



Career Pathways & Equity Policy Recommendations

In 2021, the International Rescue Committee (IRC) brought together 12 key stakeholders – practitioners, policymakers, and funders – to have a year-long dialogue about increasing equity within career pathway programs. One of the most powerful tools in achieving this goal is policy change. As America’s workforce development system is one where all layers – federal, state, and local – have an impact on programs, services, and outcomes, the team was committed to identifying areas for policy change at every level. The team embraced an expansive definition of policy that included statutory, administrative, and budgetary policy.


Together, this working group identified five specific policy areas that have the potential to increase equitable access to and outcomes in career pathway programs, detailed below. Our nation is currently in the midst of a period of historic investment in workforce development. Incorporating policy strategies that center equity as a part of career pathway work now provides a critical opportunity to strengthen this important work and orient ourselves, our communities, and our nation to a standard of equity.

Policy Recommendation #1: Expand income-based/employment status-based eligibility requirements to ensure that working low-to-moderate income (LMI) populations can participate in career pathway programs alongside unemployed and extremely low-income populations

- ❖ **Federal:** Adjust [Lower Living Standard Index Levels \(LLSIL\)](#) to enable greater access for low-wage workers
- ❖ **State:** Direct local areas to provide a plan for access to career pathway programs and upskilling for individuals that fall below 30% Area Median Income (AMI) but are not eligible for training funds through WIOA Title I specifically due to not meeting LLSIL requirements
- ❖ **Local:** Develop local policy guidance that clearly articulate(s) strategies for enabling customers to participate in career pathway programs even if these are not eligible for WIOA Title I training funds due to LLSIL; this might include proactively making space for alternative methods of skills financing

Policy Recommendation #2: Require greater data collection and disaggregation (e.g. gender, race, ethnicity, immigration status, public benefits status) so that communities, stakeholders, and key decision-makers can better see patterns of access, participation, and outcomes among diverse populations; develop benchmarks and outcome goals that emphasize equity alongside traditional performance goals

- ❖ **Federal:** Increase resources to monitor and support recent policy guidance (Training and Employment Guidance Letter 7-20) requiring that states report additional data on Priority of Service status for customer(s) served and achieve designated benchmarks (75% of those served)
- ❖ **State:** Integrate into RFPs a requirement that the past performance section of proposals includes demographic data, disaggregated where possible and additionally, adjust proposal scoring rubric to show preference to proposals that show disaggregated performance data that significantly benefited key Priority of Service or other target demographic group populations
- ❖ **Local:** Develop a local procurement strategy that makes room for new, smaller, and/or innovative workforce development service provider(s) through strategies such as allowing bidders to serve specific population(s) or regions, building in flexibility as to what constitutes past performance, and providing capacity building to help emerging practitioners understand the basics of WIOA service provision, compliance, and financial management



Policy Recommendation #3: Incentivize state and local creativity within the bounds of federal frameworks; provide technical assistance that encourages reasonable innovation and risk-taking, while mitigating fears that pursuing creative models will leave stakeholders vulnerable to disproportionate consequences regarding performance, compliance, or financial liability

- ❖ **Federal:** Issue new guidance to state and local WDBs that encourages reasonable innovation and risk-taking, while mitigating fears that pursuing creative models will leave stakeholders vulnerable to disproportionate consequences regarding performance, compliance, or financial liability
- ❖ **State:** Use WIOA 15% funds to provide technical assistance to local areas to design and implement innovative career pathway program models
- ❖ **Local:** Develop a local procurement strategy that makes room for new, smaller, and/or innovative workforce development service provider(s) through strategies such as allowing bidders to serve specific population(s) or regions, building in flexibility as to what constitutes past performance, and providing capacity building to help emerging practitioners understand the basics of WIOA service provision, compliance, and financial management

Policy Recommendation #4: Increase flexibility in the use of federal funds for career pathway programs.

- ❖ **Federal:** Introduce a dedicated funding stream for non-training costs in WIOA (modeled after funding streams such as OJT and Customized Training) specifically for case management services
- ❖ **State:** Develop legislation that allocates a portion of state general funds to be used in a flexible, responsive, innovative manner to pilot and scale career pathway programs that advance equity, including identifying specific populations to be served
- ❖ **Local:** Refrain from incorporating additional (non-federal) requirements around use of formula funds, including specific requirements around the percentage of participant costs that must go towards training and/or supportive services specifically

Policy Recommendation #5: Participate in and link to policy conversations in critical adjacent areas including expanding access to affordable childcare, housing, and transportation

- ❖ **Federal:** Consider policy strategies to incentivize (financially, performance-based) priority, expedited co-enrollment among career pathway programs and other key supports such as Head Start, Child Care and Development Block Grant, Section 8, and other resources
- ❖ **State:** Advance increased collaboration between relevant state agencies, including resourcing and staffing of cross-system liaisons that can support alignment and integration of planning, program implementation, budgeting, and policy; require cross-system collaboration when applying for state general fund opportunities
- ❖ **Local:** Formalize the integration of cross-system partners into structured planning efforts through inclusion of staff leadership from these programs on the WDB in dedicated committees and ensuring that these partner(s) are consulted during the development of the regional plan



Career Pathways & Equity Working Group Members 2021

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