January 31, 2017

Mr. William Strahan, Chairperson
Philadelphia County Workforce Development Board
One Comcast Center
Philadelphia, PA 19103

Dear Mr. Strahan,

The Pennsylvania Department of Labor & Industry (Department) has approved the Southeast Region Program Year (PY) 2016 Transitional Regional Plan. Per the Workforce Innovation and Opportunity Act (WIOA), this approval extends to the local plans associated with the local workforce development areas that comprise the planning region. Such approval is effective through the end of the calendar year (i.e., December 31, 2017). The Southeast planning region is composed of the following local workforce development areas:

- Berks County Workforce Development Area
- Bucks County Workforce Development Area
- Chester County Workforce Development Area
- Delaware County Workforce Development Area
- Montgomery County Workforce Development Area
- Philadelphia County Workforce Development Area

Approval of this plan does not constitute approval of any practice that conflicts with federal and state statutes, regulations or policies, nor does approval preclude the commonwealth from, at its discretion, readdressing any part of the plan if the content is found to conflict with such statutes, regulations or policies.

Please note that each planning region, through collaboration with its local workforce development area boards and partners, must submit a “multi-year” (i.e., PY17-PY19) regional plan, to include multi-year local plans. Each plan must be complete; consistent with the Department’s forthcoming planning guidance and the Pennsylvania’s WIOA Combined State Plan; and compliant with applicable federal, state, and local statute, guidance, policy and procedure.

Please direct specific questions regarding the PY 2016 transitional plans and/or the upcoming multi-year plans and planning processes to Michael White at (717) 214-7173 or michwhite@pa.gov.

Sincerely,

Eileen Cipriani
Deputy Secretary for Workforce Development

cc: The Honorable James Kenney, Philadelphia County Commissioner
H. Patrick Clancy, Workforce Development Board Director
Southeast Pennsylvania Workforce Development Region  
2016-2017 Transitional Regional Plan

1.1 Provide the following:

A. A reference name for the planning region;
B. Identification of the local workforce development areas that comprise the planning region;
C. Identification of the county(s) each local workforce development area serves;
D. Identification of the key planning region committee members charged with drafting the regional plan;
E. Indication of the local workforce development area each committee member is associated with; and
F. A list of key planning region committee meeting date(s). [WIOA Sec. 106(a) and (c)]

A. Southeast Workforce Planning Region

B. The Southeast Workforce Planning Region is comprised of six local workforce development areas:
   • Berks County Workforce Development Board
   • Bucks County Workforce Development Board
   • Chester County Workforce Development Board
   • Delaware County Workforce Development Board
   • Montgomery County Workforce Development Board
   • Philadelphia Workforce Development Area

C. The region services six counties/city:
   • Berks, Bucks, Chester, Delaware and Montgomery Counties
   • City and County of Philadelphia

D. & E. The regional planning committee responsible for drafting the regional plan included:

   Berks County: Dan Fogarty
   Bucks County: Elizabeth Walsh
   Chester County: Pat Bokovitz
   Delaware County: Frank Carey
   Montgomery County: Jennifer Butler
   City of Philadelphia: Mark Edwards and Meg Shope Koppel

F. Key planning region committee dates:
   • February 19, 2016—Kickoff meeting, including board chairs
   • April 15, 2016—Draft discussion
   • April 25, 2016—Draft plan review with WDB Directors
Regional Overview

The region is home to nearly 4,493,274 residents, which represents 35.1% of Pennsylvania’s population. A little more than one-third (34.7%) of the region’s population resides in City of Philadelphia, followed by Montgomery (18.2%), Bucks (13.9%), Delaware (12.5%), Chester (11.4%) and Berks (9.2%).

The region is an economic driver for the Commonwealth of Pennsylvania. While labor force participation rates have increased, the Southeast Pennsylvania region faces an interesting labor market. The region possesses a lower unemployment rate than the Commonwealth with some counties having among the lowest with all counties having a dramatic decrease from their height during the recent recession of 2008-2009.

<table>
<thead>
<tr>
<th>Local Area</th>
<th>Local Population</th>
<th>Percent of Regional Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Berks</td>
<td>413,691</td>
<td>9.2%</td>
</tr>
<tr>
<td>Bucks</td>
<td>626,685</td>
<td>13.9%</td>
</tr>
<tr>
<td>Chester</td>
<td>512,784</td>
<td>11.4%</td>
</tr>
<tr>
<td>Delaware</td>
<td>562,960</td>
<td>12.5%</td>
</tr>
<tr>
<td>Montgomery</td>
<td>816,857</td>
<td>18.2%</td>
</tr>
<tr>
<td>Philadelphia</td>
<td>1,560,297</td>
<td>34.7%</td>
</tr>
<tr>
<td>TOTAL</td>
<td>4,493,274</td>
<td>100.0%</td>
</tr>
</tbody>
</table>
Major industry sectors in the region include but are not limited to Advanced Manufacturing, Agriculture, Bio-medicine, Building and Construction, Business Services, Education, Health Care, Hospitality, Logistics, Real Estate & Finance, and Wood Clusters. The concentration of these clusters varies throughout the region with some areas, such as Berks, having a higher concentration of manufacturing than other counties. Based upon jobs by NAICS industry cluster, the largest industry cluster is Health Care and Social Assistance followed by Retail Trade, then Educational Services. These amounts will vary across the region and reflect the alignment of resources and implementation of sector strategies.

The workforce development activities throughout the region are a mix of career and training services reflecting the local context of the individual labor markets while also responding to the regional economic development and sector industry demands. The key to past and continued success is that in many cases, job seeker solutions are best convened at the county level with
human services, community college, community based organizations, and other workforce-related solutions accessed on a county basis. Each local transitional plan articulates specific examples of those workforce development activities.

The six Workforce Development Boards recognize that in order to respond to regional economic development and industry needs, to coordinate grant activities across county lines and to provide services to those individuals that may enter a neighboring PA CareerLink® center, there is a need for consistency of services. This is also an opportunity to share effective practices, build resources across the region and, in accordance with the Governor’s priorities, effectively share data and information.

As part of this regional transitional plan, the Southeast Pennsylvania Workforce Board Directors will regularly share effective practices and utilize their monthly meetings to coordinate, collaborate and ultimately integrate activities where appropriate. This may include methods such as developing shared practices such as career pathways, core partner procedures, and common credentials attainment (especially around micro-credentials). Additional potential policy areas that support improving workforce development activities may be considered including a review of ITA and OJT policies, shared monitoring, and incumbent worker policies. Ensuring staff are consistently applying these efforts, common professional development, including PA CareerLink® manager professional development, will be considered. Education of staff in all counties about special projects and initiatives will provide the greatest impact of the dollars drawn to the region.

Educational skill levels of individuals in southeast Pennsylvania compare favorably to the Commonwealth. For those individuals over 25, the Southeast Pennsylvania has a higher percentage of individuals with an Associate’s Degree with or higher at 40.6% compared to Pennsylvania at 35.8%. The region has a significantly higher percentage of individuals with education beyond high school with 57.3% (almost 6 out of 10) compared to Pennsylvania at 52.2%.
These education levels vary significantly across the region, also. Demonstrating the need to understand local context, Philadelphia and Berks have the highest workforce levels of those individuals with less than a 9th grade education, therefore, given the demographics of each county, they require distinct local responses.

**Educational Attainment by Local Area for Population Age 25 and Above**

<table>
<thead>
<tr>
<th>Educational Attainment Level</th>
<th>Berks</th>
<th>Bucks</th>
<th>Chester</th>
<th>Delaware</th>
<th>Montgomery</th>
<th>Philadelphia</th>
<th>Region</th>
</tr>
</thead>
<tbody>
<tr>
<td>Less than 9th grade</td>
<td>5.9%</td>
<td>1.8%</td>
<td>3.1%</td>
<td>2.6%</td>
<td>2.2%</td>
<td>6.1%</td>
<td>3.9%</td>
</tr>
<tr>
<td>9th to 12th grade, no diploma</td>
<td>9.6%</td>
<td>4.7%</td>
<td>4.1%</td>
<td>5.5%</td>
<td>4.3%</td>
<td>12.4%</td>
<td>7.7%</td>
</tr>
<tr>
<td>High school graduate</td>
<td>38.7%</td>
<td>31.3%</td>
<td>23.7%</td>
<td>32.1%</td>
<td>24.9%</td>
<td>34.4%</td>
<td>31.1%</td>
</tr>
<tr>
<td>Some college, no degree</td>
<td>15.6%</td>
<td>18.3%</td>
<td>14.4%</td>
<td>17.1%</td>
<td>15.7%</td>
<td>17.4%</td>
<td>16.7%</td>
</tr>
<tr>
<td>Associate’s degree</td>
<td>7.5%</td>
<td>7.4%</td>
<td>5.9%</td>
<td>7.3%</td>
<td>6.7%</td>
<td>5.2%</td>
<td>6.4%</td>
</tr>
<tr>
<td>Bachelor’s degree</td>
<td>14.8%</td>
<td>22.3%</td>
<td>29.3%</td>
<td>20.8%</td>
<td>26.1%</td>
<td>14.2%</td>
<td>20.2%</td>
</tr>
<tr>
<td>Graduate or professional degree</td>
<td>7.9%</td>
<td>14.2%</td>
<td>19.5%</td>
<td>14.7%</td>
<td>20.1%</td>
<td>10.3%</td>
<td>14.1%</td>
</tr>
</tbody>
</table>

*Source: US Census Bureau*
Sector initiatives have been and will continue to be a priority for Southeast Pennsylvania. As noted in Sections 1.4 and 1.9, the region has a long and successful history of various and innovative sector initiatives. The Boards will continue to pursue these initiatives, often done regionally, to best serve the sectors. In many situations, the companies comprising the priority sectors, such as health care, manufacturing, and agriculture, recruit and hire workers across the region. This requires sector solutions that are multi-county and regional. This integrates well with the more county based job seeker solutions. The Southeast Pennsylvania Workforce Development Boards will continue to pursue and engage regional solutions with both existing and emerging sectors.

1.3 Based upon the regional labor market and economic condition analysis as described in Appendix A’s element 1.2 and Pennsylvania’s Workforce Development Plan (PY 2016 – PY 2019), describe the planning region’s economic and workforce development oriented vision and strategic goals.

[WIOA Sec. 106(c) and Sec. 107(d)]

The Workforce Development Board partners of the Southeast Pennsylvania region have a long history of working together to achieve maximum collective impact in producing a highly-skilled workforce available to existing and prospective employers on a regional basis. The partners embrace the vision of the Governor’s Combined State Plan that sets a framework for multiple levels of government working efficiently and in concert toward shared goals (“government that works”), expanding the education and training routes that lead to skills documentation valued by employers (“schools that teach”), and the transition to higher wage jobs tied to higher skills in the workforce through stronger alignment of economic development and workforce development actions (“jobs that pay”). The partners enthusiastically support advancement of a state system built on two bedrock principles where Pennsylvania has been a national leader in creating best practices for the national workforce development system: sector-based planning through industry partnerships, apprenticeships programs, and other employer-led training programs with coalitions tied to groupings of engaged employers not county or regional boundaries; and career pathways as the language of the education and training system that constantly focuses on employment goals while allowing for the flexibility of multiple on-ramps and off-ramps.

A solid base for planning and action was created in 2015 by the Workforce Boards and economic development partners of the Southeast Partnership for Regional Economic Performance (SE PREP). The Southeast Pennsylvania partners used a grant from the Pennsylvania Department of Labor and Industry as an opportunity to enhance regional, cross-sector collaboration by bringing together the region’s 5 Small Business Development Centers, 2 Industrial Resource Centers, 6 Economic Development Organizations, and 6 Workforce Investment Boards to address regional priorities and to establish a foundation for further collaboration. After nearly a year of collaboratively implementing the initiatives funded under the grant, the partners engaged an economic development consulting organization, Camoin Associates, to facilitate a strategic planning process and to develop a strategic plan for the region. As a result of the process, which
included review of multiple existing plans in the region, the partners identified several common regional workforce challenges and opportunities and developed strategies that built on existing organizations, plans, and relationships. The major regional challenges identified were:

- Addressing the aging workforce
- Engaging youth
- Coordinating employer needs with education and training programs in the region
- Job creation through small business development
- Developing a sustained and coordinated outreach and public relations campaign.

To address the challenges seven primary strategies were developed. The strategies recognize the funding limitations and uncertainties of the partners, but serve as a framework for joint action for the multiple workforce development boards in the region and for collaboration with economic development and education partners prioritizing the use of existing funds and in acquiring additional resources. The table that follows shows the seven strategies, the alignment with the five broad goals of the Pennsylvania Combined Workforce Development Plan, and the goals to be pursued by the five Workforce Development Board partners in Southeast Pennsylvania in the upcoming year.

<table>
<thead>
<tr>
<th>SE PA Regional Strategies (2015 SE PREP Plan)</th>
<th>Alignment with PA Plan (Combined WIOA Plan)</th>
<th>SE PA 2016 Goals (SE PA Regional WIOA Plan)</th>
</tr>
</thead>
</table>
| 1. Enhance partner awareness of resources, priorities and initiatives | Strengthen data sharing across agencies to create better understanding and to better target new initiatives | • Leverage existing resources of service strategies & curricula  
• Create framework for region-wide sharing of information among PA CareerLink® staff, including meetings for all PA CareerLink® Managers in region  
• Expand train-the-trainer opportunities that service staff from multiple areas can attend |
<p>| 2. Identify New Funding Opportunities | Expand public-private investment in the development of existing &amp; emerging workers | • Acquire additional public &amp; private funding via varied coalitions of local areas to address high-priority needs |</p>
<table>
<thead>
<tr>
<th></th>
<th>Develop Partnership Framework for Ongoing Collaboration</th>
<th>Engage employers via sector strategies (demand-side clarity) and connect education/training via career pathways (supply-side responsiveness)</th>
<th>Coordinate service approaches for key employer programs (OJT, incumbent worker training) to make them more user-friendly for employer customers</th>
</tr>
</thead>
</table>
| 4. | Develop a Sustained Outreach Campaign for Job Seekers and Employers | Present clear message to the public & employers through better alignment of state, regional & local plans | Share resources for public & employer awareness of programs & services  
Develop career awareness messages that can be used by all workforce areas, with emphasis on array of pathways for young adults |
| 5. | Engage Employers Collaboratively | Engage employers via targeted industry sectors such as Industry Partnerships & WEDnet PA | Establish quarterly meetings of all regional Workforce Board chairs; use meetings as venue for connecting to regional economic development groups & industry sector leaders/associations |
| 6. | Facilitate Employer & Education Connectivity, including increasing opportunities for youth to participate in work-based learning. | Establish career pathways as primary model for credentials attainment  
Develop multi-employer partnerships to improve the connection & responsiveness of workforce programs | Promote Career Pathways as language of the system & connection for education & training to employers  
Expand sector-based employer engagement via Industry Partnerships, apprenticeships, and other programs |
| 7. | Raise Awareness of In-demand Skills & Occupations among Stakeholders | Strengthen data sharing related to specific skills needed, along with best practices for developing the skills | Create regional framework for creating micro-credentials and positioning of credentials on Career Pathways |
The Southeast Pennsylvania Workforce Development region’s economic and workforce development vision and goals are based upon regional economic development efforts and common needs of the priority clusters, their employers and their critical skill needs. The region has a strong and successful history of collaborating on regional economic and workforce development efforts for many years.

The regional economic development and business engagement strategies are often regional with employers and sectors crossing local workforce development areas geographic designations in order to obtain their needed skilled labor force. In response to the regional needs of employers, the six local workforce development board directors have a successful history of meeting regularly to develop programs, apply for funds, and implement regional efforts to address the needs of employers across the region. These partnerships for program implementation will be in direct response to the employer needs and consequently may be a full partnership of all six organizations (with one usually accepting the lead role) or could be fewer than all six depending upon the locations of employers, type of industry, funds available and other factors.

Examples of these programs include the AgConnect Partnership, Innovative Technology Action Group (itag), the Smart Energy Initiative of Southeastern Pennsylvania, and the Philadelphia Business Education Career Awareness Project to name a few. These program examples represent responses to various industry clusters throughout the region and complement the local workforce development area efforts.

Recently, the six local areas participated in a regional Southeast Pennsylvania Workforce and Economic Development collaboration project with their PREP partners. This project, funded with Jobs 1st funding initiative, helped identify priority efforts, implement successful pilot and other needed programs and enhance collaboration among workforce and economic development partners. This helped identify a successful framework for regional collaboration, however, there are no funds to continue this specific project.

To continue the momentum established by the Jobs 1st project, the six local workforce development boards will continue to emphasize and respond to the demands of employers throughout the region. To implement this, the Board Directors will continue to meet monthly and convene with their Workforce Development Board Chairs quarterly. These meetings will focus on improving the services to employers, industry clusters and skills sets necessary and in demand to complement and support local county-based efforts.

The Southeast Pennsylvania Workforce Development Region, as part of their transitional plan,
will discuss and consider the following topics (and others) as part of the quarterly meetings:

- **Acquiring grants**—the region has a successful history of acquiring grant funds to address critical regional needs and will continue to explore these opportunities as a region.
- **Leveraging existing resources**—in order to better serve employers, intermediaries, job seekers and others, the sharing of resources (such as curricula and service strategies), recruitment needed for skill needs in high demand for the region’s employers, and other related data and information.
- **Incumbent worker policies**—consider reviewing and developing consistent incumbent worker policies to best serve the region’s employers.
- **Core partner procedures**—consider development of protocols with partners such as OVR, Wagner-Peyser and Title II to better and more consistently serve employers and job seekers.
- **Train-the-Trainer**—development of training packages in venues where staff can access this training including improved employer engagement and business service strategies.
- **Review local employer engagement strategies**—one of the opportunities is to improve consistency, performance and services to employers throughout the region by reviewing and sharing effective practices related to employer engagement strategies.

As part of the transitional plan, the Directors will continue to reach out to the lead sectors throughout the region, work with intermediaries (such as Chambers of Commerce and Economic Development Organizations) both locally and regionally, and share labor market information in order to continually serve employers as effectively as possible.

1.6 Describe how the planning region will define and establish administrative cost arrangements, including the pooling of funds for administrative costs, as appropriate, for the region. [WIOA Sec. 106(c)]

The Southeast Workforce Planning Region has a long successful history of sharing resources. For many years, the Workforce Development Areas shared funds to employ a Regional Coordinator to address regional needs related to common job seeker and employer programs. Based upon experience, the six areas will use the groundwork from this past experience as a basis for sharing resources. In this case, the local areas employed evenly shared expenses based upon an equal division of the total costs shared equally among the various areas. Based upon the scope of work this was an appropriate method for sharing costs.

The Southeast Planning Region has experience working collaboratively with administering Industry Sector, Partnerships, special workforce initiatives, and most recently the Jobs 1st PREP Region Grant. These programs are based upon employer or job seeker priorities and the local areas have learned through this process to regionally prioritize activities to reflect these priorities with an eye toward a more regional impact. Toward that end, the six local areas will pursue funding streams, address economic development efforts, explore cost-sharing and cost-saving initiatives through local, regional, national, philanthropic and other funds as appropriate. The
specific determinations related to defining and establishing appropriate allocation of costs will be determined on a case by case basis.

Should this not be appropriate in the future then the local areas will agree upon a comparable formula to allocate funds. This could be based upon allowable methods based upon Generally Accepted Accounting Principles, Office of Management and Budget Circular, or similar guidance that is most efficient and effective for the circumstance. Every effort will be made with the interest of the efficient shepherding of public resources.

1.8 Outline regional transportation issues related to workforce development and ways the region will address needs identified. Include a description and/or map of the regional commuting patterns. [WIOA Sec. 106(c)]

Transportation is a critical factor to the success of an individual receiving education and training, getting to and from work, and a key success factor toward obtaining and keeping a job. This is particularly true for those individuals with barriers to employment including but not limited to ex-offenders now more commonly known as returning citizens, persons with disabilities, TANF recipients, veterans, and others. Additionally, many of the priority sector jobs available, such as health care, manufacturing, agriculture, retail sales, and management occupations require non-traditional working hours including evenings and weekend work. Managing these challenges while also including additional needs such as child care, further education, and other activities further amplifies the need of reliable transportation.

In Southeast Pennsylvania, most people drive alone to work; 50.6% of those in Philadelphia and approximately 76.8% in the suburban counties do just that. Additional but much smaller percentages of individuals car pool, take public transportation, walk or work at home. This clearly demonstrates that reliable transportation and most likely ownership or use of a vehicle is critical to the long term work success of individuals throughout the region.

This is reflected in the regional commuting patterns across the region. The chart below illustrates the means of transportation to work. Based on the American Fact Finder US Census Data, fewer people drive to work in Philadelphia when compared to their neighboring Southeast Pennsylvania counties.

<table>
<thead>
<tr>
<th>Southeast Pennsylvania Workforce Areas</th>
<th>Means of Transportation to Work</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Area</td>
<td>Drive Alone</td>
</tr>
<tr>
<td>Berks</td>
<td>80.3%</td>
</tr>
<tr>
<td>Bucks</td>
<td>81.6%</td>
</tr>
<tr>
<td>Chester</td>
<td>77.7%</td>
</tr>
<tr>
<td>Delaware</td>
<td>74.4%</td>
</tr>
<tr>
<td>Montgomery</td>
<td>77.9%</td>
</tr>
<tr>
<td>Philadelphia</td>
<td>50.6%</td>
</tr>
</tbody>
</table>

Source: American Fact Finder, US Census Bureau, 2014
As has been stated many times, skill sets do not stop at county lines. Economic development and their employer engagement efforts are often a regional approach by the Southeast Pennsylvania Workforce Development Boards (see Section 1.9). Another way to illustrate that in transportation terms is the commuting across county lines (or in some cases state lines) to get to work. The analysis of the place of work versus the neighboring county or state illustrates a broad commuting pattern from suburban Philadelphia counties to Philadelphia while the Berks County labor force mostly works within Berks County.

| Southeast Pennsylvania Workforce Areas Comparison of Place of Work vs. Residence |
|--------------------------------------|-----------------|-----------------|-----------------|
| Local Area | Work in the county | Work outside the county | Work outside of PA |
| Berks | 74.6% | 24.6% | 0.8% |
| Bucks | 57.3% | 28.8% | 13.9% |
| Chester | 64.6% | 27.1% | 8.4% |
| Delaware | 52.4% | 40.1% | 7.6% |
| Montgomery | 63.2% | 33.8% | 3.0% |
| Philadelphia | 75.6% | 19.2% | 5.2% |

Source: American Fact Finder, US Census Bureau, 2014

<table>
<thead>
<tr>
<th>Southeast Pennsylvania County-to-County Worker Flow</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Area</td>
</tr>
<tr>
<td>Berks</td>
</tr>
<tr>
<td>Bucks</td>
</tr>
<tr>
<td>Chester</td>
</tr>
<tr>
<td>Delaware</td>
</tr>
<tr>
<td>Montgomery</td>
</tr>
<tr>
<td>Philadelphia</td>
</tr>
<tr>
<td>Other PA</td>
</tr>
<tr>
<td>Other USA</td>
</tr>
<tr>
<td>Other Int.</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

Source: US Census County-to-County Worker Flow Files 2000

Comparing where a person’s permanent residence is located versus where they work is also a manner of identifying commuting patterns. The vast majority of individuals work within their home county or contiguous county. Clearly a large number of residents in counties contiguous to Philadelphia are commuting to Philadelphia. The chart below shows the county of residents versus where persons are working.
All local workforce development areas in Southeast Pennsylvania have a majority of employed residents in their counties working within their counties. On average two out of three workers work within their county of residence with Berks having a high of 79.2% (almost 8 out of 10) and Delaware being the lowest at 54.3% but closely followed by Bucks County at 55.3%.

One of the significant issues for transportation planning for both individual commuting and public transportation is the level of employment in Philadelphia versus the other Southeast Pennsylvania counties. While Philadelphia does have a significant draw of residents employed in the city from neighboring Southeast PA counties, the level varies significantly largely due to geography.

Public transit has been and will continue to be a vital component of community life throughout much of Southeast Pennsylvania.

Southeast Pennsylvania is fortunate to have an extensive public transportation system with the Southeast Pennsylvania Transportation Authority (SEPTA) serving the region. While the SEPTA map below (from their website) shows the transportation venues throughout the Southeast Pennsylvania Workforce Development Area region, the use of public transportation varies within the counties. For example, Philadelphia has the highest percentage of individuals using public transportation at 27% with 11% in Delaware County and 4% in the remaining counties.

As can be seen from the SEPTA map of their routes, the services of SEPTA are concentrated in Philadelphia and Delaware County with limited services to other counties (and also neighboring states in some cases). While SEPTA is the sole provider in Philadelphia and Delaware Counties, the other counties have various local or county-based public transportation that complements SEPTA services or addresses various county needs.
The Job Access/ Reverse Commute (JARC) program funded by the Federal Transit Administration (FTA) was established to address the unique transportation challenges faced by welfare recipients and low-income persons seeking to obtain and maintain employment. The JARC funding was used by SEPTA to provide additional service to passengers at times when regular transit operations would not be justified, such as the late evening, early morning, and on Sundays. Many low-income workers and Temporary Assistance for Needy Families (TANF) recipients in the region, particularly Philadelphia and neighboring counties rely on transit in order to work night shifts and on weekends.

All this being noted, the Southeast Pennsylvania Workforce Development Area works diligently to link with public transportation including ensuring that the PA CareerLink® centers and major contractors are on public transportation routes wherever possible. The Boards also work closely with employers and their sectors to address transportation issues.
While all of the local workforce development boards in the Southeast Pennsylvania region maintain strong connections with their multiple local economic development organizations and chambers of commerce, as described in each local plan, the primary forum for connecting workforce development and economic development goals and services at the regional level has been the Southeast Pennsylvania Partnership for Regional Economic Performance (SE PREP). In 2015 the core partners of SE PREP brought together the region’s 6 county-based economic development organizations, 6 workforce boards, 5 small business development centers, and 2 industrial resource centers to address regional priorities, establish a foundation for ongoing collaboration, and create strategic goals to guide the individual strategies and tactics of each participating organization. The plan that resulted from the process focuses on the intersection of interests, challenges, and opportunities of the partners. The plan does not supersede any other plans but rather provides an overarching framework to focus on the core issue of primary interest to the Southeast Pennsylvania partners – creating a more highly-educated and trained workforce in the region as an enabler of business expansion and attraction. Key strategies from the plan and alignment with the state and regional WIOA plans are shown in Section 1.3.

The platform of knowledge and trust among workforce development organizations and economic development organizations in the region has resulted, and will continue to result, in quick concerted action to respond to needs and seize opportunities. Coalitions in various geographic configurations provide customized approaches to address key issues, all under the regional SE PREP platform that is used to share information, expand and replicate successful models, and assess overall regional impact on employer and job seeker customers. This process allows for flexibility and speed in crafting solutions and in sharing leadership on key initiatives, while maintaining focus on regional impact of the collective efforts. Shown below are examples of such coalitions that are serving to advance workforce skills in the region:

**American Apprenticeship Grant**

**Purpose/Goals:** Build new apprenticeship structures and pipelines in the region, specifically creating an IT apprenticeship enrolling 170 trainees and a Behavioral Health Technician apprenticeship enrolling 140 trainees. Leverage other funding sources to build and maintain pre-apprenticeship feeder programs. Create visibility for apprenticeship structures in the region to stimulate the growth of apprenticeships in other occupations.

**Timeline:** 5 years beginning December 2015

**Key Partners:** Philadelphia Workforce Development Board, Philadelphia School District, Communities in Schools, Youth Build, Job Corps, District 1199C Training & Upgrading
Business-Education Partnership Grant

**Purpose/Goals:** Raise student awareness of job and career opportunities and skill needed to access them. Increase work-based learning opportunities for youth through increased business sponsorship. Target the needs of special populations. Coordinate the message and engagement strategies for students, parents, teachers, counselors, and employers.

**Timeline:** April 2015 – June 2016

**Key Partners:** Montgomery County and Bucks County Workforce Development Boards and school districts in Montgomery and Bucks Counties

Manufacturing Alliance of Bucks & Montgomery Counties

**Purpose/Goals:** Connect manufacturers in the two counties to strengthen and grow the sector. Provide opportunities for increased networking, partnering, and sharing of information. Create and maintain a supply chain website. Raise money to support goals. Provide dedicated staff from the two Workforce Development Boards.

**Timeline:** Ongoing platform

**Key Partners:** Bucks and Montgomery County Workforce Development Boards, manufacturers in both counties

Southeastern Regional Workforce Development Partnership

**Purpose/Goals:** Develop training plans and awareness initiatives to ensure a reliable pipeline of talent for the manufacturing sector. Increase employer membership. Support work-based learning for students, including summer internships. Develop a pre-apprenticeship manufacturing program. Develop on-site career coaching models. Map manufacturing career pathways to showcase education/training leading to high wages in the sector.

**Timeline:** Formed in 2007, work is ongoing

**Key Partners:** Workforce Development Boards of Philadelphia, Bucks, Montgomery, and Delaware Counties, 50+ employers, School District of Philadelphia, Philadelphia Youth Network, regional/local economic development agencies, labor organizations, faith-based organizations

Southeast PA Region Workforce/Economic Development Collaborative: PA JOBS1st Grant

**Purpose/Goals:** Build a sustainable public/private partnership in Southeast PA to provide comprehensive and integrated workforce and economic development services. Address labor shortages facing manufacturers in Southeast PA through training and aggressive career

Page 16 of 20 | Southeast PA Workforce Development Region 2016-2017 Transitional Regional Plan

Coordinating Partner: Philadelphia Works
awareness and pipeline development campaigns.

**Timeline:** Ongoing platform (built with grant from July 2014 to July 2015)

**Key Partners:** Southeast PA PREP Partners, Workforce Development Boards of Berks, Bucks, Chester, Delaware, Montgomery, and Philadelphia Counties

Workforce Innovation Fund (WIF) Grant: Micro-Credentials for Target Populations

**Purpose/Goals:** Develop micro-credentials in the successful 12-week metalworking training program of the college. Serve four cohorts of ten students each. Target new populations and engage community partners in recruitment and preparation.

**Timeline:** October 2015 – September 2019

**Key Partners:** Bucks County Community College, Bucks County Workforce Development Board

Workforce Innovation Fund Grant: High Priority Occupations

**Purpose/Goals:** Embed micro-credentials in two new and two existing career certificate programs in the healthcare and manufacturing sectors. Focus on attracting dislocated workers, with special emphasis on long-term unemployed job seekers. Provide intensive, individualize career coaching for trainees to ensure training and job placement success.

**Timeline:** October 2015 – September 2019

**Key Partners:** Montgomery County Community College, Montgomery County Workforce Development Board

Sector Partnership National Dislocated Worker Grant

**Purpose/Goals:** Train 54 dislocated workers in High Priority Occupations in the Nursing, Biotechnology and Bio-manufacturing sectors. Employ a Career Pathways framework. Connect short-term training to 2-year and 4-year degree programs.

**Timeline:** July 2015 – June 2017

**Key Partners:** Southeast PA regional community college and workforce development boards

Southeast Pennsylvania Defense Transition Collaborative

**Purpose/Goals:** Assist distressed employers, adversely impacted by defense spending cuts, in the supply chain of major Department of Defense vendors. Create marketing and diversification plans to improve business outcomes for these employers. Connect employers to other potential markets.

**Timeline:** November 2015 – November 2017

**Key Partners:** Workforce development boards and economic development entities in Southeast PA region plus Lehigh and Northampton Counties
Philadelphia Business Education Career Awareness Project

**Purpose/Goals:** Create pathways programs in manufacturing sector for 14-24-year old students and young adults. Provide career awareness and internship opportunities for over 300 youth. Enhance career awareness through real-time labor market information and mapping of pathways.

**Timeline:** June 2015 – June 2016


AgConnect Partnership

**Purpose/Goals:** Connect farmers, to business resources, training, and financing to grow businesses and promote smart, sustainable agricultural economic development. Promote agriculture as a viable career option for students. Support training and financing programs to advance the sector, acquiring grants to assist.

**Timeline:** Ongoing Industry Partnership (since 2000)

**Key Partners:** Initiative of the Chester County Economic Development Council with partner support from Southeast PA workforce development boards, PA Department of Community and Economic Development, PA Department of Labor and Industry

Innovation Technology Action Group (ITAG)

**Purpose/Goals:** Develop programs and workshops for individuals and companies, promoting the latest technology and best practices in using it. Create a pipeline of qualified technically-trained workers. Host an annual Tech Summit conference for IT leaders to share knowledge and experiences on leading trends impacting business.

**Timeline:** Ongoing Industry Partnership (since 2009)

**Key Partners:** Workforce Development Boards of Bucks and Chester Counties

Given the size, diversity, and complexity of the broader Southeast PA region that includes over 1/3 of the commonwealth’s population, the approach of sponsorship of initiatives by varying combinations of geographic and industry partners has served the region well. Many of these efforts, as shown above, are ongoing and funded for multiple years. As such, they lay the foundation for region-wide sharing of knowledge and best practices and spawning new initiatives that can be expanded and replicated as needed.
The Southeast Workforce Planning Region recognizes the value and importance of performance measures related to effective performance outcomes. These measures have many intended and unintended consequences for the entire public workforce system including the job seekers, employers and various agencies and intermediary organizations that help align services based on satisfactory performance outcomes.

The local areas will review and analyze the local performance measures negotiated for the six local areas and based upon those results will then utilize this information and negotiation experience to collectively address the regional performance levels. Since the system is awaiting guidance on these measures (and on still to be determined additional state measures and employer measure(s)), the Southeast Workforce Planning Region will then identify the process to collectively address these outcomes.

During this initial transition year for WIOA outcome measures, each local board will report on and discuss these performance measures, address any potential or anticipated concerns that arise and support each local area as appropriate.

The Southeast Workforce Development Region has significant regional populations in need of services and skills to meet the need of the region’s sector employment needs. Each local workforce area has their priorities for serving target groups in their area.

During Program Year 2015, through Job 1st funds contracted with Camoin Associates to produce a report titled “Southeast Pennsylvania Workforce-Economic Development Collaboration Strategy” identified the aging workforce and youth engagement as regional target populations.
Additional regional labor market analysis then expands the regionally targeted populations to include veterans, returning citizens, low-income individuals, low educational attainment individuals, persons with disabilities and limited English proficiency. This list of targeted populations will be regularly reviewed and updated to determine any gaps or services necessary. Additionally, each local area has spent extensive time and research documenting, reaching out, and serving to the best of their abilities many targeted populations, as identified in their respective local plans. With a region as large, extensive and diverse as the six local workforce areas comprising Southeast Pennsylvania, the regionally identified target groups could comprise sub-group of areas or the entire region.

The Workforce Board Directors will continue to explore these areas as part of their monthly meetings. The Directors will also work in the context of the Workforce Innovation and Opportunity Act (WIOA), the Commonwealth’s Combined Plan, and other significant stakeholders in reaching out to identify and address ongoing target population needs. As appropriate, they will work closely with local organizations and agencies that have a keen and in depth understanding of the critical challenges and opportunities in addressing these target populations.

Please see Addendum A for comments received on the regional plan. All comments are based on references already included in the regional plan.

Please see Addendum B for Southeast Pennsylvania Workforce Development Region local plans

- Berks County
- Bucks County
- Chester County
- Delaware County
- Montgomery County
- City/County of Philadelphia
Workforce Innovation and Opportunity Act (WIOA) Final Transitional Local Plan

June 2, 2016
Workforce Innovation and Opportunity Act (WIOA)
Final Transitional Local Plan

June 2, 2016

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Introduction

Philadelphia Works connects employers to a skilled workforce and helps individuals develop the skills needed to thrive in the workplace. Philadelphia Works, in alignment with its mission and strategic plan, is pleased to articulate this Workforce Innovation and Opportunity Act (WIOA) transitional local plan for Program Year 2016, which will serve as the foundation for ongoing WIOA implementation. As business focused, thought leaders and strategic investors, we invest in employment and training solutions and services that connect employers to workforce talent and career seekers to jobs while ensuring the highest standards and accountability for these investments.

This plan presents the mission, vision, goals and strategies necessary to support the work of our regional partners and the state. This plan also outlines many of the programs and initiatives we intend to employ as we, under the leadership of the Philadelphia Works board, provide oversight of Philadelphia’s public workforce system through the services in the PA CareerLink® Philadelphia centers, which include Temporary Assistance for Needy Families (TANF) employment and training services, known in Pennsylvania as the Employment Advancement and Retention Network (EARN) program.

Section 1: Workforce and Economic Analysis

Section 1.1

Provide an analysis of the economic conditions, including existing and emerging in-demand industry sectors and occupations; and the employment needs of employers in those industry sectors and occupations. [WIOA Sec. 108(b)(1)(A)] and [proposed 20 CFR 679.560(a)]

Note: Per WIOA Sec. 108(c), existing economic regional and/or local area analyses may be used if sourced data and/or derived analyses are economically relevant and current (i.e., within two years of the issuance of this guidance).

The Philadelphia labor market continues to expand, though unevenly, across sectors. Philadelphia has a very mature healthcare sector that dominates much of the local economy. Almost a quarter of Philadelphia’s employment is in the healthcare cluster (as defined by the Pennsylvania Department of Labor & Industry (L&I) Targeted Industry Clusters) with the education and business services clusters adding another quarter of jobs. Hospitality, leisure & entertainment account for 11 percent of employment.
### TABLE 1.11

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Agriculture &amp; Food Production</td>
<td>489</td>
<td>10,732</td>
<td>$52,072</td>
<td>-12%</td>
<td>2%</td>
<td>0.56</td>
</tr>
<tr>
<td>AM - Advanced Manufacturing</td>
<td>1,457</td>
<td>16,164</td>
<td>$50,427</td>
<td>-17%</td>
<td>3%</td>
<td>0.32</td>
</tr>
<tr>
<td>Bio - Medical</td>
<td>194</td>
<td>4,444</td>
<td>$78,516</td>
<td>-3%</td>
<td>1%</td>
<td>0.53</td>
</tr>
<tr>
<td>BS - Business Services</td>
<td>4,130</td>
<td>77,118</td>
<td>$93,575</td>
<td>4%</td>
<td>12%</td>
<td>0.96</td>
</tr>
<tr>
<td>Building &amp; Construction</td>
<td>1,729</td>
<td>18,403</td>
<td>$63,128</td>
<td>-14%</td>
<td>3%</td>
<td>0.47</td>
</tr>
<tr>
<td>Education</td>
<td>1,672</td>
<td>88,523</td>
<td>$62,376</td>
<td>1%</td>
<td>14%</td>
<td>1.40</td>
</tr>
<tr>
<td>Energy</td>
<td>187</td>
<td>8,918</td>
<td>$83,031</td>
<td>15%</td>
<td>1%</td>
<td>0.55</td>
</tr>
<tr>
<td>Health Care</td>
<td>10,047</td>
<td>152,615</td>
<td>$56,450</td>
<td>11%</td>
<td>24%</td>
<td>1.35</td>
</tr>
<tr>
<td>Hospitality, Leisure &amp; Entertainment</td>
<td>4,413</td>
<td>70,888</td>
<td>$30,205</td>
<td>14%</td>
<td>11%</td>
<td>1.06</td>
</tr>
<tr>
<td>Logistics &amp; Transportation</td>
<td>616</td>
<td>28,946</td>
<td>$54,184</td>
<td>1%</td>
<td>5%</td>
<td>1.17</td>
</tr>
<tr>
<td>Real Estate, Finance &amp; Insurance</td>
<td>2,365</td>
<td>36,040</td>
<td>$108,109</td>
<td>-15%</td>
<td>6%</td>
<td>1.08</td>
</tr>
<tr>
<td>Wood, Wood Products &amp; Publishing</td>
<td>326</td>
<td>7,149</td>
<td>$66,172</td>
<td>-26%</td>
<td>1%</td>
<td>0.58</td>
</tr>
<tr>
<td>All Industries</td>
<td>4,261</td>
<td>641,024</td>
<td>$60,162</td>
<td>1%</td>
<td>100%</td>
<td>1.00</td>
</tr>
</tbody>
</table>

Source: RDAT 5.1 Database, Center for Workforce Information & Analysis at Pennsylvania Department of Labor & Industry

The top employment occupation in the healthcare cluster remains Registered Nurses (14.2 percent of cluster employment). There are more than 20,000 Registered Nurses employed in Philadelphia. These are split between those with 2-year degrees and those with bachelor’s degrees. The highest growth occupations are Personal Care Aides and Home Health Aides, which require post-secondary training but not a degree. Occupations in decline for this cluster are losing nominal numbers (less than a percent of employment). Wages vary across occupations and are over $13 per hour except in the lowest-skilled occupations. Registered Nurses earn $37.00 per hour – top wages among those occupations without a professional degree or managerial position.

Healthcare remains an industry where occupational demand and the competencies needed are experiencing rapid change. The US Bureau of Labor Statistics (BLS) predicts that demand for workers with less than a Bachelor’s degree will expand these jobs 39 percent nationally. Emerging occupations occur as “practice redesign” increases reliance on workers without a Bachelor’s degree (Martha Ross, et al. *Part of the Solution: Pre-Baccalaureate Healthcare Workers in a Time of Health System Change*. Brookings, 2014). In Philadelphia, emerging occupations include the Community Health Worker and Healthcare Data Analyst which are poorly captured under the O*Net classifications.
### TABLE 1.12 TOP OCCUPATIONS IN THE HEALTHCARE CLUSTER BY EMPLOYMENT

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>29-1141</td>
<td>Registered Nurses</td>
<td>20,523</td>
<td>20,666</td>
<td>143</td>
<td>$37.00</td>
<td>Associate's degree</td>
</tr>
<tr>
<td>39-9021</td>
<td>Personal Care Aides</td>
<td>8,820</td>
<td>10,036</td>
<td>1,216</td>
<td>$11.32</td>
<td>Less than high school</td>
</tr>
<tr>
<td>31-1014</td>
<td>Nursing Assistants</td>
<td>10,029</td>
<td>10,003</td>
<td>(26)</td>
<td>$14.00</td>
<td>Postsecondary non-degree award</td>
</tr>
<tr>
<td>31-1011</td>
<td>Home Health Aides</td>
<td>6,829</td>
<td>7,965</td>
<td>1,136</td>
<td>$10.23</td>
<td>Less than high school</td>
</tr>
<tr>
<td>29-2061</td>
<td>Licensed Practical and Licensed Vocational Nurses</td>
<td>3,693</td>
<td>3,741</td>
<td>48</td>
<td>$24.21</td>
<td>Postsecondary non-degree award</td>
</tr>
<tr>
<td>43-9061</td>
<td>Office Clerks, General</td>
<td>2,908</td>
<td>2,918</td>
<td>10</td>
<td>$16.16</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>21-1093</td>
<td>Social and Human Service Assistants</td>
<td>2,689</td>
<td>2,788</td>
<td>99</td>
<td>$13.14</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>43-4171</td>
<td>Receptionists and Information Clerks</td>
<td>2,691</td>
<td>2,769</td>
<td>78</td>
<td>$13.70</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>43-6013</td>
<td>Medical Secretaries</td>
<td>2,503</td>
<td>2,600</td>
<td>97</td>
<td>$18.54</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>31-9092</td>
<td>Medical Assistants</td>
<td>2,557</td>
<td>2,638</td>
<td>81</td>
<td>$16.80</td>
<td>Postsecondary non-degree award</td>
</tr>
<tr>
<td>43-6014</td>
<td>Secretaries and Administrative Assistants, Except Legal, Medical, and Executive</td>
<td>2,269</td>
<td>2,311</td>
<td>42</td>
<td>$17.98</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>43-4051</td>
<td>Customer Service Representatives</td>
<td>1,966</td>
<td>1,993</td>
<td>27</td>
<td>$17.77</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>43-3021</td>
<td>Billing and Posting Clerks</td>
<td>1,911</td>
<td>1,977</td>
<td>66</td>
<td>$18.25</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>21-1014</td>
<td>Mental Health Counselors</td>
<td>1,891</td>
<td>1,884</td>
<td>(7)</td>
<td>$20.26</td>
<td>Master's degree</td>
</tr>
<tr>
<td>11-9111</td>
<td>Medical and Health Services Managers</td>
<td>1,843</td>
<td>1,862</td>
<td>19</td>
<td>$47.28</td>
<td>Bachelor's degree</td>
</tr>
<tr>
<td>21-1021</td>
<td>Child, Family, and School Social Workers</td>
<td>1,627</td>
<td>1,684</td>
<td>57</td>
<td>$20.01</td>
<td>Bachelor's degree</td>
</tr>
<tr>
<td>29-1069</td>
<td>Physicians and Surgeons, All Other</td>
<td>1,588</td>
<td>1,615</td>
<td>27</td>
<td>$81.19</td>
<td>Doctoral or professional degree</td>
</tr>
<tr>
<td>29-2012</td>
<td>Medical and Clinical Laboratory Technicians</td>
<td>1,543</td>
<td>1,596</td>
<td>53</td>
<td>$19.95</td>
<td>Associate's degree</td>
</tr>
<tr>
<td>37-2012</td>
<td>Maids and Housekeeping Cleaners</td>
<td>1,591</td>
<td>1,576</td>
<td>(15)</td>
<td>$12.12</td>
<td>Less than high school</td>
</tr>
<tr>
<td>43-1011</td>
<td>First-Line Supervisors of Office and Administrative Support Workers</td>
<td>1,507</td>
<td>1,539</td>
<td>32</td>
<td>$28.85</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>29-2034</td>
<td>Radiologic Technologists</td>
<td>1,418</td>
<td>1,422</td>
<td>4</td>
<td>$29.48</td>
<td>Associate's degree</td>
</tr>
<tr>
<td>21-1022</td>
<td>Healthcare Social Workers</td>
<td>1,346</td>
<td>1,411</td>
<td>65</td>
<td>$24.95</td>
<td>Master's degree</td>
</tr>
<tr>
<td>29-2011</td>
<td>Medical and Clinical Laboratory Technologists</td>
<td>1,427</td>
<td>1,413</td>
<td>(14)</td>
<td>$31.79</td>
<td>Bachelor's degree</td>
</tr>
<tr>
<td>29-1123</td>
<td>Physical Therapists</td>
<td>1,299</td>
<td>1,373</td>
<td>74</td>
<td>$38.23</td>
<td>Doctoral or professional degree</td>
</tr>
<tr>
<td>21-1023</td>
<td>Mental Health and Substance Abuse Social Workers</td>
<td>1,389</td>
<td>1,358</td>
<td>(31)</td>
<td>$20.67</td>
<td>Bachelor's degree</td>
</tr>
</tbody>
</table>

Source: EMSI Staffing Patterns, Quarter 1, 2016 Data set
In the education cluster, 16 percent of all jobs are for Postsecondary Teachers (over 18,000 Teachers). Philadelphia has a large number of post-secondary institutions granting degrees.

**TABLE 1.13 TOP OCCUPATIONS IN THE EDUCATION CLUSTER BY EMPLOYMENT**

<table>
<thead>
<tr>
<th></th>
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<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>25-1099</td>
<td>Postsecondary Teachers</td>
<td>18,446</td>
<td>18,423</td>
<td>(23)</td>
<td>$38.22</td>
<td>Doctoral or professional degree</td>
</tr>
<tr>
<td>43-6014</td>
<td>Secretaries and Administrative Assistants, Except Legal, Medical, and Executive</td>
<td>7,074</td>
<td>6,829</td>
<td>(245)</td>
<td>$17.98</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>25-2031</td>
<td>Secondary School Teachers, Except Special and Career/Technical Education</td>
<td>5,764</td>
<td>6,412</td>
<td>648</td>
<td>$29.60</td>
<td>Bachelor's degree</td>
</tr>
<tr>
<td>25-9041</td>
<td>Teacher Assistants</td>
<td>5,314</td>
<td>5,865</td>
<td>551</td>
<td>$11.68</td>
<td>Some college, no degree</td>
</tr>
<tr>
<td>25-2021</td>
<td>Elementary School Teachers, Except Special Education</td>
<td>5,047</td>
<td>5,926</td>
<td>879</td>
<td>$30.66</td>
<td>Bachelor's degree</td>
</tr>
<tr>
<td>43-9061</td>
<td>Office Clerks, General</td>
<td>5,946</td>
<td>5,704</td>
<td>(242)</td>
<td>$16.16</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>37-2011</td>
<td>Janitors and Cleaners, Except Maids and Housekeeping Cleaners</td>
<td>4,104</td>
<td>4,184</td>
<td>80</td>
<td>$12.90</td>
<td>Less than high school</td>
</tr>
<tr>
<td>39-9011</td>
<td>Childcare Workers</td>
<td>2,827</td>
<td>2,919</td>
<td>92</td>
<td>$9.89</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>25-2022</td>
<td>Middle School Teachers, Except Special and Career/Technical Education</td>
<td>2,232</td>
<td>2,647</td>
<td>415</td>
<td>$27.45</td>
<td>Bachelor's degree</td>
</tr>
<tr>
<td>25-2011</td>
<td>Preschool Teachers, Except Special Education</td>
<td>2,262</td>
<td>2,345</td>
<td>83</td>
<td>$12.16</td>
<td>Associate's degree</td>
</tr>
<tr>
<td>53-3022</td>
<td>Bus Drivers, School or Special Client</td>
<td>1,651</td>
<td>2,005</td>
<td>354</td>
<td>$15.20</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>21-1012</td>
<td>Educational, Guidance, School, and Vocational Counselors</td>
<td>1,780</td>
<td>1,863</td>
<td>83</td>
<td>$27.50</td>
<td>Master's degree</td>
</tr>
<tr>
<td>33-9032</td>
<td>Security Guards</td>
<td>1,549</td>
<td>1,519</td>
<td>(30)</td>
<td>$10.91</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>49-9071</td>
<td>Maintenance and Repair Workers, General</td>
<td>1,528</td>
<td>1,518</td>
<td>(10)</td>
<td>$19.25</td>
<td>High school diploma or equivalent</td>
</tr>
<tr>
<td>11-9033</td>
<td>Education Administrators, Postsecondary</td>
<td>1,459</td>
<td>1,461</td>
<td>2</td>
<td>$51.71</td>
<td>Master's degree</td>
</tr>
<tr>
<td>15-1151</td>
<td>Computer User Support Specialists</td>
<td>1,342</td>
<td>1,318</td>
<td>(24)</td>
<td>$23.97</td>
<td>Some college, no degree</td>
</tr>
<tr>
<td>25-3098</td>
<td>Substitute Teachers</td>
<td>1,115</td>
<td>1,338</td>
<td>223</td>
<td>$16.04</td>
<td>Bachelor's degree</td>
</tr>
<tr>
<td>43-3031</td>
<td>Bookkeeping, Accounting, and Auditing Clerks</td>
<td>1,279</td>
<td>1,269</td>
<td>(10)</td>
<td>$19.93</td>
<td>High school diploma or equivalent</td>
</tr>
</tbody>
</table>

*Source: EMSI Staffing Patterns, Quarter 1, 2016 Data set*

Employment in the remaining clusters is dispersed across a wide number of occupations and is not concentrated as in the healthcare and educational clusters. The fastest growing
occupations outside of these two clusters are high-wage occupations such as Applications Software Developers, Accountants and Auditors as well as low-wage occupations such as Food Preparation Workers, Cashiers and Security Guards.

**TABLE 1.14 FASTEST GROWING OCCUPATIONS OUTSIDE THOSE IN HEALTHCARE AND EDUCATION**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Combined Food Preparation and Serving Workers, Including Fast Food</td>
<td>14238</td>
<td>15,624</td>
<td>1,386</td>
<td>10%</td>
<td>$9.34</td>
</tr>
<tr>
<td>Security Guards</td>
<td>9770</td>
<td>10,458</td>
<td>688</td>
<td>7%</td>
<td>$10.91</td>
</tr>
<tr>
<td>Cashiers</td>
<td>12669</td>
<td>13,341</td>
<td>672</td>
<td>5%</td>
<td>$9.32</td>
</tr>
<tr>
<td>Parking Lot Attendants</td>
<td>1756</td>
<td>2,046</td>
<td>290</td>
<td>17%</td>
<td>$9.99</td>
</tr>
<tr>
<td>Market Research Analysts and Marketing Specialists</td>
<td>2727</td>
<td>3,005</td>
<td>278</td>
<td>10%</td>
<td>$32.05</td>
</tr>
<tr>
<td>Accountants and Auditors</td>
<td>7330</td>
<td>7,605</td>
<td>275</td>
<td>4%</td>
<td>$36.59</td>
</tr>
<tr>
<td>Laborers and Freight, Stock, and Material Movers, Hand</td>
<td>8799</td>
<td>9,041</td>
<td>242</td>
<td>3%</td>
<td>$13.40</td>
</tr>
<tr>
<td>Cooks, Restaurant</td>
<td>4113</td>
<td>4,352</td>
<td>239</td>
<td>6%</td>
<td>$12.85</td>
</tr>
<tr>
<td>Bartenders</td>
<td>3099</td>
<td>3,329</td>
<td>230</td>
<td>7%</td>
<td>$11.01</td>
</tr>
<tr>
<td>First-Line Supervisors of Food Preparation and Serving Workers</td>
<td>2935</td>
<td>3,133</td>
<td>198</td>
<td>7%</td>
<td>$19.54</td>
</tr>
<tr>
<td>Graphic Designers</td>
<td>1028</td>
<td>1,214</td>
<td>186</td>
<td>18%</td>
<td>$25.54</td>
</tr>
<tr>
<td>Electricians</td>
<td>1199</td>
<td>1,379</td>
<td>180</td>
<td>15%</td>
<td>$26.34</td>
</tr>
<tr>
<td>Food Preparation Workers</td>
<td>4147</td>
<td>4,314</td>
<td>167</td>
<td>4%</td>
<td>$11.07</td>
</tr>
<tr>
<td>Military occupations</td>
<td>5110</td>
<td>5,258</td>
<td>148</td>
<td>3%</td>
<td>$20.66</td>
</tr>
<tr>
<td>Software Developers, Applications</td>
<td>1842</td>
<td>1,989</td>
<td>147</td>
<td>8%</td>
<td>$46.20</td>
</tr>
<tr>
<td>Claims Adjusters, Examiners, and Investigators</td>
<td>2450</td>
<td>2,589</td>
<td>139</td>
<td>6%</td>
<td>$33.65</td>
</tr>
<tr>
<td>Computer Systems Analysts</td>
<td>2647</td>
<td>2,783</td>
<td>137</td>
<td>5%</td>
<td>$44.24</td>
</tr>
</tbody>
</table>

*Source: EMSI Staffing Patterns, Quarter 1, 2016 Data set*

New hires data demonstrate employment activity by industry in any given quarter. Industries with high percentages of new hires tend to be those with high workforce turnover.
TABLE 1.15 NEW HIRES QUARTER 4, 2015 WITH NUMBER OF ESTABLISHMENTS

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Philadelphia</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Educational Services</td>
<td>2928</td>
<td>329</td>
<td>962</td>
<td>79159</td>
<td>3.7</td>
</tr>
<tr>
<td>Hospitals</td>
<td>545</td>
<td>34</td>
<td>47</td>
<td>63689</td>
<td>0.9</td>
</tr>
<tr>
<td>Food Services and Drinking Places</td>
<td>7019</td>
<td>1180</td>
<td>3675</td>
<td>49582</td>
<td>14.2</td>
</tr>
<tr>
<td>Professional, Scientific, and Technical Services</td>
<td>2277</td>
<td>925</td>
<td>3214</td>
<td>45889</td>
<td>5.0</td>
</tr>
<tr>
<td>Social Assistance</td>
<td>4537</td>
<td>838</td>
<td>8239</td>
<td>38229</td>
<td>11.9</td>
</tr>
<tr>
<td>Ambulatory Health Care Services</td>
<td>3104</td>
<td>592</td>
<td>1957</td>
<td>33379</td>
<td>9.3</td>
</tr>
<tr>
<td>Administrative and Support Services</td>
<td>5616</td>
<td>561</td>
<td>958</td>
<td>25865</td>
<td>21.7</td>
</tr>
<tr>
<td>Nursing and Residential Care Facilities</td>
<td>2455</td>
<td>184</td>
<td>664</td>
<td>18294</td>
<td>13.4</td>
</tr>
<tr>
<td>Insurance Carriers and Related Activities</td>
<td>372</td>
<td>123</td>
<td>450</td>
<td>16322</td>
<td>2.3</td>
</tr>
<tr>
<td>Food and Beverage Stores</td>
<td>455</td>
<td>96</td>
<td>1232</td>
<td>14676</td>
<td>3.1</td>
</tr>
<tr>
<td>Management of Companies and Enterprises</td>
<td>199</td>
<td>70</td>
<td>299</td>
<td>12992</td>
<td>1.5</td>
</tr>
<tr>
<td>Transit and Ground Passenger Transportation</td>
<td>410</td>
<td>45</td>
<td>111</td>
<td>10855</td>
<td>3.8</td>
</tr>
</tbody>
</table>

Source: Center for Workforce Information and Analysis, Pennsylvania Department of Labor & Industry

Section 1.2

Provide an analysis of the knowledge and skills required to meet the employment needs of the employers in the local area, including employment requirements for in-demand industry sectors and occupations. [WIOA Sec. 108(b)(1)(B)] and [proposed 20 CFR 679.560(a)]

Given the dominance of “eds and meds” and business services, Philadelphia has a high number of science, technology, engineering, and math (STEM) jobs. Philadelphia has more than 33,373 jobs in STEM (not including teachers or healthcare workers) with median hourly earnings of $36.60 per hour. Philadelphia’s growth of 1.9 percent is two percent below that of the nation in STEM employment, constrained by the low educational attainment of the city’s residents. However, the dominance of healthcare, education and the growth of STEM demonstrate that Philadelphia’s economy requires greater knowledge in computers and electronics, medicine and dentistry, therapy and counseling, communications and media, and telecommunications than required by the state as a whole (see Table 1.22 below). Job openings advertised on the web continue to be dominated by demand for mathematical and computer occupations. Top jobs persistently advertised over the year reflect both the demand for registered nurses as the top occupation in the city and the emerging growth of computer and IT occupations. Philadelphia Works continues to monitor changes in occupational trends in healthcare related to policy changes and redesign of patient care in the region.
TABLE 1.21 TOP OCCUPATIONS ADVERTISED ON-LINE IN FEBRUARY 2016 AND YEAR TO YEAR

<table>
<thead>
<tr>
<th>Occupation</th>
<th>Occupation Code</th>
<th>Volume</th>
<th>Year to year - Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registered Nurses</td>
<td>29114100</td>
<td>1236</td>
<td>1343</td>
</tr>
<tr>
<td>Software Developers, Applications</td>
<td>15113200</td>
<td>789</td>
<td>643</td>
</tr>
<tr>
<td>Management Analysts</td>
<td>13111100</td>
<td>738</td>
<td>733</td>
</tr>
<tr>
<td>Marketing Managers</td>
<td>11202100</td>
<td>734</td>
<td>690</td>
</tr>
<tr>
<td>Web Developers</td>
<td>15113400</td>
<td>660</td>
<td>585</td>
</tr>
<tr>
<td>Computer Systems Analysts</td>
<td>15112100</td>
<td>575</td>
<td>613</td>
</tr>
<tr>
<td>Heavy and Tractor-Trailer Truck Drivers</td>
<td>53303200</td>
<td>546</td>
<td>574</td>
</tr>
<tr>
<td>Network and Computer Systems Administrators</td>
<td>15114200</td>
<td>542</td>
<td>475</td>
</tr>
<tr>
<td>Information Technology Project Managers</td>
<td>15119909</td>
<td>515</td>
<td>437</td>
</tr>
<tr>
<td>Sales Managers</td>
<td>11202200</td>
<td>478</td>
<td>431</td>
</tr>
<tr>
<td>Computer User Support Specialists</td>
<td>15115100</td>
<td>472</td>
<td>357</td>
</tr>
<tr>
<td>Accountants</td>
<td>13201101</td>
<td>471</td>
<td>558</td>
</tr>
</tbody>
</table>

Source: Help Wanted On-Line Data; Center for Workforce Information & Analysis, Pennsylvania Department of Labor & Industry

The aging workforce also increases demand for workers across sectors. For example, 1 in 5 Registered Nurses are 55-64 years old. Clinical and healthcare skills will remain in high demand in the city as older workers begin to retire.

Demand for knowledge in computers and electronics is greater in Philadelphia than in Pennsylvania as a whole and was predicted to increase from 2012 through 2022. This demand includes the growing need in advanced manufacturing for computer-aided design and computer-aided machining.
### TABLE 1.22 KNOWLEDGE REQUIRED IN PHILADELPHIA BY OCCUPATIONS AND EMPLOYMENT

<table>
<thead>
<tr>
<th>Knowledge Area</th>
<th>PA 2012 Employment Needing this Skill</th>
<th>PA 2022 Employment Needing this Skill</th>
<th>PA Change in Employment 2012-2022</th>
<th>Rank 2012</th>
<th>Rank 2022</th>
<th>Rank Change 2022 Rank Difference from State</th>
</tr>
</thead>
<tbody>
<tr>
<td>English Language</td>
<td>598680</td>
<td>639320</td>
<td>40640</td>
<td>1</td>
<td>1</td>
<td>0</td>
</tr>
<tr>
<td>Customer and Personal Service</td>
<td>588420</td>
<td>628630</td>
<td>40210</td>
<td>2</td>
<td>2</td>
<td>0</td>
</tr>
<tr>
<td>Administration and Management</td>
<td>482550</td>
<td>520210</td>
<td>37660</td>
<td>3</td>
<td>3</td>
<td>0</td>
</tr>
<tr>
<td>Public Safety and Security</td>
<td>382150</td>
<td>413630</td>
<td>31480</td>
<td>7</td>
<td>7</td>
<td>0</td>
</tr>
<tr>
<td>Education and Training</td>
<td>370530</td>
<td>406680</td>
<td>30150</td>
<td>8</td>
<td>8</td>
<td>0</td>
</tr>
<tr>
<td>Psychology</td>
<td>285640</td>
<td>313190</td>
<td>27550</td>
<td>9</td>
<td>9</td>
<td>0</td>
</tr>
<tr>
<td>Mathematics</td>
<td>451820</td>
<td>478770</td>
<td>26950</td>
<td>4</td>
<td>4</td>
<td>0</td>
</tr>
<tr>
<td>Computers and Electronics</td>
<td>398430</td>
<td>422400</td>
<td>23970</td>
<td>6</td>
<td>5</td>
<td>1</td>
</tr>
<tr>
<td>Clerical</td>
<td>398670</td>
<td>423200</td>
<td>23650</td>
<td>5</td>
<td>6</td>
<td>-1</td>
</tr>
<tr>
<td>Law and Government</td>
<td>258000</td>
<td>276480</td>
<td>18480</td>
<td>10</td>
<td>10</td>
<td>0</td>
</tr>
<tr>
<td>Personnel and Human Resources</td>
<td>255060</td>
<td>272690</td>
<td>17630</td>
<td>11</td>
<td>11</td>
<td>0</td>
</tr>
<tr>
<td>Medicine and Dentistry</td>
<td>124050</td>
<td>140420</td>
<td>16370</td>
<td>18</td>
<td>18</td>
<td>0</td>
</tr>
<tr>
<td>Therapy and Counseling</td>
<td>139030</td>
<td>153400</td>
<td>14370</td>
<td>17</td>
<td>17</td>
<td>0</td>
</tr>
<tr>
<td>Communications and Media</td>
<td>205570</td>
<td>219680</td>
<td>14110</td>
<td>13</td>
<td>13</td>
<td>0</td>
</tr>
<tr>
<td>Sociology and Anthropology</td>
<td>146060</td>
<td>159860</td>
<td>13800</td>
<td>16</td>
<td>16</td>
<td>1</td>
</tr>
<tr>
<td>Sales and Marketing</td>
<td>215110</td>
<td>225180</td>
<td>10070</td>
<td>12</td>
<td>12</td>
<td>0</td>
</tr>
<tr>
<td>Philosophy and Theology</td>
<td>90130</td>
<td>99820</td>
<td>9690</td>
<td>23</td>
<td>22</td>
<td>1</td>
</tr>
<tr>
<td>Biology</td>
<td>85460</td>
<td>94910</td>
<td>9450</td>
<td>24</td>
<td>24</td>
<td>0</td>
</tr>
<tr>
<td>Chemistry</td>
<td>81800</td>
<td>90070</td>
<td>8270</td>
<td>25</td>
<td>25</td>
<td>0</td>
</tr>
<tr>
<td>Economics and Accounting</td>
<td>146160</td>
<td>153790</td>
<td>7630</td>
<td>15</td>
<td>16</td>
<td>-1</td>
</tr>
<tr>
<td>Production and Processing</td>
<td>162930</td>
<td>170410</td>
<td>7480</td>
<td>14</td>
<td>14</td>
<td>0</td>
</tr>
<tr>
<td>Telecommunications</td>
<td>104040</td>
<td>109940</td>
<td>5900</td>
<td>20</td>
<td>20</td>
<td>0</td>
</tr>
<tr>
<td>Engineering and Technology</td>
<td>91340</td>
<td>97220</td>
<td>5880</td>
<td>22</td>
<td>23</td>
<td>-1</td>
</tr>
<tr>
<td>Transportation</td>
<td>107520</td>
<td>112930</td>
<td>5410</td>
<td>19</td>
<td>19</td>
<td>0</td>
</tr>
<tr>
<td>Mechanical</td>
<td>95560</td>
<td>100750</td>
<td>5190</td>
<td>21</td>
<td>21</td>
<td>0</td>
</tr>
<tr>
<td>Physics</td>
<td>52870</td>
<td>56700</td>
<td>3830</td>
<td>29</td>
<td>28</td>
<td>1</td>
</tr>
<tr>
<td>Food Production</td>
<td>52080</td>
<td>55790</td>
<td>3710</td>
<td>30</td>
<td>30</td>
<td>0</td>
</tr>
<tr>
<td>Design</td>
<td>66430</td>
<td>69750</td>
<td>3320</td>
<td>26</td>
<td>26</td>
<td>0</td>
</tr>
<tr>
<td>Building and Construction</td>
<td>61310</td>
<td>64610</td>
<td>3300</td>
<td>27</td>
<td>27</td>
<td>0</td>
</tr>
<tr>
<td>Geography</td>
<td>54400</td>
<td>56410</td>
<td>2010</td>
<td>28</td>
<td>29</td>
<td>-1</td>
</tr>
<tr>
<td>Foreign Language</td>
<td>9300</td>
<td>10010</td>
<td>710</td>
<td>33</td>
<td>33</td>
<td>0</td>
</tr>
<tr>
<td>History and Archeology</td>
<td>26240</td>
<td>26840</td>
<td>600</td>
<td>31</td>
<td>31</td>
<td>0</td>
</tr>
<tr>
<td>Fine Arts</td>
<td>23050</td>
<td>23460</td>
<td>410</td>
<td>32</td>
<td>32</td>
<td>0</td>
</tr>
</tbody>
</table>

*Source: Center for Workforce Information and Analysis, Pennsylvania Department of Labor & Industry*

Philadelphia has struggled to keep its manufacturing industry intact with recent layoffs in Food Production and Motor Vehicle Brake System Manufacturing. However, shipbuilding and repairing continue to grow at the Philadelphia Shipyard. Likewise, Medical Equipment and Supplies Manufacturing and Plastics Product Manufacturing remain strong in the city. These employers require a wide range of skills from Rolling Machine Setters, Operators and Tenders and Machinists to Welders to Clean Room Team Assemblers.
Philadelphia remains strong in demand for cross-cutting occupations such as computer skills (mentioned above), accounting and financial skills, secretarial skills and customer service skills. There are over 27,000 Secretaries and Administrative Assistants working in Philadelphia with median hourly earnings of $20.47 per hour. Financial and brokerage clerks make up another 13,000 jobs in the city across all industrial sectors and there are 7,700 bookkeepers working as well. Customer Service Representatives make up another 10,000 jobs cross-cutting across industries. (*EMSI Occupational Overview, Quarter 1, 2016 Dataset*).

Section 1.3

Provide an analysis of the local workforce, including current labor force employment (and unemployment) data, and information on labor market trends, and the educational and skill levels of the workforce in the region, including individuals with barriers to employment. [WIOA Sec. 108(b)(1)(C)] and [proposed 20 CFR 679.560(a)]

Philadelphia County had about 1,560,000 residents in 2014 – an increase of more than 31,000 residents since 2010. 54 percent of Philadelphians were in the “prime working age” (25 to 64 years old) and about 13 percent of them were 65 years old and over. Women made up 53 percent of the total population and the prime working age population in Philadelphia County. Philadelphia is younger than other Pennsylvania counties. In 2014, population ages 18 to 34 years olds made up 30 percent of the population in Philadelphia.

Over the last two decades, immigrants have played a decisive role in reversing population declines in Philadelphia and increasing the available talent pool. Between 2010 and 2014 the American Community Survey shows that the number of foreign-born Philadelphians grew from 11.4 percent of the population to 12.5 percent of the population or 193,155 residents -- an increase of over 20,700 in 4 years.

**CHART 1.31 PHILADELPHIA AGE AND GENDER IN 2014**
Source: American Community Survey, 2014
Philadelphia is a diverse city with an immigration population substantially more diverse than the rest of the nation. Areas of origin include Asia (40%), Latin American and Caribbean (30%), Europe (19%) and Africa (10%). Since 2000, immigrants are responsible for 96 percent of the small business growth and 75 percent of the workforce growth and of the nearly one billion dollars in earnings generated by small business owners in the city of Philadelphia, immigrant entrepreneurs are responsible for $770 million, or 72%, of those earnings (Fiscal Policy Institute. *Bringing Vitality to Main Street: How Immigrant Small Businesses Help Economies Grow*. 2015)

**CHART 1.32 PHILADELPHIA RACIAL DIVERSITY 2014**

![Racial Diversity Chart](chart1)

*Source: American Community Survey, 2014*

**CHART 1.33 PHILADELPHIA HISPANIC/LATINO IDENTITY 2014**

![Hispanic Identity Chart](chart2)

*Source: American Community Survey, 2014*
Despite the increase in jobs over the past 3 years, unemployment in Philadelphia remains higher than in the surrounding counties. Based on seven years of data from BLS starting in 2007, the Philadelphia area experienced a higher unemployment rate compared to both the nation and Pennsylvania. In December 2015, the unemployment rate in Philadelphia was 5.4 percent. In December 2015, Philadelphia’s unemployment rate was 0.4 points above the U.S. and 1.3 points above Pennsylvania’s unemployment rate.

According to the American Community Survey, the unemployment rate of the population below the poverty level was 40 percent, an average across 5 years from 2010 to 2014, which captures the recovery period from the Great Recession.

1Red, yellow, and green indicate a high, moderate, and low unemployment rate, respectively. Grey means that the population is not dense enough to make a good estimate of the unemployment rate.
According to an average of 2010 to 2014 American Community Survey data, the unemployment rate of men between the ages of 20 and 64 in Philadelphia was 15.5 percent and the unemployment rate of women between the ages of 20 and 64 in Philadelphia was 12.6 percent.

**TABLE 1.37 UNEMPLOYMENT RATE BY RACE IN PHILADELPHIA**

<table>
<thead>
<tr>
<th>Population 16+</th>
<th>% of Total</th>
<th>Unemployment Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>1239760</td>
<td>14.9%</td>
</tr>
<tr>
<td>White</td>
<td>551018</td>
<td>44.4%</td>
</tr>
<tr>
<td>Black or African American</td>
<td>512591</td>
<td>41.3%</td>
</tr>
<tr>
<td>American Indian and Alaska Native</td>
<td>3967</td>
<td>0.3%</td>
</tr>
<tr>
<td>Asian</td>
<td>85416</td>
<td>6.9%</td>
</tr>
<tr>
<td>Native Hawaiian and Other Pacific Islander</td>
<td>1281</td>
<td>0.1%</td>
</tr>
<tr>
<td>Other</td>
<td>61236</td>
<td>4.9%</td>
</tr>
<tr>
<td>Two or More Races</td>
<td>24251</td>
<td>2.0%</td>
</tr>
</tbody>
</table>

*Source: Philadelphia Works analysis of the 2010-2014 American Community Survey data*
TABLE 1.38 UNEMPLOYMENT RATE – HISPANIC OR LATINO ORIGIN (OF ANY RACE)

![Map of Philadelphia showing unemployment rates by Hispanic or Latino origin.](chart1)

**Source:** Philadelphia Works analysis of the 2010-2014 American Community Survey data

The unemployment rate of the Hispanic or Latino population in Philadelphia was 19.9 percent, and the unemployment rate of the white population that was not Hispanic or Latino in Philadelphia was 9.6 percent, based on an average of American Community Survey data from 2010 to 2014.

Labor force participation in Philadelphia for those 16 years old and older was 59.2 percent in 2014 according to the American Community Survey. This compares with the national labor force participation rate of 63.4 percent. Despite Philadelphia’s lower participation rate, Philadelphians in the labor force remain in the labor force despite downturns in the economy; given a poverty rate of over 26 percent, Philadelphians need to work and want to work.

Low educational attainment is the greatest barrier to reducing unemployment. As noted earlier, employers require semi-skilled to professional level workers in the majority of their positions (See also Chart 1.45).
Following WIOA guidelines that advise local areas to develop services to individuals with barriers to employment, as well as our own strategic priority to serve those with barriers to
employment, Philadelphia Works examined six populations with barriers using data from the American Community Survey: adults with limited work histories, those employed only seasonally, adults with low educational attainment, adults with disabilities, adults with limited English skills, and disengaged youth. All six populations with barriers to work were overrepresented in Philadelphia. In particular, Philadelphia had a much larger share of residents with limited work histories (last worked more than five years ago or never worked), low educational attainment (less than high school), people with disabilities, and disengaged youth (youth ages 16-24 years not working or enrolled in school).

Populations with barriers to work in Philadelphia require more intensive services and greater coordination with other service providers who can meet needs beyond the capacity of the workforce system. Only 51 percent of people with low educational attainment were participating in the labor force in Philadelphia.

MAP 1.42 PERCENT OF ADULTS 25-64 WITHOUT A HIGH SCHOOL DIPLOMA

Source: American Community Survey, 2010-2014
While there are broad estimates of returning citizens in Philadelphia and we actively engage in placement, we have few specifics about their labor force participation. According to the Countywide Blueprint produced by the Philadelphia Reentry Coalition, every year, around 35,000 inmates from local jails and state and federal prisons are released back into the County of Philadelphia, contributing to the population of nearly 50,000 parolees and probationers living within the county in any given year.

Low educational attainment and literacy rates make it harder for returning citizens to be eligible for work. The average offender in a Philadelphia area prison will have a 10th grade education at the time of their incarceration and the majority will only be able to read at a 7th grade level. Inmates in Philadelphia have a 55 percent high school dropout rate. Also, 60 percent of those who were formerly incarcerated remain unemployed up to a year after reentering into the community. In Philadelphia, returning citizens can expect to make 11 percent less than people with the same educational attainment but not with incarceration histories. Many of those formerly incarcerated who seek services from the PA CareerLink® Philadelphia centers, have low educational attainment and limited work histories, they are also, therefore, included in the numbers we present in this section.

Veterans receive priority of service in the PA CareerLink® Philadelphia system as required under WIOA. There were 69,602 veterans in Philadelphia in 2014. The unemployment rate for veterans was 12.1 percent as compared to Pennsylvania’s unemployment rate among veterans at 8.1 percent.

**CHART 1.43 POPULATIONS WITH BARRIERS TO EMPLOYMENT IN PHILADELPHIA AND SURROUNDING SOUTHEAST PARTNERSHIPS FOR REGIONAL ECONOMIC PERFORMANCE (PREP) COUNTIES**

<table>
<thead>
<tr>
<th>Population Type</th>
<th>Philadelphia</th>
<th>Other PREP Counties</th>
</tr>
</thead>
<tbody>
<tr>
<td>Limited work history</td>
<td>10.3%</td>
<td>6.9%</td>
</tr>
<tr>
<td>Seasonal workers</td>
<td>5.1%</td>
<td>4.6%</td>
</tr>
<tr>
<td>Low educational attainment</td>
<td>6.4%</td>
<td>5.1%</td>
</tr>
<tr>
<td>With disabilities</td>
<td>9.6%</td>
<td>6.5%</td>
</tr>
<tr>
<td>Limited English speakers</td>
<td>2.0%</td>
<td>1.6%</td>
</tr>
<tr>
<td>Disengaged youth</td>
<td>10.5%</td>
<td>9.8%</td>
</tr>
</tbody>
</table>

*Source: American Community Survey, 2014*
### Section 1.4

Provide an analysis and description of workforce development activities, including type and availability of education, training and employment activities. Include analysis of the strengths and weaknesses of such services, and the capacity to provide such services, in order to address the education and skill needs of the workforce and the employment needs of employers in the region. [WIOA Sec. 108(b)(1)(D)] and [proposed 20 CFR 679.560(a)]

Philadelphia Works invests in employment and training solutions and services that connect
employers to workforce talent and career seekers to jobs while ensuring the highest standards and accountability for these investments. Through the implementation of WIOA, our providers are able to offer career seekers a wider variety of basic and individualized career services and training services such as on-the-job training (OJT), customized job training (CJT), individual training accounts (ITA) and other services outlined in Section 3.3, across many in-demand sectors within our region, without requiring any sequence of services.

Career services are made available through the PA CareerLink® Philadelphia centers and a comprehensive network of partners offer occupational and technical skills training. We also work closely with colleges, universities, proprietary schools and literacy providers who offer pre- and post-secondary education. The process to assess and determine service offerings is done each year as we develop our investment strategy.

Career services, which include an assessment for individuals who may need training to obtain, retain or earn self-sufficient wages, culminating with a referral to training services, are available year-round and are aligned with Philadelphia’s designated high priority occupations (HPOs) and targeted industry clusters list. To access training, career seekers meet with PA CareerLink® Philadelphia center staff who guide them through a process to determine whether they need career services and placement or referrals to training. This process includes a review of a career seeker’s work experience, educational attainment level, current knowledge, skill and abilities, barriers to employment, and job availability. Any information related to assessments and skills are captured in the individual employment plan (IEP) which includes an assessment of their career pathway and career plan. Using strategies identified in Section 3.2., Philadelphia Works collaborates with a broad group of literacy providers to provide educational services to career seekers who need to upgrade basic skills in order to qualify for training. Participants needing training are guided toward occupations that are in demand in the local area along a career pathway.

Engagement with employers and raising employer awareness of the services available through the workforce system are coordinated through the Philadelphia Works Business Engagement Team (BET), which manages high-level engagement of employers through compacts with employers and group strategies and the PA CareerLink® Business Services Representatives (BSRs), who provide direct services to individual employers. Through coordination with each other and economic development entities such as the two Small Business Development centers in the city, and the Delaware Valley Industrial Resource Center, the teams serve the needs of local and regional employers utilizing many of the strategies identified in Section 3.4. Specifically, the BSR team is organized to target different industry sectors and develop expertise in their respective trades.

All individual career seekers have access to career resource areas in each of our PA CareerLink® Philadelphia centers where they conduct job search, submit employment applications, develop
their resumes, participate in a variety of workshops and conduct research on the availability of jobs in the area. Additional services that are provided by our partners are available to career seeker customers through referrals, on-site recruitments, virtual notifications, and other methods. Basic career services and individualized services are also made available based on a career seeker’s needs that might include specific occupational counseling, referral to other services for barrier removal, assessments, training and work-based training such as OJTs.

Philadelphia Works operates the youth system through a competitively-procured YouthWorks Administrator. Currently, the Philadelphia Youth Network services in this capacity to leverage public workforce dollars to develop and replicate high-impact models. The Philadelphia Youth Network works to equip young people for academic achievement, economic opportunity and personal success. To achieve this mission, the Philadelphia Youth Network coordinates and supports large-scale, cross-sector initiatives while developing targeted programs to expand access to services for underserved youth. The Philadelphia Youth Network is the managing partner of WorkReady and Project U-Turn. WorkReady is a citywide strategy to address the skill gap for young people and Project U-Turn is a citywide campaign focused on addressing the dropout crisis in Philadelphia.

Utilizing WIOA Youth funds, the Philadelphia Youth Network implements programming for young people across three target populations: in-school youth (young people currently enrolled in high school); out-of-school youth (also known as opportunity youth) without a secondary credential, or out-of-school youth with a secondary credential. This strategy involves coordinating citywide partnerships and leveraging public workforce dollars to develop and replicate high-impact program models, outlined in Section 3.6. These programs focus on education and youth workforce development, including innovation through E³ Power Centers, (partially funded with TANF funds), summer program models of service-learning, work experience and internships, and increasing work experience opportunities for youth that blend academic support to prepare young people to participate fully in the local economy. Our system is closely involved with the School District of Philadelphia’s Career and Technical Training Program. Special initiatives such as Registered Apprenticeships and Pre-Apprenticeships, which can be appropriate workforce interventions for in-school and out-of-school youth, young adults and lower-skilled adults of all ages, blend across youth and adult categories. Philadelphia Works and the competitively-procured YouthWorks Administrator strategically align resources to increase opportunities.

Identified areas of strength in our local system include:

- Established relationships with regional partners and the community of providers within the area.
- Strong and broad stakeholder relationships across subject areas and levels of government with employers, educators, training providers, associations and other important partners.
• High capacity to seek flexible funding beyond our formula funds to support innovative opportunities.
• Sector-based and occupationally-based strategies to serve both employers and build career seeker opportunities.
• Close relationships with our economic development partners.
• Robust research capabilities to ensure our operational work is driven by data and best practices.
• Integrated centers that offer streamlined service delivery, greater efficiency, and consistency.

Identified opportunities for improvement include the need to build internal and provider capacity around co-enrollment among core and partner programs, additional opportunities to serve those with barriers to employment with targeted services that meet their current skill levels through partnerships with providers, improving our on-line presence and community partnerships to increase access to customers across the city, and building Title I providers’ capacity around newer WIOA training and placement strategies such as work experience, internships and transitional jobs.

Section 2: Strategic Vision and Goals

Section 2.1

Describe local board’s strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment). Include goals relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) in order to support regional economic growth and economic self-sufficiency. [WIOA Sec. 108(b)(1)(E)]

Philadelphia Works connects employers to a skilled workforce and helps individuals develop the skills needed to thrive in the workplace. The board organizes its work around a set of strategic priorities adopted in 2013 following a planning process inclusive of 57 area economic development, literacy, youth, education, and workforce and social service organizations. These strategic priorities guide our efforts as our full system engages with over 2,000 employers, connects with over 40,000 Philadelphians seeking training or placement services and support over 8,000 youth on an annual basis.

Our strategic planning process yielded the following five strategic priorities that support the board’s vision to be among the most integrated, innovative, productive and transparent systems of its kind in the country by consistently delivering value for employers and career
seekers, contributing measurably to the economic growth of the region, and serving as a model for others to learn from and replicate.

The impact of these strategic priorities on our primary indicators of performance is summarized below and described in additional detail in Section 2.4.

1) **Strengthen collaboration between the workforce system and Philadelphia’s economic development efforts.**

   Philadelphia Works places high emphasis on systems thinking and collaboration between the workforce system and Philadelphia’s economic development efforts by tying both systems to fast-growing industry clusters and building career seeker skills to match existing and anticipated employer demand.

   Industry partnerships are an important economic development strategy as they bring together employers, workers and training providers from a single industry cluster to collaborate on improving the industry’s competitiveness and address common workforce needs. The Southeast Regional Workforce Development Partnership is an industry partnership that formed in 2007 to bring together stakeholders in the field of advanced manufacturing around the common purpose of improving and advancing the sector’s competitiveness. Today, the partnership encompasses over 85 affiliates representing business, education, economic development and other strategic partners. Given its success, the industry partnership is regularly highlighted as a workforce best practice. Since its inception until 2015, the partnership provided 2,296 industry-recognized certificates or credentials to upgrade workers’ skills through 3,050 trainings and the numbers steadily continue to increase. In recognition of the value that this partnership provides, members have advanced their own commitment to its success by increasing employer contribution for the cost of training from 25% to 50%. This money is used to support additional workforce activities and the Partnership’s internship program.

   We are building on the progress we have seen to date with our manufacturing industry partnership and the growth of other partnerships, including the Greater Philadelphia Healthcare Partnership, by developing a Financial and Business Services Partnership based on evidence of steady growth, placement opportunities, and the potential for career seekers to advance along pathways and achieve family-sustaining wages.

   Other employer-based initiatives bring our work into close alignment with economic development partners such as the regional grant from the Pennsylvania Department of Community and Economic Development (DCED) as part of their U.S. Department of Defense, Office of Economic Assistance effort to assist employers affected by the reduction in defense spending. Philly TechHire is an initiative that focuses on building talent for the
growing number of IT and tech employers and the increasing demand for these workers in established companies across all sectors.

Focused efforts within these recognized clusters, as a result of our partnership with economic development, also serve as a basis for training investments and pipeline development for career seeker advancement. With the expanded tools WIOA offers for engaging employers, we expect these strategies will result in an increase in the number of jobs and employers utilizing the public workforce system with opportunities that can be matched to the talent within our system. We further anticipate that the success of this strategic priority will impact all performance measures, as they are focused in industries that provide long-term career opportunities, and will specifically support measures related to credential obtainment and effectiveness in serving employers, (although this WIOA measure is yet to be defined).

2) **Serve smaller employers**.
Connecting with smaller employers increases opportunities to help businesses expand and spurs economic growth, especially as smaller businesses continue to account for the majority of jobs in the city. Given the limited familiarity of many small businesses with the services that the public workforce system has to offer, we have developed ongoing partnerships with local chambers of commerce and have small business leaders represented on our board. We also developed a first-ever Philadelphia Jobs Compact, a commitment by local business leaders to hire workers from the public workforce system in Philadelphia, support our youth summer programs, and engage with the workforce system in a meaningful way. To date, this initiative has over 50 employer signers and has resulted in over 200 hires and close to 500 job postings. In 2014, our Job Compact employers provided 274 youth summer employment and 315 summer jobs in 2015. Overall, this strategy will grow our economic development work and impact our measures related to placement, credential attainment, and effectiveness in serving employers.

3) **Implement “no wrong door”**.
Since 2013, Philadelphia has been working towards streamlining the public workforce system through the consolidation of Workforce Investment Act of 1998 (WIA) and now WIOA with EARN programming into four PA CareerLink® Philadelphia centers across the city. The integration of these two systems offers career seeker and employer customers with access to a full array of coordinated and integrated services. This strategy also includes a more robust on-line presence as well as partnerships with community based organizations to increase access to services while improving consistency in service delivery. This strategic priority allows us to streamline services, maximize public resources, and build more effective employer relationships while continuing to deliver performance outcomes.

4) **Adopt common employer-driven education and training standards across all ages.**
In recognition of the varying ways that workforce partners understand the needs of employers, the board set out to adopt common employer-driven standards for education and training activities. This standard is a unifying workforce strategy that moves the needle forward as we and other workforce partners prioritize our investment of resources to educate and train individuals utilizing our services. This strategic priority allows us to bring alignment among workforce partners in areas of shared understanding such as work readiness while seeking ways to offer flexibility so that the investment of our workforce funds is driven by employer need. To address the needs of those with barriers to employment, we can also work with employers to create career pathways for entry-level positions that reflect employer-determined levels.

As part of this work, a key step involves integrating WIOA youth, adult education, training, and literacy providers to collaboratively identify skills, credentials, and education needs to prepare quality participants, including those with barriers to employment, for the beginning rung of employment leading to career pathway opportunities requiring additional post-secondary education. Through this informed and open process, we can continue to develop career pathways for future employment success and seek methods of alternative credentialing (ex.: DOR, digital badges, etc.). To date we have mapped career pathways designed to develop trained workers to meet employer needs in targeted industry areas including advanced manufacturing, healthcare, and business/finance administration sectors. This work is being accomplished in concert with our industry partnerships to create a shared understanding of the existing and future landscape of an industry’s career ladder, with appropriate supports for those with barriers to employment, including adult and basic education resources through adult education and English Language Acquisition providers in coordination with the Mayor’s Commission on Literacy. We anticipate that this work will support our ability to meet the commonwealth’s training benchmark as well as measures related to credential attainment and measurable skill gains.

5) Prioritize hardest-to-serve populations.

At the time of the board’s strategic planning process, hundreds of thousands unemployed Philadelphians were deemed very low-skilled, had limited work histories, or faced personal obstacles to employment that limited our ability to adequately serve them through then-WIA or TANF-funded workforce programs. While the need for unique interventions persists in Philadelphia, WIOA now provides us with additional opportunities, especially through earn and learn program models such as paid work experience and transitional jobs, priority of service, and other tools, to support these unique needs.

We intend to increase the educational levels of this population through the use of technology and in partnership with our Title II adult basic education providers. This includes computer-based learning and other technology supported resources shown to make education more accessible to not only adults but young people as well. This strategy will
impact our ability to meet the commonwealth’s training benchmark as it relates to
individuals with barriers to employment but also measures related to measurable skill gains.

Overall, through these strategic priorities, we plan to:

• Implement work-based curricula, through partnership with a broad group of providers,
that prepare career seekers to work in fast-growing industry clusters.

• Identify and invest in critical skills and credentials identified by employers, including
critical thinking skills and non-cognitive skills essential to the workplace.

• Coordinate with key stakeholders and workforce and economic partners to gain
additional knowledge on employee-skill requirements that we will apply to guide our
decisions on investing in employer and career seeker services.

• Build and implement skill ladders/career pathways, including entry-level job
opportunities that are driven by employer standards.

• Create innovative models that are geared towards supporting individuals with barriers
to employment, including integrated adult education and occupational training models.

• Integrate the use of work-based technology into our program models, such as
promoting the use of smartphones, computer software, web-based and industry-based

technologies.

• Expand the success of pre-existing sector-based partnerships and actively develop
additional ones, including partnerships that link work-based educational programs to
technical training and employment.

• Develop partnerships for social service supports based on availability of resources and
customer need, including behavioral health services and those that are components of
program models such as Platform to Employment.

Section 2.2

Describe how the local board’s vision and goals align with and/or supports the governor’s
vision and goals for the commonwealth’s workforce development system. [WIOA Sec.
108(b)(1)(E)] (See Appendix C: Transitional Planning References and Resources)

Philadelphia Works’ vision and goals, as expressed in our five strategic priorities, align closely
with each of the Governor’s vision and goals. Our vision to “build a skilled and thriving
workforce” by providing high-quality services to employers, adults and youth matches the
Governor’s vision for an effective workforce system as expressed in the commonwealth’s five
goals for the workforce development system. Our work aligns with these goals in the following
ways:
1) Establish career pathways as the primary model for skill, credential and degree attainment and provide all Pennsylvanians, with an emphasis on Pennsylvanians with barriers to employment, an opportunity to obtain a job that pays.

- Philadelphia Works will continue our work of the past two years to build and implement skill ladders and career pathways as we implement WIOA (Goals 1.1 and 1.2). Working closely with employers, we developed validated career pathways for advanced manufacturing and healthcare. We are currently testing our pathway for advancement in IT and computer science across multiple industry sectors through the Philly TechHire initiative. Given the ever-evolving nature of business and other stakeholder priorities, we acknowledge that opportunities to develop pathways in new or developing sectors may arise.
- We look forward to working with the commonwealth as it creates a “comprehensive career pathway system” (Goal 1.3) that will eventually combine state-funded literacy, TANF, Supplemental Nutrition Assistance Program (SNAP) and higher education programs with core WIOA programs.
- Philadelphia Works’ “no wrong door” model that integrates TANF and WIOA services in PA CareerLink® Philadelphia centers will support the commonwealth’s goals of co-enrolling participants as needed to provide comprehensive services (Goals 1.4 and 1.5).
- As the lead partner in a regional DOL-funded effort to promote pre-apprenticeship and Registered Apprenticeships, for which we will leverage WIOA training funds, Philadelphia Works will contribute to the commonwealth’s goals of integrating apprenticeship into career pathways and further promoting work-based training such as OJTs as career pathway strategies (Goals 1.6 and 1.10).
- The close relationship between the adult literacy community with both our youth programming and adult training will help us develop more mainstream opportunities along career pathways for those with barriers that were traditionally denied access to training. We are committed to identifying innovative models to support individuals with barriers to employment, including the commonwealth’s goal of identifying quality entry-level “on ramp” jobs to career pathways for opportunity youth and adults (Goal 1.7).
- As a recipient of commonwealth funding from the Workforce Innovation Fund (WIF) for a micro-credentials project with our partner the Community College of Philadelphia, we will contribute to the commonwealth’s goal of establishing regional lists of industry-recognized credentials including those micro-credentials and badges appropriate for individuals with barriers to employment (Goal 1.9).
- Philadelphia Works has a robust local HPO review and feedback loop to the commonwealth. These HPOs provide the basis for a strong eligible training provider list (ETPL), which we expect to expand as employers offering apprenticeships become part of this list. Use of Career Coach (EMSI) for career guidance and exploration as well as the commonwealth’s links to career videos, resume writers and interviewing skills are in place today. Tracking outcomes has always been a priority so that we may meet career
seekers where they are able to engage with services and have a more successful approach to getting to “high-quality jobs.”

2) **Expand public-private investment in the state’s pipeline of workers and in incumbent workers for targeted industry sectors from entry-level skills to middle skills through Industry partnerships, WEDnetPA, and other innovative strategies.**

Our local workforce area is well-positioned to advance the commonwealth’s Goal 2 of investing in skills and talent for targeted industries in partnership with employers and educational institutions.

- We plan to implement work-based curricula that prepare career seekers for work in industry clusters and occupational targets experiencing growth in the Philadelphia region. We will continue to coordinate with our economic development partners, industry partnership members, and other employers engaged in specific talent development strategies to identify needed skills and invest in training that meets their requirements; we are committed to creating innovative models to build the skills of individuals with barriers to employment, including opportunity youth. Through training strategies that best reflect our engaged employers’ needs and those identified through our business intelligence, we expect to meet the commonwealth’s requirements for funding committed to training.

- With one established industry partnership, the Southeast Regional Workforce Development Partnership, a developing Financial and Business Services partnership and the Philly TechHire initiative, we are allowing employers to directly inform the direction of our talent development programming in these industries and associated occupations. We also coordinate closely with the Greater Philadelphia Healthcare Partnership headed by our close partners District 1199c Training and Upgrading Fund. These programs allow for incumbent worker training, crucial to keep employers engaged in the public system and to better advance employees within a company opening entry-level positions.

- Philadelphia Works intends to ensure that workforce development services for the existing workforce are coordinated and that prospective strategies are developed for rapid access to the range of employer assistance through statewide and local initiatives. Philadelphia Works recognizes that improving the education and skill levels of the current workforce will not only improve the state’s economy and fiscal well-being, but will also increase the ability of businesses to effectively compete in the region and in the global economy. In general, strategies for the existing workforce should be designed to benefit business and industry by assisting in the skill development of existing employees (incumbent workers) and increasing employee productivity, and the growth of the company. Philadelphia Works will invest in incumbent worker training opportunities given the numerous opportunities that they make available including: expansion of worker skills into new industry-demanded requirements, new career opportunities, retention of jobs that otherwise may have been eliminated, retention of existing personnel who otherwise may have left an organization, increase in the wages for
trained workers, creation of opportunities for entry-level workers through the advancement of existing workers, and overall enhancement of the local and regional economic development efforts.

- Our American Apprenticeship grant focuses on pre-apprenticeship programming as employers were eager to engage in apprenticeships but felt preparation for this full-time work with infused learning was poor in the city. Through this grant we will establish standard core pre-apprenticeship curriculum for behavioral health and IT occupations to make entry-level workers successful.

- Likewise, as noted above, we are already contributing to the commonwealth’s goal of creating micro-credentials through our WIF grant (Goal 2.6) and to its goal of expanding apprenticeships to non-traditional populations (Goal 2.7), specifically those with barriers to employment receiving priority of service, including all veterans and eligible spouses.

- We look forward to the opportunity to meet the commonwealth’s goal of expanding services to individuals entitled to priority of service, through applying for discretionary state funds and other grants (Goal 2.10). We are still evaluating whether to invest in integrated education and training models for youth and adults lacking a high school credential and/or who are basic skills deficient (Goal 2.11).

3) Increase opportunities for all youth to participate in work-based learning through summer employment, pre-apprenticeship, apprenticeship, internships and other similar experiences.

Philadelphia Works and our competitively-procured YouthWorks Administrator will continue our work in tandem to build broad partnerships across the city with employers and youth service providers that result in work-based opportunities for youth.

- Philadelphia has one of the largest summer internship programs that provides work-based, paid experiences for 7,000 - 10,000 young people each year, using a blend of funding, and we hope to continue to partner with the commonwealth in leveraging state resources for in-school youth summer jobs (Goal 3.9).

- In addition, through grants enabling connections between the Philadelphia School District and employers, we expanded opportunities during the year for specific career learning and co-op positions. Along with our YouthBuild and Job Corps partners and the Philadelphia Housing Authority, opportunity youth will continue to be served by linking apprenticeships, internships and post-secondary learning experiences to provide real opportunities towards a career with family sustaining wages.

- Co-enrollment of high-risk out-of-school youth as both WIOA adult and youth participants and co-enrollment with other partner programs will be explored in the upcoming year with careful consideration for its impact on overall performance (Goal 3.8).

- All of this work is informed and overseen by the Youth committee of our local board, the Philadelphia Council for College and Career Success, meeting the commonwealth’s goal
of all local areas having a standing youth committee. We look forward to working with the commonwealth to make the best use of additional funds and technical assistance to help high-risk youth access work-based opportunities (Goals 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 3.7, 3.10, 3.11, 3.12, 3.13, and 3.14).

- TANF funds are leveraged and used to support neighborhood-based, holistic approaches to preparing opportunity youth, youth returning from juvenile placement, and foster youth to achieve long-term educational, career and personal goals. Additional funds are raised by Philadelphia Works’ competitively-procured YouthWorks Administrator to support the model.

4) **Engage employers through multi-employer workforce partnerships to improve the connection and responsiveness of workforce programs to the demand side of the labor market, increase public-private investment in critical skills, and support the spread of employer practices that create jobs that pay.** Improving employer engagement and partnerships with educational resources and training, Goal 4 is one that the local board shares with the commonwealth and will continue to focus on under WIOA.

- Our private-sector board members are active as both users of and advisors to the workforce system, informing and ultimately deciding how investments are to be made into skills training and work-based programs.
- We will continue to use our innovative Jobs Compact as a method to engage employers and invite their feedback to improve the workforce system and its services.
- We will build on our successful industry partnership and emerging partnerships that aggregate the needs of employers in the manufacturing, transportation and logistics sectors and the healthcare sector by beginning to organize new regional business and financial services industry partnership, which will meet the commonwealth’s Goal 4.4.
- Philadelphia Works is already involved in the commonwealth’s Business-Education Partnership (Goal 4.6).
- We would welcome the capacity building and funding initiatives that the commonwealth describes (Goals 4.2 and 4.3) as well as the commonwealth’s statewide activities to build stronger partnerships with businesses, business organizations and leadership to inform the workforce system (Goals 4.5, 4.7, 4.8, 4.9, 4.10, 4.11 and 4.12).

5) **Strengthen data sharing across state agencies and workforce development partners to better understand education and employment outcomes and rely more effectively on data to improve and target our efforts.** Philadelphia Works has significant capacity and expertise to lend to the commonwealth’s goal to strengthen data sharing and more effectively use data. Moreover, Philadelphia Works is committed to doing more than share data with partners. The purpose of sharing and using data is to strategically manage data in a way that informs the service delivery and
implementation. Philadelphia Works and its partners will use data in a way that leads to continued program improvement from concept to implementation to evaluation.

- The Research and Policy committee of the board is reviewing possible return-on-investment analyses, and is also developing a new dashboard of performance and trend data.
- Philadelphia Works regularly analyze a rich array of data on a bi-weekly, monthly, and quarterly basis. A summary of these data are published for the board as the “Workforce System Quarterly Summary Report” as part of the quarterly business meeting board briefing book (available on-line each quarter). The Workforce and Economic Development committee use these data to inform its recommendations for WIOA investment strategies and new initiatives.
- At the operational level, Philadelphia Works provides ongoing data and technical assistance to our service delivery partners to drive continuous improvement of WIOA Title I and TANF workforce services.
- In our conversations with stakeholders during the WIOA planning process, a common theme was the need for more cross-agency data sharing to facilitate outcome reporting and case management. We look forward to partnering with the commonwealth on its goals to improve data quality and data sharing (Goals 5.1, 5.2, 5.3).

Section 2.4

Describe how the local board’s goals relate to the achievement of federal performance accountability measures. [WIOA Sec. 108(b)(1)(E)]

The mission of Philadelphia Works is to connect employers to a skilled workforce and help individuals develop the skills needed to thrive in the workplace. Inherent in this mission are strategies designed to improve the quality of the workforce not only to advance the quality of life for Philadelphians, but also to build upon the area’s desirability to employers. Both of these outcomes will support our achievement of the federal performance accountability measures.

Measure(s): Adult and dislocated worker employment measures (2nd and 4th quarters after exit).
    Adult, dislocated worker and youth earnings measure.

A number of strategies will be employed to ensure that the area workforce has the qualifications to obtain employment and earn family-sustaining wages. Key among these is coordination with stakeholders and economic partners to establish employer-validated skill requirements. This knowledge informs the implementation of work-based curricula in fast-growing industry clusters in order to prepare individuals for jobs that exist in the area. Employer involvement in this process is critical and provides added credibility so that employers feel confident in hiring individuals from the workforce system.
Philadelphia Works is also committed to the establishment of career pathway programs with multiple entry points for individuals of all ages and levels. These pathways identify and deliver employer-sanctioned foundational work skills that individuals can build upon as they progress along their careers with stackable high-demand credentials that ultimately contribute to both employment retention and advancement.

The timeframes for the federal performance measures demonstrate an emphasis not only on being employed, but also remaining employed. One of the local board’s strategic priorities is the implementation of the “no wrong door” service delivery model. This integrated model of service delivery emphasizes that the purpose of post-exit follow-up services is to enhance retention, wage gain, and career progress for previous participants who became employed and have exited the program. The model prescribes that all past participants be continuously informed of the availability of retention and advancement services for up to twelve months after exit. This continuity of service with an emphasis on job retention and progression will serve to achieve both the employment and earnings measures.

The federal performance measures for employment earnings will be supported further by the concentration of training funds in HPOs reflecting growth in the local economy within the commonwealth’s identified industry clusters. These occupations are those in demand by employers and are most likely to provide family-sustaining wages.

**Measure(s):**  Youth in education, training, or employment (2\(^{nd}\) and 4\(^{th}\) quarters after exit).

The youth employment measure includes those youth who are in education and/or training activities in the quarters after exit, as well as those who are in unsubsidized employment.

The high school graduation rate in Philadelphia is far below the national average, especially for minority youth. In the 2011-12 school year, the four-year graduation rate for Black male students was estimated to be only 58 percent and 55 percent for male Hispanic students in the same cohort. (Project U-Turn. A Promise Worth Keeping: Advancing the High School Graduation Rate). This presents a significant challenge for the area workforce system as these thousands of youth are out-of-school, lack skills, and may only be marginally connected to the labor force. Two of the changes for youth seeking a high school diploma equivalency are the shift in the content of the high school equivalency exams as well as the test’s transition to becoming computer-based, which presents a challenge for those with digital literacy issues. Any variations to the plan may require an increase in time needed to prepare for the examination. Alternative exams that are more focused on application of concepts as well as other pathways through the Community College of Philadelphia will need to be explored to generate strong performance results, while establishing performance levels that reflect the impact of these changes.
Using a data-driven case management process and through oversight and regular monitoring of WIOA youth participants, providers offer evidence-based, accountable, and meaningful program models that support the achievement of federal performance standards. The models focus on three populations: in-school youth, identified as at-risk youth who are enrolled in school; out-of-school without a secondary credential; and out-of-school youth with a secondary credential but who are not employed nor in a post-secondary program.

Each model directly focuses on one or more of the aspects of this performance measure. Although focused on the first rather than the second quarter, the Philadelphia youth system’s most recent record on this performance measure under WIA has been extremely strong.

**Measure(s):** Obtainment of a recognized postsecondary credential or secondary school diploma in or within one year after exit.

Percentage of participants who are in education or training that leads to a recognized postsecondary credential and who are achieving measurable skill gains toward a credential or employment goal.

One of the local board’s objectives is mapping career pathways that contain education requirements, skills, and industry-recognized credentials of HPOs. Philadelphia uses a variety of assessment tools to inform participant decision-making regarding their aptitude for a specific career in order to maximize the probability of success. These career pathways, as well as the investment of training dollars into those training programs that offer credentials in those occupations, will serve to achieve this performance accountability measure.

As described in the youth education/training/employment measure, the youth models under WIOA have a strong focus on education and credential attainment for both in-school and out-of-school youth. The local board is committed to the innovative utilization of the full array of training services under WIOA in order to achieve this measure.

Additionally, the “no wrong door” service delivery model emphasizes post-exit follow-up services. Monitoring achievements in the year subsequent to exit is an integral part of the model so that the appropriate outcomes can be recorded or the necessary intervention can be undertaken as required.

**Measure(s):** Effectiveness in serving employers.

Although this is as yet an undefined measure, the local board is acutely aware of the fact that the workforce system exists to serve two customers: the career seeker and the employer. This is evidenced by the fact that three out of our five strategic priorities for the local board directly involve employers:
• Strengthening collaboration between the workforce system and Philadelphia’s economic development efforts by identifying shared industry clusters and creating stronger Industry partnerships.
• Serving smaller employers by engaging more small businesses and coordinating services that lead to more employer satisfaction.
• Adopting common employer-driven standards by building career pathways used by employers.

Philadelphia Works is in the process of establishing a feedback loop for a variety of employer services so that we can have some measure of our effectiveness. In addition, the local board’s Employer Engagement committee is looking at employer engagement and re-engagement over time in order to establish a baseline and goals for the future.

Despite what the definition may ultimately be, we are confident that our efforts along with multiple fronts will serve to positively affect this performance measure.

Section 3: Local Area Partnerships and Investment Strategies

Section 3.1

Taking into account the analysis described in Appendix B - Section 1, describe the local board’s strategy to work with the entities that carry out the core programs to align resources available to the local area, in order to achieve the strategic vision and goals described in element 2.1. This analysis should include:

A. A descriptive overview of the local workforce development system; include key stakeholders and entities associated with administrative and programmatic/service delivery functions. Examples include elected officials, advocacy groups, local workforce development board and committee structure, fiscal agent, operator(s), required program partners, and major contractors providing Adult/Dislocated Worker/Youth program elements. Describe respective roles and functional relationships to one another;
B. A list of all local area PA CareerLink® centers; include address, phone numbers, and hours of operation; and
C. An attached organization chart that depicts a clear separation of duties between the local board and programmatic/service delivery entities. [WIOA Sec. 108(b)(1)(F)]
delivery functions. Examples include elected officials, advocacy groups, local workforce development board and committee structure, fiscal agent, operator(s), required program partners, and major contractors providing adult/dislocated worker/youth program elements. Describe respective roles and functional relationships to one another.

Philadelphia Works provides strategic direction and management of Philadelphia’s public workforce system as it implements WIOA. As the chief elected official, the Mayor appoints members nominated by Chambers of Commerce and other organizational groups as required under WIOA. The board bylaws outline term requirements. As mandated by WIOA, the board has a majority of membership representing executives from key private industry sectors that drive economic performance, plus senior appointed government officials and leaders in Philadelphia’s non-profit community. Since its designation, our board has maintained compliance with all federal regulations and is in alignment with the opportunities WIOA provides for a more lean and manageable local board. The board has eight standing committees: Executive, Board Development, Finance, Human Resources, Workforce and Economic Development, Employer Engagement, Research and Policy, and Youth. Through the work of these committees, as the fiscal agent, the board directs the strategic disbursement of and retains accountability for approximately $60 million a year in federal and state funding for employment services on behalf of the city, of which more than 90 percent are contracted to service providers consistent with funding requirements.

Philadelphia Works oversees the city’s integrated service delivery model in which both WIOA and TANF workforce programs operate through the PA CareerLink® Philadelphia system – a process that began in 2013 and concluded in December 2015. Each of the four integrated centers has a primary provider (as listed below) and our Cross Center Services provider, Educational Data Systems Incorporated (EDSI) manages consistency and uniformity in service delivery by organizing employer engagement and center events. All providers are competitively procured. As we continue to advance this service delivery model that integrates WIOA and EARN programming, we anticipate increased center traffic and improved opportunities for access. While currently, we utilize a Consortium model for the one-stop operator, we are beginning to transition the work to competitively procure the role of the operator.

Through our competitively-procured YouthWorks Administrator, Philadelphia employs program models that support youth achievement in long-term academic and employment goals. Our youth programs and collective investments have yielded success for not only the young people involved but also our city as summer jobs provide a positive work experience and may also result in quality of life and public safety improvements.

Philadelphia Works is also a partner or member to a number of organizations and associations at the local state and national level to support the visibility and vitality of the workforce system.
as a whole. We are members of four area chambers of commerce, work closely with the Federal Reserve Bank of Philadelphia, the Pennsylvania Workforce Development Association, the US Conference of Mayors Workforce Development Council, and the National Association of Workforce Boards.
### TABLE 3.11: KEY PARTNERS AND ROLES

<table>
<thead>
<tr>
<th>Partner</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Philadelphia, Commerce Department</td>
<td>The City of Philadelphia’s economic development agency that partners with Philadelphia Works to provide employer services. The Commerce Department is also represented on the local board.</td>
</tr>
<tr>
<td>City of Philadelphia, Office of the Mayor</td>
<td>Serves as chief local elected official and ultimately responsible for funds allocated to Philadelphia workforce area. Members of the Mayor’s cabinet are also represented on the local board.</td>
</tr>
<tr>
<td>Community College of Philadelphia</td>
<td>Key partner in the areas of providing training to career seekers. The Community College is also represented on the local board.</td>
</tr>
<tr>
<td>Local Management Committee</td>
<td>A local entity made up of strategic stakeholders that work together to address concerns of workforce system</td>
</tr>
<tr>
<td>Mayor’s Commission on Literacy</td>
<td>Important partner in strategizing how best to serve low literacy career seekers ages 16-64. The Mayor’s Commission on Literacy is also represented on the local board.</td>
</tr>
<tr>
<td>L&amp;I</td>
<td>Provides WIOA funding to the 23 workforce areas in PA including Philadelphia and provides technical assistance, guidance and fiscal and operational monitoring.</td>
</tr>
<tr>
<td>OVR, L&amp;I</td>
<td>Essential partner in ensuring individuals with disabilities are adequately served with career services. OVR is also represented on the local board.</td>
</tr>
<tr>
<td>DHS</td>
<td>Provides TANF funding to the 67 counties in PA including Philadelphia and provides technical assistance, guidance and fiscal and operational monitoring.</td>
</tr>
<tr>
<td>Philadelphia Industrial Development Corporation (PIDC)</td>
<td>Philadelphia’s Economic Development Corporation that partners with Philadelphia Works to provide employer services PIDC employer portfolios.</td>
</tr>
<tr>
<td>Philadelphia Youth Network</td>
<td>Our current competitively-procured YouthWorks Administrator, the Philadelphia Youth Network is an intermediary organization dedicated to connecting systems and leveraging resources. The Philadelphia Youth Network is the managing partner of WorkReady and Project U-Turn.</td>
</tr>
</tbody>
</table>
Southeast PA WDB Collaborative | A collaborative consisting of six regional workforce development boards to better coordinate our work across the region.

WIOA Title II Providers | Critical partner in increasing the competitiveness of career seekers in the job market. Title II is also represented on the local board.

B. A list of all local area PA CareerLink® centers; include address, phone numbers, and hours of operation.

There are four (4) PA CareerLink® Philadelphia centers. Each center is operated by a competitively-procured provider as identified below.

<table>
<thead>
<tr>
<th>PA CareerLink® North</th>
<th>PA CareerLink® Northwest</th>
</tr>
</thead>
<tbody>
<tr>
<td>4361 N. 5th Street</td>
<td>5847 Germantown Avenue</td>
</tr>
<tr>
<td>Philadelphia, PA 19140</td>
<td>Philadelphia, PA 19144</td>
</tr>
<tr>
<td>Managed by Nueva Esperanza</td>
<td>Managed by Impact Services, Inc.</td>
</tr>
<tr>
<td>Phone: 215-967-9711</td>
<td>Phone: 215-987-6503</td>
</tr>
<tr>
<td>Hours of Operation: 8:00 a.m. – 4:30 p.m.</td>
<td>Hours of Operation: 8:00 a.m. – 4:30 p.m.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PA CareerLink® Suburban Station</th>
<th>PA CareerLink® West</th>
</tr>
</thead>
<tbody>
<tr>
<td>1617 JFK Boulevard, 2nd Floor</td>
<td>5070 Parkside Ave, 5th Floor (interim location)</td>
</tr>
<tr>
<td>Philadelphia, PA 19103</td>
<td>Philadelphia, PA 19131</td>
</tr>
<tr>
<td>Managed by JEVS Human Services</td>
<td>Managed by SER Metro</td>
</tr>
<tr>
<td>(Also houses the Cross Center Services provider, EDSI)</td>
<td>Phone: 215-473-3630</td>
</tr>
<tr>
<td>Phone: 215-557-2592</td>
<td>Hours of Operation: 8:00 a.m. – 4:30 p.m.</td>
</tr>
<tr>
<td>Hours of Operation: 8:00 a.m. – 4:30 p.m.</td>
<td></td>
</tr>
</tbody>
</table>

C. An attached organization chart that depicts a clear separation of duties between the local board and programmatic/service delivery entities. [WIOA Sec. 108(b)(1)(F)]
Philadelphia Workforce Area Governance and Service Delivery

**Fiscal Administration**

**Chief Elected Official,**
Jim Kenney, Mayor

**Local Workforce Board**
Philadelphia Works, Inc.
Board Support

**Operational Oversight**

**YouthWorks Administrator**
Philadelphia Youth Network
(Competitively-procured by Board in consultation with the Mayor)

**PA CareerLink Operator**
PA CareerLink® Operator Consortium:
State: OVR, DHS, BWDP
(Designated by Philadelphia Board in consultation with Mayor)

**Program Delivery**

- Cross Center Services (EDSI)
- PA CareerLink® Northwest (Impact Services)
- PA CareerLink® Suburban Station (JEVS)
- PA CareerLink® North (Nueva Esperanza)
- PA CareerLink® West (SERMetro)

**Youth Providers**
Recommended by Youth Council
Approved by Philadelphia Workforce Board
Process managed by YouthWorks Administrator

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Section 3.2

Describe the workforce development system in the local area that identifies the programs that are included in that system and how the local board will work with the entities carrying out core and other workforce development programs to support alignment to provide services, including programs of study authorized under the Carl D. Perkins Career and Technical Education Act of 2006, that support the strategy identified in the State plan under section 102(b)(1)(E). [WIOA Sec. 108(b)(2)]

Note: The six (6) core programs identified by WIOA are: Adult, Dislocated Worker, Youth, Adult Education and Literacy, Wagner-Peyser Programs, and Vocational Rehabilitation.

WIOA Title I adult and dislocated worker programming encompasses two of the three program components in WIOA Title I. Priority of service is provided specifically to the WIOA Title I adult population who meet certain criteria. Through the work of our Title I providers, adult and dislocated workers can access career services as applicable, including case management, supportive services, IEP development, structure job search, group and individual career counseling, individualized skill development strategies, work experience opportunities, and others.

WIOA Title I youth programs are delivered through competitively-procured youth service providers. Consistent with statutory requirements, contracted providers are required to develop a preparation strategy focused on college-ready and career pathway instruction that includes 21st Century skills. Providers develop activities and materials that are aligned with competency profiles as determined by regional labor market information and reflect the rigor of advanced training and educational environments. Training includes access to paid and unpaid work experiences and related employment workshops and activities that provide additional opportunities for youth to practice and master 21st Century skills.

In accordance with WIOA, Title II providers are funded by the Pennsylvania Department of Education to assist adults and youth to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency; assist adults who are parents or family members to obtain the education and skills that are necessary to becoming full partners in the educational development of their children and lead to sustainable improvements in the economic opportunities for their family; assist adults in attaining a high school equivalency and in the transition to postsecondary education and training, including through career pathways; and, assist immigrants and other individuals who are English language learners in improving their mathematics, reading, writing, speaking, and comprehension skills in English and acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship. The Mayor’s Commission on Literacy works in collaboration with the PA CareerLink® Philadelphia centers to coordinate the delivery of adult education and
literacy services by Title II and other literacy providers using the myPLACE℠ system.

The Carl D. Perkins Career and Technical Education (CTE) Act of 2006 (Perkins) requires a local Perkins Participatory Advisory Committee. The Youth committee of Philadelphia Works functions as the citywide Perkins Participatory Advisory committee. In this capacity, Philadelphia Works and its Youth committee work to strengthen CTE offerings in the School District of Philadelphia, specifically the Office of CTE, and ensure alignment with high-priority occupations. Building upon the workforce system’s prior success, Philadelphia Works partners with the School District to ensure that CTE graduates who are not immediately entering post-secondary education are made aware of and connected to services and opportunities available at local PA CareerLink® Philadelphia centers including paid work experiences, paid internships and OJTs. Overall, the Office of CTE helps develop programs and prepare youth for success in the workplace and post-secondary education.

Philadelphia Works also serves on the required Perkins Participatory Advisory committee for the Community College of Philadelphia. Philadelphia Works provides data and information to the School District of Philadelphia and the Community College of Philadelphia as they build articulation agreements for increasing numbers of programs of study receiving Perkins funding.

Community College of Philadelphia assists with coordinating employer demands for skills and development of credentialing for shorter term programs along with the WIF micro-credential grant partnership. In addition, the College builds training along talent pipelines identified through our employer engagement such as computer-aided machining and arc welding. They are also active partners in the American Apprenticeship grant.

Wagner-Peyser staff delivers basic services in our integrated centers such as: assisting career seekers with skill development for an employment outcome, providing career information and options, continuously engaging career seekers through the promotion of workshops and related service activities across all the centers, also known as ‘product box’ activities.

As a result of our integration, the EARN program also delivers services in PA CareerLink® Philadelphia centers such as case management, skills training, job placement, retention and other supportive services to those individuals who were referred through the County Assistance Office.

Through a partnership agreement with Office of Vocational Rehabilitation (OVR), detailed in Section 5.1, our centers ensure that shared career seekers with disabilities have the opportunity to take advantage of services.

Understanding that many older workers seek to continue working and need tailored support, we also have a 55+ program that provides services to our older workers through services to
support computer and internet use, increased understanding of transferable skills based on their employment history and other forms of employment preparation. We also include SCSEP participants at PA CareerLink® centers to work in various capacities while supporting their transition to part- or full-time employment. Our Veterans and Trade programs also supply services to our shared participants.

Section 3.3

Describe how the local board, working with the entities carrying out core programs, will expand access to employment, training, education, and supportive services for eligible individuals, particularly eligible individuals with barriers to employment. [WIOA Sec. 108(b)(3)]

Philadelphia Works’ integrated service delivery model is specifically designed to expand access to employment, training, education and supportive services for eligible individuals, particularly eligible individuals with barriers to employment.

The Cross Center Services provider is responsible for coordination across all centers to provide uniform services and experiences for employers and career seekers. The Community Engagement and Outreach Team specifically seek strategies and plans to increase center usage and service access. They enhance relationships with community-based organizations to develop formal and effective community connection partner agreements, conduct outreach to EARN participants in partnership from the County Assistance Office, and contact WIOA service participants who are at-risk of exiting without employment to seek reengagement.

Their career seeker engagement strategies are further supported by the work of the Cross Center Services provider’s BSRs which seeks to increase the number of business and employers using system services by providing direct service to employers who have jobs matching the center’s talent pool, with a specific emphasis on EARN and WIOA participants. They foster relationships by ensuring quality customer service to employers resulting in high employer satisfaction with services to incentivize continuous use. The BSR teams work to provide proactive assistance to employers that use our system to post and fill jobs, in order to sustain a quality referral-to-hire ratio.

Universal welcome responsibilities are assigned to workforce advisors, skills and employment advisors, who are Wagner-Peyser staff, while WIOA adult and dislocated worker staff who provide increased levels of service as workforce advisors and job developers are staff of the competitively-procured providers that manage each of the PA CareerLink® Philadelphia centers. By including core program and merit staff within the universal welcome process, the Site Administrator, Universal Team Lead, and staff can effectively serve all customers who enter the center, delivering quality service, providing one-on-one welcome meetings, and connecting career seekers to basic career services within the product box.
Our center staff also provide individualized services and utilize a network of employers and training providers. OVR representatives are also available on-site at each center to provide services to eligible participants who can benefit from dual services. PA CareerLink® Philadelphia center staff also have an established process using myPLACE℠ tools to refer clients electronically to Title II services. This referral process is monitored using a dashboard of indicators reviewed by the Operator Consortium. Title II providers also partner with CareerLink® to offer onsite adult education programming and services. Title II providers are taking the initiative to create Bridge programs that contextualize adult education instruction with industry-based knowledge and competencies, and directly connect students with sector-based training and employment. A process is being established for Title II career seekers to access employment services through direct referral to CareerLink® centers. Through our partnership with Title II providers and to improve the referral process, we have identified the additional opportunity to improve assessment service delivery for the benefit of our customers and given the local board’s new role to review Title II applications, in the upcoming year, we plan to review applications with an eye for customer benefit and support while relying on the expertise and experience of our Title II partners to offer solutions resolve to this issue.

As a result of the enactment of WIOA, the board has approved a number of operational programs to expand the types of program offerings that support the needs of career seeker and employer customers:

- **Apprenticeship**: Given the renewed opportunities that WIOA provides, Philadelphia Works developed an Apprenticeship policy to outline the various funding opportunities available to support Apprenticeships. Apprenticeships are unique training opportunities that combine classroom and job-based training. Apprentices gain and demonstrate competencies either over a period of time or at specific benchmarks in the apprenticeship program. Demonstration of competencies leads to specified wage increases through the apprenticeship and until completion.

- **Customized Job Training**: CJT opportunities are ideally suited for those businesses that plan to expand their operations and are seeking the opportunity to hire new employees but have found the current workforce to be in need of additional specialized training. CJTs are designed to meet the special requirements of an employer and are conducted with a commitment by the employer to employ an individual upon successful completion of the training. Employers must also pay for a significant portion (at least 50 percent) of the training.

- **On-the-Job Training**: OJT offers are provided by an employer to a paid participant who is engaged in productive work that provides knowledge or skills essential to the full and adequate performance of a job. OJT offers reimbursement to the employer of up to 50 percent of the participant’s wage rate and are limited in duration to the occupation for which the participant is being trained, taking into account multiple criteria and factors.
As WIOA implementation progresses, Philadelphia Works will consider offering all allowable career services and WIOA section 134 training options to participants and employers.

In addition to the integration of our centers, to further modernize service delivery in both EARN and WIOA systems, customers are also able to engage with our work through a more prominent on-line presence or access services through community partnerships in neighborhoods across Philadelphia. As we continue to develop this service delivery model that integrates EARN programming into our PA CareerLink® centers, we anticipate increased center traffic and improved opportunities for access.

The commonwealth has established benchmarks to support our ability to engage with individuals who qualify for priority of service as well as individuals who have barriers to employment and we are eager to engage in this work in a meaningful way. Upon enactment of WIOA, the board approved a priority of service policy in alignment with the federal regulations, anticipating additional state guidance. In March of 2016, the board approved a priority of service policy that allows us to apply a priority of service to Philadelphia residents who qualify under certain categories for individualized career services and training services under WIOA Title I adult programs. As we conduct trainings related to the new priority of service work, we anticipate the level of outreach and support given to this population will increase.

WIOA also authorizes funds that are allocated to local areas to be used to provide supportive services to adult and dislocated workers. Supportive services are provided on a basis of need as determined by WIOA Title I program provider(s) and are intended to enable an individual to participate in workforce-funded programs and activities to secure and retain employment. Through consultation with our providers and partners, we are able to offer a number of supportive services, further in Section 3.8, through our PA CareerLink® Philadelphia centers, to enable our career seekers to continue participating with our workforce system.

Our local policies along with our integrated model design facilitate opportunities for eligible individuals to be co-enrolled in core programs, to effectively move them along the continuum of increased skill attainment and stable employment. Through strategies such as career pathways, dual enrollment, stackable credentials and specific program opportunities for individuals with barriers to employment, we anticipate increased opportunities for customers to access quality resources through the PA CareerLink® network. We have established board-approved policies that support access and services to the career seeker to successfully implement steps towards a career pathway and sustainable employment and are eager to engage in the program opportunities that WIOA provides to target those with barriers to employment such as:

- **Transitional Work**: Provides paid transitional job opportunities to individuals with barriers to employment who are chronically unemployed or have an inconsistent work history.
• **Work Experience and Internship Opportunities**: These individualized career services offer paid opportunities that are linked to careers and provide planned, structured learning experiences to provide a helpful particularly for those who face barriers to employment specifically those who are returning citizens with criminal records or career seekers who have little to no work experience or work history. Additionally, an individual is not required to have a high school equivalency to qualify for a work experience.

### Section 3.4

Identify and describe (for each category below) the strategies that are and/or will be used to:

A. Facilitate engagement of employers, including small employers and employers in in-demand industry sectors and occupations, in workforce development programs in addition to targeted sector strategies;

B. Support a local workforce development system described in element 3.2 that meets the needs of businesses;

C. Better coordinate workforce development programs with economic development partners and programs;

This must include the implementation of incumbent worker training programs, on-the-job training programs, work-based learning programs, apprenticeship models, customized training programs, industry and sector strategies, career pathways initiatives or utilization of effective business intermediaries and other business services and strategies that support the local board’s strategy in element 3.1. [WIOA Sec. 108(b)(4)(A) and (B)].

### A. Facilitate engagement of employers, including small employers and employers in in-demand industry sectors and occupations, in workforce development programs in addition to targeted sector strategies.

Philadelphia Works staff focuses on supporting employers with workforce needs in in-demand sectors such as transportation, healthcare, manufacturing, energy, and information technology industries. Most employers in these industries (and throughout the Southeast Pennsylvania region) are small businesses. As a result, Philadelphia Works has formed strategic partnerships with Small Business Development Centers, (housed at the University of Pennsylvania, Temple University, and Widener University), the PREP, various Industrial Resource Centers (IRCs), local Chambers of Commerce, and a variety of business associations. These partnerships are vital to engaging small businesses and our ability to assist with solutions to workforce challenges. Philadelphia Works is also employing other strategies to facilitate the engagement of employers, (including small employers in in-demand industries), improve services, and avoid duplication.
Philadelphia Works will host an annual **Workforce Symposium** in partnership with local economic development agencies to establish relationships, build rapport, and exchange information for effective employer engagement. The audience for this event will be Philadelphia area business professionals inclusive of employers of all sizes, and will highlight topics such as the current state and local workforce system and the availability of training services we fund, best practices from businesses that have developed effective strategies to workforce challenges, and information on how businesses can institute solutions to workforce challenges. Philadelphia Works will plan the event and facilitate conversations about a variety of workforce management strategies throughout the day. The Workforce Symposium will also provide an opportunity to highlight the success of our sector partnerships.

The **Philadelphia Works BET** is completing a rebranding of the services provided to local employers in order to streamline messaging and highlight the value of our services. The BET assists businesses to understand and maximize the value of services offered through Philadelphia Works and the PA CareerLink® Philadelphia network. To this end, the BET will use the new brand to refine messaging and employer outreach activities through meetings, presentations, a business-focused webpage, social media, employer workshops, business roundtables, e-mail newsletters, event postings on community calendars, brochures, flyers, promotion of our Jobs Compact, and working with partners to promote services. This quality interaction will move the BET from transactional relationships to transformative long-lasting relationships within the business community. The **Cross Center Services BSRs** will align their work with the new messaging and outreach efforts as they provide support services to employers.

**B. Support a local workforce development system described in element 3.2 that meets the needs of businesses.**

Philadelphia Works has a broad base of public and private partner organizations that support our work through their professional expertise and programming experience. Partners listed in Section 3.2 have a deep history of collaboration with us and one another, with extensive experience and knowledge of the public workforce system in our region. Each has played an active role in moving the system forward; these partners took an active role in developing the workforce system goals and strategies with Philadelphia Works. As a result, we are not starting from scratch, but building on the work and relationships of these partnerships to further align services and programs to reach a common vision under WIOA.

Many partners are included in the local workforce development system and have representation on our board, committees and work groups. Most notably, the Employer Engagement committee of our board supports and oversees our priority of offering a workforce system that responds to employer needs. The Committee includes representation from economic development, labor, and large and small employers to inform the work in which we
engage.

Additionally, Philadelphia Works will actively work with educational partners and community-based organizations to identify, and target occupations to train participants to meet current and future workforce needs. Philadelphia Works is committed to training center staff in labor market information tools, so they can provide career seekers with detailed information on appropriate career pathways.

C. **Better coordinate workforce development programs with economic development partners and programs.**

One of the top priorities for Philadelphia Works’ business engagement work is the development of a workforce and economic development dashboard that will help our stakeholders stay abreast of the current labor market status and future employment trends facing our city/region while coordinating our work with our service providers. With the implementation of the Executive Pulse customer relationship management (CRM) system, a CRM widely used by many of our economic development partners and partners at the state level, Philadelphia Works will be armed with quality data on employer engagement to better navigate the rapidly changing workforce and economic environment in our region.

Through our integrated service delivery model, combining staffing expertise across local state and federal funding allows our teams to work with industry partners in a concerted effort, minimizes duplication of business outreach efforts, and allows staff to address talent needs regardless of the funding stream or targeted populations they may represent. Additionally, Philadelphia Works, through our BET, will focus on convening and collaborating with various organizations and workforce stakeholders to implement many of the initiatives outlined below, which are tailored to meet the business community needs.

- **Workplace Learning Initiatives:** Philadelphia Works offers a broad range of workplace learning opportunities, most notably our OJT and CJT programs. Although these programs have their own unique regulatory requirements, they share the commonality of aiding local businesses access a viable talent pool while helping participants obtain meaningful employment through learning opportunities. Through the lens of this mission, Philadelphia Works has committed staffing resources to implement additional work-based learning services including transitional work, internship and paid work experience for career seekers, specifically those with barriers to employment.

- **Sector Partnerships:** Philadelphia Works will also continue to convene and staff the Southeast Regional Workforce Development Partnership, our manufacturing industry partnership, and our newly-developing regional Business and Financial Services Sector Partnership. As the intermediary, Philadelphia Works staff attends sector meetings with the goal of understanding the workforce needs of the participating employers and supporting their efforts. We also plan to continue collaborating with the District 1199C
Greater Philadelphia Healthcare Partnerships and other regional efforts that may arise. Currently in their eleventh year of operation, the Manufacturing and Healthcare Sector Partnerships continue to serve as useful models for engaging the private sector and public partners. With significant progress under our belt, our sector partnerships are attracting more businesses to participate and helping the BSRs grow deeper relationships with long-standing members. Moreover, we are seeing increased crossover between sector partnerships and our local PA CareerLink® centers, creating more synergy between the two systems and facilitating stronger and long-lasting relationships between our private sector partners and our public workforce system.

- **Career Pathways**: Philadelphia Works, in collaboration with key sector employers, educators, providers and other stakeholders, identified critical occupations for inclusion in our career pathways mapping in targeted industry areas including advanced manufacturing, healthcare, and business/finance administration sectors. To support clients with barriers to employment, career pathways may be extended to include entry-level employment opportunities for adults and youth who may not possess a high school diploma or equivalency when such a step exists, based on the standards set by employers. As we have engaged in conversations with our industry partnership, for example, we have heard feedback from employers as to where, in their field and work, their career pathways commence. Oftentimes, they have advised that their entry-level job opportunities require a high school diploma or equivalency. As a result, in prioritizing realistic career pathways that are employer-validated, we have applied those entry points that employers have identified.

Section 3.6

Describe the workforce activities, including activities for youth with disabilities. Identify successful models and best practices for youth workforce activities relevant to the local area. [WIOA Sec. 108(b)(9)]

Youth workforce development in Philadelphia is multifaceted. There are several foundational components that relate to and support one another. Philadelphia Works invests in a wide variety of research-based programs based on effective practices for WIOA eligible in-school and out-of-school youth, including young people with disabilities. Currently, youth funds support:

- **At-Risk Youth Enrolled in High School**: This pathway offers a multi-year engagement with 11th and 12th grade students who are at-risk of dropping out and those in need of additional support transitioning to and persisting in post-secondary education or employment. These participants will graduate high school, connect with a post-secondary option or advance to employment.

- **Opportunity Youth without a Secondary Credential**: This pathway is designed to reengage high school dropouts in education to obtain a General Educational Development (GED®), high school diploma or equivalency and continue to build their
competencies and skills beyond the secondary level. Key to the pathway’s success is barrier removal, curriculum tied to college-readiness standards, and college exploration and preparation to access and persist in post-secondary education.

- **Opportunity Youth with a Secondary Credential**: This pathway targets youth who have obtained a secondary credential such as a GED®, high school diploma or equivalency, but who are disconnected from both school and work. Programs offer industry-recognized credentials that prepare participants for positions in industries with high-growth potential.

Currently, Philadelphia Works invests TANF Youth Development (TANF YD) funds into the following programs and interventions:

- **E³ Power Centers** are neighborhood-based, holistic approaches to preparing opportunity youth and youth returning from juvenile placement to achieve long-term educational, career and personal goals, including self-sufficiency. E³ Power Centers provide supports along three interrelated pathways: education, employment, and empowerment. In addition to TANF YD, E³ Power Centers are managed by the Philadelphia Youth Network and the organization also raise additional funds to support the model.

- The local workforce system invests in summer program models that offer educationally-enriched work opportunities to in-school and out-of-school youth ages 14-21. Participants complete a six-week (120 hour), paid work experience that fosters the acquisition of 21st century skills through work-based learning. Specifically, Philadelphia Works invests TANF YD funds in three summer program models: service-learning, work experience, and internships. In addition to TANF YD dollars, the Philadelphia Youth Network raises additional funds to support these summer program models, offers career exposure programs for middle school students and more.

Philadelphia Works invests public workforce dollars (including WIOA youth funds) in citywide campaigns like WorkReady and Project U-Turn, which are managed by the Philadelphia Youth Network. These campaigns implement successful models and promising practices that are especially relevant locally. WorkReady Philadelphia actively recruits young people who are in foster care, juvenile justice, and/or live in underserved communities. Project U-Turn’s local dropout recovery and re-engagement strategies include one-stop services for re-entry counseling, assessment and referral, access to credit recovery high schools, and community-based centers for education, training, and employment. Demand-driven sectoral models prepare young people to meet industry standards and employer expectations. Both WorkReady Philadelphia and Project U-Turn campaigns are managed by the Philadelphia Youth Network. Out-of-school youth programming blends appropriate educational enhancements, occupational skills training aligned with in-demand industries, and bridging and support services. Youth summer programs include project-based learning, intentional instruction and assessment of 21st Century skills, mentoring from caring adult supervisors, and exposure to a variety of career and postsecondary pathways.
Section 3.7

Describe how the local board coordinates education and workforce investment activities with relevant secondary and postsecondary education programs and activities to coordinate strategies, enhance services, and avoid duplication of services. [WIOA Sec. 108(b)(10)]

The superintendent of the School District of Philadelphia and administrative leaders from the University of Pennsylvania, Temple University, Drexel University and Community College of Philadelphia are actively engaged in the Youth committee, also known as the Philadelphia Council for College and Career Success, as well as other citywide initiatives aimed at providing youth employment, dropout recovery and re-engagement, and college-going success. Stakeholders assist in designing, coordinating and evaluating educational and youth workforce activities.

In an effort to enhance services and avoid duplication of services Philadelphia Works and our youth system jointly work with the School District of Philadelphia to develop program models that support education and career preparation, including WIOA in-school youth programs that incorporate career-connected learning and experiences with school-day curriculum and activities. The Youth committee also functions as the citywide Perkins Participatory Advisory committee. Embedded in this role is the mission to strengthen CTE offerings, while also ensuring alignment with HPOs.

With regard to post-secondary education, WIOA in-school program models prepare youth graduating from high school to more easily connect to a post-secondary program, receive bridging and support services, and complete their first year of college coursework. To strengthen long-term education and employment youth outcomes, WIOA programs operate within a three-phase (enhanced preparation, post-secondary bridging and placement retention supports) framework-based on Jobs for the Future's Back-on-Track model. The three phases have distinct strategies intended to help youth achieve their post-secondary goals and overlap in terms of timing, resources and staffing to ensure a continuum from preparation to persistence.

Section 3.8

Describe efforts to coordinate supportive services provided through workforce investment activities in the local area, including facilitating transportation for customers. [WIOA Sec. 108(b)(11)]

WIOA authorizes funds that are allocated to local areas to be used for provision of supportive services to adult and dislocated worker participants intended to enable an individual to
participate in workforce-funded programs and activities to secure and retain employment. These services are provided based on need as determined by the Title I program providers’ Workforce Advisor staff within the PA CareerLink® Philadelphia centers. The supportive services that we have elected to provide were developed in consultation with one-stop partners and other community service providers with a commitment to revisit the availability of services on an annual basis. Philadelphia Works’ policy, enacted by the board in March of 2016, funds the following supportive services for adults and dislocated workers based on individual participant needs:

- **Transportation**: Transportation support will be provided to participants who are in full-time WIOA funded training or related vocational training or immediately upon their initial employment. Once an individual has met all eligibility requirements, Title I staff will complete a WIOA supportive services request form for transportation. The policy allows for the purchase of a public transportation pass, administered by the Southeastern Pennsylvania Transportation Authority (SEPTA) for either the first half of the individual’s length of training or up to one month for individuals who have secured employment. In limited circumstances in which sites or homes are not easily accessible to public transportation, staff may provide gift cards for gas.

- **Clothing**: Clothing support is limited to only those items which are required for work or training, including but not limited to uniforms, footwear, protective gear or tools up to $200. Original itemized receipts must be provided to show actual expense.

- **Professional Certifications, Examinations and Government Licenses**: Providers will support career seekers’ fees associated with the cost of taking an examination in order to earn a certification, license needed for a specific occupation, or education such as high school diplomas or GED® tests.

Single parents or two-parent households who are economically disadvantaged and require childcare to participate in training activities can be referred to the County Assistance Office or to Child Care Information Services.

PA CareerLink® Philadelphia Title I staff determine the individual’s eligibility, and offer information regarding the availability of the supportive services. They also coordinate the services and understand referral processes and procedures when supportive services are available through other applicable agencies. All supportive services received and referrals made to partner programs are documented and tracked by the Title I provider. All PA CareerLink® Philadelphia centers have a standardized protocol for reviewing documenting and distributing supportive services and record such distribution in case files consistent with policies.

### Section 3.9

Describe strategies to implement the operational goals of the local one-stop system, maximizing coordination of services provided by the Department’s merit staff, and the local
board’s contracted service providers in order to improve services and avoid duplication. [WIOA Sec. 108(b)(12)]

Our model of service delivery within the local one-stop system was strategically designed to ensure better service for all customers regardless of the funding source; offer a new culture emphasizing customer satisfaction, continuous improvement, improve communication; and apply more effective gathering and use of data. The local board’s PA CareerLink® Philadelphia service delivery model incorporates the center’s contracted staff and the merit staff and focuses on delivering:

- An increased number of center customers who initially and continuously engage in center services.
- Tangible customer benefit and outcomes for each center visit and services.
- More center customer connections to partner program services when needed, wanted and available.
- A focus on both skills and jobs with personalized and customized workforce advice and recommendations.
- A service concentration with the fewest service entry procedures as possible to maximize customers’ satisfaction.
- Easy access to a comprehensive series of services that are responsive to the needs of the individual.
- An increased set of options for how services are accessed including a virtual presence to reach customers outside of the center.

The one-stop service delivery model design is staffed so that all visiting career seekers have access to universal services as well as services specific to their needs, including consultation and support from representatives of the following: OVR, disabled veterans services, trade, PREP coordination, Title II, and youth system services. The PA CareerLink® Philadelphia center works to ensure seamless and appropriate access to services through:

- **The Universal Services Team**, which consists of Greeters, Workforce Advisors, PREP Coordinators, Community Connections Liaisons, and “Learn and Earn” Liaisons.
- **The WIOA Services Team**, which consists of Workforce Advisors, Quality Assurance and Data Specialists, and Literacy Liaisons.
- **Integrated Job Development Team**, which consists of Job Developers.
- **Other Co-Located Partners** such as the Department of Human Services (DHS) County Assistance Office, Disabled Veterans Outreach Program, OVR, Trade, 55+, WIOA Title II Literacy, and others, as applicable.

Each one-stop center is managed by a provider, the employer of record for the Site Administrator, except for OVR staff. The Site Administrator functionally supervises all partner and merit staff on site and is responsible for center-wide staff and performance measures.
success. The Site Administrator oversees each team to ensure the services and operations of the center are executed efficiently and in adherence with the WIOA and TANF rules and regulations. The Site Administrator and the center staff teams work cohesively and provide cross training in order to efficiently deliver information and services so that all center customers are connected to the resources, staff, and/or programs to meet their needs. Consistent use of data, internal communications and systems are in place as embedded in the service delivery model to check service quality, assure customer satisfaction and mitigate duplication of services.

**Section 3.10**

Describe how the local board will carry out a review of local applications submitted under WIOA Title II Adult Education and Literacy, consistent with the local plan (as described in WIOA Sec. 107(d)(11) and WIOA Sec. 232). [WIOA Sec. 108(b)(13)]

The state plan, consistent with federal WIOA guidelines, requires that as part of the WIOA Title II adult basic education application process, the local board receive opportunity to review applications for alignment with the local plan. The PA Department of Education (PDE) will provide an opportunity to the local boards to provide recommendations and will take the recommendations and results of the review into consideration when scoring the related sections of the applications.

Philadelphia Works will use the usual procedure for reviewing external applications. Using the commonwealth’s articulation of the federally required thirteen considerations and seven requirements, Philadelphia Works will provide a written evaluation of the alignment of the approach (if sufficient for the standards) of each application that will serve Philadelphia residents. Philadelphia Works will request the Workforce and Economic Development committee of our board, which is comprised of board members and external partners, to oversee this process and:

- Direct the staff to use state guidelines and our local plan to create a rubric for a consistent process of examining the alignment with local strategies and program implementation.
- Create an *ad hoc* workgroup empowered to review and provide written feedback on the applications of WIOA Title II adult education and literacy providers.
- Direct staff to write up feedback and any recommendations to PDE.

The time between the release of the competition information from PDE and the application due dates will determine the process timeline and dictate the amount of feedback that can realistically be delivered. However, given that PDE envisions four-year grants, Philadelphia Works is very invested in spending the time to be certain Title II services are embedded into our career pathways and support career seekers in a productive and aligned fashion with our
approach. PA CareerLink® Philadelphia center staff also have an established process using myPLACE℠ tools to refer clients electronically to Title II services. This referral process is monitored using a dashboard of indicators reviewed by the Operator Consortium.

**Section 3.11**

Based on the analysis described in Appendix B - Section 1, identify the targeted populations that the local board plans to focus additional effort and resources towards. In terms of the targeted populations, briefly describe the local board’s objectives, goals, and strategies.

Generally, we have developed strategic partnerships to support individuals with barriers to employment, listed alphabetically below, and given the composition of our city, offer services to support these targeted populations and their unique needs.

- Displaced homemakers
- English language learners, individuals who have low levels of literacy, and individuals facing substantial cultural barriers
- Homeless individuals or homeless children and youths
- Indians, Alaska Natives, and Native Hawaiians
- Individuals with disabilities, including youth with disabilities
- Individuals within 2 years of exhausting the lifetime eligibility for TANF assistance
- Long-term unemployed individuals
- Low-income individuals WIOA section 3 paragraph 36
- Migrant and seasonal farmworkers
- Older individuals
- Returning citizens, also referred to as ex-offenders
- Single parents, including single pregnant women
- Youth who are in or have aged out of the foster care system

Each population is defined in accordance with the WIOA definition. From a priority perspective, with the exception of those individuals who may fall into our priority of service categories, individuals with any of these barriers who access one-stop services will be served on a first come, first served basis.

As stated in Section 2.1, in order to support opportunities available to those with barriers to employment, Philadelphia Works plans to:

- Implement additional earn and learn models of professional development through paid work experience.
- Increase the educational levels of this population through various instructional models and the use of technology, which includes computer-based learning and other technology supported resources shown to make education more accessible to not only adults but young people as well.
• Continue to build and implement skill ladders/career pathways in targeted industries.
• Implement work-based curricula that prepare career seekers to work in fast-growing industry clusters.
• Identify critical skills and appropriate credentials to support participants’ skill development.
• Connect individuals to opportunities that develop essential work skills, also known as behavioral modifications, and soft skills for improved workplace cultural competencies.
• Coordinate with stakeholders and partners to gain additional knowledge on employee-skill requirements to guide our investments in employer and career seeker services.
• Seek best practices for innovative models that are geared towards supporting individuals with barriers to employment.
• Expand the use of technology in our program models.
• Expand and/or create sector partnerships.

Priority for receipt of individualized career services and training services will be given to career seeker customers who are residents of Philadelphia, regardless of funding levels in the following order:
• First, to veterans and eligible spouses who are recipients of public assistance; low-income, including those who are underemployed; or basic skills deficient.
• Second, to other recipients of public assistance; low-income individuals, including those who are underemployed; or individuals who are basic skills deficient.
• Third, to veterans and eligible spouses who are not recipients of public assistance; not low-income individuals, including the underemployed; or who are not basic skills deficient.
• Fourth, to long-term unemployed individuals.
• Lastly, to all other persons who are not listed above.

L&I has allowed a local area to identify an additional priority of service category if it is consistent with the intent of L&I’s priority to serve individuals with barriers to employment. In August of 2015, Philadelphia Works conducted an analysis of survey responses from 1,241 visitors at three PA CareerLink® Philadelphia centers. During this survey, among other questions, we asked visitors to identify the challenges they faced when searching for a job and their employment status. We found that almost a third of PA CareerLink® visitors were unemployed for six months or longer. They were also more likely to report that they did not have a college degree, did not have access to a computer, had higher rates of homelessness and categorized themselves as disabled more than other visitors, lacked certifications, had a high school degree only, had limited professional contacts, and/or had some level of criminal history.
Based on these factors, Philadelphia Works determined that the long-term unemployed would be the most effective additional population to include as a significant number of our visitors faced this barrier and this population group also included additional populations of individuals with barriers to employment.

In order to further support the long-term unemployed, Philadelphia Works is implementing the Platform to Employment (P2E) model in our local area through our PA CareerLink® Northwest center. The program features a five-week intensive course of daily classes that provides a support system of career development tools, workshops, and successful job search strategies. After completion of the course, participants will be assisted in finding a job where their future employer can take advantage of wage subsidies paid for by P2E. Historically, the program boasts a 90% placement rate for participants into full-time jobs upon graduation.

We also initiated Back2WorkPhilly, a robust outreach and engagement campaign to support all laid-off workers and encourage them to visit a PA CareerLink® Philadelphia center. Through this initiative, we are providing unique support to those who have been laid off through family support services, financial counseling with career training and encouraging their participation at any of our four conveniently-located PA CareerLink® Philadelphia centers.

The Mayor’s Office of Community Empowerment and Opportunity (CEO) is the city’s designated Community Action Agency responsible for spending Community Services Block Grant funds as well as other state, local and philanthropic funding to pursue the city’s anti-poverty agenda. CEO’s Shared Prosperity plan is its blueprint for collective impact citywide and includes job creation and training for adults with barriers to employment as one of its goals. To ensure full and meaningful coordination, Philadelphia Works serves on the CEO Oversight Board and is active on the Steering Committee and the Place-Based Jobs and Workforce Development Committee for the Shared Prosperity plan, helping to oversee and pilot new workforce initiatives.

Predominantly low educational attainment and literacy rates make it harder for returning citizens to be eligible for work. Understanding that this population requires very unique supports, we work very closely with the Philadelphia Reentry Coalition and coordinate with the Mayor’s Office of Reintegration Services (RISE) to support this group of individuals. We have also held a number of employer roundtable discussions with subject matter experts to offer a forum for businesses to discuss some of the primary challenges they face in hiring returning citizens and will continue to advance this work in the upcoming year.

In an effort to remove barriers to education, training, and employment, across WIOA youth programs, priority will be granted to out-of-school youth, individuals living in high poverty neighborhoods, juvenile offenders, foster care youth, and other special populations. Services will include, but not be limited to, educational support to achieve secondary credentials, basic
skills training, work experience, career pathway identification, and occupational training. A current need exists to improve our ability to offer co-enrollment. As a result, capacity building and training will be provided for adult providers to deliver young adult services and ensure true engagement.

In Philadelphia, we define an eligible youth “requiring additional assistance to complete an educational program, or to secure and hold employment” as one who:

- Has a poor work history (i.e., fired from one or more jobs within the last six months or has a history of sporadic employment such as having held three or more jobs within the last 12 months and is no longer employed).
- Has received a low score on a pre-employment skills assessment or a letter from an employer stating that the youth does not possess the requisite skills for employment.
- Has been actively seeking employment for at least two months, but remains unemployed or underemployed. This includes a youth with no employment history, with limited work experience, and/or who is actively seeking full-time employment, but has only achieved part-time employment.
- Is currently at-risk of dropping out of school as determined by a referral from school staff, probation officer, or other responsible person with documentation evidencing chronic poor attendance or discipline problems during the last 12 months, or has educational underachievement (i.e. less than a cumulative 2.0 grade point average).
- Is currently credit deficient (i.e. one or more grade levels behind peer group). This also includes youth currently enrolled in special education classes that require appropriate education for children with disabilities and has an Individual Education Plan.
- Has failing grades as defined by having failed a minimum of three classes in the most recent grading period.
- Has low literacy in Reading and/or Math.
- Has incarcerated parent(s).

In Philadelphia, only five percent of all youth, both in-school and out-of-school youth, who need to provide proof of income can be enrolled if they are not low-income, but have a barrier. Only five percent of in-school youth participants can be enrolled using the ‘Requires Additional Assistance’ barrier defined above.

**Section 3.14**

Briefly describe any additional funding outside of WIOA Title I and state general funds, and how such funding will be leveraged in support of the local workforce system.

Philadelphia Works will solicit and utilize funding from the federal government and private sources whenever possible to leverage and support the local workforce system. Philadelphia
Works currently has funding available from the National Emergency Grant/Dislocated Worker Jobs Driven Grant, H1B Job Training Grant/American Apprenticeship Initiative, Pennsylvania Department of Community and Economic Development/Department of Defense Grant, L&I WIF and The Chicago Cook Workforce Partnership/Career Opportunities in Retail award, the US Department of Labor Summer Jobs and Beyond grant and others. We also collaborate with a number of partners in support of additional funding. In addition to leveraging the WIOA Title I and state general funds received by the local workforce system, these funds provide opportunities to individuals who may not qualify or receive priority for certain services under WIOA Title I and state general funds thereby expanding our footprint in the region.

Section 4: Program Design and Evaluation

Section 4.1

Describe the one-stop delivery system in the local area including:

A. The local board’s efforts to ensure the continuous improvement of eligible providers of services, including contracted service providers and providers on the ETPL, and ensure that such providers meet the employment needs of local employers, workers and jobseekers. [WIOA Sec. 108(b)(6)(A)]

B. How the local board will facilitate access to services provided through the one-stop delivery system in remote areas, through the use of technology, and through other means. [WIOA Sec. 108(b)(6)(B)]

C. How entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA section 188, and applicable provisions of the Americans with Disabilities Act of 1990 regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities. [WIOA Sec. 108(b)(6)(C)] (See Appendix C: Transitional Planning References and Resources)

A. The local board’s efforts to ensure the continuous improvement of eligible providers of services, including contracted service providers and providers on the ETPL, and ensure that such providers meet the employment needs of local employers, workers and jobseekers. [WIOA Sec. 108(b)(6)(A)]

Presently, in Philadelphia, the Operator Consortium ensures seamless service delivery within each PA CareerLink® to include details of the day-to-day functional supervision to support continuous improvement within our centers. The duties of the Operator Consortium are to:

- Organize and coordinate all co-located partner staff by function in accordance with state personnel rules, collective bargaining agreements and state policy and guidance.
• Establish a service delivery model that is customizable to the needs of individual customers.
• Develop operational procedures and protocols that promote effective and seamless service delivery ensuring that individual partner program performance and outcomes are not negatively impacted.
• Communicate workforce system policy, directives and information according to communication protocol.
• Establish policies and procedures for situations such as inclement weather, holidays, breaks or time off, accounting for relevant policies that may not be consistent across partners.

Through the Workforce Economic Development committee, the local board is focused on continuous improvement of the system and general oversight of the WIOA and TANF investments, including accountability through performance.

Philadelphia Works facilitated a competitive process to determine the five contracted service providers that currently manage the four PA CareerLink® Centers and fill the role of the Cross Center Services provider. Philadelphia Works provides technical assistance to center providers to ensure high-quality customer service to career seekers and employers. In light of the enactment of WIOA and the transitions within our service delivery model, we held a series of trainings for providers on a rolling basis as new policies are developed and new procedures are in place. As issues arise within the centers, we seek to build the capacity of our providers through ongoing trainings and technical assistance. On a monthly basis, Philadelphia Work staff members monitor and meet with each contracted provider to review progress towards meeting the commonwealth’s negotiated performance measures and benchmarks as well as our local goals. Philadelphia Works will continue to implement formal monitoring tools to gauge all performance and success metrics.

Philadelphia Works ensures that the ETPL is accessible and current for PA CareerLink® staff members who are responsible for assessing individuals for training programs and referring them to applicable high-quality training. Philadelphia Works uses the petitioning process to add additional training providers onto the list who would not otherwise be included. Through our ongoing collaboration with workforce, business, education and economic development agencies, we continuously collect and compare current course offerings against real-time data to learn about providers of service who businesses identify as service providers who are able to develop the skills that they seek. Those employers sponsoring Registered Apprenticeships will be identified as eligible training providers as federal rules and state guidelines require. Any training providers may apply for inclusion on the ETPL.

B. How the local board will facilitate access to services provided through the one-stop delivery system in remote areas, through the use of technology, and through other
Philadelphia is a large urban city. However, accessibility outside of the physical one-stop center is an important focus of Philadelphia Works’ broader “no wrong door” strategy to provide virtual access to customers through a more robust on-line presence. This work provides options for learning and opportunities to remotely access some of the services that are also available through physical access inside the one-stop center. Specifically, by executing our digital strategy, the Cross Center Services provider will:

- Provide increased customer access.
- Create on-line content from workshops for career seekers to use through an upcoming YouTube channel and for the Philadelphia Works website.
- Create on-line job clubs.
- Provide on-line assessment and career exploration tools.
- Provide software tools such as Resume Writer, Career Coach, and Microsoft IT Academies.
- Maintain video libraries that pertain to relevant occupations, education and literacy.

The Cross Center Services provider supported the use of virtual services by training and providing on-going technical assistance to relevant staff on effective use of virtual tools and how to promote them to customers. The Cross Center Services provider also teaches workshops on how to access and effectively maximize on the benefits of virtual services. The virtual and digital services and information will be available through the Philadelphia Works and PA CareerLink® websites. The goal is to also develop smartphone compatible applications as customers are increasingly accessing on-line services through mobile devices.

C. **How entities within the one-stop delivery system, including one-stop operators and the one-stop partners, will comply with WIOA section 188, and applicable provisions of the Americans with Disabilities Act of 1990 regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities.**

[WIOA Sec. 108(b)(6)(C)]

To ensure that all customers, including individuals with disabilities and those with multiple barriers to employment, have the opportunity to take advantage of the services offered through the integrated PA CareerLink® system, Philadelphia Works will continue to employ several strategies:

- Continue to adhere with Americans with Disabilities Act of 1990 (ADA) requirements at each one-stop center, which must meet the requirements to be certified as a one-stop location annually.
- Seek opportunities for continuous improvement so that we are able to ensure universal access to services for individuals with special needs, through methods such as including input from customers and agencies that address the needs of the disabled and identifying opportunities for ongoing staff training to ensure cultural competency and sensitivity to individuals with barriers to employment, including those with disabilities.
- Develop an accessibility advisory board to advise and address issues related to ADA compliance, training issues, and in assisting disabled career seekers find employment.
- Sustain OVR as a Consortium partner to help in all applicable ADA compliance issues; OVR is also co-located at PA CareerLink® Philadelphia centers.
- Continuously leverage relationships with community partners to cross-train staff so that the centers have adaptive equipment and computer software for use by career seekers with disabilities.
- Engage local agencies that specializes in workforce development services to career seekers with disabilities, to partner with the PA CareerLink® Philadelphia system to provide workshops and job search assistance to people with disabilities.
- Implement a TTY line for the deaf community and offer Braille-printed materials for individuals with impaired sight.

Based on a commitment to support others who are also identified in WIOA section 188, Philadelphia Works will continue to ensure access by:
- Establishing partnerships with Title V older worker programs, which are on-site at the PA CareerLink® centers.
- Continuing our collaborative relationship with the Mayor’s Commission for Services to the Aging to ensure that the needs of mature workers are met.
- Increasing system capacity to serve Philadelphia’s culturally diverse non-English speaking community through the implementation of a language line, which is available in all centers.

**Section 4.2**

Describe the local board’s assessment of the type and availability of adult and dislocated worker employment and training activities in the local area. [WIOA Sec. 108(b)(7)]

Philadelphia Works engages with a broad-base of stakeholders to offer a comprehensive approach to building the availability of training services and programs in Philadelphia, including:
- Training partners we currently fund through WIOA adult and dislocated worker funding.
- Partners we fund under TANF dollars to deliver trainings.
- Partners engaged in incumbent worker training through the industry partnerships, specifically the Southeast Regional Workforce Development Partnership and the Greater Philadelphia Healthcare Partnership.
• Employer training partners associated with apprenticeships: company, trade and Registered Apprenticeships.
• Education partners.
• Unique training opportunities for targeted populations such as our Platform to Employment program.
• Other partners who are involved in the ETPL.

In order to improve our capacity, however, we are beginning a comprehensive asset map of workforce programming, activity and needs in Philadelphia. We anticipate that this mapping process will help us identify other training dollars in the city and support our ability to target our funding and identify missed opportunities for us to better support the workforce system. This map will provide us with information related to training completed by organizations with federal, state or local training grants, such as the Philadelphia Housing Authority; with corporate or foundation funds, such as the customer service credential offered by the Lutheran Settlement House; that support our growing immigrant and refugee populations, such as the Welcoming Center of Pennsylvania; that are focused in ministries and other religious organizations; and that use social investment models, such as the Goodwill Industries of Southern New Jersey and Philadelphia.

Finally, we will continue coordinating with our regional partners to share our understanding and knowledge of resources across the local areas to enhance our knowledge of the scope and scale of organizations completing training for adults and dislocated workers.

Section 4.3

Describe how the local board will coordinate workforce investment activities carried out in the local area with statewide rapid response activities. [WIOA Sec. 108(b)(8)]

Philadelphia Works has established a rapid response strategic planning committee, comprised of key workforce partners and includes representatives from L&I, specifically the Bureau of Workforce Partnership and Operations as well as the Unemployment Compensation Division, the PA CareerLink® Operator Consortium, United Way of Southeastern Pennsylvania, organized labor, the Community College of Philadelphia, and WIOA Title I adult and dislocated worker service providers. Philadelphia Works convenes these partners to ensure the system implements a strategic and comprehensive approach to address area dislocations. The convening of these partners lays the foundation for the coordination of services to affected workers and may lead to the allocation of additional resources, information-sharing in order to maximize access and use of public resources aimed at supporting workers to generate greater outcomes/economies of scale and establish a system that is relevant and responsive.
Philadelphia Works distributes labor market and economic analysis data which includes job openings data and further guides the work of the implementation partners. This ensures that these workers and staff have the most relevant information needed to inform service delivery and align rapid response activities with the public workforce system at large. In support, Philadelphia Works funded additional staff across all WIOA providers to serve as points of contact for the state’s Rapid Response Regional Coordinator and increase the level of coordination and responsiveness across the system.

**Section 4.4**

Provide an analysis and description of youth workforce activities, including activities for youth with disabilities. Identify successful models and best practices, for youth workforce activities relevant to the local area. [WIOA Sec. 108(b)(9)]

*Note:* This section must include a description of the program design elements as well as how the local area will implement the 14 program elements.

Philadelphia Works invests WIOA youth funds in three pathways: at-risk youth enrolled in high school, opportunity youth without a secondary credential, opportunity youth with a secondary credential (defined further in Section 3.6), designed to meet the needs of youth including youth with disabilities and young adults up to the age of 24 based on their education and employment status.

Youth services are delivered through competitively-procured youth service providers. Consistent with statutory requirements, contracted providers are required to develop a preparation strategy focused on college-ready and career pathway instruction that includes 21st Century skills. Providers develop activities and materials that are aligned with competency profiles as determined by regional labor market information and reflect the rigor of advanced training and educational environments. Training includes access to paid and unpaid work experiences and related employment workshops and activities that provide additional opportunities for youth to practice and master 21st Century skills.

Contracted youth service providers receiving WIOA youth funding are required to provide or make available the following fourteen (14) youth program design elements:

- Tutoring, study skills training, instruction, and evidence-based dropout prevention and recovery strategies that lead to completion of the requirements for a secondary school diploma or its recognized equivalent (including a recognized certificate of attendance or similar document for individuals with disabilities) or for a recognized postsecondary credential.
- Alternative secondary school services, or dropout recovery services, as appropriate.
- Paid and unpaid work experiences that have as a component academic and occupational education, which may include summer employment opportunities and other employment opportunities available throughout the school year, pre-apprenticeship programs, internships and job shadowing; and work-based training opportunities.
- Occupational skill training, which may include priority consideration for training programs that lead to recognized postsecondary credentials that are aligned with in-demand industry sectors or occupations in the local area.
- Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster.
- Leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social and civic behaviors, as appropriate.
- Supportive services.
- Adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months.
- Follow-up services for not less than 12 months after the completion of participation, as appropriate.
- Comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.
- Financial literacy education.
- Entrepreneurial skills training.
- Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services.
- Activities that help youth prepare for and transition to postsecondary education and training.

In Philadelphia, the array of program models and pathways incorporate all of the required features and reflect nationally-recognized effective practices. Providers determine what specific service elements a participant receives based on an objective assessment and individual service strategy. Contracted providers leverage partner resources to provide program elements when appropriate. If an activity is leveraged through a partner, the contracted provider must have an agreement in place with the partner to offer the service element and ensure that the activity is connected and coordinated with the program.

In order to increase young adult connection with employment, education and/or supportive services to enter a viable career pathway, Philadelphia Works was recently awarded a US Department of Labor Summer Jobs and Beyond Grant, which includes core partners such as the Philadelphia Youth Network, the School District of Philadelphia (Reenagement Center and Office of Technical Education), the Philadelphia Chamber of Commerce, Drexel University and
the Mayor’s Office of Community Empowerment and Opportunity. Through this grant, we plan to establish a Youth & Young Adult Opportunity Hub (YOH/theHub) in the Promise Zone at our PA CareerLink® West Philadelphia center. The Hub model is designed to meet youth where they are, understand their goals, and develop an individualized approach to enable advancement along a pathway while increasing coordination among partners and employers to better connect the youth and adult work systems. Youth Navigators will support participant access to service learning, work experience programs that are blended with work-readiness training and internships to offer career-exposure, among other strategies.

As a system, we collect, use and analyze program, participant and customer data to support stronger youth programming. We also share information about lessons learned across providers to continuously improve the experience of all youth and young adults across Philadelphia’s workforce development system.

Section 4.8

Describe the process utilized by the local board to ensure that training provided is linked to in-demand industry sectors or occupations in the local area, or in another area to which a participant is willing to relocate. [WIOA Sec. 108(b)(22)] and [WIOA Sec. 134(c)(3)(G)(iii)]

Philadelphia Works targets education and training investments to HPOs and to direct employer needs through programs such as OJTs. HPOs are used to identify workforce programs that provide individuals with the knowledge and skills necessary to enter into, maintain and advance in a career in today’s economy. We use the petitioning process to add occupations on the regional HPO list that are currently not included. Through our ongoing collaboration with workforce, business, education and economic development agencies, we continuously collect and compare the current course offerings against real-time stakeholder data. We also use the process as a way to learn about providers of service who business and industry identify as service providers that are able to develop the skills that employers seek.

Providers are invited to submit an application for inclusion on the list. We identify the most needed programming through data and employer relationships to align workforce training and education investments with occupations that are in demand by employers, have higher skill needs and are most likely to provide family sustaining wages. Combining statistical data with regional expert input allows for a complete picture of the actual workforce needs of the commonwealth.

We regularly engage with our employer partners to hear about the effectiveness of our contracting process, which currently applies a hybrid cost reimbursement and performance model. In order to support training providers on the ETPL and their ability to provide service to our local career seekers, we are re-evaluating some of the terms of our contracts to respond to
labor market needs. Many career seeker customers have expressed to us that one of the primary challenges for them to engage in training is incurring additional debt. We are actively seeking ways to respond to this feedback including re-evaluation of our current ITA cap to accommodate for those who are seeking opportunities to advance but deterred by the post-recession environment.

Section 4.9

Describe the process and criteria the local board will use to include a wide range of providers and opportunities through the Local Training Provider List (LTPL). [Workforce System Policy 04-2015, Eligible Training Providers]

Note: Such criteria must include the factors listed in the WSP 04-2014 in addition to any criteria established by the local board. Eligibility of a provider and/or program must be based solely on measurable factors.

To ensure there are a wide range of providers and training opportunities available in our area, Philadelphia Works will outreach to the public at large to invite providers and other organizations to submit information for inclusion on the local training provider list (LTPL). In accordance with L&I guidance, Philadelphia Works will use the LTPL to support work-based learning opportunities with employers as training paths to employment and other available training programs that will lead to a strong and relevant system of eligible training programs and services.

Programs included on the LTPL will be primarily funded through contracts for training services and will serve as a resource for Philadelphia to use in meeting the needs of customers. As part of its training investment strategy, Philadelphia Works will contract with training providers and, in some cases, businesses, for employer- and system-centric trainings. Philadelphia Works will qualify organizations to provide employer-centric (work-based), and system-centric training who meet requisite criteria.

At this time, Philadelphia Works is not planning to include additional eligibility criteria for the LTPL. However, we regularly receive feedback from employers regarding the effectiveness of certain trainings. In accordance with the direction of WIOA, we are re-evaluating the trainings that we fund that may not result in a credential as defined under WIOA and seeking to support those that align with a career pathway as opposed to those that are geared towards attainment of only entry-level job-related skills (i.e. certified nurse assistants, commercial driver’s license trainings, etc.) as opposed to attainment of industry-recognized credentials or certifications.

Section 5: Compliance
Section 5.1

Describe the replicated cooperative agreements, as defined by WIOA 107(d)(11), in place between the local board and the Department of Labor & Industry’s Office of Vocational Rehabilitation (OVR) with respect to efforts that will enhance the provision of services to individuals with disabilities and to other individuals, such as cross training of staff, technical assistance, use and sharing of information, cooperative efforts with employers, and other efforts at cooperation, collaboration, and coordination. [WIOA Sec. 108(b)(14)]

OVR is an integral partner of Philadelphia Works and the PA CareerLink® Philadelphia system. A representative of OVR not only sits on the local board, but also serves as a partner on the Operator Consortium to help in all aspects of ADA compliance.

Philadelphia Works currently has a partnership agreement with OVR to ensure that individuals with disabilities have the opportunity to take advantage of the services offered through the PA CareerLink® Philadelphia system. This involves OVR being physically located at each of the four PA CareerLink® Philadelphia centers to provide on-site services to individuals with disabilities. Moreover, Philadelphia Works will be entering into a Memorandum of Understanding (MOU) with OVR on July 1, 2016 that will outline the coordination efforts between the two entities for the benefit of their mutual clients. Some of these efforts include:

- Attendance of OVR staff at PA CareerLink® Philadelphia center meetings to educate staff about coordinating and engaging in a mutual referral process.
- Coordination of business services between OVR and PA CareerLink® Philadelphia centers
- PA CareerLink® Philadelphia training of OVR staff on JobGateway®.
- Implementation of a communication process regarding hiring and training events, such as career fairs, employer events and training workshops for clients.
- OVR representation in the DOR Steering Committee, which is developing an electronic portfolio system where career seekers can permanently store their resumes and evidence of their accomplishments and abilities.
- Partnering OVR’s “Early Reach Initiative” program (assisting youth with disabilities in gaining and maintaining employment) with Philadelphia Works’ competitively-procured YouthWorks Administrator’s programs to increase opportunities for youth with disabilities.
- Sharing resources and listings of community partners.

Section 5.3

Describe the competitive and non-competitive processes, as well as the process for sole-sourcing, used for procuring goods and services within the local area. This includes, but is not limited to, the process used to award funds to a one-stop operator and other sub-
recipients/contractors of WIOA Title I adult, dislocated worker, and youth services. [WIOA Sec. 108(b)(16)]

Philadelphia Works follows its Procurement Policy which encompasses the general procurement requirements set forth in the Office of Management and Budget (“OMB”) Uniform Guidance and the policies established by the Commonwealth of Pennsylvania, including but not limited to WIIN No. 2-00, Change 2 and the working draft of the L&I’s Financial Management Policy dated July 2014. The purpose of the Procurement Policy is to ensure that public funds are used efficiently and prudently, a full accounting is available and given for procurements and procurement transactions are carried out in accordance with high ethical standards and in a manner that provides open and free competition.

Philadelphia Works will employ one of several prescribed methods of procurement based on the unique service or good being purchased, as well as the aggregate cost of such a purchase. A Request for Qualification (RFQ) and/or a Request for Proposal (RFP) may be issued prior to Philadelphia Works entering into any contractual transactions for goods and services over $5,000. We may also opt to execute the Small Purchase method if under the federal threshold of $150,000 by obtaining quotes from several diverse contractors.

Using the OMB Uniform Guidance as a guide, sole source procurements are allowed in limited cases in which service expertise is found in only one source; there is public exigency or emergency that will not permit a delay resulting from competitive solicitation; if, after written request by Philadelphia Works, the awarding agency expressly authorizes a noncompetitive proposal; or after solicitation from a number of proposals, competition is determined inadequate. Sole source procurements must be justified in writing.

Generally, with respect to the procurement of significant program partner contracts, such as a one-stop operator and other sub-recipients/contractors of WIOA Title I services, the RFP method will be used. Awards are given to a responsible contractor possessing the ability to perform successfully under the contract after a thorough review and selection process by a panel of independent, unbiased reviewers.

**Section 5.4**

Describe the local area’s negotiated local levels of performance for the federal measures and their implications upon the local workforce system; attach the completed Performance Targets Template. [WIOA Sec. 108(b)(17)]

*Note:* See Appendix C: Transitional Planning References and Resources “Performance Targets Template”.
The negotiated levels of performance for Philadelphia will certainly result in implications for our service delivery in the local area. Given our continued commitment to meet our negotiated local levels of performance, these indicators drive much of the strategy that we employ for WIOA Title I populations.

As mentioned in Section 1.3, Philadelphia residents face many barriers to employment and WIOA now provides additional opportunities for us to engage this population. In alignment with WIOA and the commonwealth’s commitment to working with this population in an impactful way, we anticipate that the measures will need to acknowledge this subset of individuals who we seek to not only serve, but also prioritize for service delivery. With the commonwealth’s acknowledgment that certain accommodations will need to be made to offer appropriate on-ramps for this population, we are eager to maximize on the opportunities that WIOA provides for us to provide additional supports to this important group of Philadelphians.

The commonwealth has also placed emphasis on training services with benchmarks for local areas to meet on an annual basis. This work aligns with WIOA’s measure of credential attainment. Given WIOA’s emphasis on skill-related credentials (as opposed to job-related credentials), coupled with the commonwealth’s emphasis on training, we will need to adjust some components of our service and employer engagement to ensure that we are meeting all stakeholder expectations.

Additionally, as identified in Section 2, many of the strategic priorities that guide the work of our local workforce board align well with not only these measures, but also the goals that the commonwealth has set forth for the workforce system across Pennsylvania. Generally, of primary concern is that we are limited in our ability to hold providers to meeting measures that are not yet fully defined; this can certainly impact our local area’s overall ability to meet measures. Although we will need to make adjustments in our service delivery model to the extent that we can, especially as timelines for follow-up with career seekers have shifted in WIOA, given our alignment with these benchmarks and goals, we will strive to continue to meet measures. Generally, the measures below reflect the levels proposed in the state plan with some adjustments made based on the factors described earlier in this section.

<table>
<thead>
<tr>
<th>WIOA Performance Measures</th>
<th>Local Area PY16 Performance Goals</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Employment (Second Quarter after Exit)</strong></td>
<td><strong>Negotiated Goals</strong></td>
</tr>
<tr>
<td>Adult</td>
<td>59%</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>67%</td>
</tr>
<tr>
<td>Youth</td>
<td>56%</td>
</tr>
<tr>
<td><strong>Employment (Fourth Quarter after Exit)</strong></td>
<td><strong>Negotiated Goals</strong></td>
</tr>
<tr>
<td>Adult</td>
<td>58%</td>
</tr>
<tr>
<td>Dislocated Worker</td>
<td>63%</td>
</tr>
</tbody>
</table>
Section 5.6

Describe the process used by the local board for the receipt and consideration of input into the development of the local plan in compliance with WIOA section 108(d). Describe the process to provide an opportunity for public comment prior to submission of the local plan. Be sure to address how members of the public, including representatives of business, labor organizations, and education were given an opportunity to provide comments on the local plan. [WIOA Sec. 108 (b)(20)]

The board made the local plan available to the public via the Philadelphia Works website in order to receive written comments via email (localplan@philaworks.org). Public comment to the local plan was also received during a forum held on May 23, 2016 from 11:00am to 12:30 pm at Peirce College (1420 Pine Street, Philadelphia, PA 19102). During this forum, stakeholders and interested parties were given to offer public comment on the local plan. Stakeholders submitted both written and verbal comments during this forum. Philadelphia Works leadership attended this forum to hear from providers. After the conclusion of the 30-day public comment period, members of leadership met to review all comments we received and determined which comments would be incorporated into the plan, which would be revised to better represent our work, and which would not be incorporated for a variety of reasons. In promoting transparency in our process, we have included all public comments with a response in Appendix A.
The opportunity to offer public comment via the Philadelphia Local Plan Forum and the designated e-mail was advertised via multiple outlets including Constant Contact e-mail notifications that included targeted partners, including representatives of business, labor organizations and education; social media postings through Twitter and Facebook that include followers who represent business, labor organizations and education; multiple points of notification on our website; meetings; and other forms of outreach based on our pre-existing relationships.

**Section 5.7**

Prior to the date on which the local board submits a proposed local plan (i.e., no later than Thursday, June 2, 2016), the proposed local plan must be made available to members of the public through electronic and other means.

A. Describe how the local board made the proposed local plan available for public comment. [WIOA Sec. 108(d)(1)];

B. Describe how the local board collected and considered public comments for inclusion in the proposed local plan. [WIOA Sec. 108(d)(2)]; and

C. If any comments were received that represent disagreement with the proposed local plan, include such comments within the local plan’s attachments. [WIOA Sec. 108(d)(3)]

Prior to the date on which the local board submits a proposed local plan (i.e., no later than Thursday, June 2, 2016), the proposed local plan must be made available to members of the public through electronic and other means.

A. Describe how the local board made the proposed local plan available for public comment. [WIOA Sec. 108(d)(1)]

The board made the proposed local plan and the regional plan available through its website at [www.philaworks.org](http://www.philaworks.org). Those interested in viewing the plan were able to view and download the plan from the website and offer comment via email during the Philadelphia Local Plan Forum held on May 23, 2016 from 11:00 am to 12:30 pm at Peirce College (1420 Pine Street, Philadelphia, PA 19102).

B. Describe how the local board collected and considered public comments for inclusion in the proposed local plan. [WIOA Sec. 108(d)(2)]

Public comments on the local plan were collected primarily in two ways. Comments were collected electronically via an e-mail address ([localplan@philaworks.org](mailto:localplan@philaworks.org)), which was posted on our website and from those attending the Philadelphia Local Plan Forum held on May 23, 2016 from 11:00 am to 12:30 pm at Peirce College (1420 Pine Street, Philadelphia, PA 19102). Those
comments collected from community forum were submitted in writing or offered verbally and recorded using a digital recorder and then transcribed.

In addition many of the policies which form the plan were discussed at board and committee meetings all of which were open to the public and which allow for public comment.

After the conclusion of the 30-day public comment period, members of leadership met to review all comments we received and determined which comments would be incorporated into the plan, which would be revised to better represent our work, and which would not be incorporated for a variety of reasons.

C. If any comments were received that represent disagreement with the proposed local plan, include such comments within the local plan’s attachments. [WIOA Sec. 108(d)(3)]

All comments are included in Appendix A.

Section 5.8

List the name, organization, and contact information of the designated equal opportunity officer for each PA CareerLink® center within the local area.

The designated Equal Opportunity Officer for all four of the PA CareerLink® Philadelphia centers is:

Sharon Riley, Esquire
General Counsel and Compliance Officer
Philadelphia Works, Inc.
1617 JFK Boulevard, Suite 1300
Philadelphia, Pennsylvania 19103
(215) 557-2633
sriley@philaworks.org

There is also a designated Equal Opportunity Liaison located on-site at each of the four individual PA CareerLink® Philadelphia centers who work directly with the Equal Opportunity Officer at Philadelphia Works on all equal opportunity issues.

Section 5.9

By checking the box adjacent to each line item, the local board attests to ensuring the compliance components/documents listed are in place and effective prior to July 1, 2016.
Copies of the listed compliance components/documents are not required at this time, but may be requested during monitoring and/or auditing.

- Agreement between all counties and other local governments, if applicable, establishing the consortium of local elected officials
- Agreement between the chief elected official(s) and the fiscal agent, if a fiscal agent is designated
- Agreement between the local elected official(s) and the local workforce development board
- One-Stop Partner Agreement(s)
- Resource Sharing Agreement(s)
- Resource Sharing Agreement Budget(s)
- Local workforce development board policy and process that provides for nomination, appointment and removal of board members; resolutions; bylaws; code of conduct; and conflict of interest
- Financial management policy and process including cost allocation plan; internal controls; cash management; receipts of goods; cost reimbursement; inventory and equipment; program income; travel reimbursement; audit requirements and resolution; annual report; property management; debt collection; and allowable costs
- Local procurement policy
- Program management policy and process including equal opportunity for customers; supportive services; needs related payments; file management; eligibility; self-sufficiency criteria; individual training accounts; layoff assistance; priority of services; grievance for eligible training providers list; transitional jobs; stipends; and training verification/refunds
- Risk management policy and process including records retention and public access; public records requests; monitoring, grievance; incident; and disaster recovery plan
- Human resources policy and process including employee classification; benefits; holidays and PTO; recruitment and selection; employee development; discipline; layoffs, terminations and severance; sexual harassment; and equal opportunity/non-discrimination
- Professional services contract(s) for administrative services such as staffing and payroll, if applicable
Appendix A: Comments to WIOA Local Plan

The Philadelphia Works draft WIOA Transitional Local Plan was posted on the Philadelphia Works Local and Strategic Plans webpage for public comment from April 22, 2016 to May 23, 2016. Stakeholders and the general public were notified of the plan posting and opportunity for everyone to provide comment. Additionally, on May 23, 2016, Philadelphia Works held a public forum during which individuals were offered an opportunity to offer verbal comments that would be eventually transcribed into this document. This document also includes verbal comments that were not otherwise captured in the organization’s written comments. The following pages capture each comment as submitted and a response. As we transition towards implementing WIOA and eventually developing a fuller local plan, we will continue to reference these comments.

ON MAY 3, 2016, THE MAYOR’S OFFICE OF EDUCATION SUBMITTED THE FOLLOWING QUESTIONS/COMMENTS

"The Research and Policy committee of the board is reviewing possible return-on-investment analyses, and is also developing a new dashboard of performance and trend data" (page 28).

• What metrics are being used to review possible return-on-investment analyses?

*Philadelphia Works Response:* Philadelphia Works is exploring approaches used by other workforce areas with multiple program streams. Metrics will follow from the adoption of a methodology approved by the board.

"In our conversations with stakeholders during the WIOA planning process, a common theme was the need for more cross-agency data sharing to facilitate outcome reporting and case management. We look forward to partnering with the commonwealth on its goals to improve data quality and data sharing" (page 28).

• How would this take place? Through MOU’s? Contracts?
• What Agencies would be involved and for what metrics?

*Philadelphia Works Response:* The strategy of cross-agency data sharing is one that the commonwealth has prioritized in their state plan. While we cannot prescribe the way in which they would want to manage this priority, this language serves to support their intention in delivering this work. We anticipate that they would determine the agencies that would be involved, the manner in which they would share this information and the methods they employ to conduct this work.

"The high school graduation rate in Philadelphia is far below the national average, especially for minority youth. In the 2011-12 school year, the graduation rate for Black students was estimated to be only 45 percent" (page 30).

• What cohort? 4 year?

*Philadelphia Works Response:* We have revised this statement to reflect the cohort.
"Facilitate engagement of employers, including small employers and employers in in-demand industry sectors and occupations, in workforce development programs in addition to targeted sector strategies" (page 42).

- Is there a role for the Mayor or for the Council to play in this process?

**Philadelphia Works Response:** The Mayor and City Council are integral to the success of our ability to target in-demand industry sectors. We regularly and frequently engage them and rely on their expertise to understand the ways in which we can coordinate our work.

"Opportunity Youth without a Secondary Credential: This pathway is designed to reengage high school dropouts in education to obtain a GED®, high school diploma or equivalent and continue to build their competencies and skills beyond the secondary level. Key to the pathway’s success is barrier removal, curriculum tied to college-readiness standards, and college exploration and preparation to access and persist in post-secondary education.

Opportunity Youth with a Secondary Credential: This pathway targets youth who have obtained a secondary credential such as a GED®, high school diploma or equivalent, but who are disconnected from both school and work. Programs offer industry-recognized credentials that prepare participants for positions in industries with high-growth potential" (45).

- Would this include returning citizens and Criminal Justice youth?

**Philadelphia Works Response:** To the extent that returning citizens and criminal justice youth fall into these categories, these groups could include those populations.

"In an effort to enhance services and avoid duplication of services, jointly, Philadelphia Works and our youth system work with the School District of Philadelphia to develop program models that support education and career preparation, including WIOA in-school youth programs that incorporate career-connected learning and experiences with school-day curriculum and activities" (page 46).

- What is the interaction with OST?

**Philadelphia Works Response:** The youth system is regularly connected to the work of OST providers and often the investments that we make overlap or support the same providers. Some OST providers are also members of our Standing Youth Committee.

"We also initiated Back2WorkPhilly, a robust outreach and engagement campaign to support all laid-off workers and encourage them to visit a PA CareerLink® Philadelphia center" (page 53).

- Is there data on success?

**Philadelphia Works Response:** Back2WorkPhilly is extremely new and ongoing. As of now we do not have data on this initiative.

"Is currently at-risk of dropping out of school as determined by a referral from school staff, probation officer, or other responsible person with documentation evidencing chronic poor
attendance or discipline problems during the last 12 months, or has educational underachievement (i.e. less than a cumulative 2.0 grade point average)" (page 54).

• What is the definition of "chronic poor attendance"?

**Philadelphia Works Response:** A young person missing 10 percent or more of school days for any reason based on discretion of school officials who are in the best place to identify excused versus unexcused absences.

"Create on-line content from workshops for career seekers to use through an upcoming YouTube channel and for the Philadelphia Works website" (page 57).

• Other forms of social media/apps should be considered.

**Philadelphia Works Response:** We agree and the PA CareerLink centers have engaged in a more robust social media presence. We are also evolving our web-presence to be more mobile-friendly.

"To ensure that all customers, including individuals with disabilities and those with multiple barriers to employment, have the opportunity to take advantage of the services offered through the integrated PA CareerLink® system, Philadelphia Works will continue to employ several strategies" (page 57).

• ADA should also include plans for individuals with language barriers.

**Philadelphia Works Response:** ADA does not currently apply to individuals with language barriers.

ON MAY 19, 2016, THE MAYOR’S COMMISSION ON LITERACY SUBMITTED THE FOLLOWING COMMENTS:

<table>
<thead>
<tr>
<th>Mayor’s Commission on Literacy supports Philadelphia workforce development efforts in the following ways:</th>
</tr>
</thead>
<tbody>
<tr>
<td>• <strong>Jobseekers:</strong> using the myPLACE℠ system and tools to connect job seekers with literacy barriers to adult education opportunities aligned to career pathways</td>
</tr>
<tr>
<td>• <strong>Title II and other adult education providers:</strong> using myPLACE℠ tools to support integration of adult education services into PA CareerLink® Philadelphia services.</td>
</tr>
<tr>
<td>• <strong>Employers:</strong> using myPLACE℠ system and tools to connect employees with literacy barriers with appropriate adult education services; coordinating efforts to blend adult education services into OJT and other job training programs.</td>
</tr>
</tbody>
</table>

**Section 1.4**
Page 19: Suggested additional sentence to be inserted in second paragraph before the sentence that begins “Any information related to assessments and skills are....”
Using strategies identified in Section 3.2., Philadelphia Works collaborates with the Mayor’s Commission on Literacy to connect with Title II and other literacy providers to provide educational services to career seekers who need to upgrade basic skills in order to qualify for training.

*Philadelphia Works Response*: We made the following revision to highlight the providers who support our work: “Using strategies identified in Section 3.2., Philadelphia Works collaborates with a broad group of literacy providers to provide educational services to career seekers who need to upgrade basic skills in order to qualify for training.”

**Section 2.1**
Page 23: Suggested revision to first sentence of second paragraph of bullet 5)
We intend to increase the educational levels of this population through the use of technology and in partnership with Title II and other providers of adult basic education, in collaboration with the Mayor’s Commission on Literacy.

*Philadelphia Works Response*: We have determined that the statement is clear as written.

**Section 3.1**
Page 34, Table 3.11
Suggested insertion in description of Mayor’s Commission on Literacy: add “(ages 16 – 64)” after ‘career seekers.’

*Philadelphia Works Response*: We have made the requested change.

**Section 3.2**
Page 37: suggested revision to Paragraph 3
The Mayor’s Commission on Literacy works in collaboration with the PA CareerLink® Philadelphia Centers to coordinate the delivery of adult education and literacy services by Title II and other literacy providers using the *myPLACE™* system.

*Philadelphia Works Response*: We agree and have made the change, also incorporating and accounting for the revision we made as suggested by Title II Providers in relation to the same section.

**Section 3.9**
Page 49: suggested revision to second bullet in second paragraph:
The WIOA Services Team, which consists of Workforce Advisors, Quality Assurance and Data Specialists, and Literacy Liaisons.

*Philadelphia Works Response*: We have made the requested change.

**Section 3.11**
Page 51: Suggested revision to bullet 6 in second paragraph
Connect individuals to opportunities that develop essential work skills, *non-cognitive* and soft skills....
Philadelphia Works Response: We have made the requested change.

Page 53:
Let it be noted that the Mayor’s Commission on Literacy collaborates with Mayor’s Office of Reintegration Services to connect returning citizens with literacy services through the myPLACE℠ system.

Philadelphia Works Response: We agree this is noteworthy and while it is an important collaboration, we did not add any language to this effect in our plan.

ON MAY 19, 2016, JEVS HUMAN SERVICES SUBMITTED THE FOLLOWING COMMENTS:

Section 1
- p. 19—PWI has identified the following areas for improvement in the local workforce system:
  - The need to build internal and provider capacity around co-enrollment among core and partner programs,
  - Additional opportunities to serve those with barriers to employment with targeted services that meet their current skill levels.
  - Improving our on-line presence and community partnerships to increase access to customers across the city, and
  - Building Title I providers’ capacity around newer WIOA training and placement strategies such as work experience, internships and transitional jobs.

Comment: JEVS supports these suggestions to improve the local workforce system.

Philadelphia Works Response: We appreciate the comment in support of the plan and JEVS’ continued partnership.

Section 2
p. 23—Describe local board’s strategic vision and goals for preparing an educated and skilled workforce (including youth and individuals with barriers to employment). Include goals relating to the performance accountability measures based on primary indicators of performance described in section 116(b)(2)(A) in order to support regional economic growth and economic self-sufficiency. [WIOA Sec. 108(b)(1)(E)]

Comment: Recently, the U.S. Departments of Education and Labor issued an Information Collection Request on WIOA Common Performance Reporting that details five types of skill gains that can be counted toward the Measurable Skill Gain indicator, as follows:
1. Achievement of at least one educational functioning level of a participant in an education program that provides instruction below the post-secondary level;
2. Attainment of a high school diploma or its equivalent;
3. Transcript or report card for either secondary or post-secondary education that shows a participant is achieving the state unit’s academic standards;
4. Satisfactory or better progress report towards established milestones from an employer/training provider who is providing training (e.g., completion of on-the-job training, completion of one year of an apprenticeship program, etc.); and,

5. Successful completion of an exam that is required for a particular occupation, progress in attaining technical or occupational skills as evidenced by trade-related benchmarks such as a knowledge-based exam.

JEVS strongly urges PWI to consider all of these skill gains as acceptable under WIOA Title II.

**Philadelphia Works Response**: We appreciate this feedback. Local workforce board are responsible for ensuring that Title II providers provide services in a way that is consistent with the local plan and local workforce development strategies for implementation. Philadelphia Works will consider these skills gains as acceptable as we work with local Title II providers.

p. 23—Adopt common employer-driven education and training standards across all ages. As part of this work, a key step involves integrating WIOA youth and adult education, training and literacy providers to collaboratively identify skills and credentials. Through this informed and open process, we can continue to develop career pathways for future employment success and seek methods of alternative credentialing (ex.: DOR, digital badges, etc.).

**Comment**: JEVS supports the adoption of common employer-driven education and training standards. Ensuring youth-specific needs are attended to will be critical and thus the need for industry-recognized credentials and modernized accreditations and validations of educational accomplishment.

JEVS also applauds greater alignment between adult and youth systems. This requires system alignment on multiple levels (data sharing, policy analysis and alignment, and practitioner collaboration). We encourage PWI to invest in ways to help youth navigate the different systems, and to invite K-12 and postsecondary education to the table in order to ensure true alignment.

**Philadelphia Works Response**: We agree with this comment and have added additional language regarding our pursuit of flexible funding opportunities to drive the work that JEVS describes, including a newly-awarded US DOL grant.

p. 24—The close relationship between the adult literacy community with both our youth programming and adult training will help us develop more mainstream opportunities along career pathways for those with barriers that were traditionally denied access to training. We are committed to creating innovative models to support individuals with barriers to employment, including the commonwealth’s goal of identifying quality entry-level “on ramp” jobs to career pathways for opportunity youth and adults.

**Comment**: Ensure that targeted populations, including low-literacy individuals, non-English speakers, and other groups with barriers, benefit from the implementation of Career Pathways by integrating wraparound services, literacy programs, and other basic skills education with training for specific Career Pathways that leads to paid employment, and conducting an
outreach program so that all stakeholders understand the components and potential benefits to individuals of advancing along a Career Pathway. JEVS also suggests that quality of a job should not only be measured by the pay or complexity, but the intangible interpersonal, coping and creative skills that can be developed in any situation. For example, for youth, gaining work experience, any work experience is the start of a Career Pathway. We urge PWI to work with providers to increase internships, job shadowing, and other opportunities for youth to gain experience trying out multiple Career Pathways to ensure they have the opportunity to compare and can pursue the right pathway. Moreover, for people with disabilities, sometimes the job they secure is the only job they will ever have. In this situation, the job is not a gateway, but an ideal match where someone with intellectual disabilities can stay for the long-term, keeping turnover low for the employer as well.

Philadelphia Works Response: We agree that young people having sufficient access to work experience is essential to developing a connection to both education and career growth. We expect that our providers would support young peoples’ abilities to experience multiple career pathways as described above and look forward to opportunities to support them in this work. We also agree that defining job quality is complex and seek ample flexibility in defining it as well.

Section 3

p. 33—Philadelphia Works oversees the city’s integrated service delivery model in which both WIOA and TANF workforce programs operate through the PA CareerLink® Philadelphia system. All providers are competitively procured. As we continue to advance this service delivery model that integrates WIOA and EARN programming, we anticipate increased center traffic and improved opportunities for access. While currently, we utilize a Consortium model for the one-stop operator, we are beginning to transition the work to competitively procure the role of the operator.

Comment: JEVS supports a competitive procurement process as it ensures that job seekers will receive high-quality services.

Philadelphia Works Response: We appreciate the comment in support of our process.

p. 40—As a result of the enactment of WIOA, the board has approved a number of operational programs to expand the types of program offerings that support the needs of career seeker and employer customers:

- Apprenticeship: Given the renewed opportunities that WIOA provides, Philadelphia Works developed an Apprenticeship policy to outline the various funding opportunities available to support Apprenticeships. Apprenticeships are unique training opportunities that combine classroom and job-based training. Apprentices gain and demonstrate competencies either over a period of time or at specific benchmarks in the apprenticeship program. Demonstration of competencies leads to specified wage increases through the apprenticeship and until completion.
• **Customized Job Training:** CJT opportunities are ideally suited for those businesses that plan to expand their operations and are seeking the opportunity to hire new employees but have found the current workforce to be in need of additional specialized training. CJTs are designed to meet the special requirements of an employer and are conducted with a commitment by the employer to employ an individual upon successful completion of the training. Employers must also pay for a significant portion (at least 50 percent) of the training.

• **On the Job Training:** OJTs are offered by an employer to a paid participant who is engaged in productive work that provides knowledge or skills essential to the full and adequate performance of a job. OJTs offers reimbursement to the employer of up to 50 percent of the participant’s wage rate and are limited in duration to the occupation for which the participant is being trained, taking into account multiple criteria and factors.

**Comment:** JEVS supports these operational programs and recommends that CJT and OJT funds be more flexible on the training location as some employers do not have space within their locations to support training on-site, so they seek to contract out training in another setting.

While JEVS strongly agrees with the need to support higher-level wages that promote self-sufficiency, this too is an area where flexibility is needed, as some employers are constrained by union contracts in providing such wages within the first several months of employment. Lastly, JEVS recommends that PWI use a flexible procurement process so that employers do not have to wait until the next procurement cycle to get training.

**Philadelphia Works Response:** We appreciate the comment in support of our work and agree with these points. Because these are largely issues for the way in which we implement our work, we do not plan to make the revision in our local plan but will work closely with our partners to offer sufficient flexibility to mitigate the issues identified here.

p. 42—Philadelphia Works will host an annual Workforce Symposium in partnership with local economic development agencies to establish relationships, build rapport, and exchange information for effective employer engagement.

**Comment:** JEVS suggests that PWI establish an advisory committee comprised of local workforce agencies to help plan for and facilitate the symposium.

**Philadelphia Works Response:** As this work includes partners beyond only Philadelphia Works, we will raise this possibility with our partners as we move forward in planning.

p. 43—Additionally, Philadelphia Works will actively work with educational partners and community-based organizations to identify and target occupations to train participants to meet current and future workforce needs. Philadelphia Works is committed to training center staff in labor market information tools, so they can provide career seekers with detailed information on appropriate career pathways.

**Comment:** JEVS supports this suggestion to engage community based organizations and will gladly participate in such discussions.
Philadelphia Works Response: We appreciate the comment and commitment in support of our work.

p. 43—Describe the workforce activities, including activities for youth with disabilities. Identify successful models and best practices for youth workforce activities relevant to the local area.

Opportunity Youth without a Secondary Credential. This pathway is designed to reengage high school dropouts in education to obtain a GED®, high school diploma or equivalent and continue to build their competencies and skills beyond the secondary level. Key to the pathway’s success is barrier removal, curriculum tied to college-readiness standards, and college exploration and preparation to access and persist in post-secondary education.

Comment: JEVS agrees that career pathway success starts with barrier removal. It will be imperative to expand resources for programs that bridge the gap between a secondary credential and post-secondary success, which should include the opportunity to pursue career pathway alternatives to post-secondary education. It is also essential to provide opportunities for youth to explore careers through work-based learning, job shadowing, paid internships and employer mentorship.

Philadelphia Works Response: We agree and appreciate the comment in support of our work.

p. 47—Philadelphia Works’ policy, enacted by the board in March of 2016, funds the following supportive services for adults and dislocated workers based on individual participant needs:

- Transportation support-- The policy allows for SEPTA pass, for either the first half of the individual’s length of training or up to one month for individuals who have secured employment. In limited circumstances in which sites or homes are not easily accessible to public transportation, staff may provide gift cards for gas.
- Clothing support up to $200
- Professional Certifications, Examinations & Government Licenses (including GED test)

Comments: JEVS commends PWI for the expansion of supportive services to include professional certifications, examinations, government licenses, and the GED.

Philadelphia Works Response: We appreciate the comment in support of our work.

p. 50—The State Plan asks PWI to “identify the targeted populations that the local board plans to focus additional effort and resources towards. In terms of the targeted populations, briefly describe the local board’s objectives, goals, and strategies.

Comment: JEVS supports PWI’s proposal to focus additional effort and resources towards those individuals with barriers to employment. Based on our 75 years’ of experience with such populations, and limited resources, we recommend the following priorities from the list of suggestions for helping the most vulnerable job seekers:

- Connect individuals to opportunities that develop essential work skills, also known as behavioral modifications, and soft skills for improved workplace cultural competencies.
- Coordinate with stakeholders and partners to gain additional knowledge on employee-skill requirements to guide our investments in employer and career seeker services.
- Create innovative models that are geared towards supporting individuals with barriers to employment.
- Implement additional earn and learn models of professional development through paid work experience.

**Philadelphia Works Response:** We appreciate the support of JEVS and look forward to their continued partnership and expertise as we advance the priorities we have identified.

p. 53—In an effort to remove barriers to education, training, and employment, across WIOA youth programs, priority will be granted to out-of-school youth, individuals living in high poverty neighborhoods, juvenile offenders, foster care youth, and other special populations. Services will include, but not be limited to, educational support to achieve secondary credentials, basic skills training, work experience, career pathway identification, and occupational training. A current need exists to improve our ability to offer co-enrollment. As a result, capacity building and training will be provided for adult providers to deliver youth services.

**Comment:** We applaud the recognition of PWI to increase co-enrollment. It is not necessarily that adult providers need to be able to deliver youth services, but that BOTH youth and adult providers need to know the full array of services open to youth both within the youth systems and adult systems to create seamless progression and appropriate referrals and alignment.

**Philadelphia Works Response:** We appreciate the support and agree with their comments.

**Section 4**

p. 57—Compliance with WIOA section 188, and applicable provisions of the Americans with Disabilities Act of 1990 regarding the physical and programmatic accessibility of facilities, programs and services, technology, and materials for individuals with disabilities, including providing staff training and support for addressing the needs of individuals with disabilities...“Develop an accessibility advisory board to advise and address issues related to ADA compliance, training issues, and in assisting disabled career seekers find employment.”

**Comment:** JEVS commends the creation of an accessibility advisory board and would be happy to recommend suitable candidates, given our significant expertise serving people with disabilities seeking employment.

**Philadelphia Works Response:** We can certainly see the value in multiple partnerships and will consider the development of an accessibility advisory board as the need to do so arises.

p. 62—We regularly engage with our employer partners to hear about the effectiveness of our contracting process, which currently applies a hybrid cost reimbursement and performance model. In order to support training providers on the ETPL and their ability to provide service to our local career seekers, we are re-evaluating some of the terms of our contracts to respond to
labor market needs. Many career seeker customers have expressed to us that one of the primary challenges for them to engage in training is incurring additional debt. We are actively seeking ways to respond to this feedback including re-evaluation of our current ITA cap to accommodate for those who are seeking opportunities to advance but deterred by the post-recession environment.

**Comment:** JEVS endorses increasing the current cap on ITA, as the cost of training is a significant barrier for many of the low-income job seekers we serve at the Suburban Station CareerLink.

**Philadelphia Works Response:** We appreciate the input and will consider it and engage with our providers as we implement our ITA policy changes.

p. 62—At this time, Philadelphia Works is not planning to include additional eligibility criteria for the ETPL. However, we regularly receive feedback from employers regarding the effectiveness of certain trainings. In accordance with the direction of WIOA, we are re-evaluating the trainings that we fund that may not result in a credential as defined under WIOA and seeking to support those that align with a career pathway as opposed to those that are geared towards entry-level job-related skills (i.e. certified nurse assistants, commercial driver’s license trainings, etc.).

**Comment:** JEVS believes that certifications, even those for entry-level job-related skills, play a critical role in building a foundation to a career pathway. Certifications must be employer and industry recognized in order to hold value. Certifications are often requirements of employment and they demonstrate perseverance, learning, and accomplishment.

**Philadelphia Works Response:** We agree that certifications are important to entry-level job-related skills, especially as a foundation to a career pathway. We are not developing a broad rule against certifications, and again, are not planning to include additional eligibility criteria. We do, however, plan to closely review certifications that may not offer meaningful opportunity to career seekers in their pursuit of career development as opposed to those that are related to only one single job-related skill.

**Section 5**

p. 64—Office of Vocational Rehabilitation. Philadelphia Works currently has a partnership agreement with OVR to ensure that individuals with disabilities have the opportunity to take advantage of the services offered through the PA CareerLink® Philadelphia system. This involves OVR being physically located at each of the four PA CareerLink® Philadelphia centers to provide on-site services to individuals with disabilities. Moreover, Philadelphia Works will be entering into a Memorandum of Understanding (MOU) with OVR on July 1, 2016 that will outline the coordination efforts between the two entities for the benefit of their mutual clients.

**Comment:** JEVS endorses this increased coordination between PWI & OVR, especially as it relates to opportunities for youth with disabilities. In fact, JEVS has already successfully
advocated for increased on-site participation of OVR staff at the CareerLink it operates and would welcome opportunities to work more closely with OVR.

It is also critical that PWI work with OVR to ensure that youth with disabilities have access to work experience and career planning early on in school, as well as post high school. We recommend that PWI work with OVR to help streamline and accelerate the referral process for young adults with disabilities so that providers can provide timely training and services.

Philadelphia Works Response: We agree and are making efforts to advance the needs of young adults with disabilities, including partnerships with organizations such as SPIN.

ON MAY 21, 2016, A GROUP OF PHILADELPHIA TITLE II PROVIDERS (CENTER FOR LITERACY, COMMUNITY LEARNING CENTER, DISTRICT 1199C TRAINING AND UPGRADING FUND, LIBERTY RESOURCES, NEW WORLD ASSOCIATION, TEMPLE UNIVERSITY CENTER FOR SOCIAL POLICY AND COMMUNITY DEVELOPMENT AND THE WELCOMING CENTER FOR NEW PENNSYLVANIANS) SUBMITTED A JOINT STATEMENT THAT INCLUDED THE FOLLOWING COMMENTS:

Philadelphia Title II providers have met to review the Transitional Local Plan Draft, and submit these comments representing our views for your consideration. There are a few themes around which the comments are organized. A major theme focuses on the need for increased coordination and integration of Title I and Title II programs and services. A second theme focuses on the inclusion of entry-level career pathway opportunities for residents who do not possess a high school diploma or equivalency. Title II providers appreciate the continued efforts to develop effective, collaborative programs in coordination with the workforce system. We believe that we have the capacity and expertise to provide even greater value in working more closely with training providers and employers in the implementation of career pathway strategies for the City’s diverse population of low-income adults, disconnected youth, immigrants, people with disabilities, Veterans, and dislocated workers. Our comments represent our thinking on moving this discussion forward and developing innovative programming to address the needs of some of our most vulnerable residents.

Given the availability of the new alternatives to the GED®, we recommend that all references to the GED in the Transitional Local Plan Draft be replaced with the term high school equivalency.

Philadelphia Works Response: Any references to GED® have been replaced with or supplemented with the term high school equivalency.

Our other recommendations follow:
Section 1.4, Page 19. Paragraph at Page Bottom.

❖ Suggest adding to phrase that begins on second line: “...additional opportunities to serve those with barriers to employment with targeted services that meet their current skill levels by building partnership activities with Title II providers,...”
Philadelphia Works Response: We made the following revision to highlight the broad base of providers who are integral to developing this work: “...additional opportunities to serve those with barriers to employment with targeted services that meet their current skill levels through partnerships with providers,...”

Section 2.1, Page 22, 4) Adopt common employer-driven education and training standards across all ages. Paragraph at Page Bottom.

- Suggest adding to first sentence on second line: “to collaboratively identify the skills, credentials, and education that prepare and qualify participants, including the hardest-to-serve, for the beginning rung of employment leading to career pathway opportunities requiring additional post-secondary education.”

Philadelphia Works Response: We agree that identification of necessary skills is a part of our work and have added the following statement to our plan: “...to collaboratively identify skills, credentials, and education needs to prepare and quality participants, including those with barriers to employment, for the beginning rung of employment leading to career pathway opportunities requiring additional post-secondary education.”

- Suggest adding new sentence between 2nd and 3rd sentences: “To address the needs of the hardest to serve and most vulnerable populations, we can also work with employers to create career pathways for entry level positions (as described in the jobs identified on pages 5-9 of this document that do not require a high school diploma or equivalency) that do not require a high school credential.”

Philadelphia Works Response: We have added revised language at the end of the last paragraph on page 22 to fairly represent the feedback we have received from employers and make language updates based on changes in WIOA from hardest to serve to those with barriers to employment: “To address the needs of those with barriers to employment, we can also work with employers to create career pathways for entry-level positions that reflect employer-determined levels.”

- Suggested change to the 4th sentence, 3rd line at top of page 23: “...including adult and basic education resources through Title II providers and a network of 33 adult education and English Language Acquisition providers coordinated by the MCOL...”

Philadelphia Works Response: We agree that English Language Acquisition providers are not clearly identified in this sentence and have made the following change in our plan: “...including adult and basic education resources through adult education and English Language Acquisition providers in coordination with the Mayor’s Commission on Literacy.”

Section 2.1, Page 23, 5) Prioritize hardest-to-serve populations. Suggested additions to bulleted list.

- First bullet: “Implement work-based curricula, jointly developed by Title I and Title II providers, that prepare...”
Philadelphia Works Response: We agree that implementation of our work-based curricula may include a broader group of partners and have made the following change in our plan: “Implement work-based curricula, through partnership with a broad group of providers, that prepare career seekers to work in fast-growing industry clusters.”

- Second bullet: “Identify and invest in critical skills and credentials identified by employers, including critical thinking skills and non-cognitive skills essential to the workplace.”

  Philadelphia Works Response: We agree and have included this language.

- Fourth bullet: “Develop and build skill ladders and career pathways, including entry-level job opportunities that do not require a high school diploma or equivalency.”

  Philadelphia Works Response: We have added the following language to better represent our process for developing career pathways: “Build and implement skill ladders/career pathways, including entry-level job opportunities, that are driven by employer standards.”

- Fifth bullet: “Create innovative models that are geared towards supporting individuals with barriers to employment, including integrated adult education and occupational training models.”

  Philadelphia Works Response: We have added this language to our plan.

- Sixth bullet: “Integrate the use of work-based technology into our program models, such as smart phones, computer software, web-based and industry-based technologies.”

  Philadelphia Works Response: We agree and have made the following change to our plan: “Integrate the use of work-based technology into our program models, such as promoting the use of smartphones, computer software, web-based and industry-based technologies.”

- Seventh bullet: “Expand the success of pre-existing sector-based partnerships and actively develop additional ones, including partnerships that link work-based educational programs to technical training and employment.”

  Philadelphia Works Response: We have added this language to our plan.

- Suggested new bullet: “Develop partnerships to provide wrap around social service supports”.

  Philadelphia Works Response: In order to better describe our plans for social service supports we have made the following addition: “Develop partnerships for social service supports based on availability of resources and customer need, including behavioral health services and those that are components of program models such as Platform to Employment.”

Section 2.2, Page 24, 1) Establish career pathways as the primary model... Bulleted list.
- **Fifth bullet, suggested additional sentence**: “Innovative models may include programs that integrate basic skills and English Language Acquisition with occupational training that prepare opportunity adults and youth, including those without a high school diploma or high school equivalency, for entry-level positions.”

**Philadelphia Works Response**: We did not make the addition to this section as the section as written offers flexibility for us to identify innovative models that may best meet continuously-evolving career seeker and employer needs.

Section 2.4, Page 30, Measures: Youth in education, training or employment, second paragraph.
- **Fourth sentence suggested revision**: “Two of the challenges for youth seeking a high school equivalency is the increased complexity of the examination...(please note that the HiSET exam is now a recognized alternative to the GED®). The increased difficulty requires an increase in the time needed to prepare for the examination. Establishing realistic performance measures regarding attainment of the high school equivalency credential are recommended.”

**Philadelphia Works Response**: We have made the following revision to our plan: “Two of the changes for youth seeking a high school diploma equivalency are the shift in the content of the high school equivalency exams as well as the test’s transition to becoming computer-based, which presents a challenge for those with digital literacy issues. Any variations to the plan may require an increase in time needed to prepare for the examination. Alternative exams that are more focused on application of concepts as well as other pathways through the Community College of Philadelphia will need to be explored to generate strong performance results, while establishing performance levels that reflect the impact of these changes.”

Table 3.11: KEY PARTNERS AND ROLES, page 34.
- **WIOA Title II Providers suggested revision**: “Critical partner in increasing the competitiveness of career seekers in the job market is also represented on the local board.”

**Philadelphia Works Response**: We agree and have made the change.

Section 3.2, page 37.
- **Suggested new paragraph on WIOA Title II programs**: “In accordance with the WIOA legislation, Title II providers are funded by the Pennsylvania Department of Education to assist adults and youth to become literate and obtain the knowledge and skills necessary for employment and economic self-sufficiency; assist adults who are parents or family members to obtain the education and skills that are necessary to becoming full partners in the educational development of their children and lead to sustainable improvements in the economic opportunities for their family; assist adults in attaining a high school equivalency and in the transition to postsecondary education and training, including through career pathways; and, assist immigrants and other individuals who are English language learners in improving their mathematics, reading, writing, speaking, and
comprehension skills in English and acquiring an understanding of the American system of Government, individual freedom, and the responsibilities of citizenship.”

**Philadelphia Works Response:** We agree with this description and have made the change also incorporating and accounting for the revision we made as suggested by the Mayor’s Commission on Literacy in relation to the same section.

Section 3.3, page 39, fifth paragraph.

- **Fifth paragraph, suggested replacement of third sentence with the following:** “PA CareerLink® Philadelphia center staff also have an established process using myPLACE℠ tools to refer clients electronically to Title II services. This referral process is monitored using a dashboard of indicators reviewed by the Operator Consortium. Title II providers also partner with CareerLink® to offer onsite adult education programming and services. Title II providers are taking the initiative to create Bridge programs that contextualize adult education instruction with industry-based knowledge and competencies, and directly connect students with sector-based training and employment. A process is being established for Title II job seekers to access employment services through direct referral to CareerLink® centers.”

**Philadelphia Works Response:** We agree with some components of this description and have revised to state the following: “PA CareerLink® Philadelphia center staff also have an established process using myPLACE℠ tools to refer clients electronically to Title II services. This referral process is monitored using a dashboard of indicators reviewed by the Operator Consortium. Title II providers also partner with CareerLink® to offer onsite adult education programming and services. Title II providers are taking the initiative to create Bridge programs that contextualize adult education instruction with industry-based knowledge and competencies, and directly connect students with sector-based training and employment. A process is being established for Title II career seekers to access employment services through direct referral to CareerLink® centers. Through our partnership with Title II providers and to improve the referral process, we have identified the additional opportunity to improve assessment service delivery for the benefit of our customers and given the local board’s new role to review Title II applications, in the upcoming year, we plan to review applications with an eye for customer benefit and support while relying on the expertise and experience of our Title II partners to offer solutions resolve to this issue.”

Section 3.4 C. Better coordinate workforce development programs with economic development partners and programs. Career Pathways, bottom of page 44.

- **Suggested additional sentence:** “To support the hardest to serve clients, career pathways should be extended to include entry-level employment opportunities for adults and youth who may not possess a high school diploma or equivalency.

**Philadelphia Works Response:** We have made the following revision and included an example to better reflect our position: “To support clients with barriers to employment, career pathways may be extended to include entry-level employment opportunities for adults and youth who
may not possess a high school diploma or equivalency when such a step exists, based on the standards set by employers. As we have engaged in conversations with our industry partnership, for example, we have heard feedback from employers as to where, in their field and work, their career pathways commence. Oftentimes, they have advised that their entry-level job opportunities require a high school diploma or equivalency. As a result, in prioritizing realistic career pathways that are employer-validated, we have applied those entry points that employers have identified.”

Section 3.10. Pages 49-50. Last paragraph on page 50.

- Last sentence of paragraph refers to Title II engagement with the Operator Consortium. Please refer to note above for Section 3.3 for details on the engagement.

Philadelphia Works Response: We agree and have incorporated content from Section 3.3 to reflect Title II’s engagement with the Operator Consortium.

Section 3.11, page 51.

- Suggested addition to second bullet: “Increase the educational levels of the population through various instructional models, including classroom-based instruction and the use of technology, which includes computer-based learning and other technology supported resources shown to make education more accessible to not only adults but young people.”

Philadelphia Works Response: We have made the following change: “Increase the educational levels of the population through various instructional models and the use of technology, which includes computer-based learning and other technology supported resources shown to make education more accessible to not only adults but young people.”

- Additional suggested bullets:
  - “Create career pathway opportunities for entry-level employment that does not require a high school diploma or equivalency;
  - develop and support pipeline initiatives that enable those with barriers to OJT to access employment; and,
  - develop and support integrated education and training models that blend Title I and Title II funds, integrating contextualized basic skills instruction with sector-based occupational training.”

Philadelphia Works Response: We have determined that the original language in our plan more accurately represents the strategies that we are able to implement in the upcoming year.

ON MAY 23, 2016, YOUTH ADVOCATE PROGRAMS INC. SUBMITTED THE FOLLOWING COMMENTS:

- Be Clear on Hardest to Serve Definition and Invest in Strategies that Leverage Resources to Maximize Outcomes. Given Philadelphia Works’ commitment to serving the hardest to serve, emphasis should be made to clearly define hard to serve populations. One such
population that we recommended establishing clear service definitions for is court involved youth. Philadelphia Works should target a percentage of WIOA resources to youth with felony/misdemeanor offenses currently being served in wrap-around service programs. These programs, often supported by juvenile justice and behavioral health systems, are often without the resources to implement individualized workforce development services to achieve long term labor market outcomes. While wrap-around services effectively reduce recidivism, very little support exists for workforce development activities. By “adding-on” workforce development resources to current wrap-around service models, the dual outcomes of decreased recidivism and increased labor market attachment will yield measurable, substantial fiscal, societal and economic benefits.

**Philadelphia Works Response:** In Philadelphia, we have identified youth who are/were involved in the juvenile justice system as a priority population. However, we agree that resources are limited to support this population. Given the unique needs of these individuals and the program opportunities available in WIOA, we currently utilize funds outside of WIOA to support interventions, as appropriate.

- **Be Clear that Increased Participant Costs are Expected and Will be Supported.** Many participants will require deeper levels of engagement to successfully engage and complete WIOA services and supports. While Philadelphia Works is committed to serving Hardest to Serve youth, and WIOA calls for more intensive and longer engagements than the previous legislation, little formal direction is provided to programs on how to do so. We, therefore, suggest the inclusion of clearer mention of support for higher-cost investments in court-involved youth enrolled in wrap-around service models, even if this translates into eventually serving fewer participants system-wide. We must focus resources on these hardest to serve youth in order to have an impact on the numbers that put them at such disastrous disadvantages. We cannot continue to focus only on easy-to-serve, low risk young people and expect to increase youth employment.

**Philadelphia Works Response:** While we agree that certain individuals with barriers may require additional investment, we do not hold providers to a particular cost per individual limit nor do we receive additional WIOA funds as a result of this attribute. Our providers can make investments based on the needs of each individual youth and we encourage them to look at the depth and range of service that are available to meet young peoples’ applicable needs.

- **Mandate for Transportation Services and Flexible Scheduling.** WIOA details that all services should be consistent with the participant’s Individual Service Strategy. Based on YAP’s experience, for individual services to be effective for the truly disadvantaged, services must be provided at the time when they are needed by youth, and not based on place, organizational timetable, or structure. Moreover, for services and support to be truly individualized, they must be offered within the community where the youth reside. Too often, programs’ inability to relieve transportation challenges has resulted in program non-completion and/or termination. YAP’s 24/7 availability and access to client transportation
helps us mitigate many of the issues that interfere with young people’s school and work performance. Without strategic attention to these issues, successful youth participation in the 14 WIOA service elements may prove difficult. To this end, we suggest language reflective of the need for Philadelphia Works to support investments in transportation and services operations beyond-traditional hours of operation and definition of place (services take place in homes, community centers, basketball courts, etc.).

**Philadelphia Works Response:** Per the fourteen service elements referenced above, providers do have access to funds for supportive services such as transportation. We also invest in place-based strategies to support youth where they may reside. An individual provider’s willingness to provide flexible scheduling is set by their own processes.

- **Seek Services that Build Social Capital Building and Workforce Connecting.** Despite the best efforts of many workforce development agencies, high-risk, low-income youth are failing to secure gainful employment equal to the investment they place into workforce preparation and credentialing. A growing body of research is questioning the impact of programs focused mainly on increasing skills and credentials without giving youth the labor market connections that could help put these achievements to work. As a result, many young people remain dubious about their involvement in workforce programs where their investments have a high chance of an uncertain return. Given Philadelphia Works call to serve greater number of hardest to serve youth, this is one assumption that cannot be left to foster. Hardest to serve often means most disconnected. Without connections to the real labor market, young people are absent key labor market information and real models that could justify youth’s investment in workforce training participation and completion.

**Philadelphia Works Response:** Per the requirements of WIOA, 20 percent of our youth program funds are required to be spent on work experiences that offer us an increased opportunity to provide work-based learning. We require our providers to work with employers directly to help young people access real work experiences and offer contextualized learning opportunities through these experiences.

- **Performance Indicators.** WIOA programs serve a range of youth with various barriers to employment. Workforce programs have been reluctant to engage participants with extreme barriers due to difficulties achieving performance outcomes. Long term, stable labor market participation for some subgroups takes years, often with many stopgap work experiences in between. The youth development process takes longer for some, affording them more time to gain maturity and develop increased amounts of social capital. Consequently, youth who need the services the most are the least likely to be served. In order to assure that Philadelphia Works is targeting services to the hardest to serve, flexibility in measures of performance should be emphasized and negotiated with indicators measuring levels of labor market participation serving a greater role. In this manner, programs will be held accountable for ensuring that participants are actively engaged in the labor market and not penalized for not becoming part of it. With the recognition that
connection rates lead to placement rates, the transition to the World of work will be less traumatic for youth programs and Philadelphia Works alike.

**Philadelphia Works Response:** In application, we do not have the ability to define indicators of performance. However, we actively support this population by pursuing flexible funding opportunities to increase our ability to better serve youth with barriers to employment in other ways.

- **Focus on Building Disconnected Youths’ Future Economic Opportunity, Not “Workforce Development”** Adopt the elements outlined in the 2014 Safely Home, available at: [http://www.yapinc.org/Portals/0/Documents/Safely%20Home%20Preview/safelyhome_es.pdf](http://www.yapinc.org/Portals/0/Documents/Safely%20Home%20Preview/safelyhome_es.pdf), and attached with this submission, in any programs designed to reach the hardest to risk young people. For your convenience, these elements are as follows:
  - Accept all kids and adopt "no reject" policies
  - Be available, accessible and flexible
  - Empower voice, choice & ownership for young people and their families
  - Individualize services for each youth
  - Ensure family-focused services
  - Take a strength-based approach
  - Provide culturally competent services
  - Engage youth in work
  - Prioritize safety and crisis planning
  - Provide unconditional caring (no-eject policies)
  - Create opportunities for civic engagement and giving back
  - Cultivate long-term connection to community

**Philadelphia Works Response:** We share an appreciation for many of the elements identified above. Positive youth development is one of the primary drivers of our investments. We recognize the importance of young people participating in developmentally appropriate programming and regularly procure providers who share in this understanding.

**ON MAY 23, 2016, THE ENERGY COORDINATING AGENCY OF PHILADELPHIA SUBMITTED THE FOLLOWING COMMENTS:**

We were pleased to see on page 4 of the Philly Works' 2016 Plan that Energy was listed at the fastest growing occupation: 15% growth between 2007 and 2014, with the third highest average salary of $83,301. That is consistent with national studies such as the recent definitive study by the U.S. Department of Energy which predicts that clean energy jobs will grow at 14% again next year.

**Philadelphia Works Response:** We appreciate the comment.

In order to take full advantage of the growth in energy efficiency, solar, wind and other aspects of the clean energy industry, Pennsylvania needs to really focus on workforce development, and align its efforts to support this all important industry. To my knowledge,
outside of a little bit of training done by DCED for the WAP program, Pennsylvania is not doing anything to support workforce development in the clean energy industry.

At the same time that the clean energy industry is rapidly growing, the utility industry as a whole is facing a serious issue with its own workforce: the baby boomers are retiring, creating a brain drain of sorts. Over 29% of workers in the utility industry are age 55 or older. According to DOL reports, 10% of the workforce will retire this year, and another 10% will retire next year. The utility industry is also facing unprecedented change from technological developments, and diversification of fuel sources, not to mention the challenges of climate change.

I would suggest that part of the educational crisis we face is that we haven’t developed a strategy which can help build the clean energy workforce we need to meet the energy challenges we face. Career and Technical Education (CTE) Schools are a key part of the solution. Once considered a dumping ground for low performing students, Philadelphia’s CTE program has been one of the bright spots for the school district. Despite a significant lack of resources, district wide, the CTE schools have quietly produced some of the best outcomes for students in the city – e.g., according to the Philadelphia School District’s publication THE NOTEBOOK)

- CTE students graduate at higher rates. The CTE graduation rate was 84%, compared to 62% citywide, and they were more likely to graduate on time.
- The racial “achievement gap” for graduation is almost eliminated. Black and Latino CTE students graduate at almost the same levels as White and Asian students.
- CTE students report better “soft” outcomes. The students reported more positive experiences than non-CTE students in areas like goal-setting, planning, recovering from setbacks, and staying engaged with classes.

**Philadelphia Works Response:** We understand that in order for CTE programs to receive funding, they must be in alignment with our HPO list and we work directly with the school district to ensure that we petition for industries that meet the parameters of the high priority occupations process. We will continue connecting with the Philadelphia School District regarding this work to maximize the opportunities for students to access relevant and in-demand CTE programs and work with entities that would like to participate in the HPO process.

**ON MAY 23, 2016, AT THE PHILADELPHIA WORKS FORUM, THE MAYOR’S COMMISSION ON AGING SUBMITTED THE FOLLOWING VERBAL COMMENTS:**

- Generally, there’s a missing population in the plan; there is an over 55 population that seeks to remain in the workforce. MCOA sees about 3-400 people a month who are looking for a job. We also provide direct service through our Senior Community Service Employment Program. Program enables us to place seniors who are eligible for income residence and aid in jobs that enable them to find long-term employment.
- Out of 107 SCSEP participants:
• 34 have over high school degrees (associates, masters, etc.) with difficulty finding employment
• Population of about 12 without a GED to help them gain employment
• Many have no experience or facility in online job applications
• As of last American Community Survey, in Philadelphia, there are about 230,000 over the age of 60 and 50-59 there are 188,000. This is a growing population that seeks to stay in the workforce until they are closer to 80.

Philadelphia Works Response: We appreciate the expertise of the Mayor’s Commission on Aging and their work to support older Philadelphians. We have added some additional content in our plan related to the work that we do to engage this population.

ON MAY 23, 2016, AT THE PHILADELPHIA WORKS PUBLIC FORUM, DISTRICT 1199C TRAINING AND UPGRADING FUND SUBMITTED THE FOLLOWING VERBAL COMMENTS THAT WERE NOT OTHERWISE REFLECTED IN THEIR WRITTEN COMMENTS:
District 1199C Training and Upgrading fund highlighted the following points that were not represented in their written comments at the Philadelphia Works Forum:
• Consider regional work that spans state boundaries. Close to counties in South Jersey and Delaware

Philadelphia Works Response: We agree that the work of our regions span state boundaries. Although the state prescribes our regional partnerships in the more formal sense, as opportunities arise to engage across state borders, we are open to the possibility for collaboration.

• Employer Community: meaningful engagement may consider options of briefings related to local plan

Philadelphia Works Response: We agree that meaningful opportunity to engage the employer community may require us to adapt our planning process to meet their needs. In addition to the employer engagement strategies that we already utilize, we will pursue additional strategies to engage with employers in a more tailored way as we develop our fuller WIOA Local Plan.

ON MAY 23, 2016, DISTRICT 1199C SUBMITTED THE FOLLOWING WRITTEN COMMENTS:
The District 1199C Training & Upgrading Fund commends Philadelphia Works, Inc. for its assembly and publication of the Workforce Innovation and Opportunity Act (WIOA) Philadelphia Transitional Local Plan. Adapting and evolving the public workforce development system in line with and in response to WIOA is a significant undertaking of great importance to Philadelphia’s economy and labor force, and the Training Fund is happy to support Philadelphia Works, Inc.’s ongoing implementation of WIOA. These comments represent our views on the Transitional Local Plan for your consideration.
We would also like to direct Philadelphia Works, Inc.’s attention to the Comments submitted as a Joint Statement by Philadelphia’s Title II Providers in collaboration with the Mayor’s Commission on Literacy. Major themes in this Statement include the need for increased coordination/integration of Title I and Title II programs and services, and the inclusion of entry-level career pathway opportunities for residents who do not possess a high school diploma or equivalency.

Industry Partnerships
The name of the industry partnership (IP) sponsored by the District 1199C Training Fund is “the Greater Philadelphia Healthcare Partnership.” The IP should be relabeled in the following locations:

- Section 2.2, Page 25 – #2, second bullet (currently identified as “Direct Care Industry Partnership.”)
- Section 4.2, Page 58 – third bullet (currently identified as “Direct Healthcare Partnership”)

Philadelphia Works Response: We have made the revision to both sections.

We also respectfully ask that the success of the Healthcare partnership be noted along with that of the manufacturing industry partnership in the following locations:

- Section 2.1, Page 21 – #1, second paragraph (“progress we have seen to date with our manufacturing industry partnership”)
- Section 2.2, Page 28 – #4, first bullet on page (“partnerships that aggregate the needs of employers in the manufacturing, transportation and logistics sectors”)

Finally, Section 3.4.C, Page 44 (second bullet) states that the Healthcare Partnership is “moving into [its] tenth year” – the Greater Philadelphia Healthcare Partnership is actually in its 11th year.

Philadelphia Works Response: We have made the correction.

Section 1: Workforce and Economic Analysis
We are pleased to see the emphasis Philadelphia Works, Inc. has placed on healthcare sector employment throughout this analysis. We ask that the following suggestions also receive consideration:

- Table 1.12, Page 5 – We ask that some consideration be given to demand for emerging occupations in the healthcare sector (such as e.g. Community Health Worker and Healthcare Data Analyst) which are not presently well-measured or –described by current SOC classifications.

Philadelphia Works Response: We have added additional language regarding emerging occupations in the healthcare sector immediately above Table 1.12.
• Table 1.21, Page 9 – Given the importance of the healthcare sector to Philadelphia’s overall economic health, we ask that additional consideration be given to projected employment trends, with analysis concentrating in particular on healthcare labor market trends which are beginning to emerge as the sector adapts to Affordable Care Act reforms.

**Philadelphia Works Response:** We acknowledge the need to project demand for occupations in healthcare that reflect emerging and transformation due to policy changes and cost containment. However, we do not currently have a reliable source that we believe captures the effects of policy change given the unstable political climate for the Philadelphia region.

• Section 1.3, Page 15 – Veterans were not included in the Philadelphia Works examination of American Community Survey data on populations with barriers to employment. We suggest analyzing the over- or under-representation of veterans in Philadelphia, as was done in the case of other populations examined here.

**Philadelphia Works Response:** The eligibility requirements to receive services as a veterans vary from the self-reported service in the American Community Survey. We will work to better align these definitions with the Pennsylvania State Data Center.

• Section 1.4, Page 18 – The business engagement structure defined here can be confusing to the customer. We suggest Philadelphia Works, Inc. consider organizing business engagement as one function with different representatives for different targeted industry sectors.

**Philadelphia Works Response:** We agree that the business engagement structure can benefit from additional detail regarding the way in which our BSR structure targets different industry sectors. We have added language to further clarify this point.

• Section 1.4, Page 19 – Discussion of programs which blend across youth and adult categories may include not only Registered Apprenticeships, but also Pre-Apprenticeships, which can be appropriate workforce interventions for in- and out-of-school youth, young adults (approx. 17-29 years) and lower-skilled adults of all ages.

**Philadelphia Works Response:** We agree and have included Pre-Apprenticeships as an important targeted program both in this section as well as throughout our plan.

**Section 2: Strategic Vision and Goals**

We agree that the strategic vision and goals set out by Philadelphia Works, Inc. represent important priorities for Philadelphia’s public workforce development system. As WIOA implementation proceeds, we additionally request that consideration be given to including “raise the floor” strategies which support very low-wage workers and reward employers who prioritize investing in and valuing their front-line, entry-level workforce.
Philadelphia Works Response: We will continue to work with employers to develop strategies that support career seeker skill and employment advancement and maximize on opportunities available to us under WIOA to do so.

We also note the following:
- Section 2.1, Page 22, #4 – The current status and/or availability of the common employer-driven education and training standards is not established here; we feel that providing additional information about the current status of this priority could be helpful.

Philadelphia Works Response: While the adoption of common employer-driven education and training standards has not been finalized, there are steps that Philadelphia Works has taken. For example, Philadelphia Works has begun to:
  - identify common micro credentials that quantify competencies necessary for workplace success across multiple industries and disciplines and
  - map career pathways with employers across the industry areas of advanced manufacturing business and financial services to identify areas of similarity

There is still work to do and we invite all interested stakeholders to contribute to this discussion.

- Section 2.4, Page 29 – We agree entirely that post-placement retention services are very valuable to both workers and employers, and suggest that coaching for retention should be aggressively marketed and applied; participants should be strongly encouraged to participate, in addition to being informed of the availability of services as stated here.

Philadelphia Works Response: We also value the importance of post-placement retention services and, as described in this section, have crafted our no wrong door service delivery model to prioritize post-exit follow-up and have provided training related to this service to our providers.

- Section 2.4, Page 31 – We agree that the establishment of an “effectiveness in serving employers” baseline should be prioritized. Establishing this baseline and setting goals-specific measures of success is necessary if this measure is to credibly describe actual “effectiveness in serving employers.”

Philadelphia Works Response: We appreciate the comment in agreement with our plan and also look forward to working towards success in this performance indicator.

Section 3: Local Area Partnerships and Investment Strategies
- Section 3.1.C, Page 36 – Additional organizational chart detail could be helpful to local entities partnership in some fashion with Philadelphia Works, Inc. Additional useful detail may include e.g. how the CEO of Philadelphia Works is appointed, as well as a representative of all of the main reporting structure.
Philadelphia Works Response: We have included a revised organizational chart.

Section 4: Program Design and Evaluation

- Section 4.1.A, Page 56 – It is not presently clear whether “providers identified as possible quality training providers” (third paragraph) can identify themselves (i.e. self-nominate) or if providers must be identified and invited to apply by Philadelphia Works, Inc. We suggest that some clarifying language describing this process may be helpful.

Philadelphia Works Response: We have revised our language to clarify this point.

- Section 4.9, Page 63 – We suggest that some elaboration on the third paragraph here (regarding re-evaluation of funded trainings) may help communicate its meaning more clearly; i.e. a clear statement of which trainings Philadelphia Works, Inc. may be moving away from could be accompanied by clear examples of the trainings towards which Philadelphia Works hopes to move.

Philadelphia Works Response: We have added some additional language to this point.

Section 5: Compliance

- Section 5.4, Page 66 – Given the importance of Negotiated Goals which take into account the need to prioritize service for individuals facing significant barriers to employment, a explanation of the derivation of these Goals would potentially be helpful to providers.

Philadelphia Works Response: We have added language to describe the rationale for including these goals, which are largely based on content from the state plan.

ON MAY 23, 2016, AT THE PHILADELPHIA WORKS PUBLIC FORUM, THE PHILADELPHIA SOCIETY FOR HUMAN RESOURCE MANAGEMENT (SHRM), SUBMITTED THE FOLLOWING VERBAL COMMENTS:

- Expressed general appreciation for the development of a firm partnership with Philadelphia Works
- Intention to get more engaged in the 3-5 year plan in a more formal manner
- Also represent Rhoads Industries who plans to increase investment through a facility in a Navy Yard. The company intends to turn to Philadelphia Works in the next 6 months to a year to develop a more firm staffing model and apprenticeship training model.

Philadelphia Works Response: We appreciate the partnership and support of Philadelphia SHRM and also look forward to additional opportunities to support industries as they grow their work.
ON MAY 23, 2016, COMMUNITY LEGAL SERVICES AND THE COMMUNITY JUSTICE PROJECT SUBMITTED THE FOLLOWING WRITTEN² COMMENTS:

Community Legal Services (CLS)³ and the Community Justice Project (CJP)⁴ submit these comments on behalf of Success Against All Odds, Just Harvest, and the many low-income clients CLS and CJP represent every year who seek to better their lives through better jobs. The Philadelphia Works WIOA Transition Plan (PW Plan) was published for public comment on April 22, 2016, with comments due by May 23, 2016.

Because we work on behalf of low-income clients, our comments focus on: (i) priority of service for recipients of public assistance and other low-income, high needs persons; (ii) Career Pathways; and (iii) Transitional Jobs (subsidized employment).

We applaud Philadelphia Works’ commitment to providing services to the hardest-to-serve, and we recognize the severe challenges it faces with limited funding and a service area with a disproportionately poor population with many barriers to employment. Because of this very difficulty in achieving its goals with the resources available, the draft WIOA plan needs more detail to spell out how Philadelphia Works will achieve its goals and comply with the directives of the WIOA State Plan.

In particular, we are troubled that Philadelphia Works is not aiming high enough in serving Philadelphia’s poor job-seekers. According to its most recent Board Briefing Book, PW has set itself a target that at least 51% of adult Title I-funded customers of its CareerLinks will be entitled to and receive priority of service. We believe this figure is too low, given PW’s commitment to reaching the hardest-to-serve and that PW has expanded the Priority of Service list to include the long-term unemployed. PW should have no difficulty reaching a higher proportion of those entitled to priority of service, and we urge PW to increase this target to at least 70%.

I. Background

² Community Legal Services also testified at the public forum and because their comments were a summary of the written comments they submitted, we are responding to their written comments.
³ Community Legal Services is the largest provider of free legal services to low-income Philadelphians, representing over 11,000 clients last year. It generally limits its services to those with income below 125% of the federal poverty line. CLS has a long history of advocating in support of high-quality employment and training programs that address our clients’ barriers to employment, provide training leading to family-sustaining jobs, and/or provide transitional jobs for those who need them.
⁴ The Community Justice Project is a statewide project of the Pennsylvania Legal Aid Network focusing on impact advocacy. CJP has worked for many years with its client group Success Against All Odds and sister agency, Just Harvest, to improve access to adult and postsecondary education for single parents participating in the TANF and SNAP programs.
WIOA, like its antecedents -- the Workforce Investment Act and the Job Training Partnership Act -- places special importance on serving low-income, high needs groups. According to WIOA:

Priority for individualized career services and training services must be given to:

(i) recipients of public assistance;
(ii) other low-income individuals; and
(iii) individuals who are basic skills deficient

WIOA Sec. 134(c)(3)(E)

WIOA strengthens priority of service requirements under the Workforce Investment Act in a number of ways, including eliminating the provision under WIA that priority of services applies only when funds are limited. Under WIOA, priority of service must be provided, regardless of funding.

Strengthening the priority of service requirement was clearly needed, as a declining number of low-income persons were served under WIA, despite its priority of service requirement. National data show that only 48.7 percent of adult “exiters” who received training and/or intensive services through the WIA Adult funding stream were “low-income individuals” in Program Year 2013 – a marked decrease from 71.3 percent in Program Year 2001. And only 3.8 percent of those served in Program year 2013 were TANF recipients.5

Over the past decade and a half, WIA delivered training services to a declining share of low-income individuals, and WIA served a far lower percentage of low-income adults than the predecessor federal law in place before 1998, the Job Training Partnership Act, which required that 90 percent of the funds for adults were targeted for those who were low-income.6

In light of the underlying intent of WIOA, WIA, and the JTPA - and past failure by states to realize the goals of priority of service -- the Wolf Administration placed special emphasis on


this key provision of WIOA in its March 17, 2016 WIOA State Plan. In order to ensure successful implementation of priority of service for recipients of public assistance and other low-income, high needs groups targeted by WIOA, the State Plan included:

- Service benchmarks for those entitled to priority of service;
- Specific guidance to Local Workforce Development Boards (LWDBs) and CareerLinks on what “priority of service” means and how it works;
- A directive that LWDBs and Career Links provide detailed information on how they will address a range of issues critical to successful implementation of priority of service requirements.

(See, WIOA State Plan, pp. 10-11 and 67-70)

We focus in these comments on the last of these three priority of service provisions in the WIOA State Plan because an important purpose of the local and regional plans is for the LWDBs and CareerLinks to demonstrate that they have thought carefully about how they will ensure that training services are provided to low-income, high needs persons and have workable plans for so doing.

II. Comments

A. Priority of Service

In their local plans, LWDBs and PA CareerLink® centers are required to “state the additional methods by which they will apply the WIOA priority of service requirements and the commonwealth’s policy regarding priority of service,” by stating “in detail” how they will address specific issues critical to successful implementation of priority of service. (WIOA State Plan pp. 69-70)

In its WIOA Transition Plan, Philadelphia Works expresses support for the goal of expanding to services to those entitled to priority of services, as well as its eagerness to engage in a meaningful way in the work necessary to meet the Commonwealth’s benchmarks for service to those entitled to priority of service. And it says that it may even seek discretionary state funds and other grants to meet these goals.

As a threshold matter, we were troubled to see on Philadelphia Works’ web site that PW has adopted a Priority of Service policy that includes this provision:

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8 PW Plan, p.40.
A 51% performance goal is too low and should be increased. The state WIOA plan provides as follows:

In PY 2016, at least 50 percent of funds utilized to meet the training benchmark must be spent on low income individuals and individuals with other barriers to employment, with the percentage rising to 60 percent in PY 2017 and 70 percent in PY 2018 and thereafter. (WIOA State Plan, pp. 10-11)

PW's 51% target may be intended to comply with this requirement, but PW should do more. Philadelphia has an extremely poor population, and PW has laudably set a goal of reaching the hardest-to-serve. Unlike other LWDBs, PW should not have difficulty finding and serving people low-income individuals and those with other barriers to employment. We strongly urge PW to revise this policy to increase the target percentage at a minimum to 70% of its customers in this program year.

Moreover, Philadelphia Works provides very little information on how it will actually implement the priority of service requirement; the PW Plan fails to fully respond or respond at all to the specific requests for implementation details set forth in the WIOA State Plan, despite the clear mandate to do so. These omissions must be addressed.

Listed below are each of the elements related to successful implementation of priority of service implementation that LWDBs and PA CareerLinks are required by the WIOA State Plan to address. For each one, we explain why the concern in question is important to successful implementation of priority of service, and we offer suggestions as to how it might be effectively addressed.

(i) How [Philadelphia Works and its contractors] will obtain data reflecting each of the three categories of persons entitled to priority of service in their service area and the approximate numbers in each category.

This data is important in order to provide a sense of whether the LWDBs and CareerLinks (local agencies) are meeting the needs of the low-income communities they serve. While the Commonwealth intends to monitor LWDBs and PA CareerLinks to determine whether at least
70 percent of those served are persons entitled to priority, \(^{10}\) this in and of itself, does not tell us to what extent the needs of the low-income community overall are being met.

Comment: The PW Plan should:
- Include county-level data easily obtained from DHS showing the number of persons receiving public assistance (TANF and SNAP) -- a core group of those entitled to priority -- from the Department of Human Services (DHS).
- State how it will obtain data reflecting the number of other low-income persons, well as those who are basic skills deficient.

Philadelphia Works Response: While we did not incorporate this information into the plan, there were 78,477 TANF recipients in Philadelphia County in March 2016, down almost 1,000 from the previous year. There were 495,051 Philadelphians receiving SNAP benefits in March 2016. (This number includes all or most of those receiving TANF benefits.) Also, Philadelphia Works uses proxies from the American Community Survey. There is no current database that captures basic skills deficiency for Philadelphia. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation.

(ii) The outreach [Philadelphia Works and its contractors] will do to inform the public of Pennsylvania’s priority of service policy and how they will target this outreach to best reach those potentially eligible for priority of service and any agencies that serve them.

Because public assistance recipients and other low-income persons have been chronically and historically underserved, many in this community have little or no idea that training services are available to them through the LWDBs and CareerLinks, much less that they have priority for training. Local agencies will have to take specially tailored measures to reach this population. (Doing so will not only provide training opportunities for populations not previously served, but will help local agencies reach priority of service benchmarks established by the Commonwealth.) (WIOA State Plan, pp. 10-11 and 68).

The PW Plan provides scant information about Philadelphia Works’ strategies for outreach to TANF and SNAP participants or others low-income persons entitled to priority of service. The following are the only references to such outreach we could find in the PW Plan:

\(^{10}\) “The commonwealth will monitor data reported by LWDBs and PA CareerLink® centers to determine the percentage of those served who are individuals with priority of service. Should this percentage be less than 70 percent, the commonwealth shall provide the LWDB or PA CareerLink® center with technical assistance to ensure that effective affirmative outreach efforts to individuals with priority of service are made.” (WIOA State Plan, p. 68)
• Mentions that as it “conduct[s] trainings related to the new priority of service work, Philadelphia Works “anticipate[s] the level of outreach and support given to this population will increase.” (PW Plan, p. 41);
• References the colocation of CareerLink and DHS EARN program services and suggests, without explanation, that as this service delivery model that integrates WIOA and EARN programming is advanced, “increased center traffic and improved opportunities for access” is anticipated. (PW Plan, pp.33, 40); and
• Promises to “conduct outreach to EARN participants in partnership from the County Assistance Office,” but does not describe how this outreach will be done. (PW Plan, p. 39);

Effective outreach to those who have historically been excluded from WIA program training services will require strategies that have been more carefully thought through than this.

One principal method of outreach would be for local agencies to connect with the Department of Human Services and work cooperatively with DHS state level policy makers and local County Assistance Offices to explore the needs of TANF and SNAP recipients within their service area for adult and postsecondary education, transitional jobs, and other services and to develop a collaborative system for those in need of such services to be screened, referred to, and served by the local agency.

Comment: The PW Plan should include a commitment by PW to work in partnership with DHS and its CAOs to develop a plan for outreach and provision of training services to persons receiving TANF and SNAP benefits that includes:

• A process for informing TANF and SNAP clients of the opportunities for training services available to them through WIOA, in addition to those available through DHS and its welfare to work contractors, or through both.11
• A process for assessing TANF and SNAP clients interested in WIOA training opportunities to determine their education level, aptitudes, barriers, career interests, and training needs/goals -- along with a breakdown of what agencies/contractors will be responsible for each aspect of this process.
• The provision of career counseling to inform TANF and SNAP clients about training and job opportunities in High Priority Occupations suited to their interests, aptitude, and experience.
• A system for referral of TANF and SNAP clients to the local WIOA agency for training services.12

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11 Career Pathways programs are a good example of an important opportunity available through the WIOA system that is not available through DHS or its contractors. Transitional jobs may be another, depending on location.
12 Under WIOA this can now be done by contract with DHS, an option that should be seriously considered.
• A process for sharing data regarding activities pursued by TANF and SNAP clients and the progress that have made.

Philadelphia Works Response: Given the importance of offering clients opportunities to the WIOA system, we have identified it as one of our opportunities for improvement in Section 1.4 of our plan. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

(iii) How [Philadelphia Works and its contractors] will inform individuals seeking to access WIOA services of their priority of service, such as through posters and prominent placement of other information.

This is important in order to ensure that those who contact the local agency for training services and do not know they are entitled to priority of service will be able to identify themselves as such and receive the priority to which they are entitled.

The WIOA State Plan, itself, suggests a couple of methods to educate the public about priority of service, but there are many more. Philadelphia Works and its contractors could develop and play a video in the office waiting room, run public service announcements, place advertisements on subways, etc.

Comment: The PW Plan should describe a range of strategic methods it will use to educate the public about priority of service.

Philadelphia Works Response: As we continue to monitor the number of individuals who can access priority of service, we will seek opportunities to engage additional outreach, as needed. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.
(iv) **When otherwise deemed eligible for program participation, how [Philadelphia Works and its contractors] will affirmatively identify persons entitled to priority of service and inform those individuals of the full array of services available.**

While issue (iii), above, relates to self-identification, issue (iv) is concerns the problem of how to identify persons entitled to priority of service who seek WIOA services and who either do not know they have priority or have not disclosed this. Use of a screening tool may be the most effective way for the local agency to determine whether a client may be entitled to priority.

**Comment:** The PW Plan should describe:
- The screening or other tool it intends to use to identify persons entitled to priority of service; and
- The counseling and written materials it will use to inform them of the range of services available to them and how priority of service works.

**Philadelphia Works Response:** We will identify persons identified to priority of service in accordance with the guidelines that the Department of Labor and Industry have outlined in their Workforce System Guidance. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

(v) **The assessments [Philadelphia Works and its contractors] will use to identify barriers to employment among those entitled to priority of service and the services needed to address them.**

Many of those entitled to priority of service have barriers to employment, such as those listed in the WIOA statute’s definition of this term. The assessment process and tools employed by local agencies should include screening for barriers to employment, done in a manner that respects privacy, but nevertheless informs the client of the types of barriers for which assistance can be provided.

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13 “Individuals with barriers to employment” include: displaced homemakers; Indians, Alaskan Natives and Native Hawaiians; individuals with disabilities including youth with disabilities; older individuals; ex-offenders; homeless individuals; youth who are in or have aged out of the foster care system; individuals who are English language learners, individuals with low levels of literacy and individuals facing cultural barriers; eligible migrant and seasonal farmworkers; individuals within two years of exhausting lifetime eligibility under TANF; single parents to include single pregnant women; and long-term unemployed individuals.
Comment: The PW Plan should:

- Describe the process and tools that it uses or will use for assessment; and
- Explain how this process will inform clients of the range of barriers to employment for which services or accommodations may be available, while respecting the client’s right not to disclose personal information should she prefer not to do so.

Philadelphia Works Response: We will identify individuals with barriers to employment who also qualify for priority of service in accordance with the guidelines that the Department of Labor and Industry have outlined in their Workforce System Guidance. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

Once a barrier to employment has been disclosed, services to address or accommodate that barrier will normally be needed. So, for example, a victim of domestic violence might be referred to an agency that can provide appropriate counseling services or safety planning while she is pursuing training services through the local agency. An ex-offender with a criminal history might be counseled and/or referred to a legal services provider for help with expungement. Properly addressing barriers requires knowledge of services available in the community for the range of barriers the agency is likely to encounter and developing relationships with service providers to facilitate referral.

Comment: The PW Plan should describe how it will identify and facilitate access to appropriate services in the community to address the range of barriers to employment listed in WIOA.

Philadelphia Works Response: The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

(vi) The process by which [Philadelphia Works and its contractors] will develop Individual Employment Plans for persons entitled to priority of service that will address, in addition to training needs, any barriers to employment they may have.
WIOA eliminated sequential service requirements for those seeking Title I training services. This was a significant change and should serve to improve access to training services, especially for those entitled to priority of service.

**Comment:** PW addressed this question on page 18 of its draft plan. In addition to what it has already described, the Local Plan should:

- Spell out the content and specific steps involved in developing Individual Employment Plans;
- Explain how the local agency will incorporate plans for addressing barriers to employment.

**Philadelphia Works Response:** Individual Employment Plans are offered as a way to identify career seekers’ applicable employment goals, objectives, and appropriate services to supporting their individual achievement. Generally, the content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

(vii) **How [Philadelphia Works and its contractors] will ensure that they are serving the spectrum of persons entitled to priority of service, including those, such as English language learners, who may require more resources to serve.**

This issue is similar to element (v), dealing with barriers to employment, but is more focused on those needing special services or accommodations, such as persons with limited English proficiency (LEP) or disabilities. These needs are common in the high needs groups covered by priority of service requirements. Addressing the needs of such persons is required by Title VI of the Civil Rights Act of 1964 and the Americans with Disabilities Act and, thus, the importance of ensuring services to these groups goes without saying.

Access to Career Pathways programs, with their emphasis on adult education including English-as-a-Second-Language (ESL), is especially valuable for those with limited English proficiency. But identifying LEPs and providing interpretation and translated documents will be critical in order to facilitate equitable access and provide meaningful training services. Special attention to language access by LWDBs and CareerLinks in their local plans is warranted given the importance of these services to persons with this particular barrier to employment and considering also Pennsylvania’s poor performance in the past in serving LEPs:
While new provisions in WIOA do target workforce services to these basic skills deficient individuals, the record of career pathways models and other training programs in providing equitable access to individuals who are low-educated and/or LEP is very weak. This is an especially urgent concern in Pennsylvania, for example, where only 2.5% of those exiting from Title I Adult intensive or training services in the 2014-15 program year were LEP.14

Comment: The PW Plan should describe:

- How it identifies and tracks, through the education, training, and employment process, the primary language of people with limited English proficiency so staff will be prepared to provide accessible services;
- How it provides notice of the right to language services (oral communication through bilingual staff and/or interpretation as well as translated documents);
- How it affirmatively identifies persons with limited English proficiency, so as not to rely entirely on self-identification through notice of the right to language services. (This could include, for example, training of staff to recognize signs that a person is not sufficiently fluent in English to navigate the local agency’s WIOA process.)
- The language services it provides (e.g., direct services and/or interpretation through bilingual staff, telephonic interpreter services, in-person interpreters, and translation services) to Limited English Proficient (LEP) and deaf or hard of hearing persons.
- How it provides notice to persons with disabilities of their rights under the ADA, including the right to reasonable accommodation.
- How accommodations may be requested and how they are determined.

Philadelphia Works Response: While this level of detail is neither required nor appropriate for the Transitional Local Plan, we have addressed many of the issues raised regarding services provided to career seekers with limited English proficiency. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

(viii) How [Philadelphia Works and its contractors] will address the special needs of individuals with barriers to employment in the delivery of services, such as by assuring that appropriate career planning services are provided. This should include a detailed description

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14 Margie McHugh and Madeleine Morawkski, “Immigrants and WIOA Services, Comparison of Socio-Demographic Characteristics of Native and Foreign Born Adults in Pennsylvania” (National Center on Immigrant Integration Policy, March 2016), p. 4 (emphasis added).
of how appropriate career planning services will be provided, or arranged for, through collaboration with other agencies in the event that the LWDB or PA CareerLink® center lacks the required expertise.

WIOA defines “career planning” as:

[T]he provision of a client-centered approach in the delivery of services, designed—

(A) to prepare and coordinate comprehensive employment plans, such as service strategies, for participants to ensure access to necessary workforce investment activities and supportive services, using, where feasible, computer-based technologies; and
(B) to provide job, education, and career counseling, as appropriate during program participation and after job placement.

(WIOA Sec. 3 (8)

We see this as involving two essential components -- career counseling and case management. Career counseling is key to making wise decisions about training services and training providers and should be a central component of the assessment and training program selection process for anyone seeking services from the local WIOA agency, including especially low-income persons, who may have lacked meaningful access to such assistance in their past.

Effective case management, as described in Section 3 (8) of WIOA, is critical to ensure that clients receive support, advice, and assistance, not only in the development of their training plan, but as they pursue their training program and must deal with the need for child care, transportation, and other supportive services, as well as barriers to employment that impact on their participation.

Comment: The PW Plan should:
- Describe the case management services that will be provided, how they will be provided, and how clients will access these services;
- Explain how career counseling will be provided and under what arrangements;
- Describe how and at what points in a client’s participation in the WIOA program process career planning is provided;

Philadelphia Works Response: We agree that career counseling and case management are key components of effective career development. Generally, we find that the level of detail requested here exceeds what would be included in a broader planning document. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional
implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

(ix) How [Philadelphia Works and its contractors] will ensure access to services, i.e., interpreters and translated documents, for English language learners, as well as for persons who are deaf or hard of hearing.

This is similar to issue (vii), but is more focused on how bi-lingual staff, language line or other telephone interpretation services, in-person interpreters, and translation services are used and whether adequate resources are devoted to these services.

The PW Plan should:
- Identify the five most common languages spoken in the local agency’s service area and the approximate number of persons who speak these languages;
- Identify how the local agency will document LEP persons’ primary language in case records or files so staff will be prepared to provide accessible services;
- State the number of bi-lingual agency staff who speak any of the five most commonly spoken languages and their positions in the local agency;
- Identify the Language Services provider it uses for telephone interpretation and at what locations and under what circumstance this service is used;
- Explain whether and how it provides interpretation to LEP persons who seek training services;
- Explain how it trains staff to identify and meet the needs of LEP persons.

Philadelphia Works Response: Generally, we find that the level of detail requested here exceeds what would be included in a broader planning document. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

(x) How [Philadelphia Works and its contractors] will train staff to ensure that staff members have an understanding of who is entitled to priority of service and that the office is responsive to the needs of these groups.

Priority of services is only meaningful to the extent local agency staff understands and properly implement its requirements.
Comment: The PW Plan mentions that training related to priority of service will be provided, but it should go further and:

- Describe the curriculum it will use to train staff on priority of service requirements; and
- Explain who will receive this training (e.g., reception staff, line workers, management) and how often the training will be provided.

Philadelphia Works Response: Generally, we find that the level of detail requested here exceeds what would be included in a broader planning document. The content of our local plan was drafted based on guidance received from the Department of Labor and Industry. This local plan is transitional in nature and fulfills the requirements established by the Pennsylvania Department of Labor and Industry in their Workforce System Guidance. The purpose for this plan is to provide for the overall strategy with regard to WIOA transitional implementation. At this time, we have determined that the elements related to successful implementation of priority of service, as required by the Department of Labor and Industry, have been satisfied and will not be including additional detail based on only the state plan.

B. Career Pathways

As advocates for low-income public assistance recipients, we are particularly interested in the availability and quality of Career Pathways training programs. Career Pathways programs provide adult education (literacy/English-as-a Second Language/GED), career counseling, and transition to postsecondary education and job skills training. These programs have proven highly successful. States are strongly encouraged by WIOA to develop and operate such programs.

Over forty percent of adults receiving Temporary Assistance to Needy Families (TANF) lack a high school degree or GED. Yet, less than three percent of these parents are participating in GED programs. DHS does not operate Career Pathways or any other adult education programs for parents on TANF or SNAP. Providing access to Career Pathways programs to parents on public assistance through LWDBs and CareerLinks will provide a pathway from public assistance to employment at family sustaining wages -- a benefit not only to these families, but to the state as well.

The final WIOA State Plan requires that LWDBs and CareerLinks develop and operate Career Pathways programs, as defined in WIOA, and that such programs provide for entry at the literacy, ESL, GED, or postsecondary education level (See, Proposed WIOA State Plan, pp. 8-9)

The Philadelphia Works WIOA Transition Plan includes the following information regarding its plans for Career Pathways programs:

- We look forward to working with the commonwealth as it creates a “comprehensive career pathway system” (Goal 1.3) that will eventually combine state-funded literacy,
TANF, Supplemental Nutrition Assistance Program (SNAP) and higher education programs with core WIOA programs;

- Philadelphia Works’ “no wrong door” model that integrates TANF and WIOA services in PA CareerLink® Philadelphia centers will support the commonwealth’s goals of co-enrolling participants as needed to provide comprehensive services (Goals 1.4 and 1.5);
- The close relationship between the adult literacy community with both our youth programming and adult training will help us develop more mainstream opportunities along career pathways for those with barriers that were traditionally denied access to training. We are committed to creating innovative models to support individuals with barriers to employment, including the commonwealth’s goal of identifying quality entry level “on ramp” jobs to career pathways for opportunity youth and adults (Goal 1.7).

(PW Plan, p. 24)

**Comment:** While the information above is helpful and a good start, the PW Plan should also:

- Specify the elements of the Career Pathways programs it intends to operate, which should include at a minimum those required by WIOA;
- Identify the partners (such as Department of Education, Department of Human Services, Community Colleges, Career and Technical Schools) with whom the local agency intends to partner in operating Career Pathways programs;
- Explain the process that will be used to develop Career Pathways programs;
- State the number, location, and estimated time frame for operationalizing each Career Pathways program the local agency plans to establish.
- Explain how the local agency will provide priority of service to public assistance recipients and other low-income persons for Career Pathways slots.
- Explain how the local agency will ensure that the first step on its career pathways (Literacy, ESL or GED) is accessible to those entitled to priority of service.

**Philadelphia Works Response:** Generally, we find that the level of detail requested here exceeds what would be included in a broader transitional planning document. We plan to develop career pathways that are in alignment with WIOA. We have also added content to our local plan based on comments received from multiple organizations identified in this document regarding the “first step” of the career pathways we develop.

C. **Transitional Jobs**

WIOA allows states to spend up to 10% of Title I funds on transitional jobs, i.e., subsidized employment, opportunities for participants. Access to transitional employment slots for low-income persons can provide valuable work experience that can lead to permanent employment. This is particularly important for recipients of public assistance, many of whom want to work but lack work experience. It is also provides an important opportunity for those with criminal backgrounds.
The final WIOA state plan includes a requirement that LWDBs and CareerLinks use between 5% and 10% of their funds to provide transitional jobs and that they ensure that priority of service for transitional jobs is afforded to individuals who qualify for priority of service. (WIOA State Plan, p. 70)

In our review of the Philadelphia Works WIOA Transition Plan we founds several references to “transitional jobs” or “transitional work” that indicate Philadelphia Works’ intent to provide this service, but reveal nothing about how the transitional jobs program will be designed, funded, or targeted to TANF and SNAP participants and other low-income persons entitled to priority of service:

- We have established board approved policies that support access and services to the career seeker to successfully implement steps towards a career pathway and sustainable employment and are eager to engage in the program opportunities that WIOA provides to target those with barriers to employment such as:
  - Transitional Work: Provides paid transitional job opportunities to individuals with barriers to employment who are chronically unemployed or have an inconsistent work history. (PW Plan, p. 41)
- Through the lens of this mission, Philadelphia Works has committed staffing resources to implement additional work-based learning services including transitional work, internship and paid work experience for career seekers, specifically those with barriers to employment. (PW Plan, p. 44)
- Identified opportunities for improvement include the need to build internal and provider capacity around co-enrollment among core and partner programs, additional opportunities to serve those with barriers to employment with targeted services that meet their current skill levels, improving our on-line presence and community partnerships to increase access to customers across the city, and building Title I providers’ capacity around newer WIOA training and placement strategies such as work experience, internships and transitional jobs.
  - (PW Plan, p. 19)
  - While the need for unique interventions persists in Philadelphia, WIOA now provides us with additional opportunities, especially through earn and learn program models such as paid work experience and transitional jobs, priority of service, and other tools, to support these unique needs. (PW Plan, p. 23)

Comment: The PW Plan should also:

- State the amount of Title I funds that it will dedicate to transitional jobs and the percentage this represents, as well as the total number of jobs that it anticipates will be funded;
- Describe its plans and goals for raising additional funds for transitional jobs;
• Describe in detail the design of its transitional jobs program (including explaining what PW would do the same or do differently from its Way to Work program it ran with TANF Emergency Funds in 2010.)
• Describe how it will recruit employers to participate in the transitional jobs program, and if there are particular employers that it anticipates will participate;
• State whether the local agency will be the employer of record for clients in the transitional jobs program and, if not, whom the employer(s) of record will be.
• State whether the transitional jobs program will be incorporate “wraparound” or complementary services (e.g., job skills training), and describe the services provided, if so.
• Explain how the local agency will provide priority of service to public assistance recipients and other low-income persons for transitional jobs slots.

*Philadelphia Works Response:* We find that the level of detail requested here exceeds what would be included in a broader transitional planning document, especially given the relatively new nature of Transitional Jobs as a WIOA program. We plan to dedicate funding to transitional jobs in accordance with the Pennsylvania Combined State Plan. Generally, pursuit of additional funds for programming or flexible funding is a priority of ours and to the extent that opportunities arise that align with our needs, we plan to pursue them. The exact provisions of our Transitional Work policy will be developed and in place by July 1, 2016 as required by Section 5.9 of the Local Plan.

**ON MAY 23, 2016, THE PHILADELPHIA CORPORATION FOR AGING SUBMITTED THE FOLLOWING COMMENTS:**

After reviewing the plan, it appears that more specificity is needed for how the plan intends to meet the specific needs of those individuals over the age of 55 that are either entering the workforce for the first time, or re-entering the workforce. I work with the Title V Program, via the Senior Community Service Employment Program, and I have found that there is a growing number of older adults seeking employment opportunities in the City of Philadelphia. Their needs are sometimes different from the needs of the younger population, and more resources must be dedicated to identifying and addressing those needs.

*Philadelphia Works Response:* We appreciate the expertise of the Philadelphia Corporation for Aging and their work to support older Philadelphians. We have added some additional content in our plan on the work that we do to engage this population.

**ON MAY 23, 2016, THE CITY OF PHILADELPHIA MAYOR’S OFFICE SUBMITTED THE FOLLOWING COMMENTS:**

Following a thorough review of the draft Workforce Innovation and Opportunity Act (WIOA) transitional local plan for program year 2016, the City of Philadelphia respectfully submits the following feedback for review. We thank you for your thoughtful consideration of our comments and look forward to continued collaboration with Philadelphia Works to move our workforce development goals, and our City, forward.
Philadelphia Works Response: Given the depth and breadth of the comments from the Mayor’s Office and the board’s unique relationship to the Mayor, Philadelphia Works has engaged with key members of city agencies and offices who have developed these comments to develop an ongoing dialogue in order to better respond to these questions and incorporate their perspectives in our work, not only in the upcoming transitional year but also in the additional planning years ahead. We have also incorporated additional maps and data to provide information by neighborhood, as requested by the office.

Priority Feedback:
The plan would benefit from a more strategic vision around the following key populations:

- **Youth**: As noted multiple times in the comments below, the plan does not articulate a comprehensive strategy for bridging the service gap between the 46,000 Philadelphians, 16 to 24, who are disconnected from school and work and the 8,000 young people the Philadelphia Youth Network (PYN) is procured to support. The work of PYN outside of summer jobs should be strengthened and expanded.

- **Returning Citizens**: The size of the City’s re-entry population (as outlined in Section 1.3) calls for a more comprehensive strategy to ensure workforce dollars are specifically targeted towards supporting the unique and overlapping barriers faced by returning citizens and other individuals with justice involvement (including those with criminal records who have not served time in jail or prison). Programs like PowerCorpsPHL and others with proven track records should be expanded and similar models should be developed with new employers and industries.

- **Adults with Low Literacy**: The plan does not identify a comprehensive, long-term strategy to support the 220,000 adults in Philadelphia who lack a high school credential and the approximately 550,000 individuals who are not functioning at skill levels sufficient to secure jobs that pay family sustaining wages. New career pipelines that enable low skill workers to enter careers and advance along a career pathway should be identified and scaffolded to include opportunities for learning and customized barrier removal. Further, greater emphasis is needed on bridge programming to ensure individuals meet the minimum skill threshold to enter these pipelines.

- **Older Adults**: Approximately 13% of the Philadelphia workforce is over 65 years of age. Poverty among residents over age 60 is a staggering 41%. Many older adults seek to remain in the workforce for financial and other reasons. The plan references this segment of the workforce in a minimal way and addresses none of the particular challenges many seniors face (including, but not limited to: poverty, lack of credentials required by emerging industries, limited digital literacy and long term unemployment). Given Philadelphia’s growing adult population, a thoughtful strategy to meet their workforce needs is needed.

• Additionally:
  o We recommend Philadelphia Works actively pursue the process to designate the Pre-Kindergarten Early Childhood Education (ECE) workforce as a High Priority Occupation (HPO) to ensure individuals interested in pursuing this career pathway can readily access all available WIOA resources.
  o The plan does not articulate opportunities for quality workforce providers who coordinate directly with employers to access public workforce dollars outside of the PA CareerLink system. These opportunities would greatly enhance the likelihood of individuals advancing seamlessly along a career pipeline.

Process Comment:
• In the past, Philadelphia Works has authored a brief (4-5 page) Executive Summary of the Local Action Plan. If generated prior to the public comment period, this would be an incredibly valuable tool for stakeholders interested in engaging with the plan and providing feedback. Additionally, more robust feedback could be generated via multiple Local Plan Forums offered in different areas of the city, and at different times of day, to ensure a full complement of stakeholders is able to attend and participate. Notification of the forum date(s) should be provided several weeks in advance to guard against scheduling conflicts.
• The plan would be strengthened by a clear articulation of goals, deliverables, and corresponding timelines.
• Additional graphs and info graphics would complement the more text-heavy sections of the plan, making it more accessible to stakeholders.
• Data and mapping on occupations and employment provided by Council Districts is needed.

Section 1: Workforce and Economic Analysis
Section 1.3:
• Data on employment rates by race, gender, neighborhood and poverty level would contribute to a more nuanced and important analysis of the local workforce.
• Given the availability of neighborhood data on poverty and unemployment, the plan does not adequately address how the public workforce dollars will be used in targeted areas that need support to increase the opportunity to earn a living wage.

Section 1.4:
• It is unclear how workforce dollars support the network of programs and institutions that provide career services made available through the PA CareerLink, nor how data and other feedback is used to determine investments in these services.
• It is unclear the degree to which the Philadelphia Works Business Engagement Team (BET) supports employer partnership building with workforce providers in the Career Links referral network to ensure a seamless transition to employment for individuals who complete job readiness training and related activities offered by providers.
The plan does not identify a long term strategy for bridging the gap between the 46,000 Philadelphians, 16 to 24, who are disconnected from school and work\(^{16}\) and the 8,000 young people the Philadelphia Youth Network is procured to support.

The plan does not identify a long term strategy to address the 220,000 adults in Philadelphia who lack a high school credential and the approximately 550,000 individuals who are not functioning at skill levels that allow them to access jobs that can sustain them and their families.

To what degree does Philadelphia Works align programming with the School District of Philadelphia, beyond partnering with their Career and Technical Training Program?

To what degree does Philadelphia Works align programming with local higher education institutions?

What is the plan to explore opportunities for improvement outlined at the bottom of page 19?

What is the plan to ensure that 16-24 year old job seekers are consistently informed of opportunities for new or additional training and “learn and earn” opportunities matched with the employers utilizing the system?

Given the priorities of the Mayoral Administration, add Pre-Kindergarten teachers to the HPO list. Pre-Kindergarten teachers are currently in demand and more growth is anticipated. There is a clearly articulated career pathway complete with assistance from the state for tuition assistance and retention bonuses.

**Section 2: Strategic Vision and Goals**

**Section 2.1:**

How does Philadelphia Works ensure the ongoing relevancy of the strategic priorities developed in 2013? When will these priorities be formally revisited by stakeholders?

How does Philadelphia Works compile data on the number of employers engaged, Philadelphians connected to training and placement services, and youth supported? Additionally, what are the standards for engagement, connection and support?

How does Philadelphia Works report out on progress towards the overarching vision ‘to be among the most integrated, innovative, productive and transparent systems of its kind in the country’?

How does Philadelphia Works envision their role in Early Childhood Education workforce development? Consider resources to provide a person dedicated to ensuring the City meets its Pre-K workforce goals by:

- Coordinating resources directly with the City’s partner pre-K providers who need workers
- Designating a person who is well-versed in the ECE career pathway and supports for that pathway

o Developing a Hot Jobs campaign for pre-K teachers that introduces them to the various career pathways open to individuals in this field, including K-12 teaching, early childhood policy, administration, etc.
o Serving as a point person for the Mayor’s Office of Education MOE’s workforce development goals.

Strategic Priority #1: Strengthen collaboration between the workforce system and Philadelphia’s economic development efforts.
- Does Philadelphia Works, or the Southeast Regional Workforce Development Partnership, collect data on the degree to which offering industry-recognized credentials and certificates has resulted in new jobs or advancement opportunities for those who earned them?
- How are workforce system dollars used to ensure individuals with significant barriers to employment are able to eventually realize the opportunities made available through industry partnerships?
- How and what specific tools within WIOA will be used to strengthen the articulation of expectations and engaging employers to ensure they are maximizing the availability of funds as well as contributing to the economic goal of reducing the poverty level?
- How can employers in the Pre-Kindergarten Early Childhood Education sector be supported by the formation of industry partnerships that address ECE employer needs for recruitment, apprenticeship, and training for the anticipated growth in this sector?

Strategic Priority #2: Serve Smaller Employers
- Is there a strategic plan to grow the Philadelphia Jobs Compact to scale? If so, what are the target metrics for success?

Strategic Priority #3: Implement “no wrong door”
- What is the plan and corresponding timeline for measuring the success of the integrated Career Link Center model against the stated goals of the “no wrong door” policy?

Strategic Priority #4: Adopt common employer-driven education and training standards across all ages
- How is Philadelphia Works ensuring that strategies to meet employer-driven education and training standards are responsive to the unique strengths and challenges exhibited by youth, particularly those disconnected from school and work? How are these strategies being integrated into a system that has traditionally focused on adult job seekers?
- The report neglects to include the Early Childhood Education sector and identification of workforce partners that, with common knowledge and standards, will help new and existing workers boost skills, wage rates, and employment stability.

Strategic Priority #5: Prioritize hardest-to-serve populations?
- By definition, ‘hardest-to-serve’ populations face employment barriers that the workforce system traditionally struggles to address. In an attempt to tackle entrenched
challenges, how will Philadelphia Works balance the tension between the need for innovation and pursuit of best practice, and the constraints of compliance, particularly in regards to TANF recipients?

- It is unclear how the plan and strategies will increase the services to re-entry citizens and account for the disparity between the number of re-entry citizens and the number of jobs and employers that can hire individuals with criminal backgrounds.
- What process is in place to pursue innovative models that will result in more re-entry citizens employed and/or trained in specific occupations that are open to them?

Section 2.2:

- **PA Strategic Priority #1:** Establish career pathways as the primary model for skill, credential and degree attainment and provide all Pennsylvanians, with an emphasis on Pennsylvanians with barriers to employment, an opportunity to obtain a job that pays.
  - How will Philadelphia Works identify and illuminate situations in which barriers to advancement along a career pathway are the result of compliance requirements and/or other policies that negatively impact job seekers?
  - How will the plan address connecting PA CareerLink eligible Philadelphia residents to a “comprehensive career pathway” system and track its implementation and outcomes as it aligns with the work of the Commerce Department across the city?
  - Add education to the list of career pathway clusters.

- **PA Strategic Priority #2:** Expand public-private investment in the state’s pipeline of workers and incumbent workers for targeted industry sectors from entry-level skills to middle skills through industry partnership, WEDnetPA, and other innovative strategies.
  - How will Philadelphia Works report out on progress towards this goal, including both successes and lessons learned to ensure innovation is constantly informed by what is and isn’t working?
  - Prioritize creating public-private partnerships with employers in the Pre-Kindergarten Early Childhood Education sector. Doing so will enable career pathway programs linked to credentials and post-secondary degrees which will expand, stabilize, and boost the wage rate of existing workers. It will also increase access for new hires to advance their careers.

- **PA Strategic Priority #3:** Increase opportunities for all youth to participate in work-based learning through summer employment, pre-apprenticeship, internships and other similar experiences.
  - As raised earlier, how does Philadelphia Works plan to bridge the gap between the 46,000 Philadelphians, 16 to 24, who are disconnected from school and work\(^\text{17}\) and the 8,000 young people the Philadelphia Youth Network is procured to support?

• How will Philadelphia Works influence efforts to scale Philadelphia’s current summer jobs program to reach a greater percentage of young people interested in summer employment?

PA Strategic Priority #4: Engage employers through multi-employer workforce partnerships to improve the connection and responsiveness of workforce programs to the demand side of the labor market, increase public-private investment in critical skills, and support the spread of employer practices that create jobs that pay.
• Related to an earlier question, how will Philadelphia Works scale the Philadelphia Jobs Compact as a tool to achieve this overarching goal?
• It is unclear how employers will be specifically attracted to using the public workforce system and how Philadelphia Works will ensure viable, robust matches between employer needs and the training and qualifications of the talent pool in the system.

PA Strategic Priority #5: Strengthen data sharing across state agencies and workforce development partners to better understand education and employment outcomes and rely more effectively on data to improve and target our efforts.
• How will Philadelphia Works advocate for stakeholders interested in increased and improved cross-agency data sharing to facilitate outcome reporting and case management? This seems especially critical given the need to building employment pipelines that involve multiple entities supporting an individual job seeker.

Section 2.4:
• How will Philadelphia Works support providers to ensure they have the resources and capacity to collect data on initial employment and retention over time? How will Philadelphia Works build a collective understanding, across providers, of best practices for engaging job seekers as they transition along a career pipeline?
• How will Philadelphia Works customize these efforts in support of both tracking and supporting WIOA youth as they progress over time? How will these efforts be focused on youth prone to setbacks in their progression (including, but not limited to, setbacks caused by housing instability, incarceration and/or child care issues).

Section 3: Local Area Partnerships and Investment Strategies
Section 3.1:
• How does Philadelphia Works orient and support new Board Members who may not be fully versed in the workforce system, including the opportunities and limitations of local, state and federal funding?
• In the chart on page 34, it would be helpful if all acronyms were spelled out.
• What is the permanent site for PA CareerLink West and when is the intended transition date?

Section 3.2:
• What strategies and practices are in place to ensure maximum collaboration and alignment across the programs outlined in this section?

Section 3.3:
• Is there a process in place to help quality workforce providers who work directly with employers to access Customized Job Training (CJT) and On the Job Training (OJT) resources for their clients?
• How and by whom are transitional work, work experience and internship opportunities created? Do quality providers have access to the resources needed to create these opportunities for their clients? Finally, how do these opportunities help job seekers address barriers beyond lack of work experience (including barriers that are the result of poverty and/or a criminal record)?

Section 3.4:
• When and how will further information on the upcoming Workforce Symposium and re-branding of the Philadelphia Works BET be shared with stakeholders?
• What is Philadelphia Works’ strategy for proactively engaging new partners and stakeholders over time?
• How will Philadelphia Works share the feedback from current employers about their experience with the workforce system and with economic development partners to ensure employer services are continuously improving and supporting talent pipelines that are established by the City’s Commerce Department?

Section 3.5 appears to have been omitted.

Section 3.6:
• The response in this section does not specifically reference activities for youth with disabilities, as required in the question.
• How is ‘best practice’ research used to determine the investment strategy for youth, especially as this field of study is constantly growing and changing with renewed emphasis nationally on disconnected youth?

Section 3.7:
• How is information shared from the Council for College and Career Success, and how is the work that happens there reviewed by members of the Workforce Investment Board?
• How and where is information shared publically on the impact of WIOA-funded youth programs for both in and out of school youth? How are these funds deployed strategically to address Philadelphia’s significant population of 16 to 24 year-olds who are disconnected from work and school? How is progress monitored towards the overarching goal of decreasing Philadelphia’s high rate of youth disconnection?

Section 3.8:
• Is there a system in place for quality workforce providers to access transportation, clothing and certification resources for their program participants, particularly those not directly referred via a CareerLink?
• What is the mechanism to ensure partner organizations and workforce stakeholders are aware of the supportive services available to assist their referred candidates to the system’s initiatives?
• Is Philadelphia Works involved in helping parents more easily access and retain child care resources through the County Assistance Office? Is Philadelphia Works partnering with others to shed light on the challenges non-custodial parents face when sharing child care responsibilities with a custodial parent who may not qualify for or choose to access subsidized child care assistance?

Section 3.9:
• How is CareerLink customer satisfaction measured and reported?
• Is CareerLink service quality measured by an external source?

Section 3.10: no comments/questions

Section 3.11:
• Is there data available to inform an understanding of how these populations compare by size or concentration across the city? For example, it would helpful to understand the size of the City’s re-entry population compared to the population of older job-seekers or youth who have aged out of the foster care system. Likewise, it would be helpful to know if individuals with unique barriers (ex. migrants and seasonal workers; homeless individuals; displaced homemakers) are concentrated in specific neighborhoods across the city.
• While individuals in these categories are served on a first-come, first-serve basis, is there an attempt to prioritize outreach or customize services to the unique needs of any particular group or groups?
• Philadelphia Works currently partners with a broad range of stakeholders to advance workforce goals in specific industries. More transparency around existing partnerships that support specific industry pipelines is needed and would greatly enhance additional opportunities for strategic collaboration. In the Early Childhood Education sector, for example, Philadelphia Works could support efforts for greater alignment and strategic investments across the following partners:
  o PA Office of Child Development and Early Learning (OCDEL)
  o Southeast Regional Key
  o Graduate! Philadelphia
  o District 1199C
  o Esperanza College of Eastern University
  o Temple and Drexel Universities
  o Harcum I-Lead

Section 3.12 and 3.13 appear to have been omitted.

Section 3.14:
• How does Philadelphia Works report out on the impact of funds secured outside of WIOA Title 1 and state general funds, and to what extent are these funds used to ameliorate limitations that stem from compliance?
Section 4: Program Design and Evaluation

Section 4.1A:
- As the integrated Career Link model is new, is there a system in place to measure progress over time that takes into consideration start-up challenges while holding providers accountable to make improvements over a defined period of time, leading to maximum service delivery?

Section 4.1B:
- How are sites selected to offer “virtual access” to the Career Link system? How are staff and other stakeholders orientated to this resource and trained to help local job seekers use it effectively?

Section 4.1C:
- How will Philadelphia Works gather and share data on the degree to which their efforts to engage and serve individuals with disabilities are successful?

Section 4.2:
- Is there a projected date for the completion of the comprehensive asset map of workforce programming, activities and needs, as well as a plan to share findings with workforce stakeholders outside of the Career Link network?

Section 4.3: No comments/questions.

Section 4.4:
- Is there a functioning mechanism in place to assist WIOA funded providers in identifying high quality partners that can assist them in offering the full menu of required service design elements?

Sections 4.5, 4.6 and 4.7 appear to have been omitted.

Section 4.8 and 4.9:
- Once a training provider is included on the list of approved providers, what is the process for ensuring their services continue to be of high quality and are responsive to the ever changing needs of local and regional employers.

Section 5: Compliance

Section 5.1: No comments/questions.

Section 5.2 appears to have been omitted.

Section 5.3: No comments/questions.

Section 5.4:
- What is the plan for engaging the full range of workforce stakeholders in a robust conversation of the challenges and opportunities that come with revisions to WIOA legislation (including target performance measures), particularly regarding how this will inform and influence Philadelphia Works’ commitment to supporting ‘hardest to serve’ populations?

Section 5.5 appears to have been omitted.

Section 5.6 and 5.7:
As noted earlier, it would be helpful to offer more than one Local Plan Forum. Forums should be offered in different areas of the city, and at different times of day, to ensure a full complement of stakeholders is able to attend and participate. Notification of the forum date(s) should be provided several weeks in advance to guard against scheduling conflicts.

How will Philadelphia Works ensure that the approved plan and its opportunities and improvements are shared with the public in a manner that is accessible to employers, workforce providers and the average individual in need of services?

Section 5.8 and 5.9: No comments/questions.

ON MAY 23, 2016, A GROUP OF ORGANIZATIONS CONSISTING OF CHILDREN’S VILLAGE, DELAWARE VALLEY ASSOCIATION FOR THE EDUCATION OF YOUNG CHILDREN, DISTRICT 1199C TRAINING AND UPGRADED FUND, FELS EARLY LEARNING SERVICES, MONTGOMERY EARLY LEARNING CENTERS, NATIONAL UNION OF HOSPITAL AND HEALTH CARE EMPLOYEES AFSCME, PUBLIC HEALTH MANAGEMENT CORPORATION, PHILADELPHIA FREEDOM VALLEY YMCA, SPIN, UNITED CHILD CARE UNION AND PUBLIC CITIZENS FOR CHILDREN AND YOUTH SUBMITTED THE FOLLOWING COMMENTS:

We specifically request that adjustments be made to the draft WIOA plan to ensure that individuals seeking to enter the burgeoning Pre-Kindergarten Early Childhood Education (ECE) sector as a priority of the current Mayoral administration can readily utilize all available WIOA resources. We also note that the expansion of this employment sector is a priority of the Mayor and City Council. Further the Governor and each of the four caucuses of the Pennsylvania legislature demonstrated interest in expanding the sector by adding more than $60 million in new investment in the sector in the last three years.

Philadelphia Works Response: We recognize that there is an opportunity within our plan to, while acknowledging the progress that has been made to date, offer additional flexibility for acknowledgment of additional sectors that may develop in our area as a result of stakeholder initiatives. As such, we have added language in our plan on pages 24-25 recognizing this possibility.

In addition to the public investments that will predictably grow employment in the Pre-Kindergarten ECE sector, the three largest cohorts of Philadelphia residents are comprised of adults between 20-34, the prime child-bearing years of adulthood. The bulge in this age cohort is a strong indicator of likely increased demand for employees credentialed for positions with Pre-Kindergarten ECE employers.

In the plan’s section on Strategic Vision and Goals, Section 2.1, five priorities are outlined. Given the burgeoning demand of pre-kindergarten expansion, the public funds behind the
expansion, and the shortage of qualified workers to meet the new job demands, we recommend that the following language be included within the following two sections:

Strengthen collaboration…. – in the paragraph that reads: “We are building on the progress we have seen with our manufacturing industry partnership”…insert “and review the ways employers in the Pre-Kindergarten ECE sector can be supported by the formation of an industry partnership that addresses employer needs for recruitment, apprenticeship, and training for the anticipated growth in the sector.”

**Philadelphia Works Response:** We have maintained the language as it provides ample flexibility to explore additional possibilities for multiple industry partnership, including a Pre-Kindergarten ECE sector partnership based on industry criteria.

Adopt common employer driven education and training standards …– insert “early childhood education sector” along with the sectors specifically identified so that all workforce partners are working from common knowledge and standards to help new and incumbent workers boost their skills, wage rates and employment stability.

**Philadelphia Works Response:** The sectors identified in this section are based on career pathways we have mapped to date.

In section 2.2. in the first item 1) add “education” to the list of career pathway clusters referenced. In item 2), add “the option of creating public-private partnership with employers in the Pre-Kindergarten ECE sector.” Doing so will enable nascent career pathway programs linked to credentials and post-secondary degrees to expand and stabilize, boost the wage rate of incumbent workers, and create openings for new hires with the opportunity for advancement as incumbent workers move up the career ladder.

We respect the draft plan, we also note that it includes job projections within the Education Cluster for pre-school teachers and teacher assistants that under-estimated reasonable projections for new hires in those positions and misstate the level of education needed for those positions. Those new hire figures derived from the EMSI Staffing Patterns Data set indicate a lack of awareness of the state funded expansions in the Pre-Kindergarten ECE sector that occurred CY 2016 and the projected City investment that will dramatically expand hiring in the sector. We provide detail with respect to hiring projections based on this expanded public investment in this memo and recommend that the plan be revised to augment the EMSI dataset with the contextual information that shows significantly augmented hiring in this sector.

**Philadelphia Works Response:** We recognize that there is an opportunity within our plan to, while acknowledging the progress that has been made to date, offer additional flexibility for acknowledgment of additional sectors that may develop in our area as a result of stakeholder initiatives. As such, we have added language in our plan on pages 24-25 recognizing this possibility. We plan to engage with the City regarding the Mayor’s plans to expand Pre-Kindergarten that may result in developments in this area. The second section of this
submission was identified as a “High Priority Occupation Petition” and, therefore, is not included here as a part of comments. Generally, relating to this request that asks Philadelphia to petition the Commonwealth to include two occupations related to early childhood, we have reached out to those who made the submission to advise of the high priority occupation process and the requisite information that is required for the request to be formally recognized and complete.