

March 3, 2017

RE: PUBLIC COMMENT FOR EAST BAY REGIONAL PLANNING UNIT PROGRAM YEAR 2017-2020

Dear East Bay Regional Planning Unit,

On behalf of the Greenlining Institute, we thank the East Bay Regional Planning Unit (EBRPU) for your leadership in developing the regional strategic draft plan for Program Year 2017-2020. The strategic plan draft lays out a comprehensive and innovative strategy to build an effective and more aligned workforce system.

The EBRPU strategic plan presents a unique opportunity to improve the delivery of workforce development programming, services, and implementation to meaningfully address training and employment challenges of our highest need communities.

Below are several recommendations, and we urge you to integrate them into your final strategic plan:

- **Specify the terminology describing “quality jobs with good wages and benefits”**
 - We urge EBRPU to specify what comprises good jobs specifically, wages and benefits. Specifically, EBRPU should ensure that East Bay residents benefit from jobs that provide living wage and comprehensive benefits, such as health and dental coverage. EBRPU should also outline how they will engage employers in adopting new and equitable hiring policies; examples include:
 - A description of how EBRPU will prioritize working with employers who offer quality jobs with good wages and benefits
 - Encouraging employers to adopt hiring policies that build a diverse workforce. Furthermore, EBRPU should specify how it will serve WIOA target populations -- such as boys and men of color, women, and disconnected youth -- who are disproportionately affected by discrimination and unemployment.
- **Guarantee comprehensive support services (i.e., trauma-informed care, transportation stipends, etc.) that promote successful participation of individuals facing barriers to employment**
 - EBRPU should support the successes of the most vulnerable populations including, but not limited to, formerly incarcerated individuals, disconnected youth, immigrants, foster care youth, young people who have cycled through the justice system, and limited English proficient individuals. Support services should also be trauma-informed, such that they ensure healing, mentorship, life-coaching, and other vital services. These types of services are critical to

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low income individuals' ability to participate, complete workforce training programs, and secure and retain employment.

- **Align high demand sector job growth with efforts to reduce employment disparities among disadvantaged populations**
 - Health care and the growing environmental sectors are some of the top five industries in the East Bay. Data suggests that communities of color suffer from much higher rates of unemployment, which reinforces the need to reduce the disproportionate impacts on communities of color. Furthermore, this presents a unique opportunity to outreach to our most vulnerable communities, such as out-of-school youth, and integrate them into workforce development programming such as career pathways. By integrating out-of-school youth into job trainings and into high demand sectors, such as health care, health and racial disparities will decrease and contribute to a stronger East Bay economy.
 - By 2020, the health sector in California is projected to create 450,000 new jobs
 - One third of these jobs provide an annual salary of at least \$35,000
- **Track, disaggregate, and share all outcome data in a publicly accessible form**
 - In accordance with provisions of WIOA pertaining “(d) information to be included in reports,” outcome data must be disaggregated to include important demographic markers such as race, ethnicity, gender, age, income and educational level. By doing so, we will have a clearer understanding of which groups are having specific challenges and needs.
 - The strategic plan should include an analysis of disaggregated data. The analysis report, along with the outcome, data should be publicly accessible for everyone to view, analyze, and understand. If the analysis has yet to happen, we urge that the East Bay regional plan includes the methodology of how EBRPU will gather disaggregated data, and its proposed data analysis.
 - For Asian American, Native Hawaiian, and Pacific Islanders (AANHPI), the disaggregated groups should be reflective of the growing diversity of California’s AANHPI population: accounting for each major Asian group including but not limited to Chinese, Japanese, Filipino, Korean, Vietnamese, Asian Indian, Laotian, Hmong, Bangladeshi, Indonesian, Malaysian, Pakistani, Sri Lankan, Taiwanese, Thai, and Cambodian; and each major Pacific Islander group, including but not limited to, Hawaiian, Guamanian, Fijian, Tongan, and Samoan.

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- **Include and specify supportive services for immigrant workers such as legal services and cultural competent care**
 - Immigrants are the backbone of California’s economy and make up 18 percent of youth from the ages of 16 to 24. It is also critical to provide legal services, cultural competent care, and dual language training into supportive services for immigrant workers.
 - **Realign funds from corrections to rehabilitation**
 - The strategic plan has identified the California Department of Rehabilitation as a partner. EBRPU must allocate WIOA funding to systems impacted individuals, such as the reentry population, and individuals on parole. By aligning priorities and funding resources from corrections to rehabilitation, EBRPU can play a leadership role in combating the stigma of hiring individuals with records and ensure that everyone has the opportunity to gain employment. In addition, expand the definition of reentry population to include individuals under state parole and require CBOs to be a part of reentry workforce development training programs.
 - **Expand partnerships with community-based organizations to provide workforce development and training.**
 - Youth services goals included partnerships between public, private, and community-based organizations. CBOs have direct, grassroots networks with the most vulnerable populations. Uplifting the work of CBOs will advance an equitable workforce development system and provide best practices for other organizations and employers when engaging with limited English individuals and the reentry populations. Furthermore, partnering with community based organizations that provide financial education and access to safe and affordable financial products will support workforce providers to bring financial management skills to their participants, in line with WIOA mandates'.

Adopting these recommendations will promote employment and economic mobility for the East Bay region. The recommendations add clarification and guidance in directing the East Bay Regional Planning Unit to best identify and address the workforce needs of high demand industries in our communities. This will expand entry to well-paying jobs and careers for low income communities and communities of color, ensuring that every East Bay resident has a fair chance to contribute and thrive, while maximizing economic outcomes for the county and state.

Thank you again for your commitment and leadership to advancing workforce and career opportunities for disadvantaged populations. We respectfully ask that you prioritize these important recommendations into your strategic plan.



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If you have any questions regarding this letter, please contact Daniel Cano, with The Greenlining Institute, at danielc@greenlining.org

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