nothing in the plan that addresses their needs. The purpose of WIA is to get people to work together to meet the needs of the community. The ESL program in Las Animas county has been closed due to lack of funding. 34% of the residents in Las Animas do not have a high school diploma (60-65% if you include adults over 65). Does the plan cover everyone in the state who is eligible for services? 85% of GED graduates go to Trinidad State and are working within 3 years. Residents should not be penalized because family and culture are more important than the higher wages they would get in a city. Colorado is the only state in the country that does not fund adult basic education. The work first approach with an emphasis on employment means that you have to emphasize vocational training without addressing basic literacy. People are being set up to fail. Adult education services are getting swamped with referrals from the one-stops, but don't have funding to serve them. One-stops need to provide funding.

Need to get away from categorical programs, and better align existing resources to serve special populations.

Is there any special outreach to people of color? People of color were not represented in the hearing. How are we going to include everyone? What is the outreach?

Performance Accountability	<p>Need to negotiate a lot lower than what baseline data currently shows. Use of JTPA data for WIA baseline is not appropriate. Allow locals to use regression model when negotiating with state. Need to negotiate local measures before negotiating state measures, and basing state measures on the local ones so they won't be too high. Locals need to be involved in negotiation with feds.</p> <p>How will retention be tracked? Concerns about the earnings gain measurement. Most jobs in the area pay minimum wage, and a skilled job may only pay \$8.00 an hour.</p>
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To: Marie Valenzuela

From: Martha Treiber
Employment Specialist
Mesa County Workforce Center

Date: March 17, 2000

THE WORKFORCE INVESTMENT ACT: COMMENTS REGARDING FUNDING FOR ASSISTING OLDER WORKERS

I believe that state discretionary funds should be used to provide assistance for seniors who are seeking employment. Congress wisely set aside JTPA funds specifically for this purpose because their own studies indicated that without special assistance, older workers seeking employment were found to be taking longer to return to work than other age groups. As a JTPA older worker specialist for seven years, I have witnessed that age-related issues do present a barrier to employment. Some of these barriers and possible solutions are discussed below.

Health Issues

The majority of my older worker customers during the last seven years have had health or physical barriers of some type. These include seniors who can no longer meet the stamina or other physical requirements of their previous occupations, seniors who have chronic pain, illness, or physical restrictions but are not considered totally disabled, and seniors with significant and permanent disabilities.

Discretionary funds could be used for a representative of the Division of Vocational Rehabilitation to be located at the Workforce Center, who would provide assistance to seniors with physical problems. This would be similar to the current partnership of TANF, Voc. Rehab., and Welfare to Work. This is justifiable because many of these seniors are receiving public assistance from SSI or SSDI, and thus, the term "Welfare to Work" does describe their situation and would save taxpayer dollars.

Discretionary funds could also be used to assist seniors with health-related supplies and services not funded by other agencies. For example, many JTPA Older Worker participants would not have been able to succeed in learning computer skills or even in obtaining employment if JTPA had not paid for eyeglasses.

Learning and Training Issues

Older workers participating in Core Services and Intensive Services may require special assistance, which could be provided with the use of discretionary funds. Lu Horner and Janice Mirshab have copies of research indicating that seniors who are learning new materials, such as ABE and computer literacy, have a learning style that

requires more personal instruction and a slower pace than younger students. If that assistance is not provided, seniors may be excluded from effectively learning these important basic skills. The State of Colorado Older Worker Network, under the direction of Lu Horner and Janice Mirshab, has developed a program for assisting seniors who need special assistance while participating in core and intensive services. This program has been praised by other states and should be implemented in Colorado.

Job Search Skills Issues

Seniors need special assistance with writing resumes and coaching about handling interview questions. They frequently hear, "YOU ARE OVERQUALIFIED," when they apply for jobs, because they have a lengthy work history and often want less responsible jobs than they have previously held. They often are changing fields because of physical health or general stamina. They sometimes encounter age bias of employers. Because of these barriers, they require special assistance with identifying their transferable skills and writing functional resumes rather than chronological resumes. They also require coaching about answering interview questions to handle employer concerns about older workers. Discretionary funds can be used to provide personal assistance for seniors by a person who is trained in older worker job search issues.

General Assistance for Older Workers

Many seniors have their own age-related issues that create their barriers to employment. They need a trained counselor who can address such attitudes as "No one will hire me at my age," "I can't learn these computers at my age," "I have never done anything besides raise my family; who would hire me," "I was raised not to brag on myself (in interviews or resumes)." They often have a general lack of self-confidence that can best be addressed by having personal contact with an advocate at the Workforce Center. Discretionary funds can provide them with this advocate. Sometimes this can be the factor that helps them obtain employment instead of giving up and accepting OAP funds.

ROCKY MOUNTAIN

JOBS FOR PROGRESS, INC

303.480.9394 FAX: 303.480.9214

March 21, 2000

P.O. Box 11148 Denver, CO 80211

Colorado Workforce Development Council
1580 Logan Street, Suite 410
Denver, CO 80203

Dear Councilmembers:

Rocky Mountain SER/Jobs for Progress, Inc. is writing this letter to comment on the Colorado 5-year Unified Plan for Workforce Development. As the National Farmworker Jobs Program grantee through the U.S. Department of Labor since 1982, Rocky Mountain SER is a required partner in local one-stop systems where we operate the program. The following comments will pertain to service availability to MSFWs (migrant and

seasonal farmworkers) and other low-income individuals through the Workforce Investment Act and the Wagner-Peyser Act. These remarks will deal with the state plan as a whole, as well as local workforce areas with “significant” numbers of MSFWs.

1. In section H.1.a it is stated that “each partner agency is represented on the State Council.” Although formerly represented on the council, currently Rocky Mountain SER does not have a representative.
2. Coordinated delivery of core services to MSFWs is being accomplished in most of the affected Workforce Centers in Colorado due to close cooperation and co-located offices. The only exception is Weld County where these services are not consistently available to MSFWs because this workforce center will only allow
very limited itinerant service provision by Rocky Mountain SER.
3. It seems that various allocation factors have been proposed which have made the distribution of WIA funds vary significantly. Certain allocation formulas have been put forward to clearly benefit urban and suburban counties even though the plan states at D.1.b that “the metropolitan regions typically enjoy a significantly higher economic standard than the rural areas, many of which have remained economically depressed despite the state’s overall prosperity.” CCI has not appeared to be neutral in this situation. We recommend that the state budgeting office determine the best allocation process.
4. WIA’s 10% limit on administration makes it impractical to have 5 workforce areas with separate administrations in the Denver metro area and 8 workforce areas concentrated in the front range within 70 miles of Denver.
5. The state plan varies from the federal legislation in its process to designate workforce area and one-stop operators in that grandfathering appears to be the
most favored option. The Colorado Workforce Investment Act further favors grandfathering by making it the first option. The federal act allows grandfathering only on a case-by-case basis requiring approval by the governor. Grandfathering existing operators protests the current inefficient system and ignores the capabilities of many private non-profit and for-profit entities. These entities can provide more effective services to those most in need at lower administrative and operating costs.
6. The state plan documents the increasing age of Colorado’s population. However, the plan does not contain any provision requiring a proportionate increase in services to older workers. In fact, there are no requirements to service older
workers at all.
7. Sub-regional boards take away from WIA’s requirement to have at least 50% of members from the business community. This creates specific dangers because of their ability to circumvent administrative cost limitations through inter-locking boards whereby pass through funds can contain unlimited administrative costs.
8. CBOs (community-based organizations) and private for profit firms are the only entities required to compete for funds. This is contrary to the intent of WIA which is that all entities, government and non-government, be required to compete and document effectiveness.

9. The plan allows local workforce investment areas to decide if training funds are not limited in order to justify intensive and training services going to individuals who are not public assistance recipients or low-income. Those individuals who are most-in-need typically have the lowest educational attainment levels and least job experience. They require more intense outreach and longer-term services. Since workforce investment areas have been historically underfunded, the state should set the criteria for determining if training funds are not limited.

10. The state plan should clarify that community-based organizations and for-profit entities can serve as one-stop operators and they need not administer Wagner--Peysner funds. Nationally, many CBOs have developed agreements that allow Wagner-Peyser staff to continue as state or county employees with the CBO providing functional supervision.

Rocky Mountain SER appreciates the opportunity to comment on the plan. If you have any questions regarding these comments please contact me.

Sincerely,

Charles Tafoya
Executive Director

To: R. Roy Palmer
Chief of Staff
Office of the Governor

From: Charles Tafoya
Date: March 16, 2000

Subject: Letter from Danniell Sandoval, State Commander
Colorado American GI Forum

Thank you for taking the time to meet with me at the Governor's Mansion on March 16, 2000. I am enclosing a copy of the letter to Governor Bill Owens from Dan Sandoval, State Commander for the American GI Forum from Pueblo. Don is the Board Chairman for Rocky Mountain SER and is a member of the Pueblo Workforce Board. He is also the former Chairman of the Pueblo Republican Party. The copy of the letter that I gave you this morning was inadvertently printed on the wrong stationary (our local Denver Chapter). Dan's correct return address and telephone number is on the new copy. If you would please contact him by phone or e-mail and let him know that we talked. He is very supportive of the Governor and he is a real doer in the community.

Roy, I was able to talk about this with the Governor and he seems very much in favor of open and fair competition and against the idea of the existing operators and providers protecting themselves by preventing competition from even occurring. As we discussed, this will prevent any opportunity for any private for profit or non-profit from

becoming involved and improving services to Colorado employers and job seekers.

I realize that this a tough issue with the current Service Delivery Area (SDA) staff, but it is also an important issue for Colorado taxpayers to insure that these services arc delivered in the most effective and efficient manner. Open and fair competition will allow the local workforce boards to select the best providers of services at the lowest cost as will provide a means for measuring performance and replacing operators who can do a better job at a lower price. As I mentioned, Rocky Mountain SER bids for every dollar that we receive. We live and sometimes don't live through competition. We believe that this has always be the cornerstone of our success.

I am sending you my business card through the mail today. I can be reached as follows: Charles Tafoya, Executive Director, Rocky Mountain SER, PO Box 11148, Denver, Co. 80211. My telephone number is (303) 480-9394 or (800) 748-2074. Fax (303) 480-9214. E-mail Chuck@rmser.org. Please let me know how we can work together to promote open and fair competition.

Thank You.

AMERICAN GI FORUM OF COLORADO
NATIONAL VETERANS FAMILY ORGANIZATION

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March 16, 2000

The Honorable Bill Owens
Governor of Colorado
136 State Capitol
Denver, Colorado 80203-1792

Dear Governor Owens,

The American GI Forum of Colorado appreciates the opportunity to participate in the Roundtable discussion of Latino issues on March 16, 2000 in Denver. Unfortunately due to other commitments, I am unable to attend the meeting in person. I have therefore asked Mr. Charles Tafoya, Executive Director of Rocky Mountain SER to deliver this letter to you and to discuss

our concerns with the implementation of the Workforce Investment Act in Colorado.

Rocky Mountain SER is a non profit community based organization established in 1980 which provides employment and training services and early childhood education to more than 5,000 individuals and their families throughout Colorado each year. This organization is sponsored by two of the oldest and largest organizations in the nation serving Hispanics: the American GI Forum and League of United Latin American Citizens (LULAC). Throughout the past twenty years Rocky Mountain SER has served more than 50,000 individuals and has always been recognized for outstanding performance.

At present, the Board of Directors and sponsoring organizations are extremely concerned by the various administrative and legislative efforts to eliminate the competitive process for selecting One Stop Operators and service providers required by the federal legislation. The Workforce Investment Act is designed to be a performance driven system which offers customer choice and universal access. The staff of the current service delivery areas have requested in their local plans to be "grand fathered" in without competition, regardless of their prior performance and without justification. We ask for you to reject this presumptive scheme at automatic designation and to require competition to insure accountability and performance. These local plans have recently been forwarded to your office for review and approval.

The current service delivery area staff has further attempted to maintain the status quo by introducing amendments to the Colorado Workforce Investment Act which would "grand father" all current operators into the new system without competition regardless of past performance or cost effectiveness.

We respectfully request that you work with the bill's sponsors, Representative Gail Berry and Senator Dave Owens to remove the grand father clause and to require open and fair competition. This competitive process will help to bring about seriously needed reforms, improvements, as well as greater performance and accountability. An open and fair competitive process will also allow private non profit and for profit companies such as Rocky Mountain SER, Goodwill Industries, and Lockheed-Martin to bid to become one stop operators and service providers. The exclusion of these and other entities as one stop operators and service providers will help to perpetuate an ineffective system which fails to engage employers and the private sector from becoming active partners with the public sector in meeting Colorado's diverse education and employment needs.

The State of Texas, under Governor George W. Bush, has created one of the most effective and comprehensive workforce development systems in the nation based upon a competitive process at every level. In Texas the private and public sector work in partnership to achieve mutual workforce development goals. Each member's role and responsibility is based upon a competitive process which insures high quality services now and in the future. We request that you adopt a similar process in Colorado requiring competition at the local level in selecting one stop operators and service providers under the Workforce Investment Act.

If you have any questions or require additional information, please contact me at your convenience.

Sincerely,

Dan Sandoval

State Commander

cc. Francisco Ibarra, National Commander, American GI Forum
Marlene Roys-Flenniken, State LULAC Director
American GI Forum members
Rocky Mountain SER Board of Directors
Charles Tafoya, Executive Director, RMSER