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Ms. Adele Gagliardi
Office of Policy Development and Research
U.S. Department of Labor
200 Constitution Avenue NW, Room N-5641
Washington, DC 20210

DOCKET NUMBER ETA-2015-0001 – RIN 1205-AB73

Dear Ms. Gagliardi:

On behalf of Opportunity Nation, I am writing to thank you for the opportunity to comment on the Department's Notice of Proposed Rulemaking (NPRM) for the Workforce Innovation and Opportunity Act of 2014 (WIOA).

Opportunity Nation is a bipartisan, national campaign comprised of more than 300 businesses, educational institutions, nonprofits and civic organizations working together to expand economic mobility and close the opportunity gap in America. We are committed to the notion that an individual's zip code need not determine his or her destiny and that targeted actions to provide greater opportunity for young Americans under WIOA will pay off in long-term economic success for communities and the nation. Opportunity Nation's comments focus on provisions related to industry or sector partnerships; career pathways; and youth services under RIN 1205-AB73.

Industry or Sector Partnerships – WIOA promotes the use of industry and sector partnerships that include key stakeholders in an industry cluster or sector that work with public entities to identify and address the workforce needs of multiple employers. Additionally, successful implementation of many of the approaches called for within WIOA, such as career pathways and sector strategies, require robust relationships across programs and with businesses, economic development, education and training institutions, including community colleges and career and technical education, local entities, and supportive services agencies.

Accordingly, Opportunity Nation supports the new definition of "Industry or Sector Partnerships" (and the requirement that implementation of industry or sector partnerships be part of both state and local activities) under WIOA that includes a workforce collaborative, convened by or acting in partnership with a state board or local board, that organizes key stakeholders in an industry cluster into a working group focused on the shared goals and human resources needs of the industry cluster. We believe this new definition better reflects the growing recognition of the value external partners can bring to programming to help ensure success.

To help improve the design and implementation of industry or sector partnerships, Opportunity Nation recommends that unified state plan requirements be amended to include a description of how the State board will carry out activities related to industry or sector partnerships.

Career Pathways – Opportunity Nation supports provisions under WIOA that encourage "multiple pathways" to secondary and postsecondary success, including through reentry and completion of secondary education; enrollment in postsecondary education and advanced training; and employment that leads to economic self-sufficiency.

Accordingly, Opportunity Nation is pleased that WIOA adds a new definition of career pathway that includes a combination of rigorous and high-quality education, training and other services aligned with the skill needs of industries in the economy of the state or regional economy involved and prepares an individual to be successful in a full range of secondary or postsecondary education options.

Opportunity Nation also supports provisions under WIOA that would require the state Workforce Development Board to assist the Governor in the development and continuous improvement of the state's workforce development system, including developing or expanding sector-based training and career pathways proven to support individuals seeking to enter or retain employment.

To help with the development and implementation of successful career pathways, Opportunity Nation recommends that unified state plan requirements be amended to include a description of how the state will carry out activities related to the development of career pathways.

Youth Services – Today, 5.6 million youth ages 16-24 are “disconnected” meaning they are neither in school nor working. Millions more are at risk for disconnection. We know that a child born into a family with low income in Canada and half a dozen European countries stands a better chance of improving his or her lot in life than a similar child born in the United States. The United States, which has been slipping on international tests, continues to lose its competitive edge globally as other nations aggressively strengthen their education systems, particularly in the so-called STEM fields: science, technology, engineering and math.

Therefore, Opportunity Nation is particularly pleased that under WIOA, local programs are required to provide services to youth participants that include tutoring; study skills training; and 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.

Today, the American Dream is out of reach for far too many. We believe that to address this crisis, it will take all of us: public, private and nonprofit sectors; Democrat and Republican; urban, suburban and rural residents; all working together to ensure our young people and future generations have an equal chance to succeed. Thank you for your consideration of our recommendations to RIN 1205-AB73. If you have any questions, or if I can provide any further information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Melanie Anderson".

Melanie Anderson