



# SMRT Research

## WIOA Implementation Experiences from the Local Development Workforce Board community

### Overview

Local Workforce Development Boards face many challenges to implementing the Workforce Innovation and Opportunity Act (WIOA). SMRT surveyed over 200 members from the community of local Workforce Development Boards to document the barriers they are facing. Our goal is to identify the obstacles, as well as some of the bright spots, in WIOA implementation to help local boards understand the experiences of their counterparts around the nation as they look to find innovative and effective solutions.

#### PREPARED BY

**Nick Anderson**

Director of Research and Evaluation

**Rashid Marcano-Rivera**

Data Analyst

**Joseph Rosenbaum**

Research Analyst



## Findings from a National Survey: Implementation of WIOA on the Local Level

**Objective:** At the recent National Association of Workforce Boards annual conference in Washing, D.C., we learned that different states and boards are approaching Workforce Innovation and Opportunity Act in diverse ways across the United States. In response, we have decided to launch a survey to assess the successes and challenges at the local level in implementing WIOA. Our survey targeted representatives from the local Workforce Development Board (WDB) level.<sup>1</sup> This report details our findings.

### Background

In 2014, the Workforce Innovation and Opportunity Act (WIOA) formally reauthorized the Workforce Investment Act (WIA). WIOA contains five titles: Workforce Development Activities (Title I), Adult Education and Literacy (Title II), Amendments to the Wagner-Peyser Act (Title III), Amendments to the Rehabilitation Act of 1973 (Title IV), and General Provisions (Title V). As observed by the National Association of Workforce Boards (NAWB), this law envisioned a reinvigorated workforce system that would be more flexible in meeting the demands of jobseekers, employees, and employers.<sup>2</sup> The hope is to create this flexibility by delivering a more integrated and seamless set of services at the local level through collaboration and drawing upon the comparative advantage of each stakeholder. Through better alignment, WIOA aims to build a truly integrated workforce system.

### Findings

Not surprisingly, the most commonly cited challenge to WIOA implementation was the lack of final regulations from the U.S. Department of Labor (DOL). One respondent used the simile, “It’s like trying to build an airplane, and fly it at the same time.” As some suggested, it doesn’t help that WIOA increases the demands on the workforce system while keeping their budgets unchanged – it even reduced minimum size that boards are allowed to be. In essence, local boards are being asked to do more with less. One respondent articulated their frustration as receiving “due dates without guidance.” Many echoed this concern, stating that the quick implementation timeline combined with an absence of final regulations was a major challenge. Several respondents suggested they weren’t given enough time, with one noting that writing the plan with regional partners was a challenge in the allotted timeframe while a few others indicated that they ran their boards on a part-time basis only and had difficulty staying informed about movements in WIOA. Related to following WIOA movements, many highlighted the fact that the final definitions of performance measures have yet to be released.

The six core programs of WIOA (adult, dislocated worker, and youth programs under Title I, the Adult Education and Family Literacy Act under Title II, the Employment Service program under Title III,

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<sup>1</sup> To collect information, we administered a brief survey to 908 participants in the workforce community; 201 individuals from that survey pool responded, making for a total response rate of 22%. All of the quantitative data that we collected from these surveys are included in this report in aggregated, anonymized format. Since our target was local WDBs across the U.S., some states could not be surveyed because they simply do not have local boards and instead only use a single, state-administered WDB (e.g. Montana, New Hampshire, and North Dakota, among others). In total, we received responses from 39 of the 43 states that have local WDBs. We also conducted 20 phone interviews of local boards around the nation.

<sup>2</sup> See the National Association of Workforce Boards and Public Consulting Group “[The Workforce Innovation and Opportunity Act \(WIOA\) - Driving Innovation, Collaboration, and Performance](#),” 2014.



and the Vocational Rehabilitation State Grant Program under Title IV) are required to submit the same six performance indicators to state and federal regulators. While some of these outcomes are similar to metrics under WIA (Entered employment, retained employment, and average earnings), other performance metrics are new and rather vague in federal statutes. For example, there is a new measure of “effectiveness” in serving employers, yet how effectiveness will be measured remains a mystery. There is also ambiguity around the new indicator of achieving a “measurable skill gain” for those enrolled in an education or training program. On top of these primary performance measures, each state must submit a “state adjusted level of performance” that accounts for the expected level of performance on each indicator – these are supposed to be negotiated between the state and federal governments. Yet, until the state plans are officially released, it is rather unclear what these “levels” of performance measures will look like for each state.<sup>3</sup> The story doesn’t end there for local WDBs – because they actually have to wait for these state and federal negotiations to conclude so that they can then negotiate local performance targets with the governor.

Furthermore, many respondents suggested that both the federal and state governments are rather slow in responding to inquiries. One respondent suggested that one of the best places to look for clarifications was in series of Training and Employment Guidance Letters (TEGL) released by the DOL incrementally to help the workforce system prepare for WIOA.<sup>4</sup> For example, [TEGL 23-14](#) explores one of the largest transitions from WIA to WIOA: the new emphasis placed on out-of-school youth. The minimum expenditure rate for Title I youth formula funds for out-of-school youth was raised from 30 to 75 percent. This dramatic shift poses a very large challenge for local boards with little time to adjust. The lack of guidance is not just a federal problem, but a state-level problem as well. While respondents from some states reported this did not pose a significant challenge for them, many felt they received little direction from the state in how to implement WIOA. A few even indicated that state guidance contradicted federal directives. In fact, some state legislation appears directly conflict with WIOA. In Ohio, for example, it was noted that the governor has put an emphasis on TANF at the expense of WIOA. This greatly contrasts with a state like Virginia, where the governor has jokingly said his middle name is “workforce board.”

Many respondents also commented on the One-Stop procurement process. WIOA sees the approximately 3,000 One-Stop centers around the country as the government’s central point of contact with relevant stakeholders. Under WIOA, WDBs are tasked with selecting One-Stop operators based on a competitive process among eligible entities; the use of a competitive procurement process was optional under WIA. While this is intended to maintain quality, many respondents felt this was a strange provision considering their WDB actually administered most of the services provided by their local One-Stop Center. This new provision made some boards feel like they had to “compete” to continue serving as a One-Stop operator. More generally, some also noted that it was difficult to get their local partners to enter into true cost-sharing agreements over One-Stop operation. It was reported that most One-Stop partners were still getting used the idea of One-Stop centers as a comprehensive delivery unit of employment, training, and educational services.

Our survey discovered several bright spots for WIOA implementation as well. For example, most respondents suggested that the transition to using a career pathways and case management approach were going relatively smoothly – as shown in the Appendix. Interestingly, we found a moderately strong

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<sup>3</sup> See Bradley, DH, “The Workforce Innovation and Opportunity Act and the One-Stop Delivery System,” 2015.

<sup>4</sup> The DOL also provides some guidance for WIOA at: <https://www.doleta.gov/WIOA/>. They also hosted a webinar series last year that explores various parts of WIOA implementation, see [here](#) for details.

relationship between respondents who felt their state was using evidence driven policies and the existence of a career pathways ( $r = .497$ ) and case management ( $r = .418$ ) approach as well as local momentum in adequately monitoring the essential outcomes ( $r = .549$ ). In the states with at least 10 responses, we noticed that local board representatives within the same state often felt very differently on how career pathways and case management implementation were going on a local level. This makes sense. These approaches are implemented at the local level, which explains why respondents within the same state could have very different perspectives on this question. It is encouraging nonetheless that most local boards feel their localities are well prepared to implement a career pathways and/or case management strategy.

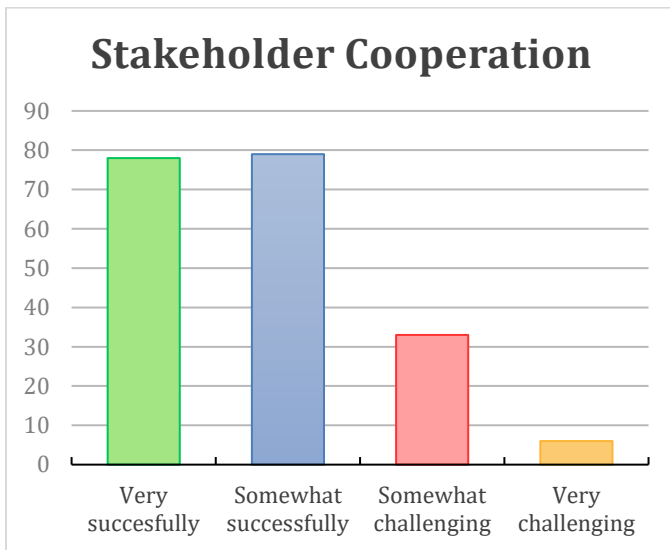


Figure 1: Getting MOUs Signed with Partner

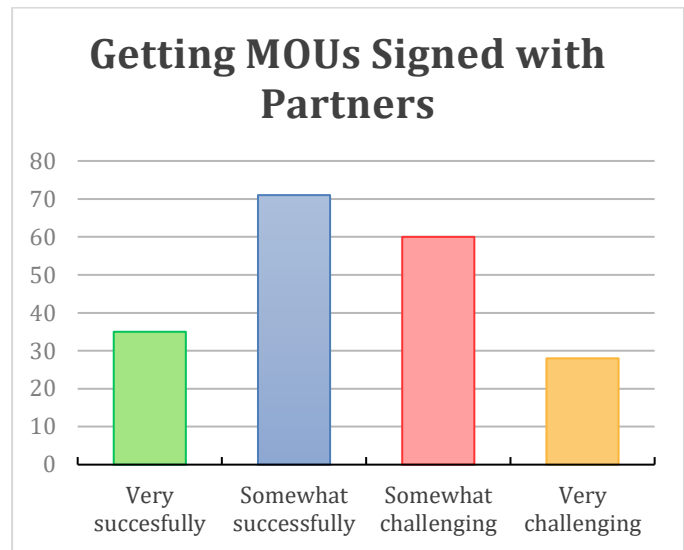


Figure 2: Stakeholder Cooperation

As can be seen above, when asked to rate the quality of their cooperation with local stakeholders, most respondents responded positively – fully 80% said they viewed this outcome as more of a success than a challenge. This is good news, because WIOA radically transformed the relationship between the workforce system and all of their partners, mandating much tighter integration than before. We received a less favorable response when we asked respondents about the difficulty of getting their memorandum of understandings (MOUs) signed with their partners, with a little over half reported that they were at least somewhat successful in this endeavor. Many respondents suggested that their state had yet to release guidance on developing MOUs, a delay which does not help considering the short time frame left for boards to get their MOUs officially agreed upon. One respondent noted that their local partners suffered from a lack of guidance on how they should be engaging the workforce system since they were largely unfamiliar with WIOA. This creates an additional challenge for local boards of educating and leading some of their stakeholders towards deeper levels of cooperation. Some noted the added challenge of balancing local goals and priorities with state directives around the MOUs. Furthermore, the cost-sharing provisions of MOU development remains a major roadblock as reported by some, since many WDB partners do not have these additional expenses budgeted. In the end, when we restricted the data to those states where more than 10 responses were available, the difficulty of getting MOUs signed was strongly dependent on the state in which a particular local board resides.

As it relates to engagement with the business community specifically, most reported that the business community has proven responsive to working with them under WIOA. As depicted in Figure 3, fewer than 7% reported the business community as not being engaged. Given the heavy focus for the workforce system to remain demand driven, this is an encouraging finding.

For your local board, which of these best describes the level of engagement by the business community when it comes to WIOA matters?  
(196 responses)

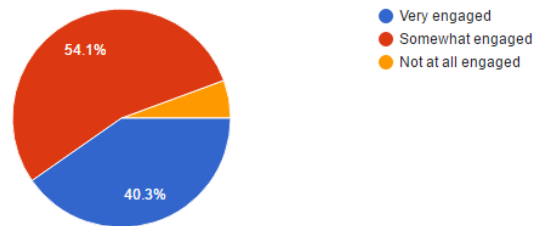


Figure 3: Level of engagement by business community  
Image generated by Google Forms

One of the biggest challenges to cooperation was using technology to share data efficiently, as seen in the Appendix – almost 25% of survey participants viewed “using technology to share data efficiently” as a major challenge. Some pointed out that their state is currently in the process of upgrading their data systems to match the WIOA world, which puts them in a holding pattern until the state system is ready. Some states, in fact, are not even planning on using a centralized data system to create efficient sharing, and will instead rely on each partner to submit their data via manually-generated reports to their relevant stakeholders.

**On state and local board dynamics:** Our survey also included two questions asking about state and local WDB dynamics. As seen in Figure 4, approximately 60% of participants identified the decision-making process for WIOA implementation as more decentralized than centralized. This would suggest that most local boards do have sufficient autonomy in how they understand and implement WIOA, though this point ultimately depends on what state a particular local board is located in. With about 40% of respondents stating that the process is more centralized, many described their relationship as tense, stressful and frustrating. In particular, many respondents referred to the fact that state boards routinely ignored suggestions made by local boards, opting for a more authoritarian, top-down approach to management. It appeared many of the challenges arose from a centralization, rather than a decentralization, of power. One participant reported that, “Boards are seen in a dismissive way, and are generally utilized to serve centralized state administration purposes.”

### In your state or territory, how centralized is the decision making process as it concerns WIOA implementation matters?

(196 responses)

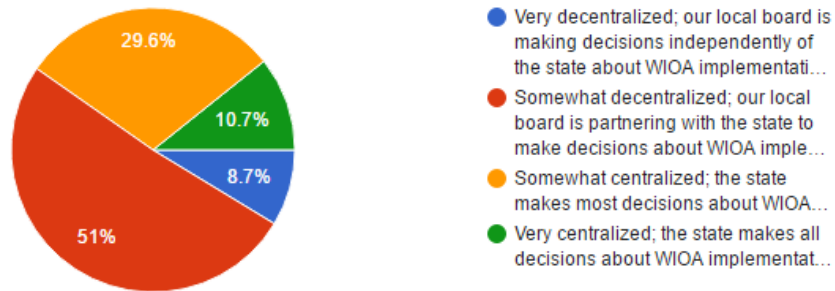


Figure 4: Level of centralization in decision making process  
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Some reported that the state feels like they “own” the Career Centers and they that fail to take individual community needs into account, which could alienate board members who are from the private sector. All of this is occurring despite the fact that WIOA intended to put more power in the hands of local boards to prioritize local needs. One respondent stated, “There is too much ‘one size fits all’ silo mentality, despite words to the contrary and too little room for individual areas to use local knowledge and innovation to produce results.” As a result, many reported on the tenuous and often political relationship between local and State boards. Part of the challenge may be due to the lack of on-the-ground knowledge from state officials, “We need state-level decision makers to come spend a few days in the career center with staff to better understand the reality of what takes place.” Some suggestions for improving board dynamics included: ceding more autonomy to the WDBs, increasing the sensitivity of state-level boards to local board challenges and priorities, improving communication, and obtaining clearer guidance on expectations.

Although quite a few responded on the negative aspect of their respective board relationships, many also explained the complex nature of the relationship and focused on the positive. In particular, those who reported a “Good” or solid relationship often mentioned the importance of communication, collaboration, and cooperation as central to success. Others also recognized the difficulty and barriers to fostering a positive dynamic amongst the boards, especially due to the lack of federal regulations.

## Appendix

The following graphs all based on the same underlying question. Respondents were asked to indicate the degree of success or challenge that their local board and partners have faced in each of the following implementation areas.

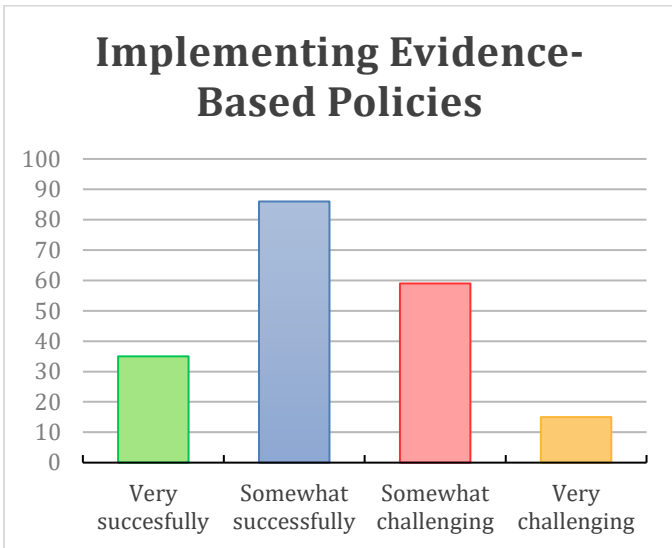


Figure 5: Implementing Evidence-Based Policies

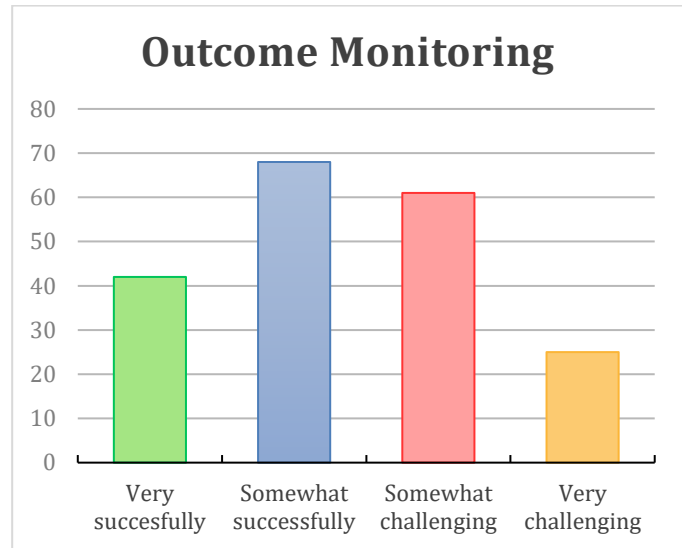


Figure 6: Outcome Monitorin



Figure 7: Adopting a Career Pathways Approach

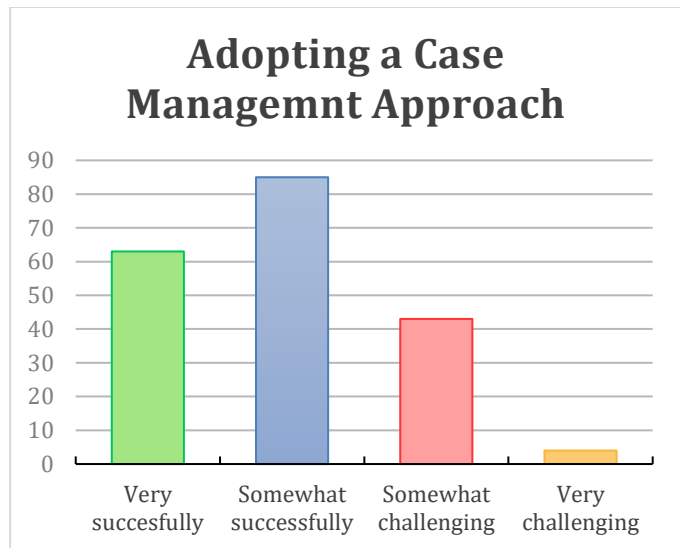


Figure 8: Adopting a Case Management Approach

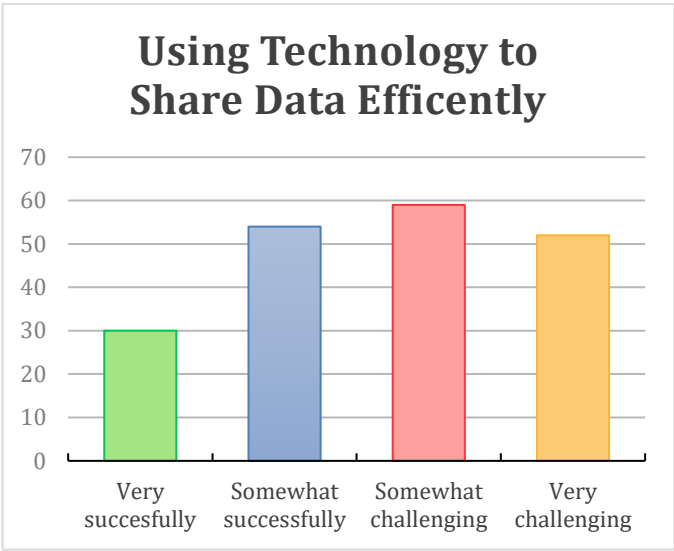


Figure 9: Using Technology to Share Data Efficiently

How regularly does your local board collaborate with other local boards around your state as you look to implement WIOA?

(195 responses)

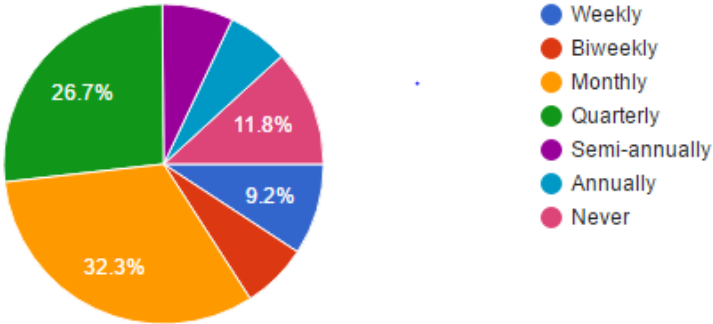


Figure 10: Frequency of collaboration with other local WBDs  
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