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ABSTRACT

The Coalition on Women and Job Training has developed a women's job training agenda that focuses on nine issues related to women's full participation in training and achievement of economic self-sufficiency. The issues highlighted in the agenda are as follows: (1) the need to make long-term economic self-sufficiency the goal of all employment and training policies; (2) the importance of developing training programs to provide individuals with a mix of basic and advance academic skills, competencies in all aspects of industry, and a range of prevocational services; (3) the need for support services such as dependent care and transportation; (4) the importance of comprehensive and uniform evaluation of both student and program performance; (5) the need to ensure that women and other disadvantaged groups receive a fair share of the benefits of job creation efforts; (6) the potential pitfalls of instituting mandated employer contributions for worker training without ensuring gender and racial equality in allocation of the revenues raised; (7) the key role of apprenticeships in job training initiatives; (8) the essential nature of comprehensive welfare-to-work programs; and (9) the dangers of detrimental consolidation of agencies and services in the name of increased coordination. (MN)

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Women's Job Training Agenda

December, 1992

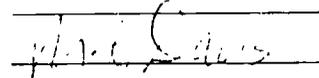
Coalition on Women and Job Training
c/o Women Work! The National Network for Women's Employment
(formerly The National Displaced Homemakers Network)
1625 K Street NW, Suite 300
Washington, DC 20006
Phone 202/467-6346
Fax 202/467-5366

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Women Work! The National Network for Women's Employment
(formerly The National Displaced Homemakers Network)
Women's Legal Defense Fund
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INTRODUCTION

The Coalition on Women and Job Training is pleased that job training and job creation are at the forefront of the nation's economic policy agenda. With the promise of a new infusion of public investment in training and job creation, we must invest in women. A government effort to grow the economy can only be successful if we spend equitably and effectively on women's economic development.

One of the critical flaws in past job training programs has been the failure to recognize the fact that women experience different barriers to employment than do men, and therefore have different job training needs. The result of such "gender-blind" employment and training policies and programs has been that services essential for women's full participation in training and achievement of economic self-sufficiency have been under-emphasized or left out altogether.

Several job training proposals that have been put forward recently by respected employment and training policy analysts have not mentioned women at all. These proposals neglect to address these crucial issues affecting more than half the population needing employment and training services or only focus on the small percentage of women receiving public assistance.

Adding to the problem is the fact that job training policies of the past have gone only half-way toward solving the problem of poverty -- shifting people off welfare without lifting them up to economic self-sufficiency. Any credible job training proposals must have as their goal long-term economic self-sufficiency for all participants.

It is equally important to realize that not all women in need of job training services are welfare recipients. The nation's employment and training system must also address the needs of women who are among the working poor, single women, married women, displaced homemakers, women who are dislocated workers, and older women who can't afford to leave the workforce. Our country's employment and training policies must address the needs of the full range of women needing training to enter or upgrade their positions in the workforce in order to attain economic self-sufficiency. The policies must also reflect the important contributions that community-based organizations have played in assisting women achieve their employment and training goals.

The cornerstone of efforts to assure the success of employment and training programs for women and people of color is the strict enforcement of all legal requirements that 1) prohibit discrimination in employment and education and 2) promote affirmative action. This requires sufficient funding and staffing for the Equal Employment Opportunity Commission, the Office of Federal Contract Compliance (Department of Labor), and the Office of Civil Rights (Department of Education).

In an increasingly competitive global marketplace, we cannot afford to waste the talents of a single person. The task now is to craft employment and training policies that will ensure that all Americans will have access to training and jobs that will allow them to participate fully in the nation's economy.

We urge the adoption of the following guiding principles for the development of the nation's employment and training policy. Policies founded on these principles will ensure that women have equal access, opportunity and benefit from the programs developed.

Principles for Equity in Employment and Training Policy and Practice

- ▶ Recognize women's unique employment and training needs.
- ▶ Enforce legal requirements prohibiting discrimination and promoting affirmative action.
- ▶ Establish long-term economic self-sufficiency as the program goal for every participant.
- ▶ Ensure women's access, regardless of age or personal circumstances, to all training programs.
- ▶ Provide the full extent of support services needed.
- ▶ Ensure that women have an equitable role as decision makers in design, administration, implementation and monitoring at all levels of the system.

Using these principles as a guide, and drawing on the many years of our organizations' direct experience in designing and implementing effective women's employment and training services and programs, we have developed the **Women's Job Training Agenda**. This Agenda is intended to provide solid information on the kinds of employment-related policies that lead to women's long-term economic self-sufficiency.

A SELF-SUFFICIENCY STANDARD

THE ISSUE

Long-term economic self-sufficiency should be the goal of all employment and training programs and policies. Presently, this outcome is seldom achieved, and is difficult to identify when it does occur.

Performance standards presently used by job training programs are particularly inadequate for women, because they are narrowly focused on a few outcomes -- percentage of trainees who obtain employment, wages at placement, and job retention rates. They do not examine competency attainment or gains. Nor do they provide a means to judge the quality of jobs obtained through a training or education program. By using only these measures, the different needs of women and their families are not recognized, and misleading conclusions can be drawn. For example, a job that pays \$5.00 per hour and does not have health insurance benefits may be adequate for a single person living with his/her family, but for a woman with dependents, both the income and the lack of benefits make it inadequate to her needs.

THE SOLUTIONS

- ✓ **Performance standards should be based on a broader *self-sufficiency standard*, which would judge the quality of a job by taking into account the economic needs of the trainee and family members supported by the trainee, as well as local variations in the cost of living.**

A self-sufficiency standard would incorporate the following elements:

- It would be set at a level at which a recipient would be not only better off than if he/she was receiving public assistance, but one at which she/he had resources sufficient to meet the family's basic needs, for food, shelter, health care, child care, etc., without public subsidies.
- It would incorporate both monetary and non-monetary resources; e.g., health insurance as well as wages.
- It would vary by family size and composition (number of children, number of adults).

- It would vary by local living costs, especially housing.
- Since self-sufficiency requires long-term employment, it would incorporate a measure of the employment obtained subsequent to training; obtaining a job that meets the other criteria, but only lasts one month, would thus not meet the standard. It would also measure not just retention in the first job, but the total amount of employment, over as long a period as is practicable -- at least six months, preferably a year -- in order to pick up those who may lose the first job, but then obtain a second job, perhaps at higher wages.

✓ **A self-sufficiency standard would acknowledge that just as job markets differ from one locality to another, achieving self-sufficiency varies from community to community.** Thus each community -- or in JTPA terminology, each SDA -- would develop its own set of self-sufficiency standards.

There are two possible approaches that could be taken.

- First, the National Academy of Sciences, or another organization, could be commissioned to develop a process or formula to be used in each community to develop its self-sufficiency standards.
- Or secondly, the basics of such a system could be outlined in legislation.

Either way, it would start with the **poverty threshold**; the poverty threshold provides a very bare minimum for the necessities, such as food and clothes, but it has become increasingly out-of-date, particularly in regards to some kinds of costs (for example, housing and child care), and does not incorporate geographical variations at all. By adding these underestimated or excluded costs not adequately recognized in the compilation of the poverty threshold, and varying it by geographic area and family composition, we will have a relevant standard against which we can truly measure whether a program has helped a parent and her family become economically self-sufficient. There would be several common elements to the **poverty threshold**:

- **Housing costs would be incorporated by adding in the difference between 30% of the poverty threshold and the local area's average rent (using the HUD Fair Market Rent for the appropriate size unit).** (The figure of 30% was chosen because that is the maximum used by public housing authorities as the proportion a person should pay for housing). Depending upon the area custom -- whether utilities are included with the rent or not -- utilities cost should be added as well. For example, let us assume that the poverty threshold for a family of 3 is \$12,000; 30% of that is \$3600, or \$300 per month for housing. If the HUD Fair Market Rent for a 2-bedroom apartment in that area is \$400, then we would add \$1200 (\$400 HUD FMR - \$300 poverty threshold allowance = \$100/month x 12 months = \$1200) to the poverty threshold of \$12,000, raising it to \$13,200.

- **Child care costs should be added in their entirety to the poverty threshold, because the poverty threshold does not include child care costs at all.** Local surveys may be used, or the rate established under the Family Support Act (which is mandated to reflect a rate which accesses 75% of the local market). Likewise, a similar figure for adult dependent care costs should be developed and included where appropriate; i.e., where a family has an adult dependent.
- **Health care costs are also not included at all in the calculation of the poverty threshold.** Average costs to employees, e.g., their share of premium costs, should be included, for full family health care coverage. This figure should average those who have to buy insurance on the individual market with those who have employment-related coverage to arrive at an average cost.
- **Transportation costs are also not included in the poverty threshold, and thus must be included in their entirety.** Costs for the area would take into account the adequacy of public transportation, or the need for using private transportation (cabs or car repair for trainee's own car).
- **Other costs should be incorporated as needed.** For example, uniforms in certain occupations or tools not provided by employers (e.g., auto mechanics usually own their own tools) may be a minor or major barrier to self-sufficiency because of their cost.

PROGRAM CONTENT

THE ISSUE

In order to meet any but the most short-term needs of women, education and training programs must provide individuals with basic and advanced academic skills, competencies in all aspects of the industry they are preparing to enter, and a range of pre-vocational services. The Carl D. Perkins Vocational and Applied Technology Education Act Amendments of 1990 recognizes this and mandates that vocational education programs receiving funds under the Act focus on these criteria. These provisions of the Perkins Act should be reinforced and included as the keystones of all other vocational or workforce preparation programs. Women such as displaced homemakers and single parents should have access to specialized services meeting their particular needs.

Non-traditional occupations are an important link in breaking the cycle of gender-based occupational segregation. Yet few women are aware of the non-traditional occupation opportunities that exist. In fact, the small proportion of women in non-traditional occupations -- about nine percent -- has remained virtually unchanged in two decades. A much stronger, focus on non-traditional occupations for women is needed across all programs.

Because of problems of accessibility and negative past experiences, many women such as women of color, displaced homemakers and older women are more likely to seek services from community-based organizations (CBOs) than campus-based programs. Therefore, CBOs must be an integral part of every service delivery strategy.

THE SOLUTIONS

- ✓ **In order to provide women with real, long-term employment opportunities, programs should integrate employment/vocational training and academic education to provide participants with strong development and use of problem-solving skills and basic and advanced academic skills.**

Many women enter the education and training system with deficiencies in basic and academic skills. In order to ensure the success of these women in education and job training, it is critical that both basic and advanced academic skills instruction (math, science, reading, writing, social studies) be an integral part of the services offered within the employment and training system.

As technology rapidly changes in the workplace, the required skills of an employee have become more extensive. Rather than being isolated experts in narrowly defined fields, successful workers must become team participants. They must be capable of understanding many different types of information and must be able to use that information to solve problems and make decisions with co-workers.

Integration is a powerful tool to help individuals gain advanced academic competencies by showing them how academic ideas work in the real world and why they are important. In secondary education in particular, it is vital to ensuring that vocational education does not serve as a second-class track within schools, and thus within society. When vocational students come out of programs with basic and advanced academic skills, they can choose from a much wider array of education and work opportunities.

✓ **All programs serving women should provide experience in and understanding of all aspects of the industry.**

Programs, including apprenticeships, should ensure that all women are provided with strong understanding of and experience in all aspects of the industry they are preparing to enter, including: planning, management, finance, technical and production skills, underlying principles of technology, labor issues, community issues and health, safety and environmental issues. Providing women with strong understanding of and experience in all aspects of the industry they are preparing to enter is essential to:

- **Empowering women to make career and life choices.** If programs provide only the skills for one job, they force women to choose what occupation they will have for the rest of their lives. Such programs leave them unprepared to change their career goals or to cope with labor market changes. Teaching all aspects of an industry gives women transferable skills, such as planning and management, which expand their later opportunities.
- **Enabling women to adapt to technological change.** Asking programs to predict how technology will change and to constantly revamp equipment is no longer reasonable -- if it ever was. Providing women and all students with broad skills in all aspects of an industry, together with academic skills, enables them to understand and adapt to changes when they leave school and throughout their careers.
- **Involving women in economic development.** If programs prepare women only to fill the current job openings in low-income communities, they are left dependent upon too few jobs, which demand too few skills and provide too little income for a decent life. In contrast, those who understand and have experience with planning, management, community issues, etc., can survive, thrive, and help others in their communities.

- **Preparing women to succeed in high-performance work places.** High-performance work places are ones where each worker has responsibility for a range of tasks, shares decision-making, and uses information from a host of areas to solve problems and initiate improvements. Teaching "all aspects of the industry" is the best way to provide those skills. It cuts across barriers between management and front line workers and ensures that everyone has the skills to make decisions and adapt to changes.
- ✓ **The job training system should provide women with the full range of pre-vocational services needed to ensure successful training and job retention.**

Experts in women's employment and training policies and programs have found that women are most successful when they receive comprehensive services, not short-term skills training only. These services include, but are not limited to: career counseling and education, job readiness, support groups and individual counseling, referral to community and emergency services, support services and life skills development (parenting, financial management, goal-setting, self-esteem/assertiveness training) and information about and referrals to community services.

- ✓ **All programs serving women should be required to offer information and exposure to non-traditional occupations and training.**

Unless there are aggressive policies and practices to move women, whether they are teen mothers, welfare recipients or displaced homemakers, into higher-wage, non-traditional jobs, the occupational segregation that does not allow women to adequately provide for themselves and their families will continue. Most programs targeted to women are still training them for female-dominated, low-wage jobs.

An important legislative measure to begin addressing this problem has recently passed. The *Nontraditional Employment for Women (NEW) Act* requires the JTPA system at the state and local levels to set goals and report on the number of women receiving nontraditional training. This law needs close, aggressive monitoring and evaluation by the federal government if it is to change the system.

- ✓ **Women should have access to specialized services that address their unique barriers.**

The *Displaced Homemakers Self-Sufficiency Assistance Act (DHSSAA)* is a much needed program to assist mid-life and older women to move into the work force and become economically independent. The DHSSAA builds on the strengths of the current system and would assure that displaced homemakers in every state have access to the specialized support,

career counseling, education and training that they need to become economically self-sufficient. Despite passing Congress unanimously and being signed into law more than two years ago, no funds have been appropriated for this program. This program should receive full funding (\$35 million) for FY 1994.

SUPPORT SERVICES

THE ISSUE

Support services, especially dependent care and transportation are vital for most women to succeed in the job training system. A recent glaring example of the importance of including these services can be found in the McKinney Homeless Assistance Act. The McKinney Act provided for job training for homeless individuals, but failed to include child care services. As a result, almost no women have been able to acquire needed training.

Support services must be provided both during program participation and during a transition period after placement into a job. These services must also be made available to all women in the job training system, not just welfare recipients.

THE SOLUTIONS

✓ Dependent Care

Addressing the dependent care needs (both child and adult) of low-income families requires consideration of the needs of the responsible family member as well as the needs of the dependent family member. High-quality care must be available to ensure that low-income families are not subjected to a separate and inadequate system.

- Fully subsidized dependent care must be provided for program participants in every federal job training program.
- Subsidized dependent care must be provided for all workers' families whose total income does not meet the self-sufficiency standard except in two-parent families if one parent chooses to remain at home to care for their family.
- The responsible family member must be allowed maximum flexibility, in accordance with adequate standards that will ensure quality and safety, to select the care that meets their needs and those of their dependent family members.
- Dependent care for job training program participants be paid for at locally determined market rates to ensure that low-income families have access to quality care (see Self-Sufficiency Standard, p. 5).

- Each state should be required to establish information and referral systems to help families acquaint themselves with the available dependent care services and subsidies.

✓ **Transportation**

Adequate transportation is an integral component of a support services package which will enable low-income women to take advantage of job training opportunities. These women often live in areas where public transportation is either very expensive or non-existent.

- Communities administering job training programs should have the flexibility to combine existing transportation services and develop new services as needed through the use of public, non-profit and private sources.
- All employment and training programs should reimburse participants for transportation costs that are necessitated by dependent care.
- Programs should be allowed flexible payments, reimbursement or advances, depending on the transportation needs of the programs' participants.

✓ **Other Necessary Services**

Many women face particular challenges due to economic disadvantage, educational disadvantage, disability or limited English proficiency. All employment and training programs should provide participants with the full range of services needed to succeed. Participation criteria that screen out those with significant support service needs should be prohibited. Otherwise, those women most in need of training will be excluded.

PERFORMANCE AND EVALUATION

THE ISSUE

The goal of all government-sponsored employment and training programs should be to assist the participant to achieve long-term economic self-sufficiency. Achievement of that goal depends on the efforts of both the service provider and the participant. The primary role of public policy should be to facilitate the success of both parties' efforts. One way that government can do this is to establish a process of measuring the progress and ultimate success of the programs and their participants. A key component of effective program and participant measurements is a comprehensive and uniform data collection system.

THE SOLUTIONS

✓ **Measuring Participant Progress and Competencies**

Measurements used to assess the participant's progress and competency should be designed to provide information to both participant and service provider. These can be used to tailor the services being provided to yield maximum benefit for the participant. These measurements are also a critical component of evaluating a program's performance. Under no circumstances should measurements of participant progress be used to penalize the participant.

- **Assessment instruments must be free of biases that create barriers for women, people of color, individuals with disabilities, low-income individuals, individuals with limited English proficiency, and older workers.**

As a nation, our record of using fair, valid, and appropriate assessments is dismal. We have relied heavily on standardized multiple-choice tests that contain both race and sex biases.

The only way to effectively develop bias-free assessment instruments is to develop them with the full and ongoing participation of representatives of women and other disadvantaged people. It is critical that these representatives be involved from the outset. The federal government should take a leadership role in developing bias-free assessment instruments as well as stimulating the development of such instruments by

the private sector.

- **Competency assessments that measure participant progress must be comprehensive, encompassing basic and advanced academic skills in reading, writing, math, science and social studies, and experience in and understanding of all aspects of the industry participants are preparing to enter.**

Only in this way can the standards encompass the broad and advanced skills needed by individuals to work in high-performance workplaces, to adapt to technological and industrial change, and to pursue a range of opportunities within and across industries.

- **Individual competency standards should only be used to evaluate current employees when results will be used solely to determine the need for training, which the employer will provide (or provide for) during work hours and without financial or other penalty to the worker.**

Too often, competency tests and standards have been used to jeopardize workers' jobs and earnings, even when they were successfully performing their jobs. Workers with low scores on literacy audits have been replaced by new hires, placed in positions with no advancement potential, and/or been denied wage increases. Importing externally-developed standards to the workplace particularly hurts women and low-income individuals who are successfully performing their jobs but may have had less formal training.

✓ **Measuring Program Performance**

When a self-sufficiency standard is in place, the program performance standards must reflect the emphasis on the quality of the job placement and not narrowly focus on a few outcomes. The standards must also ensure that women are receiving the full complement of services needed to achieve long-term economic self-sufficiency, regardless of their pre-placement status as a welfare recipient, displaced homemaker, full- or part-time worker.

- **Formulas allowing variations in performance standards should be designed to promote employment and training strategies that result in economic self-sufficiency for populations that face the greatest barriers to self-sufficiency.**

Current JTPA formula adjustments allow programs to set lower achievement goals for serving those with multiple barriers. As a result, programs fail to provide the range of services these individuals need to obtain jobs with high wages.

Standards should not be lowered when the proportion of "hard-to-place" individuals is greater than the average across all jurisdictions. Standards should instead reward those

who perform better with all women as well as men of color. Specifically, rewards should recognize not only just reaching the self-sufficiency standard, but for exceeding self-sufficiency goals for women and minorities. For example, an entity which serves a higher than average proportion of women and obtains for the female trainees unusually well-paying jobs thus exceeding the self-sufficiency goals by a substantial amount should be rewarded with more incentive money than an entity that just barely meets its self-sufficiency goals, even if it serves a disproportionately high number of women and/or minority men.

- **Performance standards must ensure that all women receive the support services they need to succeed in programs.** (See section on Support Services.)
- **Performance standards should include participant competency standards.** (See preceding section.)

✓ **Employer Standards**

- **All internships, work experience or job placements should fully utilize and continue to develop women trainees' skills. This requires work places in which jobs use a range of competencies, authority is decentralized and on-going education and training is emphasized.**

Such workplace standards are essential to making work-experience components useful. The main purposes of work experience components are 1) to give women the opportunity to use the skills they are learning and 2) to help women understand why those skills are important. These goals are not accomplished if women are taught about all aspects of the industry but then go to a work site that is organized according to a mass production model, where jobs are broken into numerous rote tasks. Work at that site would not enable women to apply their knowledge and skills on the job, nor would it help them to see how those skills are important to their futures.

✓ **Data Collection**

Data collection and reporting should be viewed as an important management tool to assess performance, to set and refine program goals and objectives, to monitor equitable treatment of all eligible populations and to monitor and enforce all OFCCP requirements. Data reports should be readily available to service providers, and data collection and reporting requirements should not be overly burdensome. Without comprehensive and standardized data collection, it is impossible to fully evaluate and measure whether the job training system is adequately meeting women's needs.

- **A uniform data collection system should be developed for use in every federal job training program, regardless of the administering agency.**

It is common for programs serving women to use funds from more than one federal program to provide their participants with the services they need; e.g., child care from JOBS, training from JTPA, life skills development from Perkins. These different systems do not provide states or the federal government with a mechanism for fully evaluating the effectiveness of the various job training programs or the effectiveness of coordination efforts. In addition, service providers are burdened with using separate and often disparate data collection instruments and reporting requirements for each funding source.

- **All data should be collected and reported at all levels (local, state and national) by relevant age, sex and race variables.**

It is especially vital that services provided, type and focus of job training, and outcomes are reported in this manner. The current data collection system does not provide answers to basic questions about job training programs' ability to meet the needs of different groups of women: women over age 40, Hispanic women, displaced homemakers, welfare recipients, underemployed women, etc. that have received training for non-traditional careers. Policy and program adjustments cannot be effectively made without information at this level of detail.

- **Data should be reported by local service providers by individual participant, not just in aggregate.**

When data is reported in the aggregate by local service providers, neither the local program, states nor the federal government have a way of determining what specific set of services lead to a successful outcome for various participant profiles or determining whether the lack of providing specific services lead to program incompleteness. This information is especially important for serving women who are juggling family responsibilities with program participation.

- **It should be required that data from employment and training programs be made available to agencies responsible for enforcing equal opportunity requirements.**

Program performance, retention and evaluation data should be broken down by sex, race, ethnicity and age of participants. All data collection efforts should be coordinated with the EEOC and the OFCCP so that categories are comparable and employment and training data can be used in the compliance process on a regular basis.

JOB CREATION

THE ISSUE

Many strategies will be needed to create new, high-wage jobs for U.S. workers. Promotion of emerging technologies, development of the nation's infrastructure, conversion of defense industries to civilian technology, microenterprise development and the creation of a national service corps are all promising options. However, it must be cautioned that it is not a given that all Americans will benefit equally from such job creation efforts. Clear and specific policies must be put in place that will ensure that women and other disadvantaged groups receive their share of the prosperity promised by new jobs that pay enough to support a family.

THE SOLUTIONS

- ✓ **Special recruitment, training and support efforts must be made to move women into non-traditional, high-wage jobs.**

Most high-wage jobs, including many of those that would be created through expanded investment in infrastructure and emerging technologies, are traditionally held by men. Policies must be put in place to ensure that women have equal access to training for these jobs, and that they receive the additional support needed to help them succeed in a non-traditional environment. Specific commitments should be made to hire substantial numbers of women and other disadvantaged groups for these jobs.

- ✓ **High-wage job options should not be limited to those occupations traditionally dominated by men.**

Traditional assumptions about priorities for public expenditures for job creation must be reexamined. For example, rebuilding the nation's infrastructure should not be limited to construction of roads and bridges, but should also include building and maintaining an infrastructure of child care, after-school care, eldercare, education and health care. In creating jobs in these sectors, care should be taken to redefine the nature and value of the work involved. We cannot afford policies that promote a double standard that says children are our nation's most important resource and are worthy of substantial investment (such as Head Start and other highly effective programs), while asserting that the individuals who provide those

services merit minimal wages, no benefits and part-time employment structures that minimize job quality and fail to attract and keep skilled workers.

- ✓ **Federal statutory goals for awarding prime and sub-contracts should be expanded to include women-owned businesses.**

Presently, women-owned businesses are not included in most statutory contracting goals governing federal agencies. "Good faith" efforts by federal agencies have resulted in minimal contract awards to women-owned businesses. Given that by the end of 1992 women-owned businesses will employ more people than the Fortune 500 companies, this is not only unfair, it makes poor economic sense as well.

Evidence shows that statutory requirements have a significant impact on the amount of federal contracting dollars directed toward women-owned businesses. Under the Department of Transportation's Disadvantaged Business Program's "good faith" efforts, 2.7% of contracting dollars went to women-owned businesses. When women were included in *statutory* requirements governing the Department, the amount of contracting dollars going to women-owned businesses doubled to 5.4%. Statutory contracting goals for contracting with women-owned businesses should be established for *all* federal agencies.

- ✓ **Micro-enterprise development for women should be promoted.**

Federal funds must be devoted to supporting existing programs that assist women to develop small or micro-enterprises. Funds should also be devoted to the replication of these successful models throughout the country. There must be coordination between small business development and job training, vocational education and welfare programs. This means, at minimum, that these programs introduce the concept of entrepreneurship as an employment option, and facilitate exploration of that option for interested participants. To further facilitate the success of low-income women as entrepreneurs, statutory barriers to self-employment for public assistance recipients and JTPA participants must be eliminated. In addition, discriminatory practices in lending must be eliminated.

- ✓ **Jobs created through a national service corps program should provide significant training and lead to permanent, unsubsidized employment in a job that will yield economic self-sufficiency. Women and other disadvantaged groups of all ages must have equal access to the jobs that are created.**

Policies governing allocation of funds must provide for enforcement of equal access requirements. It should be required that affirmative steps be taken to train and place women in non-traditional jobs. Quality, affordable dependent care which would make employment feasible for those with family responsibilities should be provided.

Service corps participation should be open to adults of all ages. Many women, such as displaced homemakers, enter the labor market for the first time well after their high school years are past. Service corps jobs represent an ideal opportunity for these women to gain needed training and work experience.

Wherever possible, subsidized job creation efforts should reach beyond work and wages to create model work environments. On-site dependent care, transportation and other services should be part of the effort to create jobs that will yield economic self-sufficiency for the workers.

The creation of service corps jobs must not displace existing workers or undermine union contracts. Contractual job rights, such as seniority and rights of laid off workers should not be adversely affected by the hiring of subsidized workers.

- ✓ **New jobs should be designed to reflect the characteristics of high-performance work organizations.**

The work should utilize a range of skills and should provide workers with the authority to use their judgment and make decisions. Jobs should be created in a manner that facilitates interaction and communication among workers and that is integrated with continuing education and training programs. Jobs should be structured to give employees the opportunity to improve and advance. This is especially important for women who are more likely to hold low-wage jobs with little opportunity for advancement.

MANDATED EMPLOYER CONTRIBUTIONS FOR WORKER TRAINING

THE ISSUE

Sufficient federal funding for employment and training programs will not be possible without a major re-structuring of federal budget priorities. The approximately 6.9 billion combined dollars for funding of JTPA, Perkins, JOBS and Older Americans Act currently available only reaches a small fraction of the population eligible and in need of these services. Even with an immediate, massive infusion of new dollars into the federal employment and training system, other methods of generating funds for worker training must be established.

One of the proposals put forth for supplementing federal training dollars is mandated employer contributions requiring business and industry to invest in retraining the American workforce. Employers would be assessed a percentage of the total wages paid in a calendar year.

If such a pool of training dollars is created, it must include a number of provisions to ensure gender and racial equity in the administration and implementation at the state and local levels. The track record of employers and the current training system indicates that without specific equity provisions, the occupational and training segregation that has resulted in high poverty rates for women and people of color will only be perpetuated by an employer-paid training trust fund.

THE SOLUTIONS

- ✓ **All employers should be required to contribute to the fund, regardless of other expenditures for worker training.**

Waivers for contributing should be allowed where there is a contractually agreed upon training fund, and otherwise in only the most exceptional of cases. Employers should not be able to piece together isolated training circumstances to show that they are already spending the required percentage of payroll for worker training. Moreover, training expenses should be defined narrowly enough to exclude executive "perks" (such as resort-style retreats and entertainment) that often constitute the bulk of executive training expenditures.

- ✓ **Reimbursement for the workers' dependent care and transportation costs associated with participating in training not during regular work hours and off-site must be a required use of funds.**

Most women workers with dependent children or adult relatives already spend a disproportionate amount of their wages towards day care. "After-hours" care is almost non-existent in most communities and workers must seek assistance from other family members, neighbors and friends for isolated situations. Dependent care will be a significant barrier to many women participating in on-going or short-term employer-sponsored training that is not conducted during the regular work day. Without some reimbursement for these expenses, the training programs will be dominated by men who are not responsible for making dependent care arrangements. Likewise, low-wage workers in general will find it difficult to pay for transportation costs to attend training that does not take place at the work site and thus will be less likely to participate in employer-sponsored training programs. These costs must be reimbursed as well.

- ✓ **State and local-appointed bodies to administer the trust fund must be required to reflect the gender, racial, ethnic and service diversity of the state.**

It is essential that the administering body of the state include full representation of women, people of color and community-based organizations. An important cause of the failure of the current job training system to adequately serve women and people of color is the lack of decision-making responsibility accessible to them in many states and communities. In addition, many women and people of color are more likely to seek services from community-based organizations than from traditional education and training institutions. Because of their important role in the employment and training system, community-based organizations must be represented among those administering the trust fund. *Community-based organizations must also be among those eligible to apply for grants from the trust fund.*

- ✓ **Each state must establish and monitor statewide standards for achieving gender and racial equity in trust fund-supported services.**

Without statewide standards for achieving and maintaining gender and racial equity, there is the danger that those who have traditionally benefitted from employer and labor sponsored training and apprenticeship programs will also be the primary benefactors of newly created programs. This historical exclusion of women and people of color has contributed to their disproportionate numbers among low wage workers and the working poor.

- ✓ **Each application for funding must include a plan for assuring gender and racial equity among those receiving services.**

Potential grant recipients must detail how the services funded will be distributed equitably along gender and racial lines among the existing workforce or newly recruited trainees. Proposals for continued funding must detail the grantees effectiveness in achieving gender and racial diversity in the training program.

- ✓ **Each application for funding must include a plan for assessing and meeting the supportive services (dependent care, transportation) needs of workers participating in training.**

Without such an assurance, the number of women and low-wage workers able to participate in after-hours training will be severely decreased.

- ✓ **Priority consideration should be given to applications that propose training and education of women workers for nontraditional jobs within the business or industry.**

Every government-funded or government-initiated program must promote and expand training women to move from low-wage, gender-segregated jobs to those that pay higher wages and are currently dominated by male workers.

- ✓ **Priority consideration should be given applications that propose training for unskilled and low-wage workers.**

Unskilled and low-wage workers, the majority of whom are women and people of color, have the least resources to seek and pay for their own training and retraining. Strict guidelines that disallow the use of the majority of these funds for training of managers is critical. Employers should not be permitted to take advantage of training-related tax incentives for employee business education expenses, unless training is distributed equitably among top and bottom earning tiers of employees.

APPRENTICESHIP

THE ISSUE

Apprenticeships ought to be an important vehicle for matching women and girls with the training needed for skilled employment. Many apprenticeships lead those being trained to high-wage, skilled occupations with built-in career ladders designed to increase pay and responsibility as skills increase. Yet, the current apprenticeship system serves only a fraction of the women and girls who would be interested in these training opportunities. Moreover, apprenticeships exist in a very small number of the career areas in which workers might profit from apprenticeship training. While there are 800 apprenticeable trades recognized by the Department of Labor, apprenticeships are concentrated in only 20 trade areas, in fields largely dominated by male workers.

In 1990, women held only 7.1% of the nation's registered apprenticeships, although the Bureau of Apprenticeship and Training (BAT) has had goals to increase the participation of women in apprenticeships since the late 1970s. Moreover, while BAT made documentable progress between the mid-1970s and 1983 on improving the number of women in apprenticeships, very little progress has been made since that time. Participation rates fall far short of the Department's goal of having women fill at least 23% of apprenticeships. Moreover, almost two-thirds of women in apprenticeships (63%) are concentrated in the occupations with the lowest earnings among apprenticeable trades. In two occupations, cosmetology and computer operation, women are the majority of apprentices.

Youth-oriented apprenticeship initiatives must assure that young women are targeted equitably. In apprenticeship programs where there are adult entrants, women must be recruited and admitted.

THE SOLUTIONS

- ✓ **Strategies to increase women's participation in apprenticeship programs should be institutionalized by the Department of Labor.**

The Secretary of Labor should target at least 5% of appropriated BAT funds over the next five years to develop a full-scale outreach and technical assistance effort-- with joint planning by BAT and the Women's Bureau of the Department of Labor-- to assist registered apprenticeship programs with less than a 10% participation rate of women. Each program --

and the BAT itself -- should set yearly goals for improving the participation of women in those apprenticeship programs and should report yearly on their actual progress in meeting these goals. Regional staff should be authorized and trained to develop corrective action plans -- accompanied by technical assistance -- should registered programs not meet their goals. Materials should be developed for the apprenticeship system on overcoming the barriers to recruiting, retaining, and successfully supporting women and girls in these programs. Clear guidelines for federal certification should be developed so that no new apprenticeship programs are certified until they have demonstrated good faith effort to recruit and sustain women in their programs.

- ✓ **The Department of Labor should recognize and strengthen the link between the enforcement of its affirmative action goals and the preparation of trained workers through the apprenticeship system. Coordinating the approaches of the Office of Federal Contract Compliance (OFCCP) and BAT through work on major contract sites would create jobs for women and stimulate BAT recruitment efforts.**

The Office of Federal Contract Compliance and the Bureau of Apprenticeship and Training should work vigorously together to enforce the goals for women set by registered apprenticeship programs, including actively monitoring major federal projects, developing and monitoring corrective action plans, providing technical assistance to solve the problems, and - if a good faith effort is not demonstrated -- decertifying apprenticeship programs and barring contractors.

A staff role -- mirroring the role of the Sex Equity Coordinator in Vocational Education -- should be developed to work with both OFCCP and BAT to strengthen the links, actively develop and provide technical assistance, review compliance on major federal projects, and to work on the development of effective plans. This role could be in place in the federal Department of Labor and at the Regional offices to assist in achieving a stronger participation of women in each of the programs.

- ✓ **More resources should be devoted to expand the scope and reach of apprenticeships to include more adults and to develop apprenticeship programs for occupational areas such as health, environment, and computer technologies, where growth is expected in the job market and where systematic skills development and career ladders can be put in place.**

The Office of Work Based Learning which is focusing much of its effort on the school to work transition and apprenticeship development for young people should be given resources to work more deliberately on apprenticeship opportunities for adults, including older workers. The Office should develop a special program to explore new technologies and high-demand career areas -- both traditional and non-traditional for women.

✓ **Support services must be provided to women in apprenticeship programs.**

BAT should establish a support services fund and information and referral system for dependent care and other support services for apprenticeship programs. The program should be established to support registered apprenticeship programs as an aid to the recruitment and retention of women in the programs. A portion of this fund should be targeted to pilot innovative dependent care arrangements for those workers whose trades operate using other than business hour shifts or include frequent changes of work site.

✓ **The Department of Labor must insist that its registered apprenticeship programs create environments which are not hostile to women workers.**

Apprenticeship sponsors should be required to put in place systematic policies to address sexual harassment and to annually organize training programs for instructors, on-the-job supervisors, and co-workers on preventing and addressing sexual harassment in the workplace and in apprenticeship training.

✓ **Fund the Women in Apprenticeships and Non-traditional Occupations Act.**

The *Women in Apprenticeship and Non-traditional Occupations Act*, most recently passed by Congress, but yet to be funded, provides technical assistance to employers and unions to assist them in successfully receiving women in apprenticeships and non-traditional jobs in the workplace. This program should receive full funding (\$1 million) for FY1994.

WELFARE-TO-WORK

THE ISSUE

Comprehensive welfare-to-work programs are an essential component of job training policy. However, these programs only serve a very small percentage of the women who need job training and therefore should not be the focus of services targeted to women.

The goal that should underlie all education and training programs for welfare recipients under the current welfare system (primarily Aid to Families with Dependent Children, or AFDC) is assisting recipients to achieve long term economic self-sufficiency rather than removing them from public assistance. Only comprehensive services based on the principles of this document can achieve this goal.

A critical part of any job training initiative for welfare recipients must be a careful review of the existing programs, primarily the Job Opportunities and Basic Skills (JOBS) program of the *Family Support Act (FSA) of 1988*. There are a number of elements of the FSA that are commendable and should be emphasized in any modifications to FSA or any other welfare-to-work programs.

THE SOLUTIONS

✓ **JOBS should be adequately funded.**

The positive goals in the JOBS program have not had a chance to be fully realized in large part because the program has been grossly under-funded. Without adequate funding welfare recipients cannot receive the full range of basic and academic skills, pre-vocational services, career and personal counseling and support services (including transition support services), needed to achieve long term economic self-sufficiency.

✓ **Welfare-to-work programs should support and encourage higher education and training for skilled jobs.**

The emphasis in welfare-to-work policies should be on education and training, rather than on job search, workfare, or other approaches that will not necessarily lead to good jobs. This is reflected in some provisions of the *Family Support Act*. Too often higher education is

overlooked as an option for low-income women, even though many have fulfilled the prerequisites for entering two or four-year programs. Too many training programs are gearing women towards low-paying and often traditionally female jobs. Training programs must be geared towards getting women into skilled jobs that offer living wages and benefits and that offer opportunity for advancement. Programs should also be geared towards helping the hard-to-employ, such as those with few skills and little work experience.

- ✓ **Current higher education laws mandating the disregard of student financial aid when determining need for other federal public assistance programs should be strictly monitored and implemented.**

Low-income individuals who are attending school and have received federal student financial aid should not be penalized by having other public assistance benefits reduced or eliminated. The 1992 Higher Education Act Amendments clarify and strengthen the *Disregard of Student Aid in Other Federal Programs* provision, which states that federal student financial aid should not be taken into account when determining the need or eligibility of any person for benefits or assistance, or the amount of such benefits or assistance, under any Federal, State, or local program financed in whole or in part with Federal funds. This law has not been consistently enforced. Despite the fact that this law has been in effect since the 1986 Higher Education Act Amendments, many state and local social service agencies will reduce AFDC, food stamps benefits, or housing subsidies when a client receives a Pell Grant. The individual often is then forced to discontinue her education in order to provide food or shelter for her family. To prevent these reductions from continuing, this law must be explicitly implemented at the federal, state, and local levels, and throughout all public assistance programs.

- ✓ **Under the current AFDC system, benefits must not be cut any further.**

The average AFDC benefit level has fallen 42% in real terms in the last twenty years. The maximum benefit in the median state is now less than 40% of the federal poverty line. Additional cuts will only hurt low-income families with children, already suffering from the current recession, even more, and will make it more difficult for recipients to participate in education and training programs. At the federal level, AFDC benefits should be indexed for inflation, so that welfare recipients do not fall even further below the poverty line over time. Additionally, a national minimum benefit level should be set at the federal level to reduce the great inequities between state-by-state benefit levels.

- **Arbitrary time limits on the receipt of welfare are unacceptable.**

Individuals generally are on public assistance because they are unable to find adequate employment, lack access to needed services or training, or have other personal or family

problems that keep them out of the job market. Simply forcing people off the welfare rolls after two years without addressing any of these underlying problems will not move families out of poverty; instead, it may move families into the streets. Any time limits on AFDC must be linked to education, training, services and guaranteed jobs if necessary.

✓ **Punitive approaches to welfare reform are unacceptable.**

Using monetary incentives that are meant to induce behavioral changes that are not related to employment prospects is not acceptable. Many welfare reform proposals contain provisions that cut benefits to welfare recipients who do not engage in "proper" behaviors. These are based on myths and incorrect assumptions about welfare recipients and indicate a serious lack of understanding of the limited options available to women living in poverty. These proposals, such as Learnfare, migration restrictions, family cap provisions, sterilization incentives, and others, do nothing to help women out of poverty and should be strongly opposed as a component of any training program. At the federal level, waivers for state proposals should be allowed only if no individual recipient would be worse off as a result. State initiatives to encourage economic self-sufficiency through added services, benefits and training should be encouraged.

✓ **Welfare programs are not human laboratories.**

Welfare programs were established to provide income support and assistance to low-income women and children. They should not be used to conduct experiments on people's behavioral response to deprivation. Many of the recent behavioral welfare proposals are based on the idea that different incentives may affect recipients' behavior and we should try them out, even if there is no evidence that these experiments will work. Experiments on human subjects without voluntary, informed consent; without a control group or appropriate experimental design; and without viable underlying hypotheses are forbidden by all ethical standards of social science. They should not be allowed in our welfare system either, especially when the consequences to low-income women and children could be devastating. There is no need to experiment on welfare recipients, what works in getting people out of poverty: adequate education, training and other related services, child care and health insurance, and high-wage job opportunities.

COORDINATION VS. CONSOLIDATION

THE ISSUE

Increased coordination among the many diverse federal employment and training programs is desirable. The primary purpose of all coordination efforts should be to make it as easy as possible for participants to gain access to the full range of services for which they are eligible. In developing coordination strategies, special care must be taken to avoid *consolidating* and thus reducing the effectiveness of programs and services that address special or unique needs of women or other disadvantaged groups.

Opportunities for coordination occur at three points in the employment and training system, beginning with governance and moving through planning and service delivery. The 1992 JTPA reform amendments attempted to address coordination at all three points by giving states the option of establishing Human Resource Investment Councils (HRICs) to replace their State Job Training Coordinating Councils (SJTCCs) and encouraging the involvement of more federally funded programs in local planning and service delivery. Several states have already begun moving toward establishing HRICs. It is already apparent that some coordination strategies can be detrimental to women's access to and success in these programs.

THE SOLUTIONS

- ✓ **Women must have an equitable role as decision makers in design, administration, implementation and monitoring at all levels of the system.**

SJTCCs, HRICs, Private Industry Councils (PICs) and their staffs, and service delivery agencies must have equitable numbers of women in decision-making roles so that women's unique employment and training needs will be recognized and addressed. Included among these women should be both experts in women's employment and training issues, and actual recipients of the services. Systems serving primarily women, such as child care and domestic violence shelters must also be represented, for purposes of both coordinating services and educating the other administrators about the importance of these issues and services for female participants. In addition, EEOC and OFCCP representatives should be mandated members of these decision-making bodies.

If a HRIC is in place, in which administrative representatives from many federally

funded programs are members of one large council making policy for all the affected programs, representation of women and other disadvantaged groups is especially important. Administrators who are specifically charged with improving access for one or more populations, such as the Sex Equity Coordinators under the Perkins Act, must have a pivotal role on any HRIC.

In addition, it is important that there be active representation and participation by all essential service delivery systems working with low-income populations, including housing, food stamps, AFDC, general assistance, and medicaid.

- ✓ **Whenever one federal program has developed an initiative that increases access and quality of services for women or other disadvantaged groups, coordination plans should be required to promote the success of that initiative in every way possible.**

Whenever a single federal program has established special initiatives designed to improve services or access for women or other disadvantaged groups, the coordination plan should endeavor to expand the special initiative to all programs involved in the coordination plan. At minimum, the coordination plan must allow the initiative to continue within the program in which it began.

Examples of such initiatives include the *Nontraditional Employment for Women Act* (NEW) which requires the JTPA system to train and place women in nontraditional jobs. This requirement has the potential to greatly increase women's access to higher-wage jobs. Another example is the Perkins Vocational and Applied Technology Education Act's requirement that a percentage of the basic state grant be devoted to serving displaced homemakers, single parents and single pregnant women.

In some states, initial attempts at coordination have centered on identifying the lowest common denominator -- the requirements common to all programs -- and then providing waivers for all other program requirements, resulting in the elimination of crucial special services for women. Such an approach is counterproductive and should be prohibited.

- ✓ **Efforts aimed at coordinating education and employment and training services for low-income women should include *all* government services available to that population, including AFDC, housing, food stamps, general assistance, etc.**

Some of the greatest barriers to successful participation in education and training for low-income women lie in the instability of their day-to-day lives. A woman whose housing is inadequate or insecure, who fears losing medical assistance for her children, or who can't feed her family on the assistance she receives will be unable to participate in training until those fundamental issues are addressed. Navigating the maze of public assistance programs

and services can be far more difficult than understanding the employment and training system. Therefore, it is essential that all these systems be part of a coordinated approach to helping poor women achieve economic self-sufficiency.

It is important to note that the complexity of these systems makes them difficult for case managers to navigate as well. Moreover, employment counseling requires specialized knowledge that welfare case workers do not have, and vice versa. Therefore, a coordination plan should make use of case management teams, composed of a welfare case manager and an education/training case manager who can together assist women to gain access to the full range of services needed to achieve economic self-sufficiency.

✓ **Efforts at coordination should not result in "source of last resort" policies.**

Lack of resources is a serious barrier to coordination. Too often, local coordination plans reflect each administrative entity's desire to protect its resources, rather than coordinate with other administrative entities to create a resource package that will provide the greatest benefit to the client. A common example of this in current practice are local policies, held by each administrative entity, declaring that the entity's funds are to be used for a particular purpose (such as child care and transportation) only when all other sources of funds for that service have been exhausted. The result of this practice is that women are denied access to needed support services, and thus to education and training.

An important objective of coordination is to assure that a client has easy access to the full complement of services she needs in order to achieve economic self-sufficiency. It must be acknowledged by the administrative entities involved that this may result in fewer clients being served, because those who are served will be receiving services they would not have had access to under a less coordinated system. Unless this fact is acknowledged, administrative entities will continue to try to evade financial responsibility for providing services the client needs.