

THE MELVILLE CHARITABLE TRUST

February 1, 2016

Kim Andy
Department of Labor
State of Connecticut
kim.andy@ct.gov

Dear Ms. Andy:

I write on behalf of the Melville Charitable Trust, the largest foundation in the U.S that is exclusively devoted to supporting solutions to prevent and end homelessness. We focus on solutions within three interrelated areas - housing, employment, and health & support - as it is challenges within these areas that most often result in a person or family becoming homeless. A major priority of our funding is the growth of initiatives within Connecticut providing effective national models for serving vulnerable individuals, families and youth.

We would like to thank Connecticut's Department of Labor, Office of Workforce Competitiveness and the Workforce Innovation Opportunity Act (WIOA) Implementation Workgroups for your leadership in developing the draft WIOA Unified State Plan.

We were very excited to learn of the reauthorization of WIOA for several reasons. First, it has an increased focus on serving low-income Americans who have high-barriers to employment. Second, it makes a significant commitment to serving disconnected youth by increasing the percentage of youth formula funds serving out-of-school youth from 30 to 75 percent. Finally, the legislation clearly emphasizes the integration and formation of cross-sector partnerships that will result in improved economic outcomes.

Feedback & Recommendations

Emphasize federal *priority of service* requirement.

- US DOL recently provided the expectation that each state plan must describe how it will prioritize services for high-need adults, in particular “public benefits recipients, other low-income individuals, and individuals who are basic skills deficient.” The Trust sees this as a critical directive to serve vulnerable populations. We also recognize that this requirement came after Connecticut's draft plan was sent out for public comment. Moving forward, including this description in the state plan will not only clarify and emphasize the intention of the federal law, but will enhance the state's guidance in explicitly directing regions to focus on their most vulnerable residents. We look forward to learning more about how the state and regions will prioritize and better serve these target populations.

Out-of-School Youth

- Although there was mention of “youth” in the plan it wasn’t as robust as we had assumed due to the changes in funding requirements. It is imperative that youth with substantial barriers to success in school or work are prioritized and served. Without the right strategies for comprehensive and integrated supports for youth who are out of school, reintegrating them into the educational system and the workforce can be quite challenging. We hope that the plan and its implementation will provide a clear road map with expectations on how youth will be better served.

Collaboration & Integration

- Although collaboration in workforce development programs is often encouraged, we all know that true integration with other systems (education, family and homeless services, etc.) can be challenging. We are pleased that the State has included the Secure Jobs pilot – an initiative launched by the Melville Trust and 25 philanthropic partners statewide - within the state plan. One of the desired outcomes of Secure Jobs is to re- envision how service delivery agencies and workforce systems can work together effectively and efficiently to develop innovative approaches to improve the economic security of families exiting homelessness in Connecticut. This work is demanding, but crucial. We strongly encourage the State to include in its plan clear guidance on ways that regions can more fully realize integration between state and local workforce, social service and education agencies.

We hope that this feedback will provide for successful implementation of a plan that best captures its spirit and intent to promote collaboration among partners and income mobility for all citizens of Connecticut. We thank you again for your commitment and leadership to this work and respectfully ask for you to consider this feedback as this plan moves forward and is adopted.

Sincerely,

Janice Elliott
Executive Director