

## Ohio Draft Combined Plan Comments from The Literacy Cooperative

The Literacy Cooperative of Greater Cleveland was established in 2006 to be an oversight and coordinating entity to work on behalf of the community to improve literacy levels among children, youth, and adults in Greater Cleveland. The Literacy Cooperative endorses and supports early literacy programs that increase school-readiness, third grade reading, and parent engagement. At the adult level, The Literacy Cooperative convenes literacy providers and stakeholders to shape strategies and services that connect low skilled adults to literacy and career pathways for better employment opportunities and instructors with quality professional development. The Literacy Cooperative also works with policy makers, state and local leaders, employers and education providers to address critical literacy issues.

We applaud the Governor's Office of Workforce Transformation, the Office of Human Service Innovation, the Department of Higher Education, the Department of Education, all the state agencies, local providers, and businesses that provided input into this 2016 Combined State Plan. The draft plan includes many strong features, including the 10 reforms that were part of the 2014 Unified Plan. We support the ten reforms outlined in the draft plan. We believe that co-enrollment is essential between programs and services and we further encourage a deliberate partnership between programs with the goal of maximizing the opportunity of employment for all participants, especially for the low-skilled, low-literate adults.

We agree that it is crucial to increase access to remedial education and high school credential training. This has proven success when the curriculum is contextualized and offered as part of industry-specific training that can provide not only educational but occupational credentialing as an outcome (i.e., Integrated Education & Training). We believe business deserves well-trained workers and agree that job readiness and soft-skills training should be included in workforce training programs.

The draft plan builds on these reforms by including increased integration with Temporary Assistance for Needy Families (TANF); and state support and requirements for Career and Technical Education (CTE) Programs of Study, stackable credentials, and articulation.

For the draft plan to be more comprehensive, The Literacy Cooperative offers the following opportunities and comments for consideration.

The Title II section of the draft plan indicates that in the second year of the plan Integrated Education and Training (IET) activities will be required. It would be stronger if this important strategy were highlighted as a key reform in the strategic portion of the draft plan, and not mentioned only in the Title II program plan. In addition, the Perkins section should discuss steps Ohio will take to integrate postsecondary CTE and adult basic education, including professional development. As part of the steps, the IET activities should be included as a process in reform 7 "Increase Access to Remedial Education and High School Credential Training."

The draft plan includes the WIOA mandate that Title II plans will be reviewed by the local boards ensuring that ABLÉ activities are aligned with local needs. However, it misses the opportunity to require ABLÉ programs to be part of the local boards' business plans that would allow ABLÉ programs and local boards to be proactive in ensuring alignment.

The draft plan references the Ohio ABLÉ programs' ability to assist employers by offering on-site workplace literacy programs. Workplace literacy programs should be included in the incumbent worker services and career pathway development strategies.

The Re-branding ABLÉ effort should link ABLÉ's relevance to a career and linkage to post-secondary training. The draft plan should recommend that ABLÉ services are embedded into credential and certification programs and not a standalone service.

The draft plan should reference the Ohio Incumbent Workforce Training Voucher Program and include opportunities for workers below the current wage threshold outlined in the policy to receive integrated education and training that leads to wages that support their families. IET should also be included in the Incumbent Worker Training Guidelines.

Important steps to support career pathways are mentioned at places in the draft plan (including in discussions of the Comprehensive Case Management and Employment Program (CCMEP), IET, and CTE), however the development of career pathways is not highlighted as a key strategy in the strategic portion. Plans to serve the individuals that are part of the priority of service should also be a part of the key strategy in the development of career pathways.

The draft plan does not discuss how the state will implement the priority of service for low income individuals, public assistance recipients, and individuals with low basic skills. This is an important new requirement of WIOA that should be emphasized in the plan and in a separate WIOA policy guidance letter developed by the Ohio Department of Job and Family Services. Moreover, the state should define each category within the priority of service so there is a consistent process especially in determining individuals with low basic skills. The U.S. Department of Labor has recently indicated that they will require a description of the state's process for priority of service in the state plan. Ohio should specifically include a statewide policy on priority of service and set service goals to ensure that people with barriers to employment are being prioritized through the workforce system.

The analysis of the state's labor market under-states the need for postsecondary training by using the BLS category of occupations that require only a high school education, without recognizing that about half of these occupations require some form of postsecondary training of at least a month in length.

The draft plan fails to provide data on the state's immigrant population and the steps that will be taken to serve this population. Many of the population will meet the priority of service category and the connection to services should be addressed.

The draft plan is unclear whether or not the WIOA common measures will be applied to TANF E&T and whether TANF E&T will be included in the state's dashboard. These would be positive steps that would enhance coordination. It is also unclear how each of the agencies should work together in meeting the WIOA common measures to eliminate possibilities for duplication of services.

The draft plan indicates that CTE is part of the state's dashboard and common measures; however, the Perkins portion of the plan does not include the additional state indicators that are among the state's common measures.

The draft plan misses the opportunity to include SNAP E&T as part of the combined plan, in particular state actions to increase resources by obtaining SNAP E&T 50-50 funds.

The draft plan mentions Ohio's Workforce Alliances, but fails to highlight these sector partnerships as a key strategy with broad applications. For example, the state could use the Alliances to inform CTE programs of study and avoid burdening employers with overlapping requests for engagement. The plan does not include a way of funding the Alliances after June 30, 2017.

The draft plan does not discuss the planned uses of the Governor's reserve fund as required by WIOA, including the use of reserve funds to support sector partnerships

The draft plan for Eligible Training Providers seems to rely on providers self-reporting performance. In order to increase consistency, validity, and reliability, instead of relying on self-reports the state should require providers to send administrative records on all students/participants to the state for matching with wage and other administrative records. The draft plan should also identify steps that the state will take to provide a comprehensive student scorecard system on training providers so that the public has sufficient information to make informed choices.

The Literacy Cooperative looks forward to assisting the Governor's Office of Workforce Transformation finalize the many details within the plan that addresses the needs of employers and provides opportunities for all Ohio residents to obtain the skills needed for meaningful employment.

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