

**NATIONAL COALITION  
ON WOMEN, JOBS AND  
JOB TRAINING**



June 28, 2013

**VIA EMAIL**

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

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

The Honorable Patty Murray  
Member, 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 Alexander, Senator Murray and Ranking Member Isakson:

As leaders of two coalitions concerned about education and workforce development for women and girls – the National Coalition on Women, Jobs and Job Training (NCWJJT) and the National Coalition for Women, Girls in Education – we commend you for drafting legislation to reauthorize the Workforce Investment Act (WIA) and write to offer our comments regarding key issues that we hope you will consider. For decades, these coalitions, representing scores of organizations, have advocated for policies to serve women and girls equitably in such programs as WIA, the Carl D. Perkins Career and Technical Education Act and TANF all to ensure they can achieve economic self-sufficiency for themselves and their families.

Overall, we believe that the current discussion draft of legislation to reauthorize WIA makes positive strides to better align the nation’s job training and education programs and to support the needs of local businesses by increasing the skill sets of individuals to grow the economy. For women entering the workforce, we specifically appreciate the inclusion of provisions addressing economic self-sufficiency, training for nontraditional occupations, and services for those with barriers to employment; prioritizing training services for low-income individuals and those with barriers to employment; eliminating any perception of a “sequence of services;” and permitting WIA funds to be used for needs-based payments and support services for job training. While we

believe the discussion draft strengthens the nation's largest job training program, we also believe that the following changes would considerably improve its performance for women.

**First, the definition of “individuals with barriers to employment” should be expanded to include individuals preparing for nontraditional occupations.** Both men and women can improve their lifetime earnings and self-sufficiency by pursuing employment in nontraditional careers. This is defined in WIA as occupations in which 25 percent or less of the current workforce is of one gender. While nursing is a nontraditional occupation that can offer men a pathway to economic self-sufficiency, there is a wide range of occupations in blue collar and technical fields such as construction, transportation, manufacturing, and information technology which can offer women a greater opportunity to earn self-sufficiency wages than many traditional occupations for women. Women, for example, are **fewer than 3 percent of workers in the building trades** and 11 percent of computer, ATM and office machine repairers. The one-stop system appears to maintain this disparity. In Program Year 2011, one in twenty women, but almost one in two men received WIA-funded training in “installation, repair, production, transportation and materials moving” and less than one percent of women received training in “farming, fishing, forestry, construction and extraction.” In the same year, the earnings of female exiters were less than 75 percent of the earnings of male WIA service exiters, suggesting that the workforce investment system performs less well for women than for men.<sup>i</sup>

Real barriers exist for any women interested in a nontraditional career.<sup>ii</sup> Due to their socialization, women are often unaware of the potential, including the earnings potential, that nontraditional occupations can offer them. Young women may also lack the math, science and technical skills and familiarity with tools that their male counterparts have gained from their early socialization and K-12 education. In addition, women need extra assistance in gaining entry into apprenticeships and on-the-job training positions in order to enter male-dominated careers.

As we have seen, workforce boards, one-stop staff and counselors do not seem to address these barriers unless they are directed to do so. There are a number of ways that the legislation could increase opportunities for nontraditional careers, but we believe that expanding the definition of “barriers to employment” would be an important step given the emphasis the discussion draft gives to serving these populations. Expanding the definition to include individuals preparing for nontraditional occupations also would align WIA with the Carl D. Perkins Career and Technical Education Act where nontraditional job-seekers are included as a “special population.”

**Second, the legislation should require that all performance data reporting be fully disaggregated and cross-tabulated by gender, race/ethnicity and age in addition to the subpopulations that comprise “individuals with barriers to employment.”** Although these demographic categories are specified, as under current law, in the general section on record keeping and reports, Title II, Sec. 285(d)((1)(A)), p. 375, it is important to include them specifically in relation to reporting performance measures. These measures are a central mechanism for holding funding recipients accountable for the effective use of WIA dollars. In a recent survey of local workforce boards about services for women, 35 percent of responding workforce boards reported that they did not analyze demographic data for program participants, and 58 percent did not analyze data on whether women are placed in nontraditional occupations or did not know if they analyzed this data.<sup>iii</sup> At the same time, a majority of respondents agreed that better data on who receives services and on other outcomes would help local boards

set policy for the workforce development team. By including language requiring that performance data be disaggregated by gender, race/ethnicity and age in addition to the subpopulations including individuals preparing for nontraditional careers, the legislation would enable workforce boards to set more effective evidence-based policy.

Currently, performance reports do not disaggregate performance data by gender, race/ethnicity or age. Rarely do they report on placement into nontraditional employment. Washington state is an exception, reporting in program year 2006, for example, that 10.2 percent of adults and dislocated workers were placed into nontraditional jobs. Even when reported in this way, however, it is impossible to know how many of these placements were men and how many were women. While we know from MIS data contained in the annual WIASRD Data Book that women are a majority of WIA participants, we do not know from state or local reports how they fare with respect to employment retention, earnings and credentials, nor do these reports indicate performance measures for sub-groups such as women of color or older women. Such data are already collected as part of WIA reporting requirements; adding an explicit mandate to address these in performance reports would not add burden or create additional costs, but has the potential of significantly improving the performance of the workforce development system for women.

The Pew Research Center report indicates that mothers are the sole or primary source of income for 40% of all households with children under the age of 18, highlighting the need to ensure access to training and education that leads to higher-wage employment opportunities for women. One of the key ways to achieve this goal is to hold the workforce development system accountable for upgrading women's skills and for preparing them for employment in high demand occupations that can lead to self-sufficiency for themselves and their families.

**Third, we are gratified to see that the discussion draft includes a possible study on participants entering nontraditional occupations. However, we feel strongly that the report from the Departments of Labor and Education should be required.** Such a study does not replace the need for annual data on local and state progress in serving women generally and those seeking training in nontraditional occupations. Rather, such a study could serve as important evidence for states and localities as they develop strategic plans to serve those seeking services to move into a nontraditional occupation.

We and other members of NCWJIT and NCWGE look forward to working with you on these and related issues as you move toward the long-awaited reauthorization of the Workforce Investment Act. Please feel free to contact any of us for additional information.

Sincerely,



Lisa Maatz  
Vice President of Government Relations  
American Association of University Women (AAUW)



Elizabeth Grayer  
President  
Legal Momentum



Fatima Goss Graves  
Vice President for Education & Employment  
National Women's Law Center



Wendy Pollack  
Director, Women's Law & Policy Project  
Sargent Shriver National Center on Poverty Law



Shawn McMahon  
Acting President & CEO  
Wider Opportunities for Women

In order of priority, here is a full description of each item highlighted in our comment letter including specific legislative references and proposed legislative language if applicable:

1. Include in the definition of “individuals with a barrier to employment” in Title I, Section 101(24), p. 22, Line 21, a new “(M),” “individuals preparing for nontraditional careers.”
2. Remove language that limits the delivery of career counseling for nontraditional occupations as a core local service in Title II, Sec. 234(c)(2)(D)(i) p. 126, line 7, after “job search and placement assistance and” strike “in appropriate cases.”
3. Change “may” to “shall” after “...training of staff, which” in Title II, Sec. 234(a)(2)(B)(i)(III) p. 111, line 24 so that statewide capacity building for staff of one-stop centers and local trainings programs state on identifying opportunities for individuals with barriers to employment for in-demand sectors and nontraditional occupations is a required activity rather than optional.
4. Include “and the relevant demographic characteristics including race, ethnicity, sex, and age.”, after “disaggregated by each subpopulation” in Title I, Section 131(d)(2)(B), p. 149, line 20; 131(d)(3)(B), p. 151, line 3; 131(d)(4)(B), p. 152, line 17 to disaggregate data in state, local and provider performance report by race, ethnicity, sex and age in addition to the subpopulations that comprise individuals with barriers.
5. Change “may” to “shall” after “with the Secretary of Education” in Title II, Section 270(c)(2)(D), p. 248, line 15 so that the proposed study on participants entering nontraditional occupations is required.

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<sup>i</sup> Workforce Investment System Reinforces Occupational Gender Segregation and the Gender Wage Gap, Institute for Women’s Policy Research, IWPR #Q012 (June 2013) available at <http://www.iwpr.org/publications/pubs/workforce-investment-system-reinforces-occupational-gender-segregation-and-the-gender-wage-gap/>.

<sup>ii</sup> Ariane Hegewisch and Helen Luryi, “The Workforce Investment Act and Women’s Progress: Does WIA Funded Training Reinforce Sex Segregation in the Labor Market and the Gender Wage Gap?” Institute for Women’s Policy Research, January 2010.

<sup>iii</sup> WIA Reauthorization: What Local Workforce Boards Day about Services for Women, A Survey conducted by the National Association of Workforce Boards and Wider Opportunities for Women (2003).