



Wider Opportunities for Women

June 17, 2011

The Honorable Tom Harkin
Chairman, Committee on Health,
Education, Labor and Pensions
United States Senate
Washington, DC 20510

The Honorable Michael Enzi
Ranking Member, Committee on Health,
Education, Labor and Pensions
United States Senate
Washington, DC 20510

The Honorable Patty Murray
Chairman, Subcommittee on Employment
and Workplace Safety
United States Senate
Washington, DC 20510

The Honorable Johnny Isakson
Ranking Member, Subcommittee on Employment
and Workplace Safety
United States Senate
Washington, DC 20510

Dear Chairman Harkin, Ranking Member Isakson, Chairman Murray and Ranking Member Enzi:

On behalf of Wider Opportunities for Women (WOW), I am grateful for the opportunity to submit comments on a discussion draft of legislation to reauthorize the Workforce Investment Act of 1998. Overall, we believe the draft makes positive strides to better align the nation's job training and education programs in ways that will strengthen the nation's economy, local economic development and the skill sets needed both by businesses and American workers striving for self-sufficiency. It also recognizes the need to emphasize skill training and services for low-income job seekers and those with barriers to employment.

WOW works nationally and in its home community of Washington, DC to promote economic independence and equality of opportunity for women and their families at all stages of life. For over 45 years, WOW has been a leader in the areas of nontraditional employment, job training and education, welfare to work and workforce development policy. Through our Family Economic Security Project, Elder Economic Security Initiative and the new [Basic Economic Security Tables](#), WOW has developed measurements, across the generations, what income is needed by different types and sizes of families to meet basic needs and save for emergencies, retirement and at least two years of college.

In appreciation for the opportunity to offer priorities for improving the discussion draft prior to mark-up, WOW offers the following recommendations:

Add to the definition of “individuals with barriers to employment,” “individuals preparing for nontraditional careers.” Both men and women can improve their lifetime earnings and self-sufficiency by pursuing employment in nontraditional careers. This is particularly true for women who are a small minority of the current workforce in the many building trades as well as transportation, energy, and technical and manufacturing fields, but also for men in nursing and allied health fields. Women, for example, are fewer than 3 percent of workers in the building trades and 11 percent of computer, ATM and office machine repairers. This change would align WIA with the Carl D. Perkins Career and Technical Education Act where nontraditional job-seekers are included as a “special population.” Real barriers to nontraditional employment for women, from a lack of knowledge about possible career pathways to how to confront hostile workplaces, have been well-documented.¹

In order to more adequately serve the needs of older workers and employers, the wage data collection system should impute full-time earnings to part-time workers who are older. The reliance of performance measures on unadjusted earnings erects a disincentive for state and local workforce boards and service providers to serve older workers who are more likely than younger workers to be unable or unwilling to continue working a full-time schedule. This change was contained in the Health Care and Training for Older Workers Act (S. 281) introduced during the 111th Congress by Senator Herb Kohl, chairman of the Special Aging Committee. Such a provision will help meet the growing demand for skilled workers as the economy recovers and as increasing numbers of workers approach retirement age. It will also help fill the income needs of older workers whose retirement savings are insufficient to meet expenses when they retire.

Remove the language that places the qualification “in appropriate cases” on the delivery of career counseling for nontraditional occupations as a core local service. A major reason for non-professional women’s concentration in low-paying occupations is a lack of knowledge of the long-term career and earnings potential of nontraditional occupations. Unfamiliarity with skill requirements, education and training sources, possible career pathways and possible work supports often keep women and girls from choosing nontraditional education and training. Research has documented that low-income women can earn as much as 30 percent or more in nontraditional jobs than traditional clerical, retail, administrative, food service and personal care occupations.

Statewide capacity building for staff of one-stop centers and local training programs staff on identifying opportunities for individuals with barriers to employment for in-demand sectors and nontraditional occupations should be a required, not optional, activity. Staff development of this type is essential in order to fully integrate the concept of nontraditional employment for occupations that lead to self-sufficiency into the one-stop system.

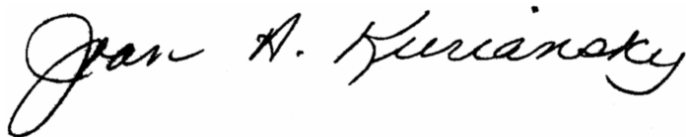
The contents of all performance reports -- state, local area and individual training programs) -- should be disaggregated by race, ethnicity, sex and age in addition to the subpopulations that comprise “individuals with barriers to employment.” Although these demographic categories are specified in the general section on reports, Title II, Sec. 285, Reports Record Keeping and Investigations, WOW believes it is important to emphasize them in relation

to performance measures, the central mechanism for holding funding recipients accountable for the effective use of funds under WIA.

Because increasing the economic self-sufficiency of participants is part of the purpose of Title II programs, the WIA performance and accountability system should adopt as a primary performance measure a measure of progress toward a participant's economic self-sufficiency level, not simply median earnings. Such a system has been used by workforce boards, including the Seattle-King County Work force Development Council, which recently reported that two-thirds of participants who had entered below their family's Self-Sufficiency Standard, exited at or above that level of income for their families.

WOW looks forward to working with you on these and other issues as you move toward mark-up and ultimately final enactment of legislation that re-shapes the workforce development system in keeping with the lessons of the past 13 years. Please feel free to contact Susan Rees, WOW's director of national policy, at srees@wowonline.org for additional information.

Sincerely,

A handwritten signature in black ink that reads "Joan A. Kuriansky". The signature is written in a cursive, flowing style.

Joan A. Kuriansky

Executive Director

¹ Susan Moir, Meryl Thomson and Christa Kelleher, "Unfinished Business: Building Equality for Women in the Construction Trades," Labor Resource Center, College of Public and Community Services, and Center for Women in Politics & Public Policy, McCormack Graduate School of Policy and Global Studies, University of Massachusetts Boston.