

**AN EVALUATION OF THE PRIORITY OF SERVICE
PROVISION OF THE JOBS FOR VETERANS ACT BY THE
WORKFORCE INVESTMENT SYSTEM IN PROVIDING
SERVICES TO VETERANS AND OTHER COVERED PERSONS**

FINAL REPORT

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CHAPTER 1: INTRODUCTION

A. Project Background and Purpose

The purpose of this study was to provide the U.S. Department of Labor's (DOL) Employment and Training Administration (ETA) with an independent evaluation of the implementation of priority of service (POS) provision of the Jobs for Veterans Act (JVA). A key objective of this study was to determine whether “covered persons” (including “veterans” and “covered spouses”) are receiving priority of service as specified in the JVA and are being fully served by employment and training programs offered through the One-Stop Career Center system.¹ The evaluation is intended to provide a better understanding of how veterans (i.e., covered persons) are provided access to the full array of workforce services through One-Stop Career Centers. The project tasks and activities conducted under this study focused on assessing the extent to which POS requirements under JVA are being met, with a particular focus on implementation of POS at the state and local levels through the One-Stop Career Center system. Under JVA, DOL is required to "evaluate whether covered persons are receiving priority of service."²

¹ Veteran means a person who served in the active military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable, as specified in 38 U.S.C. 101(2). Active service includes full-time duty in the National Guard or a Reserve component, other than full-time duty for training purposes. Eligible Spouse as defined in section 2(a) of the JVA (38 U.S.C. 4215(a)) means the spouse of any of the following: (1) Any veteran who died of a service-connected disability; (2) Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days: (i) Missing in action; (ii) Captured in line of duty by a hostile force; or (iii) Forcibly detained or interned in line of duty by a foreign government or power; (3) Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs; (4) Any veteran who died while a disability, as indicated in paragraph (3) of this section, was in existence. See: U.S. Department of Labor, Veterans' Employment and Training Services (VETS), “Priority of Service for Covered Persons: Final Rule,” Federal Register, Vol.73, No. 245, December 19, 2008.

² In this report, term “veteran” and “covered persons” are sometime used interchangeably – often in discussions with states, local areas, and national associations the term “veteran” is broadly used to mean “covered persons.”

This evaluation effort was initiated in response to an action item ETA identified in response to the recommendations the Government Accountability Office (GAO) made in report number GAO-06-176³ to improve accountability and help states integrate veteran services in One-Stop Career Centers. The project tasks and activities conducted under this study focused on assessing the extent to which POS requirements under JVA are being met, with a particular focus on implementation of POS at the state and local levels through the One-Stop Career Center system. In addition, as part of this study, the project team assessed the feasibility and utility of conducting additional research based upon a potential large-scale telephone survey of veterans. It is important to note that key data collection activities conducted under this study, including analyses of Workforce Investment Act data, interviews with national workforce and veterans' organizations, and site visits to states were conducted prior to or just shortly after the Veterans' Employment and Training Services (VETS) issued the Final Rule on "Priority of Service for Covered Persons" in the *Federal Register*.⁴

In discussion with ETA staff early in this study, several critical observations were made that helped to frame the evaluation effort:

- ***Study to Focus on One-Stop Career Center Implementation of Priority of Service for Veterans.*** A primary motivation for this study was that there was a need to provide Congress with evidence of the attention that ETA, states, and local agencies have given to the implementation of POS. At the time the study was commissioned (in June 2007), there was insufficient data available on POS implementation, particularly relating to how states and local WIBs/One-Stop Career Centers had implemented POS at the "ground level." As a result, a critical focus of this study was on the extent to which veterans (i.e., covered persons) were served through the One-Stop Career Center delivery system and able to access the full range of One-Stop Career Center services in a seamless manner. For example, a concern was whether veterans were being funneled to DVOP/LVER staff

³ GAO, *Veterans' Employment and Training Services: Labor Actions Needed to Improve Accountability and Help States Implement Reforms to Veterans' Employment Services*, Report GAO-06-176, December 2005. Data collection for this study was conducted between January and November 2005, so study results and findings are somewhat dated.

⁴ U.S. Department of Labor, Veterans' Employment and Training Services (VETS), "Priority of Service for Covered Persons: Final Rule," *Federal Register*, Vol.73, No. 245, December 19, 2008.

when they first came to a One-Stop Career Center (or Employment Service Office) and missed out on receiving the full range of other services available at the One-Stop Career Center.

- ***Study to Focus Primarily on WIA, ES, and VETS Programs.*** In discussions at the start-up meeting, given project resources, there was consensus that Workforce Investment Act's (WIA) Adult and Dislocated Worker Programs, the Wagner-Peyser/Employment Service (ES), and Veterans Employment and Training Services (VETS) Programs should be the central programmatic focus of the study.
- ***Analysis of Characteristics of Veterans Served, Service Mix, and Outcomes Using WIA Data Should Be Conducted.*** It was agreed that to the extent possible, the study should include analyses of individual-level data collected under WIA (i.e., the Workforce Investment Act Standard Record Data, WIASRD) to assess patterns of service delivery and outcomes for veterans served within the local workforce investment system.

B. Key Study Questions and Data Collection Methods

The key questions provided as part of the original scope of work (issued by ETA for this study) and supplemented by questions elicited through discussions with ETA and VETS staff were the major questions addressed by this study. **Exhibit 1-1** provides a matrix that lists these key study questions along with the principal data sources used to address each of the study questions. Based on discussions with DOL staff and review of existing databases and literature, the following major types of data collection activities were conducted: (1) interviews with federal program officials responsible for administering the POS requirement and with national veteran workforce and veterans' organizations; (2) site visits to states and local workforce areas; (3) analysis of WIA Adult and Dislocated Worker Program participant-level data (collected through the WIASRD data system); and (4) collection of additional background information related to the feasibility of conducting a survey of veterans focusing on the implementation of POS requirements. The sections that follow briefly address each of the major data collection tasks that were conducted under this study.

EXHIBIT 1-1: KEY STUDY QUESTIONS AND PRINCIPAL DATA SOURCES TO ADDRESS EACH QUESTION

KEY STUDY QUESTIONS	INTERVIEWS WITH ETA AND NATIONAL WORKFORCE AND VETERANS' ASSOCIATIONS	SITE VISITS TO STATES AND LOCAL WORKFORCE AREAS	ANALYSIS OF PARTICIPANT DATA
What policies exist at the state and local levels to implement the priority of service provisions in JVA?	√	√	
How have the Department of Labor's two agencies with primary responsibility for employment assistance to veterans, VETS and ETA, collaborated to provide priority of service to veterans?	√		
Are State and Local Workforce Boards fully aware of the POS provision, and do they use their strategic plans and policy-making authority to implement it?	√	√	
Are veterans aware of the priority of service provision?		√	
Is the workforce investment system (particularly services provided through the One-Stop Career Center delivery system) giving priority of service to veterans?	√	√	√
What does priority of service mean when it comes to the provision of services through local WIBs and One-Stops?	√	√	√
Are all assets within the system being used? Are WIBs and One-Stop Career Centers going beyond simply referring veterans to VETS representatives?	√	√	√
Do One-Stop Career Centers have routine processes or special initiatives to outreach to veterans?		√	
Do states/local areas have targeted and well-coordinated strategies for serving veterans? What happens, for example, when WIA funding for training runs low – do veterans get priority for remaining available training funds?	√	√	
In local areas where there have been base closures, does the One-Stop Career Center system integrate its service delivery with the Transitional Assistance Program (TAP)?		√	
Are One-Stop Career Center staff provided training on how to apply the priority of service provision?		√	
How do One-Stop Career Center staff identify veteran customers and when is this done? Do One-Stop Career Centers have processes or special initiatives in place for the intake of veterans, and do they have processes to inform		√	

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KEY STUDY QUESTIONS	INTERVIEWS WITH ETA AND NATIONAL WORKFORCE AND VETERANS' ASSOCIATIONS	SITE VISITS TO STATES AND LOCAL WORKFORCE AREAS	ANALYSIS OF PARTICIPANT DATA
veterans of their right to POS?			
How do local areas engage businesses and what are practices with regard to "marketing" veterans to businesses for job openings?		√	
What role do Disabled Veteran Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) play in the One-Stop Career Center to ensure veterans receive priority of service for all One-Stop services? What tools would be valuable for One-Stop Career Center staff to support providing veterans priority of service?	√	√	
How do the employment outcomes for veterans compare to non-veterans? How do employment outcomes compare to results before POS was enacted?		√	√
Has the priority of service provision impacted the mix of services available to veterans? How do quantities and mixes of services provided to veterans compare to those provided to non-veterans? How do quantities and mixes of services provided to veterans compare to those provided to veterans prior to implementation of POS?		√	√
What challenges does the workforce investment system face in applying the priority of service provision?	√	√	√
Do One-Stop Career Center staff see clients who have received assistance through the Transition Assistance Program (TAP)?		√	

Interviews with Federal Officials and National Veterans/Workforce Organizations. As part of the start-up for this project, project staff met with representatives of ETA and VETS to gather background information about implementation of POS within DOL, as well as their input on key evaluation questions and types of data collection activities that should be undertaken for this study. In addition, project staff conducted telephone interviews with representatives from the following national organizations: the National Association of State Workforce Agencies (NASWA); National Association of Workforce Boards (NAWB); and several veterans' service organizations (including the Disabled American Veterans, Veterans of Foreign Wars (VFW) of the United States, the American Legion, and Vietnam Veterans of America). The discussions with national associations were aimed at gathering nationwide views from varying perspectives of the extent to which veterans have received POS in their dealings with the workforce investment system. Appendix A provides a copy of the discussion guide used during telephone interviews with representatives of veterans' organizations and national workforce investment organizations. These interviews were conducted in March through May 2008 (prior to issuance of the Final Rule for POS for covered persons in the *Federal Register*).

Site Visits to States and Local Areas. During this task, the project team gathered information and conducted interviews aimed at building an in-depth "on-the-ground" understanding of implementation of POS at the state and local levels. Based on discussions with ETA and review of background information – and particularly the desire to get as wide a representation of states and localities given the project's resources – the team visited seven states and one local workforce area within each state. The selection of seven states provided an opportunity to examine POS implementation across all regions of the country and in varying state models of delivery of services (e.g., where ES and WIA are co-located and are not co-

located within the One-Stop Career Center). Discussions during the start-up meetings with ETA and VETS officials provided guidance with regard to the criteria to be used in selecting states and local sites. Recognizing that visits to seven states (and seven local workforce areas) cannot possibly be “statistically representative” of how veterans are being served in 600-plus local workforce areas and over 1,700 One-Stop Career Centers across the country, to the extent possible, it was suggested that site selection should provide a good mix of states and local offices. While ETA indicated that the sample selection should be purposive, it should also strive to be as representative as possible on several key criteria and not be limited to (for example) exemplary states or local sites.

In selecting candidate states and local areas, the study team first selected seven states and then selected a local workforce investment area (LWIA) within each state. The two main criteria used to select states were: (1) the extent to which Wagner-Peyser/Employment Service offices were integrated into One-Stop Career Center operations, as indicated by the “Status of Stand-Alone Employment Service Offices in the U.S., as of April 1, 2007” according to a GAO survey of 50 states and the District of Columbia,⁵ and (2) percentage of population 18 years and over who were veterans (according to rankings by the U.S. Census Bureau for 2006, based on the American Community Survey).⁶ As directed by ETA, the study team then sought a mixture of geographic areas across the country (i.e., regional balance) and some larger and smaller states.

⁵ Government Accountability Office, *Workforce Investment Act: One-Stop System Infrastructure Continues to Evolve, but Labor Should Take Action to Require That All Employment Service Offices Are Part of the System*, GAO-07-1096, September 2007(see Figure 3 and Appendix 6).

⁶The source for the percentage of civilian population 18 years and over who are veterans is the U.S. Census, American Community Survey, 2006. Appendix C provides detailed rankings and percentages of veterans for all states and 528 metropolitan/micropolitan areas (sorted in descending order of the percentage veteran).

With regard to the first factor, the study team relied upon a four-part classification developed by GAO to categorize the extent to which states had stand-alone ES offices (see

Exhibit 1-2 for GAO's categorization of states):

- states without stand-alone ES offices (33 states); and
- states with all stand-alone ES offices (18 states), subcategorized as follows: (1) affiliated with the One-Stop Career Center System (9 states); (2) unaffiliated with the system (6 states); and (3) both affiliated and unaffiliated with the system (3 states).

With just seven states to be selected, the study team allocated four state slots to states without stand-alone ES offices (from the 33 states) and three state slots to states with stand-alone ES offices (and one for each of the three subcategories). Next, the study team examined the percentage of veterans in the adult civilian population in each state, ranking states and then placing them into three subcategories -- the top third, middle third, and bottom third (in terms of ranking). The aim was to produce a sample of sites that was somewhat more heavily inclusive of the top third, but also included several states that did not have a high concentration of veterans. The study team then considered several other factors – inclusion of at least one state from each of the four U.S. Census regions; variation in terms of large, mid-sized, and small states; and inclusion of states that had varying population densities.

As shown in **Exhibits 1-2 and 1-3**, the states nominated and visited under this study were the following: Alaska, California, Florida, Kansas, New Jersey, Ohio, and Virginia. These seven states provided a fairly diverse group with the following variation in state characteristics:

- **Extent to which ES has been incorporated into One-Stop Career Center system** (according to recent GAO study) – 4 states where ES has been fully integrated into the One-Stop Career Center system and 3 states where states (at the time) still had stand-alone ES offices (with representation of each of the three GAO subcategories of affiliation with the One-Stop Career Center System).

EXHIBIT 1-2: STATE SITE SELECTION CRITERIA

Selected States	State	ES Stand Alone-Code	Top/Med/Low In Veterans Ranking	Veteran Ranking	Census Region	Top/Med/Low Total State Population	Top/Med/Low in Population Density
	Arizona	X-3	Top Third	14	West	Top Third	Medium Third
	South Carolina	X-3	Medium Third	19	South	Medium Third	Medium Third
➤	Kansas	X-3	Medium Third	26	Midwest	Medium Third	Low Third
	Delaware	X-2	Top Third	17	South	Low Third	Top Third
	Arkansas	X-2	Medium Third	19	South	Medium Third	Low Third
	North Carolina	X-2	Medium Third	26	South	Top Third	Top Third
	Tennessee	X-2	Medium Third	33	South	Top Third	Medium Third
	Illinois	X-2	Low Third	46	Midwest	Top Third	Top Third
➤	California	X-2	Low Third	49	West	Top Third	Top Third
	Montana	X-1	Top Third	2	West	Low Third	Low Third
➤	Virginia	X-1	Top Third	5	South	Top Third	Top Third
	Oklahoma	X-1	Top Third	10	South	Medium Third	Low Third
	West Virginia	X-1	Top Third	10	South	Low Third	Medium Third
	Hawaii	X-1	Top Third	14	West	Low Third	Top Third
	New Mexico	X-1	Top Third	17	West	Low Third	Low Third
	Iowa	X-1	Medium Third	29	Midwest	Medium Third	Low Third
	Kentucky	X-1	Low Third	35	South	Medium Third	Medium Third
	Connecticut	X-1	Low Third	44	Northeast	Medium Third	Top Third
➤	Alaska	X	Top Third	1	West	Low Third	Low Third
	Wyoming	X	Top Third	3	West	Low Third	Low Third
	Maine	X	Top Third	4	Northeast	Low Third	Low Third
	Washington	X	Top Third	6	West	Top Third	Medium Third
	New Hampshire	X	Top Third	7	Northeast	Low Third	Medium Third
	Nevada	X	Top Third	8	West	Low Third	Low Third
	South Dakota	X	Top Third	9	Midwest	Low Third	Low Third
➤	Florida	X	Top Third	10	South	Top Third	Top Third
	Idaho	X	Top Third	10	West	Low Third	Low Third
	Oregon	X	Top Third	14	West	Medium Third	Low Third
	Missouri	X	Medium Third	21	Midwest	Medium Third	Medium Third
	Alabama	X	Medium Third	22	South	Medium Third	Medium Third
	North Dakota	X	Medium Third	22	Midwest	Low Third	Low Third
	Colorado	X	Medium Third	24	West	Medium Third	Low Third
	Nebraska	X	Medium Third	25	Midwest	Low Third	Low Third
	Vermont	X	Medium Third	28	Northeast	Low Third	Medium Third
	Maryland	X	Medium Third	29	South	Medium Third	Top Third
	Pennsylvania	X	Medium Third	29	Northeast	Top Third	Top Third
➤	Ohio	X	Medium Third	32	Midwest	Top Third	Top Third
	Indiana	X	Medium Third	34	Midwest	Top Third	Medium Third
	Georgia	X	Low Third	35	South	Top Third	Medium Third
	Wisconsin	X	Low Third	37	Midwest	Medium Third	Medium Third
	Minnesota	X	Low Third	38	Midwest	Medium Third	Medium Third
	Louisiana	X	Low Third	39	South	Medium Third	Medium Third
	Michigan	X	Low Third	40	Midwest	Top Third	Top Third
	Mississippi	X	Low Third	41	South	Medium Third	Medium Third
	Rhode Island	X	Low Third	41	Northeast	Low Third	Top Third
	Texas	X	Low Third	43	South	Top Third	Medium Third

EXHIBIT 1-2: STATE SITE SELECTION CRITERIA

Selected States	State	ES Stand Alone-Code	Top/Med/Low In Veterans Ranking	Veteran Ranking	Census Region	Top/Med/Low Total State Population	Top/Med/Low in Population Density
	Massachusetts	X	Low Third	45	Northeast	Top Third	Top Third
	Utah	X	Low Third	46	West	Medium Third	Low Third
	District of Columbia	X	Low Third	48	South	Low Third	Top Third
➤	New Jersey	X	Low Third	49	Northeast	Top Third	Top Third
	New York	X	Low Third	51	Northeast	Top Third	Top Third

Note: ES Office code (from GAO Survey) is as follows: X - States without Stand-Alone ES Offices; X- States with Stand-Alone ES offices, with the following subcategories: X-1 - Affiliated with One-Stop System; X-2 - Unaffiliated with One-Stop Career Center System; and X-3 - Both Unaffiliated and Affiliated with One-Stop Career Center System. Table is sorted in order by the following columns: first by “ES- Stand-Alone Code; then by Veterans’ Ranking (among states).

EXHIBIT 1-3: SEVEN CANDIDATE STATES SELECTED FOR SITE VISITS

State	ES Stand Alone-Code	Top/Med/Low In Veterans Ranking	Veteran Ranking	Census Region	Top/Med/Low Total State Population	Top/Med/Low in Population Density
Kansas	X-3	Medium Third	26	Midwest	Medium Third	Low Third
California	X-2	Low Third	49	West	Top Third	Top Third
Virginia	X-1	Top Third	5	South	Top Third	Top Third
Alaska	X	Top Third	1	West	Low Third	Low Third
Florida	X	Top Third	10	South	Top Third	Top Third
Ohio	X	Medium Third	32	Midwest	Top Third	Top Third
New Jersey	X	Low Third	49	Northeast	Top Third	Top Third

EXHIBIT 1-4: SEVEN CANDIDATE LOCAL AREAS SELECTED FOR SITE VISITS

State	Local Area Selected	Type of Local Area	Percent Veteran	Veteran Ranking
Kansas	Area II (Heartland Works – Junction City)	Rural	N/A	N/A
California	Golden Sierra Job Training Agency (Auburn)	Rural	N/A	N/A
Virginia	Virginia Beach-Norfolk-Newport News, VA-NC Metro Area	Urban	19.4%	11
Alaska	Anchorage, AK Metro Area	Urban	15.0%	66
Florida	Jacksonville, FL Metro Area	Urban	16.6%	42
Ohio	Toledo, OH Metro Area	Urban	10.5%	348
New Jersey	Newark-Union, NJ-PA Metro Division	Urban	7.0%	511

Note: For four urban areas, percentage of adult population that are veterans is shown, along with ranking out of 528 metropolitan/micropolitan areas, according to 2006 American Community Survey.

- **Concentration of Veterans within State** – three states (Virginia, Florida, and Alaska) were ranked in the top third in terms of the percentage of veterans in the adult population; two states (Kansas and Ohio) in the middle third, and 2 states (California and New Jersey) in the lower third.
- **Representation from 4 Census Regions:** 2 states were from the West (California and Alaska), 2 states are from the South (Florida and Virginia), 2 states are from the Midwest (Kansas and Ohio), and 1 state from the Northeast (New Jersey).
- **Representation of Large/Small States (in terms of state population):** 5 states were from the top third (California, Virginia, Florida, Ohio, and New Jersey); 1 state was from the middle third (Kansas); and one from the lower third (Alaska).
- **Population Density:** 5 states were from the top third (California, Virginia, Florida, Ohio, and New Jersey) and 2 states were from the lower third (Kansas and Alaska).

Once the states were selected, the study team then selected one LWIA within each state. Five of the seven slots were set aside for metropolitan areas and two slots for areas that were predominantly small town or rural in nature. In selecting the metropolitan areas, the team wanted to get a mixture of urban areas that had high and low concentrations of veterans (see **Exhibit 1-4** for seven local areas selected for visits). The study team used Census Bureau data (from the American Community Survey for 2006) to identify several metropolitan areas ranked among the highest in the nation in terms of percentage of veterans within the local population (Virginia-Virginia Beach; Alaska-Anchorage; Florida-Jacksonville). Researchers selected one metropolitan area that was in the middle of the rankings in terms of the percentage of veterans (Ohio-Toledo) and one ranked very low (New Jersey-Newark).

Once final approval was received from the ETA Project Officer on the states and local sites to be visited, the project team moved forward with scheduling each visit. The scheduling began with notification of each ETA regional office of the planned visit to a state within its region. The project staff then contacted the appropriate state-level personnel within each candidate state to provide background about the study, to begin identifying potential dates for the

one-day visit to the state, and to identify individuals that should be contacted at the local level to make arrangements for the visit to the selected locality. The project team used the discussion guides provided in Appendices B and C) during visits to the seven states and one local workforce areas within each state. Two researchers were sent for one-day visits to each of the seven states and one-day visits to each local workforce area. Site visits occurred between October 2008 and April 2009. Site visits at the state level included interviews with officials from the state workforce investment agency and VETS; at the local level, interviews were conducted with administrators and staff at one or more One-Stop Career Centers, and as appropriate, the local workforce investment board (LWIB) and employment service (ES) offices. Local visits included interviews with LVER and DVOP staff, as well as other One-Stop Career Center staff involved in serving veterans. Following each state and local site visit, the project team prepared summaries to highlight key site visit findings. Copies of these site visit summaries are attached in Appendix D.

Secure and Analyze Relevant DOL Aggregate and Participant-Level Data. Several of the questions posed under this study required analysis of readily available large-scale participant databases, for example: How do the employment outcomes for veterans compare to non-veterans? Has the priority of service provision impacted the mix of services available to veterans? The project team investigated several available databases, but determined that the best possible database to address these types of questions was the Workforce Investment Act Standard Record Data (WIASRD) database. As discussed in greater detail in Chapter 2, the team was able to conduct regression analyses, which examined the variation in services provided and outcomes for veterans versus non-veterans exiting from the Workforce Investment Act Adult and Dislocated Worker Programs.

Collect Other Background Information Relating to the Feasibility of a Survey of Veterans And Analyze Feasibility of Such a Survey. Finally, as part of this project, the study team assessed the feasibility of conducting a future survey of veterans that could be used to assess the extent to which ETA workforce programs are providing priority of service as required by the JVA. As part of this study task, the research team prepared a sampling plan, survey instrument, and OMB clearance package that could be used should ETA or Congress determine that in the near future that such a survey would be useful. This OMB package and survey instrument is attached in Appendix E.

C. Organization of the Report

The remainder of this report is organized into four chapters. Chapter 2 summarizes results of statistical analyses of the Workforce Investment Act Standard Record Data (WIASRD) aimed at examining the similarities and differences for veterans versus non-veterans in terms of WIA exiter characteristics, service mix, and outcomes. Chapter 3 summarizes results of telephone interviews with representatives of national veterans' organizations and workforce organizations, which focused on implementation of priority of service for veterans within the public workforce system. Chapter 4 reports on key findings from interviews conducted with state and local workforce agency administrators during site visits to seven states. These interviews examined policies and implementation of POS, as well as ways in which veteran services are structured and delivered through the One-Stop Career Center system. The final chapter in this report provides a summary of key study findings and some next possible steps for assessing POS implementation. In addition, this report includes several appendices, which provide more details about the site visits and other data collection and analysis activities conducted under this study.

CHAPTER 2:
**FINDINGS FROM AGGREGATE DATA ANALYSES OF WIA ADULT AND
DISLOCATED WORKER DATA**

A. Background

This section of the report summarizes results of statistical analyses of the Workforce Investment Act Standard Record Data (WIASRD). These analyses focus on similarities and differences for veterans versus non-veterans in terms of WIA exiter characteristics, service mix, and outcomes. The analysis relied on the WIASRD public use files for 2004, 2005, and 2006. Data was pooled and sampled from the overlapping public use files to use the most recent and accurate records. The final dataset was composed of WIASRD records of Adult and Dislocated Worker Program exiters during program years 2003, 2004, and 2005.⁷ The analyses include both descriptive statistics and regression analyses. The descriptive statistics compare the veteran and non-veteran participants in the Adult and Dislocated Worker Programs on a variety of factors, including background characteristics, patterns of service receipt, and employment outcomes. The regression analysis determines if there is a statistically significant relationship between being a veteran (holding selected other background characteristics constant) and receipt of assisted core, intensive, and training services under WIA. The analyses presented were conducted on data for program years in which POS was in effect, but prior to the issuance of the Final Rule for POS for covered persons in the *Federal Register*.

⁷ National Emergency Grant (NEG) exiters have been excluded from this analysis.

B. Descriptive Statistics

Exhibit 2-1 presents the background characteristics of Adult and Dislocated Worker Program participants who exited the WIA Program during program years 2003, 2004, and 2005.⁸ Veteran participants were found to be different from non-veterans on many of the variables. When compared to WIA non-veteran exiters, veteran exiters in both the Adult and Dislocated Worker Programs were *more likely to be*:

- male;
- in the two oldest age categories (45 to 54 years old and 55 years or older);
- white and non-Hispanic;
- have education beyond high school (though data were missing on education for about one-quarter of non-veterans and one-third of veterans);
- have a disability;
- not employed at registration; and
- an Unemployment Insurance (UI) claimant or exhaustee.

The differences observed between the veteran and non-veteran WIA Adult and Dislocated Worker Program exiters paralleled some of the same characteristic differences observed in veterans versus non-veterans in the overall U.S. labor force.

As shown in **Exhibit 2-2**, when compared to non-veterans in the U.S. labor force in 2005, veterans were generally *more likely to be*:

- male;
- in the oldest age category (55 years or older);
- white and non-Hispanic;
- have education beyond high school;
- have a disability; and
- not living below 185 percent of the poverty line.

⁸ A veteran was defined as any person who served in the active U.S. military, naval, or air service, regardless of length of service, and who was discharged or released from such service under conditions other than dishonorable. We also included other eligible individuals such as military spouses and widows as well as individuals forcibly detained or interned in the line of duty by a foreign government.

**EXHIBIT 2-1: BACKGROUND CHARACTERISTICS OF WIA ADULT AND
DISLOCATED WORKER EXITERS, PROGRAM YEARS 2003 – 2005**

BACKGROUND CHARACTERISTICS	WIA ADULT EXITERS (%)		WIA DISLOCATED WORKER EXITERS (%)	
	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN
Program Year				
2003	31.1	33.0	35.3	35.5
2004	33.9	32.3	33.2	33.1
2005	35.0	34.8	31.5	31.4
Gender				
Male	40.2	80.9	43.4	87.8
Female	59.8	19.0	56.6	12.2
Age at Participation				
21 or Less	12.7	4.6	2.7	1.2
22 to 29	29.2	16.2	15.1	9.0
30 to 44	37.6	37.7	42.8	34.2
45 to 54	15.0	27.4	28.7	31.8
55 or Older	5.5	14.1	10.8	23.8
Race/Ethnicity				
Hispanic	17.5	8.1	13.8	5.9
Black (non-Hispanic)	32.8	36.4	21.0	20.9
White (non-Hispanic)	41.6	50.9	57.5	69.2
Other (non-Hispanic)	6.6	3.9	6.2	3.1
Missing	1.5	0.7	1.5	0.9
Highest School Grade Completed				
Less Than H.S.	12.7	3.1	8.6	2.6
H.S. Graduate or GED	40.3	37.6	41.5	39.1
Education beyond H.S.	21.5	28.5	31.8	38.5
Missing	25.6	30.9	18.2	19.8
Disability				
Yes	4.7	23.0	2.8	13.3
No	95.3	77.0	97.2	86.7
Employed at Registration				
Yes	23.5	17.7	8.8	8.3
No	76.5	82.3	91.2	91.7
Limited English Proficiency				
Yes	4.1	0.5	4.6	0.5
No	73.4	70.0	79.7	81.5
Missing	22.6	29.5	15.7	18.1
Unemployment Compensation				
Claimant or Exhaustee	15.9	20.1	62.3	62.0
Neither	58.9	47.2	17.6	14.7
Missing	25.1	32.6	20.0	23.3
Low Income				
Yes	47.1	38.7	1.8	1.0
No	27.4	29.8	2.1	1.9
Missing	25.5	31.6	96.2	97.1
Total Sample (N)	664,627	47,673	441,006	46,637

Source: WIASRD Public Use Data files, Authors' Calculations

**EXHIBIT 2-2: BACKGROUND CHARACTERISTICS OF
U.S. LABOR FORCE IN 2005**

BACKGROUND CHARACTERISTICS	U.S. LABOR FORCE IN 2005 (%)	
	NON-VETERAN	VETERAN
Gender		
Male	49.4	90.2
Female	50.6	9.8
Age at Participation		
21 or Less	8.8	1.5
22 to 29	18.4	7.8
30 to 44	36.3	27.2
45 to 54	23.2	22.9
55 or Older	13.3	40.7
Race/Ethnicity		
Hispanic	14.3	5.8
Black (non-Hispanic)	11.1	11.8
White (non-Hispanic)	67.9	78.8
Other (non-Hispanic)	6.7	3.6
Highest School Grade Completed		
Less Than H.S.	13.4	5.2
H.S. Graduate or GED	28.5	29.1
Education beyond H.S.	57.0	64.6
Disability		
Yes	7.1	11.1
No	92.9	88.9
Employed or Serving in the Armed Forces		
Yes	93.1	94.9
No	6.9	5.2
Limited English Proficiency		
Yes	5.4	0.5
No	15.3	7.4
Missing	79.4	92.2
Living below 185 % Poverty Line		
Yes	20.6	11.3
No	79.4	88.7
Total Unweighted Sample (N)	1,251,483	165,466
Total Weighted Sample (N)	130,700,000	15,470,000

Source: American Community Survey 2005 Microdata, Authors' Calculations

As shown in **Exhibit 2-3**, when comparing the veteran WIA Adult and Dislocated Worker Program exiters to the overall veteran population in the labor force, we see general similarities in the two populations. However, those veterans served by the WIA Adult Program (in PY 2003-PY 2005), for example, were somewhat more likely (than U.S. veteran population as a whole) to be female, be in the two middle age categories (30 to 54 years of age), be black, and have a disability.

Analyses of WIASRD data indicate that (for PY 2003-05) WIA veterans and non-veteran exiters had generally similar patterns of service receipt, though WIA Adult veteran exiters exhibited slightly lower rates of service receipt in comparison to the non-veteran exiters (see **Exhibit 2-4**). For example, with regard to the WIA Adult Program, veterans were slightly less likely to receive intensive services (68.7 percent for veterans versus 74.5 percent of non-veterans), to receive training services (53.3 percent for veterans versus 56.5 percent of non-veterans); and to establish ITAs (22.1 percent for veterans versus 27.1 percent of non-veterans). With regard to the WIA Dislocated Worker Program, patterns of receipt of service for veterans and non-veterans were very similar (i.e. less than a two percentage point difference between veterans and non-veterans on receipt of intensive services, training, and ITAs). It is important to keep in mind that higher or lower levels of service receipt by veterans do not necessary indicate that veterans are or are not receiving priority of services under the WIA Program. For example, differential levels of service receipt may reflect that veterans come from a culture where they are less likely to accept additional services beyond the assisted core services. Veterans also may be less likely to require additional services because they have higher levels of education, are older, have more work-related experience, or are less likely to be living in a low-income family.

**EXHIBIT 2-3: COMPARING VETERAN BACKGROUND CHARACTERISTICS
BETWEEN WIA ADULT AND DISLOCATED WORKER PROGRAM EXITERS AND
VETERANS IN THE U.S. LABOR FORCE**

BACKGROUND CHARACTERISTICS	VETERANS EXITING WIA ADULT PROGRAM PY 2003-2005 (%)	VETERANS EXITING WIA DISLOCATED WORKER PROGRAM PY 2003-2005 (%)	VETERANS IN THE U.S. LABOR FORCE IN 2005 (%)
Gender			
Male	80.9	87.8	90.2
Female	19.0	12.2	9.8
Age at Participation			
21 or Less	4.6	1.2	1.5
22 to 29	16.2	9.0	7.8
30 to 44	37.7	34.2	27.2
45 to 54	27.4	31.8	22.9
55 or Older	14.1	23.8	40.7
Race/Ethnicity			
Hispanic	8.1	5.9	5.8
Black (non-Hispanic)	36.4	20.9	11.8
White (non-Hispanic)	50.9	69.2	78.8
Other (non-Hispanic)	3.9	3.1	3.6
Missing	0.7	0.9	0.0
Highest School Grade Completed			
Less Than H.S.	3.1	2.6	5.2
H.S. Graduate or GED	37.6	39.1	29.1
Education beyond H.S.	28.5	38.5	64.6
Missing	30.9	19.8	0.0
Disability			
Yes	23.0	13.3	11.1
No	77.0	86.7	88.9
Total Unweighted Sample (N)	47,673	46,637	165,466
Total Weighted Sample (N)	47,673	46,637	15,470,000

Source: American Community Survey 2005 Microdata (Authors' Calculations), WIASRD Public Use Data files (Authors' Calculations)

EXHIBIT 2-4: SERVICE RECEIPT AMONG WIA ADULT AND DISLOCATED WORKERS PARTICIPANTS, PROGRAM YEAR 2003 – 2005

TYPE OF SERVICE RECEIVED	WIA ADULT EXITERS (%)		WIA DISLOCATED WORKER EXITERS (%)	
	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN
Intensive Services				
Yes	74.5	68.7	82.8	80.9
No	25.5	31.3	17.3	19.1
Training Services				
Yes	46.7	43.5	52.1	52.6
No	53.3	56.5	47.9	47.4
Support Services				
Yes	18.7	19.3	19.0	17.8
No	81.3	80.8	81.0	82.2
Established ITA				
Yes	27.1	22.7	35.7	35.8
No	57.1	56.5	53.9	51.9
Missing	15.8	20.8	10.4	12.3
Pell Grant Recipient				
Yes	5.7	3.5	3.7	2.6
No	71.4	66.7	79.6	78.3
Missing	23.0	29.7	16.7	19.1
Total Sample (N)	664,627	47,673	441,006	46,637

Source: WIASRD Public Use Data files, Authors' Calculations

EXHIBIT 2-5: EMPLOYMENT OUTCOMES OF ADULT AND DISLOCATED WORKER PARTICIPANTS, PROGRAM YEARS 2003 – 2005

EMPLOYMENT OUTCOME	WIA ADULT EXITERS (%)		WIA DISLOCATED WORKER EXITERS (%)	
	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN
Employed in --				
3 rd Qtr Prior to Participation Qtr.	55.7	54.9	75.8	73.8
2 nd Qtr Prior to Participation Qtr.	55.3	55.1	73.4	71.6
1 st Qtr After Exit Qtr.	72.6	70.7	77.7	75.3
2 nd Qtr After Exit Qtr.	70.2	67.7	76.8	73.9
Average Earnings in --				
3 rd Qtr Prior to Participation Qtr.	\$2,463	\$2,998	\$6,012	\$7,294
2 nd Qtr Prior to Participation Qtr.	\$2,374	\$2,894	\$5,716	\$6,924
1 st Qtr After Exit Qtr.	\$3,619	\$3,925	\$4,905	\$5,432
2 nd Qtr After Exit Qtr.	\$3,666	\$3,920	\$5,046	\$5,517
Total Sample (N)	664,627	47,673	441,006	46,637

Source: WIASRD Public Use Data files, Authors' Calculations

Exhibit 2-5 provides analysis of employment outcomes for veterans and non-veterans exiting in PY 2003 through PY2005. As shown in the exhibit, veteran and non-veteran exiters exhibited very similar patterns in terms of pre- and post-employment rates (i.e., less than a three percentage point difference in employment rates between WIA veterans and non-veterans in both the WIA Adult and Dislocated Worker Programs). However, veterans earned substantially more before entering the program, as well as after exiting the WIA Adult and Dislocated Worker Programs. The higher average earnings before entry into WIA may reflect that veterans enrolling in WIA come to the program with more work-related experience and educational qualifications – and hence, perhaps also may have less need (or desire) for training services.

Exhibit 2-6 and **Exhibit 2-7** break out the background characteristics, service receipt, and outcomes of WIA Adult and Dislocated Worker Program participants (veterans versus non-veterans) by program year (i.e., for PY 2003, 2004, and 2005). There does not appear to be any clear time trend that can be observed in the data. Generally, the background characteristics, service receipt patterns and outcomes are similar over all of the years for both the WIA Adult and Dislocated Worker Programs.

C. Regression Analyses

Ordinary least squares regression analysis was used to determine relationships between the participant characteristics and service receipt. This approach permits analysis of the effect of specific characteristics, such as veteran status, while holding constant other characteristics, such as age and gender. A “linear probability model” was used to estimate the relationship between either the receipt of intensive services or receipt of training and individual characteristics.⁹ The

⁹ In the cases where values were missing for an explanatory variable and the missing values for that variable were relatively few, a dummy variable was assigned indicating a missing value for the variable.

EXHIBIT 2-6: WIA ADULT EXITER CHARACTERISTICS AND EXPERIENCE BY PROGRAM YEAR

BACKGROUND CHARACTERISTICS	PY 2003 (%)		PY 2004 (%)		PY 2005 (%)	
	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN
Gender						
Male	41.0	84.7	39.9	79.6	39.6	78.6
Female	58.9	15.3	60.0	20.4	60.3	21.4
Age at Participation						
21 or Less	12.2	3.2	12.8	5.4	13.0	5.1
22 to 29	28.7	13.9	29.5	17.3	29.3	17.5
30 to 44	38.8	38.8	37.5	37.4	36.7	37.0
45 to 54	14.9	29.3	14.8	26.3	15.4	26.6
55 or Older	5.4	14.8	5.5	13.6	5.6	13.9
Race/Ethnicity						
Hispanic	16.4	8.3	17.9	7.2	17.9	8.6
Black (non-Hispanic)	32.2	34.2	33.4	38.1	32.7	36.9
White (non-Hispanic)	44.5	52.9	40.1	50.2	40.3	49.6
Other (non-Hispanic)	6.0	4.1	7.2	3.8	6.8	4.1
Missing	0.9	0.5	1.4	0.7	2.3	0.8
Highest School Grade Completed						
Less Than H.S.	14.2	3.5	12.2	2.7	11.9	2.9
H.S. Graduate or GED	42.3	40.4	39.2	35.6	39.6	36.7
Education beyond H.S.	22.4	30.0	20.7	28.0	21.4	27.6
Missing	21.1	26.1	27.9	33.7	27.2	32.8
Disability						
Yes	5.3	20.6	4.6	24.5	4.2	23.9
No	94.7	79.4	95.4	75.6	95.8	76.1
Employed at Registration						
Yes	22.5	17.1	21.7	16.5	26.0	19.3
No	77.5	82.9	78.3	83.5	74.0	80.7
Limited English Proficient						
Yes	4.1	0.5	4.5	0.5	3.6	0.6
No	75.4	74.6	72.9	66.4	72.0	68.9
Missing	20.5	24.8	22.6	33.1	24.4	30.5
Unemployment Compensation						
Claimant or Exhaustee	16.8	20.9	17.6	20.9	13.6	18.6
Neither	55.8	45.8	59.1	45.2	61.6	50.5
Missing	27.5	33.3	23.3	33.8	24.8	30.9
Low Income						
Yes	48.3	41.1	51.1	37.8	42.0	37.2
No	24.0	28.9	25.5	28.8	32.4	31.5
Missing	27.7	30.1	23.4	33.4	25.6	31.3

EXHIBIT 2-6 (CONT'D): WIA ADULT EXITER CHARACTERISTICS AND EXPERIENCE BY PROGRAM YEAR

BACKGROUND CHARACTERISTICS	PY 2003 (%)		PY 2004 (%)		PY 2005 (%)	
	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN
Services Received						
Intensive Services						
Yes	74.2	71.6	75.7	66.3	73.5	68.2
No	25.8	28.5	24.3	33.7	26.5	31.8
Training Services						
Yes	47.5	47.2	47.2	42.4	45.6	41.0
No	52.5	52.8	52.8	57.6	54.4	59.0
Support Services						
Yes	18.0	20.0	18.8	18.2	19.2	19.5
No	82.0	80.0	81.3	81.8	80.8	80.5
Established ITA						
Yes	26.3	22.1	28.1	24.1	26.9	22.1
No	73.7	77.9	50.2	44.1	49.1	47.8
Missing	0.0	0.0	21.8	31.9	24.0	30.2
Pell Grant Recipient						
Yes	5.5	3.3	5.8	3.9	5.8	3.4
No	71.4	69.6	72.5	64.2	70.3	66.4
Missing	23.2	27.2	21.7	31.9	24.0	30.2
Employment Outcomes						
Employed in --						
3 rd Qtr Prior to Participation Qtr.	56.1	57.0	54.8	53.5	56.1	54.3
2 nd Qtr Prior to Participation Qtr.	55.1	55.3	54.6	54.5	56.3	55.5
1 st Qtr After Exit Qtr.	72.6	71.5	73.0	71.2	72.2	69.6
2 nd Qtr After Exit Qtr.	70.0	67.7	70.7	68.7	69.9	66.9
Average Earnings in --						
3 rd Qtr Prior to Participation Qtr.	\$2,426	\$3,228	\$2,339	\$2,796	\$2,615	\$2,970
2 nd Qtr Prior to Participation Qtr.	\$2,298	\$3,030	\$2,241	\$2,701	\$2,569	\$2,946
1 st Qtr After Exit Qtr.	\$3,430	\$3,865	\$3,549	\$3,827	\$3,854	\$4,071
2 nd Qtr After Exit Qtr.	\$3,472	\$3,818	\$3,579	\$3,872	\$3,921	\$4,061
Total Sample (N)	206,403	15,712	225,433	15,377	232,791	16,584

Source: WIASRD Public Use Data files, Authors' Calculations

EXHIBIT 2-7: WIA DISLOCATED WORKER EXITER CHARACTERISTICS AND EXPERIENCE BY PROGRAM YEAR

BACKGROUND CHARACTERISTICS	PY 2003 (%)		PY 2004 (%)		PY 2005 (%)	
	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN
Gender						
Male	45.2	90.8	42.9	87.2	41.8	84.8
Female	54.7	9.2	57.1	12.7	58.2	15.1
Age at Participation						
21 or Less	2.5	0.9	2.8	1.3	2.8	1.5
22 to 29	15.1	7.1	15.2	8.9	15.0	11.1
30 to 44	44.5	34.8	42.6	34.4	41.0	33.3
45 to 54	28.0	34.3	28.7	31.1	29.5	29.7
55 or Older	10.0	22.9	10.8	24.4	11.6	24.4
Race/Ethnicity						
Hispanic	12.5	6.4	14.5	5.3	14.4	6.2
Black (non-Hispanic)	20.5	19.4	20.7	20.9	21.7	22.5
White (non-Hispanic)	58.8	70.5	56.7	69.6	56.8	67.2
Other (non-Hispanic)	7.2	3.2	6.2	2.9	5.4	3.1
Missing	1.0	0.5	1.9	1.3	1.7	1.0
Highest School Grade Completed						
Less Than H.S.	8.6	2.7	8.3	2.6	8.8	2.5
H.S. Graduate or GED	42.5	40.7	41.3	39.4	40.6	37.1
Education beyond H.S.	34.7	41.9	31.8	38.9	28.5	34.2
Missing	14.2	14.7	18.6	19.1	22.2	26.3
Disability						
Yes	2.8	11.6	2.6	12.8	2.9	15.8
No	97.3	88.5	97.4	87.2	97.1	84.2
Employed at Registration						
Yes	7.1	6.3	8.6	8.3	11.0	10.6
No	92.9	93.7	91.4	91.7	89.0	89.4
Limited English Proficient						
Yes	3.9	0.4	5.2	0.5	4.7	0.5
No	82.5	85.2	78.9	80.7	77.5	78.0
Missing	13.6	14.4	16.0	18.8	17.8	21.5
Unemployment Compensation						
Claimant or Exhaustee	61.8	60.4	61.9	63.1	63.4	62.6
Neither	15.7	13.7	20.3	16.1	17.1	14.4
Missing	22.6	25.9	17.9	20.8	19.5	23.0
Low Income						
Yes	1.2	0.8	2.9	1.1	1.2	1.1
No	1.5	1.6	2.8	2.3	1.8	1.9
Missing	97.3	97.5	94.3	96.7	97.0	97.0

**EXHIBIT 2-7 (CONT'D): DISLOCATED WORKER EXITER CHARACTERISTICS
AND EXPERIENCE BY PROGRAM YEAR**

BACKGROUND CHARACTERISTICS	PY 2003 (%)		PY 2004 (%)		PY 2005 (%)	
	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN	NON-VETERAN	VETERAN
Services Received						
Intensive Services						
Yes	83.6	83.3	83.4	81.4	81.1	77.6
No						
Training Services	53.9	56.5	53.0	53.1	49.0	47.6
Yes						
No						
Support Services						
Yes	17.4	17.5	18.5	16.1	21.2	20.0
No	82.6	82.5	81.5	83.9	78.8	80.0
Established ITA						
Yes	36.5	37.2	35.8	36.8	34.7	33.2
No	63.5	62.8	49.7	46.2	47.6	45.4
Missing	0.0	0.0	14.5	16.9	17.7	21.4
Pell Grant Recipient						
Yes	3.1	2.4	3.9	2.8	4.2	2.8
No	79.1	78.6	81.6	80.3	78.1	75.8
Missing	17.8	19.0	14.5	16.9	17.7	21.4
Employment Outcomes						
Employed in --						
3 rd Qtr Prior to Participation Qtr.	65.9	63.5	80.1	80.2	82.3	78.7
2 nd Qtr Prior to Participation Qtr.	61.7	59.2	78.5	78.5	81.1	78.4
1 st Qtr After Exit Qtr.	78.7	76.9	78.2	76.3	76.2	72.5
2 nd Qtr After Exit Qtr.	77.8	75.3	77.2	74.7	75.3	71.4
Average Earnings in --						
3 rd Qtr Prior to Participation Qtr.	\$6,114	\$7,440	\$5,899	\$7,437	\$6,031	\$7,002
2 nd Qtr Prior to Participation Qtr.	\$5,581	\$6,768	\$5,677	\$7,092	\$5,887	\$6,893
1 st Qtr After Exit Qtr.	\$4,923	\$5,401	\$4,965	\$5,587	\$4,820	\$5,302
2 nd Qtr After Exit Qtr.	\$5,118	\$5,541	\$5,043	\$5,636	\$4,968	\$5,363
Total Sample (N)	155,779	16,577	146,458	15,440	138,769	14,620

Source: WIASRD Public Use Data files, Authors' Calculations

dependent variable is estimated as a linear function of the explanatory variables. An advantage of this model is that the statistical results are easily interpreted; the regression coefficients show the effect a unit change in an explanatory variable has on the outcome variable. The interpretation of coefficients depends on what outcome is being analyzed. In this analysis, the dependent variable is a binary outcome,¹⁰ and the coefficients can be thought of as the percentage point change in the probability of the outcome occurring for a one unit change in the explanatory variable.

The same regression model was used to analyze four different outcomes in the data: (1) receipt of intensive services in the WIA Adult Program, (2) receipt of training services in the WIA Adult Program, (3) receipt of intensive services in the WIA Dislocated Worker Program, and (4) receipt of training services in the WIA Dislocated Worker Program. The model examines service receipt as a function of the available background characteristics known for individual records. That is, participation in either intensive or training services was predicted based upon individual socio-demographic characteristics (e.g., age, gender, and veteran status). Several variables had to be excluded due to high missing rates observed in the data.¹¹ The coefficient on the veteran status variable indicates what effect is specifically attributable to being a veteran, holding all other characteristics constant. If we were to take two individuals that are identical in every respect except for veteran status, the coefficient would predict how many percentage points more likely or less likely the veteran is to receive the service. This relationship is not necessarily causal, as that would require that all relevant explanatory variables be included in the regression.

¹⁰ Binary outcomes are those that have two dichotomous possibilities: 1) the event occurs or 2) the event does not occur.

¹¹ These variables included educational attainment, low income status, limited English proficiency, and unemployment compensation status.

In **Exhibit 2-8**, we present the parameter estimates for the regression analysis. In models 1 and 3, where we are regressing the receipt of intensive services in the Adult Program population and Dislocated Worker Program population, there are statistically significant and slightly negative coefficients on the veteran status variable. This indicates that veterans are slightly less likely to receive intensive services, holding other characteristics constant. In models 2 and 4, where we are regressing the receipt of training services among those who received intensive services in the Adult and Dislocated Worker Programs, the coefficient on the veteran variable is statistically significant and positive. This indicates that among those who receive intensive services, veterans are more likely to move on to receive training services. One possible interpretation of these results is that, after controlling on relevant characteristics, veterans are somewhat less likely to need services beyond assisted core services. There are a variety of human capital characteristics (e.g., leadership and motivation) that our model does not capture, and it is possible that these missing variables might make it less likely that veterans would need additional services. Since veterans typically earn somewhat higher wages from their jobs before and after program participation, this is one possible explanation. However, among those veterans who do move on to receive intensive services, they tend to be more likely to receive training services.

D. Conclusions

We are limited in what we can say from the findings from the statistical analysis. Without knowing the criteria that are used to determine which customers should receive intensive services and training, it is impossible to know if we have included all the key variables in the analysis. Also because there are no data available on customers who receive unassisted core services, there is no way to analyze this first progression in the service process. While not

**EXHIBIT 2-8: PARAMETER ESTIMATES OF SERVICE RECEIPT FOR ADULT AND
DISLOCATED WORKER RECIPIENTS, PY 2003–2005**

	Adult Program		Dislocated Worker Program	
	Received Intensive Services (1)	Received Training Services (2)	Received Intensive Services (3)	Received Training Services (4)
Case Characteristics				
Veteran	█ -0.026 (11.43)***	█ 0.063 (22.32)***	█ -0.009 (4.53)***	█ 0.032 (11.76)***
Male	█ -0.040 (37.23)***	█ -0.034 (25.59)***	█ -0.015 (12.65)***	█ 0.022 (13.79)***
Age	█ 0.002 (32.95)***	█ -0.005 (79.52)***	█ 0.001 (16.21)***	█ -0.005 (66.44)***
Employed at Entry	█ 0.065 (54.12)***	█ 0.211 (142.43)***	█ -0.005 (2.70)***	█ 0.053 (20.65)***
Missing entry employment status	█ 0.171 (17.63)***	█ -0.127 (7.16)***	█ -0.007 (0.37)	█ -0.130 (4.95)***
Has a disability	█ -0.072 (30.49)***	█ -0.031 (10.23)***	█ -0.072 (22.14)***	█ -0.057 (12.93)***
Missing disability status	█ 0.000 (0.07)	█ -0.135 (32.18)***	█ 0.003 (0.76)	█ -0.148 (25.24)***
Wages 3 quarters prior to entry (thousands)	█ 0.001 (4.09)***	█ 0.006 (21.11)***	█ 0.004 (42.22)***	█ 0.001 (7.98)***
Race/Ethnicity				
Hispanic	█ 0.080 (57.68)***	█ -0.116 (63.70)***	█ 0.038 (24.75)***	█ -0.087 (36.87)***
Black (non-Hispanic)	█ -0.043 (34.77)***	█ -0.085 (56.50)***	█ -0.053 (34.85)***	█ -0.094 (45.45)***
White (non-Hispanic)	<i>(excluded category)</i>		<i>(excluded category)</i>	
Other (non-Hispanic)	█ 0.034 (14.30)***	█ -0.062 (20.53)***	█ 0.024 (10.64)***	█ -0.017 (4.92)***
Missing Race	█ -0.030 (6.65)***	█ -0.120 (22.11)***	█ -0.087 (16.29)***	█ -0.036 (5.77)***
Program Year				
2003	<i>(excluded category)</i>		<i>(excluded category)</i>	
█ 2004	█ 0.011 (8.56)***	█ 0.015 (9.39)***	█ -0.029 (22.79)***	█ -0.007 (3.77)***
█ 2005	█ -0.013 (10.03)***	█ -0.002 (1.12)	█ -0.054 (40.29)***	█ -0.031 (16.07)***
Constant	█ 0.694 (339.44)***	█ 0.764 (306.36)***	█ 0.817 (317.22)***	█ 0.846 (241.51)***
Observations	█ 705095	█ 545206	█ 462860	█ 395691
R-squared	█ 0.02	█ 0.07	█ 0.02	█ 0.02

Robust t statistics in parentheses

* significant at 10%; ** significant at 5%; *** significant at 1%

Source: WIASRD Public Use Data files, Authors' Calculations

capable of providing statistically representative results, the site visits to states and local One-Stop Career Centers (discussed in Chapter 4 of this report) provide some additional qualitative information helpful in interpreting the results of these statistical analyses.

CHAPTER 3:
**FINDINGS FROM INTERVIEWS WITH VETERANS
AND WORKFORCE ORGANIZATIONS**

Project staff conducted telephone interviews between March and May 2008 with representatives from the four veterans' organizations: Disabled American Veterans; Veterans of Foreign Wars (VFW) of the United States; the American Legion; and Vietnam Veterans of America. In addition, representatives of two workforce organizations were interviewed: National Association of State Workforce Agencies and the National Association of Workforce Boards. Questions for veterans' organizations and national workforce investment organizations are provided in Appendix A. Veterans' organizations and one of the workforce agencies were generally critical of ETA's handling of POS. However, it should be noted that the perspectives of these organizations were provided prior to VETS issuance of the Final Rule on POS in the *Federal Register* (in December 2008) – and so, views could have changed significantly since these interviews were conducted. Key findings from these interviews are discussed below.

POS notification on DOL website (“Questions& Answers”) was not viewed as sufficiently detailed or clear – several organizations suggested that DOL needed to issue formal regulations on POS, including clearer guidance for individual ETA programs. At the time the interviews for this study were conducted with veterans' and workforce organizations (in March through May 2008), DOL had furnished states and local areas with a “Questions and Answers” webpage, but had not yet issued formal regulations with regard to POS in the *Federal Register*. Several veterans' organizations and one of the workforce associations were critical of DOL for not following through with issuing formal POS regulations in a timely manner and

suggested that the lack of such regulations made it difficult for states and local workforce agencies to effectively implement POS across various ETA programs. One organization noted that “we asked repeatedly for implementing regulations by DOL relating to POS, but this was never done.” A second organization observed:

“ETA issued TEGL 5-03 in September 2003, which provided general guidance on POS (but not specific to each ETA program). ETA said specific guidance per program was forthcoming, but guidance has not been issued (note: as of May 2008, when the interview was conducted). Overall, our main concern is that no regulations have been issued by ETA on POS and that not enough formal guidance has been given to states on POS...as a result, states have not been able to guide local WIBs/One-Stops on implementation of POS.”

The guidance provided as part of the ETA’s TEGL was viewed by members of one organization’s veterans’ affairs committee as “too vague because it did not have the requirements for specific programs – for example, how POS was to be applied to the WIA Adult Program.” While this organization did not typically advocate for issuance of regulations because it favors greater flexibility for states and local workforce programs; in the case of POS, this organization supported additional guidance. This organization noted, for example, that one of the difficulties in implementing POS is there is a not one definition for “veteran” across ETA programs – and recommended that a single definition for veteran be applied across all ETA programs.

Information/knowledge of POS at WIBs/One-Stop Career Centers is sometimes incomplete or incorrect. Closely related to the lack of definitive regulation, several of the organizations interviewed indicated that local workforce agencies, One-Stop Career Centers, and One-Stop partnering agencies often had incomplete and varying understanding of POS and how it should be applied within their particular program and across the various programs/agencies typically co-located at One-Stop Centers. One organization believed that “WIBs are getting better at providing POS, though information/knowledge of POS at local level is sometimes

incorrect – for example, veterans’ preference is sometimes confused with POS.” A second organization felt that some of the difficulty with implementing POS stemmed from the fact that certain agencies and programs within One-Stop Career Centers simply did not serve many veterans and so did not tend to pay as much attention to the POS requirements (e.g., the WIA Youth Program). Another related issue for programs is that individuals must first be eligible for a specific program, and only then do POS considerations apply, and they may only be of critical importance when there are funding constraints (particularly limited funds for training under a program such as WIA). Another organization viewed One-Stop Career Centers as not being sufficiently informed about POS and, when confronted by limited resources and staffing levels, lumping in most veterans with other One-Stop customers for less intensive services:

“Sometimes veterans go into One-Stops and they just throw them on a machine (i.e., veterans like other One-Stop users are simply referred to self-service and are not referred to assessment and other staff-assisted services). Other One-Stops evaluate you and see if you need additional services.”

DOL is not viewed as having sufficiently “promoted” POS. One organization expressed concern that ETA had not adequately promoted the importance of POS to state and local workforce agencies responsible for implementing (and enforcing) POS. For example, this organization felt that “lots of the states would not have known about ETA’s website devoted to POS, if our organization had not promoted ETA’s website.”

DOL has not come up with a method to ensure POS is enforced at state/local levels – as a result, there is considerable variability across states in whether and how POS is implemented. Several organizations pointed to an overall lack of enforcement with regard to

POS by states and local workforce agencies. For example, according to a representative of one organization:

“...There is a lot of variation across local One-Stops in the extent to which veterans receive POS. Whether POS is enforced depends to a large extent on the commitment of local office managers to serving veterans. One of the biggest problems with regard to enforcing POS in the One-Stop system is that local offices do not receive more dollars for doing a good job of serving veterans and do not get less funding for doing a worse job of serving veterans. So One-Stops have a total license to do what they want – and the extent to which POS is enforced is largely dependent upon whether the local office manager is committed to serving veterans. Unfortunately, even the good office managers use DVOP/LVERs to disproportionately serve non-vets. State and local workforce agencies often view funding for veteran services as a cash cow (to subsidize services for non-veterans).”

Another organization official argued for setting “certain mandatory standards for employment and training programs and for the way in which services are implemented –as it currently stands, there is not an equal playing field for all veterans with regard to receipt of services – there is a lot of variability across states and local areas in terms of services delivered and whether POS is enforced.” A representative of a third organization tied uneven and lack of enforcement of POS to the fact that formal regulations (i.e., a final rule) had not yet been issued by DOL providing clear guidance on both what constituted POS and how states and local workforce areas should enforce POS (particularly within One-Stop environments that feature multiple partners with widely varying levels of participation by veterans).

A further challenge cited by several of the organizations, is that even if there is a strong commitment to enforcement of POS, it is challenging to determine if veterans are in fact receiving POS. One interviewee observed that not even veteran representatives are certain what constitutes compliance with POS: “When you talk to DVOPs/LVERS in the field, they indicate that it is difficult to measure/quantify if veterans are receiving POS.” An official of a second organization pointed to the need for more explicit measures of POS tied to employment

outcomes and making certain that veteran representatives are focusing their attention squarely on the placement of veterans into jobs:

“...There is a need for real accountability, where services to and placement of veterans in jobs are tracked and rewarded. Everyone studies to the test – it is important to hold local office managers accountable for using DVOP/LVER staff to serve veterans and to make sure staff are going in the field to secure job openings for veterans directly from employers. Because of cutbacks in Wagner-Peyser funding, DVOP/LVER staff have become a greater percentage of One-Stop staff – with customer service demands high, One-Stop managers are under intense pressure to use DVOP/LVER staff to serve non-veterans. One-Stop managers do not get in trouble for doing this.”

Need for ongoing training/technical assistance on POS. Several agency officials pointed to the need for bolstering training and providing technical assistance to One-Stop staff on POS. A concerted and ongoing training and technical assistance effort is needed not only because of uncertainty and confusion over POS (stemming from the lack of formal regulation/guidance), but because within the One-Stop environment there is often a wide variety of partners and because even among WIA and Wagner-Peyser staff, there is considerable turnover. One agency official, for example, had observed a lot of variation in the types and quality of services provided across One-Stops and even within a One-Stop:

“A problem is that not all One-Stop staff are trained on what you need to do for veterans. LVERS/DVOPS are required to get certified...but a lot of them have been there for 20 years and are not aware of changes in WIA and One-Stop operation. For the veteran coming into a One-Stop, it is the luck of the draw. There is no standardization across One-Stops – for example, you might walk into one and get a particular set of services, but walk into another and you would get a different set of services.”

A second organization official indicated that the need for training and technical assistance in the future is linked to “if regulations are vague or not specific enough – we won’t know if technical assistance is needed until regulations are issued.”

“Half-time” DVOPs/LVERs are viewed as not sufficiently focused on veterans. As alluded to earlier, for a number of the organizations interviewed, the flexibility that states and

local areas have with respect to assigning veteran representatives to serving both veterans and non-veterans within One-Stops is troubling and may undercut POS for veterans. Three of the organizations interviewed expressed strong sentiments with regard to using half-time veterans representatives.

CHAPTER 4:
FINDINGS FROM SITE VISITS TO STATES
AND LOCAL WORKFORCE AREAS

An important component of this study involved site visits to seven states and one local area within each state. The purpose of these visits was to provide an in-depth “on-the-ground” understanding of implementation of POS at the state and local levels. The selection of seven states provided an opportunity to examine POS implementation across all regions of the country and in varying state models of delivery of services (e.g., where ES and WIA are co-located and are not co-located within the One-Stop Career Center). **Exhibit 4-1** provides an overview of the states visited, including background on the state’s population and workforce system. The seven states visited (with local areas in parenthesis) were the following:

- Kansas (Area II – Heartland Works (Junction City))
- California (Golden Sierra Job Training Agency (Auburn))
- Virginia (Virginia Beach-Norfolk-Newport News, VA-NC Metro Area)
- Alaska (Anchorage, AK Metro Area)
- Florida (Jacksonville, FL Metro Area)
- Ohio (Toledo, OH Metro Area)
- New Jersey (Newark-Union, NJ-PA Metro Division)

It is important to note that site visits to states were conducted prior to or shortly after the Veterans Employment and Training Services (VETS) issuance of the Final Rule on “Priority of Service for Covered Persons” in the *Federal Register*. As a result, the findings in this section are reflective of views of states and local workforce areas either prior to issuance of the Final Rule or at the very early stages of implementing that rule. The sections that follow summarize the key findings from site visits conducted to these seven states.

EXHIBIT 4-1: OVERVIEW OF SEVEN STATES WHERE SITE VISITS WERE CONDUCTED

STATE	STATE POP. (2008)	% VETERAN (RANKING)	DISTINGUISHING FEATURES OF STATE AND VETERAN POPULATION	# OF LWIBS	# ONE-STOPPS	DISTINGUISHING FEATURES OF WORKFORCE SYSTEM AND/OR SERVICES FOR VETERANS
Alaska	670,053	14.6% (1)	-Largest (geographically) and least densely populated state -State with highest % of veterans, with most residing in Anchorage/Mat-Su	1	5 full-service (total - 23)	-Single WIB-state (formerly 2 LWIBs) -State's 1-Stop operator is Wagner-Peyser Program -Decrease 12 FTE to 4.5 FTE veterans representatives over past 10 years
California	36,457,549	8.0% (49)	-Most populous state -State with most veterans (2M), but near bottom in % of veterans -Pockets with large numbers of veterans (Los Angeles, San Diego, and Sacramento)	49	150 full-service (total-168)	-Highly decentralized workforce system, with much local discretion -1-Stop operators are typically city or county government -Veterans more likely to receive case management services (through veterans representatives)
Florida	18,089,888	12.5% (10)	-Fourth largest state with second largest and fastest growing veteran population (1.9M) -About 10% of those involved in Operation Iraqi Freedom and Operation Enduring Freedom from FL	24	17 full-service (total-92)	-With funding decreases, # of 1-stops have decreased in recent years -TANF, ES, WIA, and wide range of other partners often represented at 1-Stops
Kansas	2,764,075	11.4% (20)	-Fairly sparsely populated, but ranked in middle in % veteran -Home to several large military bases (Ft. Riley, Ft. Leavenworth, and Ft. McConnell)	5	5 full-service (total-23)	-Different community organization operates each of 5 full-service 1-stops -Substantial decline in veterans representatives over last 15 years (46 to 26 statewide)
New Jersey	8,724,560	8.0% (49)	-Most densely populated state, but ranked near bottom in % of veterans -Two large densely populated metropolitan areas – NYC and Philadelphia -Six large military bases in state (including Ft. Monmouth, Ft Dix and Earle Depot)	29	24 full-service (total-30)	-LWIBs typically cover single county with a few exceptions -Hiring freeze for past 3 years at state, so unfilled ES and VETS positions -Steep decrease in veterans representatives in recent years
Ohio	11,478,006	11.1% (32)	-Seventh largest state in population, with nearly 1M veterans -Most veterans located in Cleveland, Columbus and Cincinnati	19	30 full-service (total-90)	-State has a balance of state LWIB that covers about 1/2 of state's counties -Workforce system decentralized with considerable local discretion -State has had hiring freeze -All veterans representatives are full-time
Virginia	7,642,884	13.5% (5)	-With over 800,000 veterans, state has 6 of nation's top 10 areas with highest veteran concentration -Hampton is U.S. city with highest % of veterans (27% of adult population); Virginia Beach (22%), Norfolk (20%), Newport News (20%), Chesapeake (19%), Portsmouth (19%) -Over 48 military installations in the state (especially concentrated Tidewater and the DC-metro areas)	15	33 full services	-WIA administration recently transferred to community college system -Some ES offices operate separately from 1-stops in some local areas

A. State and Local Policies Related to POS

One focus of the site visits to the state and local workforce agencies was to determine whether these agencies had issued specific POS policies, and if so, the specific provisions of such policies. In all seven states visited, officials indicated that their underlying approach was to essentially pass on ETA guidance on POS to local workforce areas. **Exhibit 4-2** provides an overview of what state agency officials indicated they had done when asked during interviews if the state had issued “a specific set of policies at the state level to implement the priority of service provision in JVA.” In each state, officials at the local workforce agencies were in agreement with what state workforce officials had indicated with respect to issuance of policies. In all states visited, state workforce officials indicated that they had made local workforce areas aware of the guidance ETA had provided – generally passing on ETA’s Training and Employment Guidance Letter (TEGL No. 05-03, issued in September 2003) and making sure that all local workforce areas were aware of the existence of ETA’s “Questions and Answers” (“Q and A”) website.

New Jersey’s approach was fairly indicative of what most states did with respect to making sure that local workforce agencies understood POS requirements. The state’s workforce agency (the New Jersey Department of Labor) distributed state policies and guidance on POS through the Department’s web-based “portal” system. The state’s policies exactly mirrored the language of DOL’s Training and Employment Guidance Letter (TEGL), specifically providing guidance on POS eligibility for veterans and covered persons. The state’s policies emphasized that after specific eligibility requirements are met within a given program (e.g., meeting of income eligibility or the definition of a “dislocated worker” under WIA), programs with federal

EXHIBIT 4-2: OVERVIEW OF STATE POLICIES ON PRIORITY OF SERVICE

STATE	OVERVIEW OF STATE POLICY GUIDANCE ON PRIORITY OF SERVICE (POS)
Alaska	A set of state policies has been developed and distributed regarding POS for veterans. Policy guidance includes a stipulation for POS to be implemented for training in the WIA Adult and Dislocated Worker Programs once 65 percent of WIA funding has been obligated within a given program year.
California	Each WIB is required, as part of its annual plan, to state local policies and procedures to ensure POS requirements are being met. The basic strategy of the state has been to make sure local areas are aware of federal policies (i.e., a straight pass through of DOL guidance, such as the “Qs and As” issued on ETA website), without interpretation by state.
Florida	The state does not have specific policy for the regional workforce boards (RWBs) to provide POS. However, the state assists RWBs with interpretation of POS, especially through training. State monitors POS compliance and has each RWB explain in its two-year report how POS is implemented.
Kansas	In the event funds become limited in relationship to the anticipated population to be served (as determined by the WIB), the WIB is to implement a priority system. Priority is to be given to Adult recipients of public assistance, other low-income individuals, and to individuals 55 and over. The first group to be served is veterans meeting one or more of the categories. The second group to be served is a covered person meeting one or more of the categories. The third group to be served is non-veterans meeting one or more of the categories. In order to prioritize individuals within each group, points are given for each category the individual meets. The individual with the highest points in the group is served first. If the points for individuals within the group are equal, the earliest application date is served first. The fourth group to be served is veterans meeting none of the categories.
New Jersey	A set of state policies has been developed and distributed regarding POS for veterans through the Department’s web-based “portal” system. The state’s policies mirror the language of DOL’s Training and Employment Guidance Letter (TEGL). The guidance sets out POS eligibility for veterans and covered persons and provides additional guidance on what is meant by POS in terms of veterans receiving priority. In particular, the state policies emphasize that after specific eligibility requirements are met within a given program (e.g., meeting of income eligibility or the definition of a dislocated worker) that programs with federal funding must then give priority to veterans and covered spouses.
Ohio	The basic strategy of the state has been to make sure that local areas are aware of federal policies (i.e., a straight pass through of DOL guidance, without interpretation by the state). Each DVOP/LVER has been provided with a policy book that defines POS requirements and provides guidance on delivery of veteran services. Additionally, the state policy is once a workforce area has entered a limited funding situation, defined as WIA funding for the program year being 75 percent obligated, a priority system takes effect and governs the enrollments to ensure that the those most in need receive intensive and training services.
Virginia	The state does not have a specific POS requirement that addresses veterans only. Rather, each LWIB establishes its own POS policies, though these policies must follow state and federal guidelines (e.g., TEGLs issued by ETA). The state passes these guidelines and memorandums through to LWIBs, who develop their own POS policies and submit them to the state for approval. Virginia’s Priority of Service Policy states that in the event that adult funds are determined to be limited, the LWIB must develop a priority of service policy. At a minimum, the policy must grant first priority to individuals who are receiving public assistance or are classified as “low-income” in accordance with WIA definitions. Additional priorities may also be set for specific populations, such as individuals with significant barriers to employment or for participants interested in training for occupations that are in demand in the area.

Note: Exhibit is based on site visits conducted to states and local workforce areas between November 2008 and April 2009.

funding must then give priority to veterans and covered spouses. Similarly, California's Employment Development Department (EDD) issued three policy guidance memoranda that essentially passed along the federal guidance received with regard to Priority of Service: (1) a June 2003 memorandum ("One-Stop Service Priorities for Veterans"), which provided a one-page overview of the requirements of the Jobs for Veterans Act (JVA); (2) a September 2003 memorandum ("Implementing the Veterans' Priority Provisions"), which passed on TEGL 5-03 to each local area; and (3) a July 2004 memorandum, which notified local areas of the ETA guidance in the form of a series of Questions and Answers.

Three of the seven states – Alaska (which has the highest concentration of veterans of any state), Ohio, and Kansas -- went beyond passing along the guidance on POS that had been issued by ETA. Alaska's policy guidance included a stipulation that priority of service was to be implemented for the WIA Adult and Dislocated Worker Programs once 65 percent of WIA funding had been obligated within a given program year:

"...In the event WIA Adult Program funding becomes sixty-five percent (65%) obligated, and other One-Stop partner agency funding is unavailable, the Chief of Field Operations, Employment Security Division (ESD), will implement the following priority of service when providing WIA Adult Program participants with intensive and/or training services:

- (1) Veterans or a military spouse who are low-income;*
- (2) Individuals with disabilities who are low-income;*
- (3) Public assistance recipients;*
- (4) Other low-income individuals; and*
- (5) Individuals who are not self-sufficient.*

The Jobs for Veterans Act does not change the requirement that individuals, to include veterans and military spouses, must first qualify as eligible under the WIA Adult Program before participation."¹²

Alaska's policy guidance also includes definitions of "veteran" and "eligible spouse" (based on ETA's TEGL). The Alaska Department of Labor and Workforce Development has had to invoke the 65 percent provision the last several program years – and for the most recent program

year (ending June 2009), the 65 percent threshold was reached during the first quarter of the program year. Though notification of the 65 percent provision had gone out to One-Stops, (based on interviews at several One-Stops) non-veterans had not yet (as of the visit conducted in December 2008) been denied training under WIA as a result of this provision. This was, in part, due to the fact that the state has a variety of other training funding sources that could be used, including a state-funded training program, National Emergency Grant (NEG) funding, and a High Growth Job Training Initiative (HGJTI) grant. The fact that Alaska is a single-WIB state and that the One-Stop system is operated in all localities by the Employment Service facilitates uniform implementation of POS across One-Stop Centers.

Similarly, in Ohio, the state policy is once a workforce area has entered a limited funding situation, defined as WIA funding for the program year being 75 percent obligated, a priority system takes effect and governs the enrollments to ensure those most in need receive intensive and training services.

In Kansas, as shown in Exhibit 4-2, in the event that funds become limited in relation to the anticipated populations to be served, LWIBs in the state are required to implement a priority of service system. For programs with mandatory priorities (such as serving low-income individuals), the state's policies are explicit with respect to veterans' priority of service (though does not provide explicit guidance on a percent of funds to be expended that would initiate POS):

"...(1) An individual meeting both the veterans' and the mandatory priorities or spending requirement or limitation should obtain the highest preference for the program. (2) Non-veterans within the program's mandatory priority should receive a preference over eligible veterans outside the program-specific mandatory priority or spending requirement or limitation. (3) Eligible veterans outside the program-specific mandatory priority or spending requirement or limitation should receive priority over non-veterans outside the priority or spending requirement or limitation (once the spending requirement or limitation is met)."

¹² State of Alaska, Department of Labor and Workforce Development, Policy Number 310.00, "WIA Adult Program Participant Eligibility and Priority of Service," August 19, 2005.

With regard to POS in the Wagner Peyser/ES Program, six of the seven states (all except Virginia) had policies with regard to placing a hold on release of job orders to the general public for a certain number of hours (e.g., 24 hours), so that veterans have the first opportunity to apply for the job. In addition, across all states and local areas visited, there was a policy or procedure (though not always formalized in written policy) that at the time of entry into a One-Stop, customers are to be asked about their veteran status with the aim of identifying veterans as early as possible. This would usually be accomplished by having each new One-Stop customer complete a slip of paper or sign-in sheet with basic identifying information, including checking off if the individual is a veteran (and, in some instances, an eligible spouse).

B. Outreach to Veterans

During visits to states and local areas, the study team inquired about processes and special initiatives that workforce agencies undertake to recruit veterans. **Exhibit 4-3** provides an example of one state's approach (Kansas) to conducting outreach to veterans, which is closely coordinated with the efforts of local workforce boards and One-Stops in the state. The methods employed in Kansas are broadly reflective of the approaches followed in other states that were visited as part of this study. Outreach efforts are intended to increase awareness of veterans of the various services available through the workforce system, and particularly, to encourage unemployed and underemployed veterans (and non-veterans) to use One-Stop Career Center resource rooms, be assessed, and explore employment and training opportunities.

**EXHIBIT 4-3: EXAMPLE OF ONE STATE’S (KANSAS) OUTREACH ACTIVITIES
AIMED AT RECRUITING VETERANS INTO THE ONE-STOP CENTERS**

OUTREACH ACTIVITIES DIRECTED AT VETERANS IN KANSAS
<p>TAP Sessions. TAP workshops are conducted in three different sites across the state: Fort McConnell, Fort Leavenworth, and Fort Riley. Sessions at Fort McConnell and Fort Leavenworth are conducted monthly, while those at Fort Riley are conducted once each week. A TAP instructor (often a DVOP/LVER from a nearby One-Stop), using the nationally-standardized TAP curriculum, provides an overview of veteran services available at One-Stops. Several PowerPoint slides provide an overview of One-Stop services, identifying specific types of employment and training services available for veterans. Veterans are encouraged to visit One-Stop Centers and are told that they will get first referrals to job opening and preference over non-veterans for training.</p>
<p>DVOP Contact to Veteran Self-Registrants. When veterans self-register via the Internet for Wagner Peyser services in Kansas Works, a DVOP is automatically notified in the locality in which the veteran registers. The DVOP will follow up with a call to the veteran to inform them of the services available through the One-Stop and particularly veteran services. The DVOP will also check to see if the veteran has special needs or faces barriers to employment, and if so, will encourage the veteran to come into the One-Stop to meet with a veterans representative.</p>
<p>Media Advertisement. The Department of Commerce runs quarterly advertisements in nine newspapers across the state detailing the One-Stop services available to veterans. A LVER in Hays, Kansas has a radio call-in show focused on employment and services available for Veterans.</p>
<p>Job Fairs for Veterans. The Department of Commerce sponsors outreach events, particularly job fairs that are specially targeted on veterans. Each year, job fairs exclusively for veterans are held around the state. For example, in November 2008, there were five Veterans job fairs conducted across the state on the same day with a total attendance of 1,000 veterans and 200 employers. There are also an annual homeless Veterans “stand-downs” in Topeka and Kansas City, during which the Department of Commerce and partnering organizations set up a tent-city and inform homeless Veterans about all services available to them, including housing, employment, legal, and medical services. A “field” One-Stop office is set up at the stand-down, which include computers that enable veterans to register for the ES, search for job openings, and complete resumes with help from a DVOP.</p>
<p>Linkages to Businesses. The state developed a brochure for Kansas businesses detailing the advantages of hiring veterans. The state also developed a brochure for veterans informing them of how to market their skills and work experiences to employers. The Department has created additional marketing materials such as pens, clocks, and t-shirts featuring the “Hire the Vet” logo. In the more rural areas of the state, veterans representatives know many of the employers personally and can use these connections to assist veterans in securing jobs.</p>
<p>“Vet Links” Website. A website under development (at the time of the site visit), called “Vet Links,” will provide information about all services available for veterans, including training, education, job search, marriage counseling, financial aid, and business advice. An on-line questionnaire will enable veterans to explore their eligibility for various programs and services, and will then automatically generate a resource list with contacts for the veteran – including referrals to the One-Stop system.</p>
<p>Warriors Transition Battalion. This special initiative located at Ft. Riley is designed to help nearly 500 wounded military personnel (returning from Iraq and Afghanistan) to make the transition to the civilian sector. A full-time DVOP has been assigned to this program to provide one-on-one help that is particularly aimed at helping veterans to obtain training and job search assistance.</p>

Note: Exhibit is based on a site visit conducted to Kansas in January 2009.

Outreach efforts are not usually explicitly aimed at informing veterans about priority of service. Promotional brochures, advertisements and other outreach sessions rarely (if ever) include references to POS, though they typically include references to availability of a veteran representative (DVOP/LVER) to meet the special needs of veterans at One-Stop Centers.

While most states rely upon local workforce areas to promote services available through the public employment and training system, each of the states visited conducts some level of outreach to inform veterans of employment, training, education, and other support services available within the state. In particular, states disseminate promotional brochures/materials, sponsor job fairs for veterans, and disseminate information about available services for veterans through the state's website. For example, California's Employment Development Department (EDD) has two brochures that are specifically aimed at informing veterans about employment, training, and support services available through the labor exchange (Wagner-Peyser) and WIA systems. These brochures have been made available at One-Stops, job fairs, VA hospitals, military bases, and other outreach sessions that inform the general public and veterans about eligibility and services. In Ohio, for example, the state workforce agency's website has a special page for veterans, which advertizes job fairs and Ohio Transitional Assistance Program (OTAP) sessions, as well as describes job seeker/business services available through the One-Stop system and how to contact veterans representatives. Florida has a website called "Florida Vets First," which provides links to information on the benefits and services veterans can receive including those provided through the workforce development system.

To a large extent, state workforce agencies rely upon local workforce areas and partnering agencies to reach out to and recruit veterans for a range of workforce services provided through the One-Stop system. In doing so, states typically provide local areas with

substantial latitude in developing and implementing such outreach and recruitment efforts, including the substantive content and formatting of outreach materials and presentations. Some example of specific types of outreach aimed at veterans include:

- **Presentations by Veteran Representatives at Transitional Assistance Program (TAP) Sessions.** Military personnel making the transition from the military to civilian life attend TAP workshops on military bases, which are aimed at assisting military personnel in preparing for life after military service. A particular focus of TAP workshops is on job readiness training and helping military personnel to secure a job (and if necessary, additional education and/or training) soon after departure from the military). In the states visited, it is common for veteran representatives (DVOPs/LVERs) to make presentations at TAP workshops. The topics covered, which are developed by the Department of Defense, typically include an overview of labor exchange and training services available at One-Stop Career Centers. Such sessions include mention of the availability of veterans representatives and their ability to provide special attention and case management assistance. In some instances (but not always), TAP presenters mention that veterans and their eligible spouses will receive priority of service or that they will be afforded some level of preference with respect to job listings (e.g., a 24-hour hold on job orders), training, or other intensive services. TAP session attendees are also be made aware of where the nearest One-Stop Career Center is located and that a DVOP/LVER is available upon request to provide one-on-one assistance.
- **Job Fairs, Including Those Exclusively for Veterans.** State and local workforce agencies sponsor job fairs throughout the year, with some fairs (especially in November of each year) targeted exclusively on veterans. During these fairs, workforce agency officials (often including a veteran representative) typically staff a table where they distribute program brochures and provide background information about various employment, training, education, and support services (including services especially for veterans) available through the One-Stop system.
- **Outreach Efforts to Other Veteran-Serving Agencies.** Veterans representatives often go to Veterans Administration (VA) offices and reach out to a variety of places where one would expect to find veterans (such as homeless shelters, correctional centers, work-release programs, and DoD family support centers). In New Jersey, for example, a DVOP is out-stationed full-time from the state office to the East Orange VA Hospital. The DVOP's job is to inform veterans of services available through the One-Stop/workforce development system. The DVOP can register veterans with the ES, and provide the full range of ES/Wagner Peyser services at the hospital. The DVOP can and often does refer individuals to the local One-Stop offices for additional services – especially job leads and training services. In some local areas, veterans representatives go to prisons and community events (e.g., “stand-downs” focusing on homeless veterans) to make sure that veterans (and the general public) are aware of workforce services available at One-Stops. Veterans representatives

may also be outstationed several days a week to military bases – for example, one of the four veterans representatives at the Roseville (CA) One-Stop Center is outstationed four days a week at a satellite employment center located on the campus of a facility that was formerly an air force base. Veterans representatives also may provide briefings for veteran service operators and visit the American Legion and other veterans’ organizations.

- **Other Outreach Efforts.** Veterans representatives (or other One-Stop staff) may attend rapid response sessions (in response to WARN notices), during which the agency staff hold special workshops or individual meetings with veteran employees to discuss dislocated worker services and other services available through the One-Stop system. Veterans representatives and other One-Stop staff keep One-Stop partners informed about veteran services and preference given to veterans within the workforce system. This may include frequent visits to or co-location of One-Stop staff at other agencies to facilitate outreach and recruitment of veterans. For example, in Florida, in collaboration with the Department of Corrections, a DVOP is stationed in areas with the largest numbers of veterans being released from incarceration. The DVOP organizes and provides a variety of workforce services for incarcerated and/or transitioning incarcerated veterans. If a recently released veteran is moving to a new region, the DVOP notifies staff in that region about the veteran’s planned move and the expected arrival date. Finally, veteran representatives and other Wagner-Peyser staff make sure businesses are informed about veterans flowing into and through the One-Stop system and that veterans may be appropriate for specific job openings.

C. Workforce Agency and Veteran Awareness of POS

All the state and local workforce agencies visited as part of this study were well aware of POS, though some officials indicated that without final regulations it was difficult to be exactly sure what constituted compliance with POS requirements. All state workforce officials interviewed during visits had read guidance issued by ETA and states that set forth definitions (e.g., of a veteran, eligible spouse, and POS), but many officials expressed concerns that they were lacking the specific details and requirements that only could be provided by ETA’s issuance of final regulations on POS. For example, one state official observed (prior to VETS issuance of the Final Rule):

“...ETA has not provided adequate guidance on POS....It is difficult to take the Q&As on ETA’s website and tell staff what it means in terms of serving someone. I need to be able to give my people clear guidance...we need to be able to translate POS to

requirements and procedures...my people need something a little more concrete with regard to POS.”

With regard to awareness, some administrators at the state and local levels perceived that there is a lack of clear guidance from DOL on key definitions relating to POS and how the provision should be applied within a One-Stop setting. A state workforce official in one state had a relatively straightforward suggestion for eliminating such ambiguity: “DOL needs to say, this isn’t guidance, this is the law...Technical letters (TEGLs) do not carry the full weight of regulation issued in the *Federal Register*.” While ES and WIA staff at the state and local levels are aware of POS and have a basic understanding of POS, some state and local workforce officials expressed concern that other One-Stop partners are not always aware of the provision. These partnering agencies face mandates to serve other special populations (such as welfare households, the homeless, mentally-ill, and low-income households), which may get in the way of providing veterans with priority of service. One state official also noted that even WIA Program staff face requirements to serve other special subpopulation of non-veterans, including youth, unemployed/dislocated workers, disable individuals, and low-income/welfare populations. As a result, One-Stop staff often needs to balance among various specially targeted populations (veterans among this group) in providing services. An added complicating factor with regard to awareness of POS is that, within a One-Stop, there is frequent staff turnover, both within workforce programs (such as WIA, ES, and TAA) and at other partnering agencies co-located at One-Stops. While departing staff may have knowledge and awareness of POS, new staff members may be unaware of or only vaguely familiar with the POS provisions (and so, need to be trained).

One-Stop customer and veteran awareness of POS is more difficult to judge. A survey of One-Stop customers aimed at better understanding One-Stop customer awareness of POS (and

views on its implementation) was planned, but not conducted under this study. As a result, it is not possible to draw definitive conclusions about One-Stop customer awareness of POS. Before coming in to One-Stops, some veterans may have attended TAP sessions, which provide an overview of services available at One-Stop Centers. In some instances, TAP workshops may include an observation that veterans will receive preference or priority of service at One-Stop Career Centers.

According to interviews with state and local workforce officials, veterans often come to One-Stops with a general understanding they have a right to meet with a veterans representative (DVOP/LVER) and that there are some targeted services available to veterans and/or a temporary hold on jobs listed with the ES. In all the One-Stops visited under this study (prior to or shortly after issuance of the Final Rule), when customers enter the One-Stop Center for the first time, they are asked if they are a veteran by a receptionist and/or entered information onto a sign-in sheet which includes a column to check as to whether the customer is a veteran. In addition, there are often signs welcoming veterans, and in some instance, informing them that they are to receive preference or priority for services. At the time the site visits were conducted to the seven states, local workforce officials indicated that they did not normally inform veterans that they are entitled to “priority of service,” but rather that they could see a veterans representative, who could provide case management services and job referrals. Several state and local workforce officials indicated that they are fearful if they play up POS, they might create a sense of entitlement for veterans that they will immediately gain access to training opportunities. Overall, while veterans using One-Stop customers generally aware that they can see a veteran representative and often aware that there are some special services available for them (mainly case management services with a veterans representative and job listing), they are not well

informed about priority of service and what the requirements of POS could specifically mean in terms of receipt of services.

D. Administration/Implementation of POS in One-Stop Career Centers

One of the key objectives of this study was to determine to what extent POS makes a difference in terms of how services are delivered to veterans in One-Stop Career Centers.

Several of the key questions of this study focused on how POS requirements affect the flow of veteran customers through One-Stop Career Centers and the services they receive:

- Is the workforce investment system (particularly services provided through the One-Stop Career Center delivery system) giving priority of service to veterans? What does priority of service mean when it comes to the provision of services through local WIBs and One-Stops?
- Do states/local areas have targeted and well-coordinated strategies for serving veterans? Are WIBs and One-Stop Career Centers going beyond simply referring veterans to VETS representatives? What happens, for example, when WIA funding for training runs low – do veterans get priority for remaining available training funds?
- In local areas where there have been base closures, does the One-Stop Career Center system integrate its service delivery with the TAP program?
- What role do Disabled Veteran Outreach Program (DVOP) specialists and Local Veterans' Employment Representatives (LVER) play in the One-Stop Career Center to ensure veterans receive priority of service for all One-Stop services? What tools would be valuable for One-Stop Career Center staff to support providing veterans priority of service?

An important focus of the site visits conducted during this study was on documenting the flow of veterans through One-Stop services and the ways in which being a veteran (and the priority of service provision) could affect the types of services received. There is substantial variation in the structure of One-Stop Career Centers (including their size and the types of partners) and ways in which services are delivered within and across local workforce investment areas. Based on the visits to states and particularly visits to One-Stops within each state, there are several

conclusions that can be drawn about how being a veteran (and to some extent priority of service) affects the way in which customers are served:

- Veterans are identified early in their involvement in the One-Stop system – in all One-Stops visited under this study, veterans were identified when they first arrived at the reception desk at the One-Stop.
- Perhaps one of the biggest differences in the delivery of services between veteran and non-veteran customers within One-Stops is that veterans are afforded the opportunity to meet one-on-one with a veterans representative. This means that they receive counseling sooner and often move through intensive and training services sooner. This possibility of working one-on-one with a veterans representative results in a greater likelihood of receipt of case management services and may result in quicker entry into training for veterans.
- One-Stops generally have “go to the front of the line” policies for veterans, which means that veterans may experience shorter wait times to see workforce staff and/or use resource rooms (compared with non-veteran customers). Veterans may also have the opportunity to use special rooms or computers at One-Stops, which means that if a One-Stop Center is crowded veterans are able to conduct self-service activities more quickly.
- In several states and localities, there are policies that when training resources became tight (e.g., in Alaska when WIA expenditures reached 65 percent of total available resources) that veterans receive priority over non-veterans for remaining training dollars. Where there is scarcity of WIA funding for training (typically toward the end of the program year), these requirements can translate into a greater probability of veterans receiving WIA-funded training.

Exhibit 4-4 illustrates in some detail the basic flow of veterans through five One-Stop Centers each located in different states (note: the flow of veterans through other One-Stop Centers included in our visits is chronicled in site visit summaries attached in Appendix D). These more detailed descriptions illustrate both the main findings discussed in the bullets above, but at the same time show how different client flow can be across One-Stops and ways in which flow is tailored to staffing patterns and available resources/programs within each One-Stop.

EXHIBIT 4-4: EXAMPLE OF CLIENT FLOW AND SERVICE DELIVERY FOR VETERANS AT FIVE ONE-STOPS CENTERS

OVERVIEW OF CLIENT FLOW FOR VETERANS THROUGH SERVICES IN SELECT ONE-STOPS
<p>Alaska (Anchorage). When customers initially arrive at a resource room in a One-Stop Center they are asked to complete a short intake slip (1/4 of a sheet of paper) in which they check off if they are a veteran (note: there is no place to indicate whether a customer is an eligible spouse of a veteran). If the individual is only interested in conducting a search of job listings or using other self-service features of the One-Stop, veteran status does not have much effect on the services received or POS. If there is not a self-service terminal available, the veteran may be able to use a terminal set aside for veterans. For example, the Muldoon and Midtown Job Centers (in Anchorage) each have a Veterans' Job Lab, which offers several PC workstations that are set aside for use by veterans. If the veteran is in need of case management or more intensive services, they will move ahead of other non-veterans with regard to seeing an ES staff person (usually a veterans representative). There are posters in One-Stop hallways and self-service areas highlighting services available within the Center and through veterans representatives. One of the biggest differences between veterans and non-veterans in how they are treated is that, if desired by the veteran, one-on-one case managed services are available from practically the moment they walk into a Center. In comparison, these same one-on-one services would normally be available to non-veterans further along, and generally if they are going into training, have special needs, or experience difficulty in securing a job.</p>
<p>California (Roseville). The Roseville One-Stop aims to get all veterans to see one of its four veterans representatives (administrators estimate that 90 percent of vets do so). If a veteran self-identifies on the ½ page tracking sheet, the One-Stop "Greeter" checks the scheduling software to see if any of the four veterans representatives is immediately available to meet with the veteran. If a veterans representative is available (which is often the case) the veteran is immediately scheduled to see the veterans representative; if not, the veteran is likely be scheduled to meet with a veterans representative the next day (or when it is next convenient for the customer to meet). During the initial meeting with the veterans representative the veteran is provided with a one-page form (called the "Veteran Intake Sheet"). On the front side of this sheet the veteran provides some basic identifying information, as well as service-related information (including service branch, service status, date of military service, whether he or she has a service-connected disability, education level, occupation, and minimum starting salary). The veterans representative interviews the customer for about a half hour to obtain additional background and to make an initial assessment of the veteran's barriers to employment and service needs. If the veteran is in need of case management or more intensive services, he/she is seen by the veterans representative as needed. If desired by the veteran, one-on-one case managed services are available, where the same one-on-one services would normally be available to non-veterans further along, generally if they are going into training or experience difficulty in securing a job. If the veteran is interested in moving on to training, the veterans representative normally guides the individual through the process of applying for WIA-funded (or other funded) training, increasing the likelihood of the individual completing all the necessary steps to enter training. Another service often needed by veterans is "de-mil-ing" of resumes (that is, help with translating skills and experience accumulated in the military to civilian applications).</p>
<p>Florida (Jacksonville). When a customer first walks into a Region 8 One-Stop Career Center, a greeter immediately asks if the customer is registered with Worksource and if the customer is a veteran. Customers usually identify if they are the spouse of a veteran. Veterans representatives also work in the resource room where they can identify spouses (and assist with intake). If the customer is not a veteran, then he or she is sent to the resource room, where the person is offered services (such as self-service computers and workshops). If the non-veteran requests training, he or she first receives core services. The One-Stop also provides an orientation, explaining that there are other services available if the customer cannot find a job. Later on, the customer could receive WIA orientation and progress through intensive services and training. In contrast, if a veteran walks in, the vet is immediately offered an opportunity to meet with a veterans representative, which veterans almost always accept. The veterans representatives are usually available within a few minutes. If available, the veterans representative makes sure the customer is a veteran and then provides an interview, evaluation, and registration. If the veterans representative is not immediately available, and if there is no other staff appropriate for the veteran customer, then the staff provides the veterans representative's card and asks if the veteran would like to make an appointment or wait in the resource room.</p>
<p>Kansas (Junction City). Near the Welcome Desks of each One-Stop in the state is posted an 8 by 10 inch sign (developed by the state) that details basic provisions of Priority of Service. The One-Stop sign-in sheet contains a</p>

EXHIBIT 4-4: EXAMPLE OF CLIENT FLOW AND SERVICE DELIVERY FOR VETERANS AT FIVE ONE-STOPS CENTERS

OVERVIEW OF CLIENT FLOW FOR VETERANS THROUGH SERVICES IN SELECT ONE-STOPS

column indicating veteran status. At the One-Stop visited (in Junction City), there is a separate check box on the sign-in sheet to indicate that customers are the covered spouses for the purposes of priority of service. Upon signing in at the One-Stop, customers are asked to self-identify as veterans by a greeter and indicate their status on the sign-in sheet. Next, customers complete a form that inquires about veteran status, identifies barriers, and measures eligibility and receipt of other VA services. The Junction City One-Stop has a private conference room space where veterans are able to meet with DVOPs. While the One-Stop does not have specially designated computer terminals for veterans, if terminals are fully utilized, veterans receive priority for usage. After sign-in and completion of the form, the customer is sent to an ES staff person to review the questionnaire form, discuss barriers, and make an initial assessment of whether the customer should be referred to the DVOP for a more in-depth assessment and possible case management. If the ES worker determines that the veteran does not face barriers, the customer is encouraged to use the self-services available at the One-Stop and may get additional case management from the ES staff, but do not generally see a DVOP. However, if the veteran specifically requests to meet with a veterans representative, he or she would be immediately scheduled for such a meeting. Because of the scarcity of veterans representatives, DVOP services are reserved for veterans with barriers to employment. At the state and in One-Stop Centers, the policy is not simply to refer all veterans to DVOP for case management services. Rather, there is intent that veterans make full use of ES/Wagner Peyser and One-Stop services available in the self-help Resource Room. If the veteran is referred to a DVOP, he or she has a more detailed interview covering barriers to employment and potential services that could address such barriers. The DVOP then makes an informed decision about whether the veteran is in need of continuing case management services – and if this is the case, the DVOP would add the veteran to his/her case management caseload. The DVOP would then develop a plan of service with the veteran. If training is needed, the customer is referred to WIA for eligibility determination.

New Jersey (Newark). All new customers (whether veteran or not) attend a Re-employment Orientation when they first come to the Newark One-Stop Center. This orientation is held Monday through Friday, twice a day, and lasts roughly 45 minutes. During this orientation, a Wagner Peyser/ES staff makes a PowerPoint presentation that provides an overview of services available at the center (including veteran services). The orientation staff asks if there are any veterans attending the session. During the session, each attendee completes an ES registration form. So that veterans are identified, the registration form completed by veterans is color-coded (green); while non-veteran customers complete a form that is copied on regular white paper (note: the forms contain the same information). All of those attending the orientation receive a scan card, which is used to track subsequent services. After the orientation, customers return to the main desk at the entrance to the One-Stop to request services and/or set up an appointment with ES staff. Veterans and non-veterans are free to request programs and services that they want and/or to use self-service computers to search for jobs. To ensure that veterans receive the services they need (and priority of service), orientation staff notifies the LVER of each veteran attending the initial orientation, including those who may request to meet with a veterans representative or have special needs/barriers to employment. If a veteran requests to see a veterans representative following the orientation, the front-desk will immediately schedule the veteran for a meeting with the LVER (note: if the LVER is not available, the veteran will be scheduled to meet with a regular ES/Wagner Peyser employment counselor). The duration of this initial meeting varies – from about 20 minutes to 1 hour if the veteran faces serious barriers to employment. Because of special arrangements with community organizations and support service providers, according to one LVER, veterans tend to receive a richer mix of services than non-veterans and, if they face serious barriers to employment, tend to receive more one-on-one attention and referrals to a fuller range of services (e.g., if homeless, the veteran will be referred to a homeless service provider; if they have substance abuse issues, they will be referred to a VA facility for treatment). With regard to job placement, if appropriate, the LVER will contact employers directly to market individual veterans for job openings. Veterans follow the same basic flow as non-veterans through services, but have priority to receive intensive and training services over similarly qualified non-veterans. If they are interested in and in need of training, veterans (and non-veterans) must first take the TABE test and then meet with a counselor for assessment and to be authorized for training. Like non-veterans, veterans must also go through self-directed job search before being authorized to receive training assistance.

Note: Exhibit is based on site visits conducted to states and local workforce areas between November 2008 and April 2009.

Training. States and local workforce areas have varying policies with regard to providing training services for WIA-eligible customers, and within those general policies, states to varying degrees provide preference or priority for veterans. In addition, it should be noted across the states and local workforce areas included in this study that access to veterans representatives and case managed services seemed to make it easier and quicker for veterans in general to make a transition from intensive services into various training programs. In addition, several of the states had special funds available for providing more intensive services and training for veterans: For example, over the past 15 years, in California, EDD has awarded grants to, on average, 10 to 12 public, private nonprofit, and private for-profit organizations to provide employment and training services specially targeted on veterans. The purpose of these solicitations has been to select, through a competitive process, eligible applicants that are qualified and prepared to use the funds in innovative ways to provide services to recently separated veterans discharged within the past four years. During the most recent round of grants \$2 million was awarded. In Florida, the Florida State Board has also partnered with Florida's three grantees (two in Jacksonville and one in Cocoa, totaling \$650,000) of the federal Homeless Veteran Reintegration Program (HVRP). HVRP is intended to help homeless veterans obtain meaningful employment and to bolster other services to homeless veterans. Staff from One-Stops either goes to grantees, or the grantees have a presence at the One-Stops. The state has also given four grants to RWBs to develop innovative, employed worker training programs for various special populations, including veterans. Finally, Florida has created the "Military Family Employment Advocacy Program" to provide a variety of workforce services to the family of those in the military. This program operates out of seven One-Stops, all close to bases.

Of the states visited, the most distinctive and explicit policy with regard to priority of service for receipt of WIA-funded training was in Alaska and Ohio. In Alaska, as discussed earlier, the state policy stipulates for priority of service to be implemented in the WIA Adult and Dislocated Worker Program once 65 percent of WIA funding has been obligated within a given program year. Similarly, in Ohio the state policy is once a workforce area has entered a limited funding situation, defined as WIA funding for the program year being 75 percent obligated, a priority system takes effect and governs the enrollments to ensure that the those most in need receive intensive and training services. The state's policy is reflected in the very explicit policy followed at the local level with regard to POS when funds become limited, as illustrated by the policy that has been implemented locally in Lucas County (Ohio):

...A limited funding situation shall be deemed in effect when Lucas County Workforce Investment Act (WIA) Adult funding has expended and/or obligated 75% of the available Adult funds for Intensive and/or Training services. Obligated shall be defined as the amount of money for registered participants that it would take to finish the Intensive and/or Training services to that customer. The funds will be monitored at the end of each quarter to determine if they are limited. Once the county has entered a limited funding situation, the priority system shall take effect and govern the enrollments to ensure those most in need are served. Priority for intensive and training services will be given to those WIA eligible adults who are low income, as defined in the WIA Act, Section 101 (25) or receiving public assistance, and are county residents. As with all enrollments, veterans will be given preference. When a limited funding situation exists and the priority of service is instituted, staff and subcontractors must enroll into intensive and training services only those core customers who are receiving public assistance or are considered low income, with preference given to veterans. The public assistance or the reason for low income must be documented in the participant files. Veteran status must also be documented. Core services will remain open to the universal customer.

The approach to providing priority of service for training in other states is less explicit (than Alaska's or Ohio's policies) and in several states there is very little or no difference in the ways that training services are provided for veterans versus non-veterans. The following provides contrasting approaches to the more explicit approaches to priority of service with regard to training in two other states visited as part of this study:

- **Jacksonville, Florida.** All customers seeking training go through an intensive assessment to ensure that they have the background to pursue the desired career. While there is no formal POS regarding training, veterans representatives do personally speak with the training staff if the veteran needs training. There are also other funding sources available for training veterans, such as the VA Vocational Rehabilitation (about a three-week process, preceded by intensive services from veterans representatives) and the GI Bill.
- **Roseville, California.** The state has not issued specific guidance on what One-Stops should do if WIA training funds run short, but has passed along ETA guidance that stipulates that veterans should receive POS when it comes to employment and training services. Each WIB has discretion with regard to restricting or not restricting funds for training for veterans as appropriate. With regard to the Roseville One-Stop, circumstances have not yet arisen whereby veterans and non-veterans have competed for scarce training dollars. If a veteran and non-veteran had the same circumstances and dollars were scarce, then the veteran would, according to One-Stop administrators, receive preference. However, the one-on-one case management services provided by veterans representatives can give veterans a “leg up” with regard to going through the steps required to be approved for training. The process can be fairly demanding, with particular emphasis on demonstrating a strong commitment to undertaking training and a need for training in order to enter a high demand occupation. A veterans representative can be of considerable assistance in helping a veteran to complete the necessary paperwork and interview to qualify for training. In addition, because of this case management assistance, a veteran is likely to get into training faster than a non-veteran, as much as 4 to 6 weeks earlier.

Temporary Holds on Job Listings. One way in which most states and local workforce areas have been able to distinguish employment services provided to veteran versus non-veteran customers of One-Stops is to provide more one-on-one attention when it comes to job development/placement services and by placing a temporary hold on the release of job listings to allow veterans a first-shot at applying for job openings. **Exhibit 4-5** illustrates various approaches to posting job listings that states have taken. Several of the states (Alaska, California, and Ohio) have 24-hour holds on the release of job listings (during which veterans have access or can be matched to job orders). The approach in Kansas to holding of job orders is variable depending upon how the job listing is made – there is generally a 24-hour hold on job order listings, but if the listing is one that is taken by ES staff directly from an employer (rather

EXHIBIT 4-5: VARYING STATE APPROACHES TO DELAYING RELEASE OF JOB LISTINGS TO PROVIDE VETERANS WITH FIRST OPPORTUNITY TO APPLY

OVERVIEW OF STATE APPROACHES TO POSTING EMPLOYMENT SERVICE JOB LISTINGS
<p>Alaska. A 24-hour hold is placed on all job orders coming to the ES unless the business submitting the job order requests immediate dissemination of the job order. During this 24-hour hold, veterans will have an opportunity to review and apply for the job order. Veterans representatives maintain a roster of veterans and their job preferences so that they can match veterans to appropriate job orders – and veterans are either called or e-mailed to notify them within the 24-hour period of job orders. In some instances, the veterans representative will make a call on behalf of the veteran to the employer to introduce the veteran and perhaps even advocate on his/her behalf. According to one veterans representative interviewed, matching job orders to veterans and making calls to employers can make the critical difference in terms of the veteran getting an interview and landing a job.</p>
<p>California. A 24-hour hold is placed on all job orders coming to the ES (and entered into the CALJOBS system). During this 24-hour hold, veterans have an opportunity to review and apply for a particular job order, and employers only receive matches on veterans for listed positions. Veterans representatives maintain a roster of veterans and their job preferences so that they can match veterans to appropriate job orders – and veterans may be either called or e-mailed to notify them within the 24-hour period of job orders. According to one veterans representative interviewed, the effectiveness of the 24-hour hold depends in part on the search process used by employers – the hold can make a difference for veterans if an employer searches for candidates the first 24 hours and if the employer tends to hire the first qualified applicant. The veterans representative also noted that employers using the ES often tend to hire quickly, and thus, the 24-hour hold can make a difference.</p>
<p>Florida. The state previously had a 24-hour hold on job listings, but eventually came to view this as a disservice to employers. Currently, Florida’s computerized job listing service (called “Employ Florida Marketplace”) does not permit RWBs to have a 24-hour hold. For this reason, Region 8 (serving Jacksonville) ended this aspect of POS around two years ago. Employers can still search Employ Florida Marketplace for veterans, and this sometimes occurs.</p>
<p>Kansas. Under state policies, there is a hold on release of job orders submitted by employers so that veterans gain a head start over non-veterans in applying for job openings. Employers can submit job orders on-line via the web or by telephone (or in-person) to ES staff. For online posting of job orders, there is a 24-hour hold during which only veterans are able to see the postings. During this 24-hour period, veterans whose qualifications and skills match those of the job order are automatically emailed by the system to alert them of the job opening. In addition, employers receive a list of matched job seekers with veterans listed first (followed by non-veterans). Non-Veterans do not receive an e-mail alert during this 24-hour period, and cannot search for the position in the online database during the 24-hour hold period. If an employer calls in a job order or submits a job order in-person to ES staff rather than using the online system, this is referred to as a “staff-assisted job order.” Staff-assisted job orders are placed on a 4-hour hold, during which time the staff member taking the job order is to do a job match against veterans registered with the ES and call each veteran who matched the qualifications of the post.</p>
<p>Ohio. A 24-hour hold is placed on all job orders coming to the ES (and entered into the SCOTI system). During this 24-hour hold, veterans have an opportunity to review and apply for a particular job order, and employers only receive matches on veterans for listed positions. Veterans representatives maintain a roster of veterans enrolled in intensive services and their job preferences so that they can match veterans to appropriate job orders – and veterans may be either called or e-mailed to notify them within the 24-hour period of appropriate job orders.</p>
<p>Virginia. Every job order taken for ES and WIA customers goes into a hold for veterans until a DVOP, LVER, or other staff member (if neither a DVOP nor a LVR is available) reviews it. As decided by the state, job orders may stay in a veteran hold for a maximum of 48 hours. During this hold, automatic matching in the job database system (called the “Virtual One-Stop System” or “VOS”) between job postings and qualified individuals is conducted only against veteran records. This provides veterans with priority of service for labor exchange services.</p>

Note: Exhibit is based on site visits conducted to states and local workforce areas between November 2008 and April 2009.

than via the Internet), then there is just a 4-hour hold on the listing. The hold in Virginia is up to 48 hours (but may be released earlier). Florida has taken the opposite tack from these states – formerly having a 24-hour hold on job listings, the state decided to scrap this rule because it was felt to be a disservice to employers.

E. Training and Technical Assistance on Priority of Service

At the time the site visits were conducted under this study, VETS had either not yet or had recently issued final regulations on POS in the *Federal Register*. States had received guidance from ETA in the form of a TEGL, and ETA had added to its website a “Questions and Answers” (“Qs and As”) section that was intended to provide further guidance (on a program-by-program basis) of how states and local workforce areas should implement and comply with POS. According to workforce officials in each of the seven states visited, the TEGL and “Questions and Answers” website were the main sources of information that they used in terms of developing state policy on POS and in instructing and providing technical assistance to local workforce areas on how to implement POS. State workforce officials had also been able to clarify questions that they had concerning POS through telephone discussions or during compliance visits conducted by the ETA regional office. This included consultations with federal VETS representatives (i.e., DVET) outstationed to state workforce agency offices. Another source of training for both the state and local workforce areas was to send workforce officials and veterans representatives (DVOP/LVERs) for week-long training workshops at the National Veterans Training Institute (NVTI) in Denver. During various NVTI training modules veterans representatives (and other workforce officials) were briefed about provisions of priority of service and provided in-depth training on effective methods for serving veterans. Following the NVTI training sessions, veterans representatives returned to their One-Stops where they

served as a source of information and technical assistance to other One-Stop staff concerning POS and approaches to providing effective employment and training services for veterans. One state agency also brought NVTI instructors to the state to provide workshop training for both veterans representatives and workforce staff, which focused primarily on effective recruitment and service delivery for veterans but also included discussion on effective implementation of POS in state and local workforce agencies.

State workforce agencies also play a role in providing local workforce agencies with training on POS policies and implementation, as well as responding to questions that veterans representatives and other local workforce officials have about POS and more generally about providing employment and training services targeted on the veterans. **Exhibit 4-6** provides an illustration of the types of training and technical assistance provided in one state (Ohio), which is quite similar in nature to what was at the time of the site visits being provided in other states. Two important issues with respect to providing training on POS at the local workforce level were that (1) among partnering agencies at One-Stops there were varying levels of veteran involvement in programs and, hence, varying levels of interest in learning about and implementing POS; and (2) especially in larger One-Stop Career Centers with many partners, there can be considerable staff turnover, and a resulting need to frequently provide training on POS (and other issues related to effectively serving the needs of veterans) for newly hired staff. In addition to sending DVOP/LVERs for training at the National Veterans Training Institute (NVTI) in Denver, some of the more general types of training provided on POS (which is usually part of a wider effort to make local workforce staff knowledgeable about POS) has included the following:

- *Web-based Training for Wagner-Peyser and Other One-Stop Staff.* Some states employ web-based training systems, that can be utilized to train new staff on POS (and veterans'

EXHIBIT 4-6: SAMPLE OF TECHNICAL ASSISTANCE AND TRAINING PROVIDED FOR LOCAL WORKFORCE AGENCY STAFF IN ONE STATE (OHIO)

OVERVIEW OF VARIOUS TYPES OF TECHNICAL ASSISTANCE AND TRAINING PROVIDED FOR LOCAL WORKFORCE AGENCY STAFF
<p>Specialized Training of Veterans representatives in Denver. All new DVOP/LVERs (once they have completed their 120-day probationary period) attend specialized training at the National Veterans Training Institute (NVTI) in Denver. During various training modules held over a 2-week period, veterans representatives are briefed about priority of service and provided in-depth training on effective methods for serving veterans. These staff returns to their One-Stops and provide training to other (non-vet) staff at the One-Stop on how to effectively recruit and serve veterans.</p>
<p>Training/Monitoring Provided by 3 State Veteran Program Managers. Ohio is divided into three geographic regions and a Veteran Program Manager is assigned to each region. These 3 Program Managers provide training to One-Stop staff (including partner agency staff) on effective delivery of services to veterans, including requirements related to priority of service. These managers advocate for veterans within the One-Stop system to ensure that they receiving priority and regularly monitor the percentage of veterans being served by One-Stops (versus all customers) and whether veterans are receiving priority. The state vet coordinators also provide three days of orientation and training for each new veterans representative (referred to as Veterans Representatives Orientation Workshop, VROW).</p>
<p>Policy Book. DVOPs/LVERs have each been provided a policy book that sets out policies and procedures (including TEGLs) with regard to serving veterans.</p>
<p>Video Conferencing. Each month (and sometimes bi-weekly), the state sponsors a videoconference for workforce staff across the state (in One-Stops and other locations); some sessions have focused on services to veterans, including POS.</p>
<p>Monthly Staff Meetings. One-Stops have monthly staff meetings involving WIA/ES staff and partners, during which POS and veterans services may be discussed. For example, every 3rd Friday, there are staff meetings at the Lucas County One-Stop. These meetings involve program updates, cross-trainings, and other exchanges among various partnering organizations. The veterans representative makes presentations from time to time on various topics, including effective delivery of services for veterans and discusses POS.</p>

Note: Exhibit is based on a site visit conducted to Kansas in January 2009.

services, in general) and to provide refresher tutorials for existing staff. For example, in Alaska, all new ES staff are required to complete courses on a web-based training system, referred to as “Intra-Learn.” Three courses specifically include modules and references to the need to provide Priority of Service for veterans. ES staff are tested at the end of each training module and receive an upgrade in pay and status once they have successfully completed the various required training modules (and tests associated with each module). Prior to the implementation of Intra-Learn, the state had a series of PowerPoint slides that focused on POS and effective delivery of services to veterans. The Alaska Department of Labor is in the process of implementing the Intra-Learn system as a requirement for all new WIA employees.

- *State Conferences and Workshops.* Most states sponsor annual or quarterly conferences in various parts of their state to provide local workforce agency staff and One-Stop partnering agency staff information and training on policies and effective delivery of service. In several of the states visited, state officials indicated that at such conferences, workshops have been included that focus on POS policies and implementation, as well as more generally delivery of services to veterans within the One-Stop system.
- *Staff Meetings/Conference Calls at the Local Workforce/One-Stop Level.* Most One-Stops have staff meetings (generally quarterly or monthly) involving WIA/ES staff and partners, during which POS and veterans services are discussed. For example, an official at a One-Stop visited noted that during the monthly partners’ meeting at the center, a veterans representative discussed veterans’ service issues (including POS) for about 5 to 10 minutes during each meeting. Such meetings and conference calls often focus on issues and problems that emerge in One-Stop operations and provide a forum for dissemination of information to One-Stop managers and staff, including information relating to veterans’ services.
- *One-on-One or Group Training of New Staff.* A particularly important part of training focuses on informing new staff in One-Stops about POS and veteran services. Training of new veterans representatives often occurs one-on-one or in small groups, with a coordinator or experienced veterans representative providing hands-on training. Also, similar types of training, usually in a workshop setting, occurs for new and existing One-Stop staff.

F. Monitoring of Compliance on POS

In addition to providing training and technical assistance, each of the states visited conducts periodic compliance reviews to assess provision of services to veterans. A portion of these monitoring and compliance reviews focuses on determining if POS requirements are being

met. It should be noted, however, that at the time of the site visits, VETS had either not yet issued or had only recently issued final regulations on POS in the *Federal Register*, which made it challenging for states to hold local workforce areas and One-Stops to a specific standard with respect to POS. Several ways in which states monitor POS compliance are discussed below.

First, each state initially certifies One-Stop Centers and then re-certifies them within several years to make certain that such centers are providing appropriate and high quality services. For example, the Alaska Workforce Investment Board certifies One-Stop Career Centers every two years. As part of this process, questions are asked pertaining to POS implementation and availability of services to veterans.

Second, state workforce agencies conduct periodic monitoring visits, usually on an annual basis to some or all One-Stops and workforce agencies. For example, in California, EDD conducts annual monitoring visits to One-Stops. As part of this process, questions are asked pertaining to POS implementation and availability of services to veterans.

Third, states utilize data collected by local workforce areas through the state's data system and other methods to produce reports and analyze patterns of service delivery and outcomes for veterans. For example, in Kansas, the State VET coordinator conducts quarterly reviews of service logs and reports to see whether the priority of service is being administered correctly. The reports reviewed include the ES-9002 and the Vets-200 reports, and specific areas reviewed include the total number of veterans who are registered for the ES, receive job referrals, and receive case management services. In New Jersey, within the One-Stops, veterans representatives review the quarterly reports for their local area, including numbers and types of veterans served, services received and outcomes. Also in New Jersey, there is a newly implemented "Future Works" data system, which brings together ES/WP, TAA, and WIA data

into one system and allows for state and local program managers to customize reports to meet their needs. This system is real-time and provides a highly flexible report generating capability. State and local administrators can closely monitor and analyze service delivery patterns, client characteristics, outcomes, and other characteristics for any special population, including for veterans.

Finally, DVOPs/LVERs play an important role in monitoring POS and, more generally, recruitment, client flow, service delivery, and outcomes for veterans. For example, veterans representatives interviewed in one state indicated that they served as the “eyes and ears” with respect to implementation of POS and provision of workforce services for veterans. These veterans representatives indicated that they reported any emerging problems/challenges with respect to delivery of services (including POS) to the state’s coordinator overseeing veterans’ services.

G. Challenges of Implementing POS

State and local workforce agencies were not reticent about identifying some of the challenges to implementing POS and more broadly to providing high quality and cost-effective workforce development services well targeted on the needs of veterans. Several key issues and challenges with regard to providing POS for veterans are discussed below.

First, and foremost, because at the time of the site visits were conducted formal regulations had either not yet been issued or had only recently been issued by VETS, state and local workforce agency officials felt that it was very difficult to effectively implement POS at the state and local levels and to monitor compliance. In one state, a state official observed: “DOL needs to say, this isn’t guidance, this is the law...Technical letters (TEGLs) do not carry the full weight of regulation issued in the Federal Register.” Further, this state official

observed that One-Stops and partnering agencies have been left in the position where they have to interpret what is meant by priority of service – and this results in differences of interpretation across states and One-Stops.

Second, if POS is to be effectively implemented – especially within a One-Stop setting – there needs to be more coordination across agencies and programs at the national level with regard to providing services and priority for veterans. One state administrator, for example, observed that DOL issuance of regulations does not mean that partnering agencies in a One-Stop will necessarily adhere to these regulations: “My concern is that there is an expectation that if DOL issues regulations that everyone will follow...TANF program administrators see themselves under DHHS guidance... programs listen to their funding sources.” A further complicating factor is that there are some differing definitions of “veteran” across programs.

Third, and related to the previous challenge, there is a lot of variation across programs and agencies at the local level in terms of awareness of POS and willingness to implement POS. While Wagner Peyser and WIA staff typically have an understanding of POS, other One-Stop partners are not always aware of the provision and may face mandates to serve other special populations (such as welfare households, the homeless, mentally-ill, and low-income households). Even WIA Program staff face requirements to serve other special subpopulation of non-veterans, including youth, unemployed/dislocated workers, disabled individuals, and low-income/welfare populations. One-Stop staff needs to balance among various specially targeted populations and, as a result, POS for veterans can get watered-down and not addressed by some One-Stop partners.

Fourth, there are some more specific issues with regard to fully implementing POS within a One-Stop setting, which include willingness of veterans and eligible spouses to self-identify:

- Veterans do not always identify themselves as veterans when they enter One-Stops – they may not want to be singled out or may feel that veteran status could hurt their chances of securing a job in some occupations or with some employers. Additionally, it was noted by one workforce official that female veterans, those who were not involved in combat, those with less than honorable discharges, and eligible spouses sometimes do not self-identify.
- Eligible spouses are often difficult to identify. The form used to collect identifiers and demographic characteristics when an individual enters the One-Stop often does not include a question to determine if the individual is an eligible spouse of a veteran. The definition of an eligible spouse is also long and convoluted, which makes it difficult to ask and apply to new customers entering the system.

Fifth, some state and local workforce official noted that there has been a decrease in inflation-adjusted funding for employment and training services (e.g., WIA and Wagner-Peyser funding) that makes it difficult to provide intensive and training services to those in need (including veterans). As a result of stagnant funding or cutbacks in funding for the workforce development system, staffing levels – including DVOPs and LVERs – have decreased in recent years, as well as available funds to provide training. This has generally made it more challenging to provide intensive one-on-one services and training needed by veterans (and non-veterans, as well) served through the One-Stop system. For example, in New Jersey, with respect to serving veterans, there has been a steep decline in the number of veterans representatives (DVOPs/LVERs) – decreasing over about a five-year period from 48 FTE (full-time equivalent) DVOPS to 32.5 FTE DVOPs and from 24 FTE LVERs to 10.5 FTE. The steady decline in the number of veteran representatives has created challenges to providing the types of one-on-one, case-managed services that veterans often want (and expect) when they come to One-Stop Centers. In some instances, One-Stops have had to use Wagner Peyser staff to

provide individualized/intensive services that might otherwise had been provided by a veterans representative. Also, looking ahead, the workforce system in New Jersey will need to respond to the largest deployment in the state's history of reserve forces which will be coming back to the state in the coming months – which will further stress the workforce system and already stretched veterans representatives.

Finally, there is some wariness in states and at the local level that POS could potentially be misinterpreted and result in less effective services for veterans and unrealistic expectations for services. For example, one state official observed that his state agency does not want veterans to lock into a veterans representative, but rather use the full range of One-Stop services (including, as appropriate, veterans representative assistance): “We are not old school, which was – you are a vet...go see a veterans representative.” Also, this same state does not want to give veterans the impression that priority of service means “entitlement” to training, jobs, or other services. A complicating factor is related to implementing and ensuring POS requirements are met within a One-Stop system, when some customer may never come into a local office (primarily preferring to interact remotely using the state's website and/or other job vacancy sites, such as Monster.com) or may primarily come into One-Stop Centers to use the self-service resource room and not to interact with veterans representatives or other One-Stop staff. As one state official observed: “There is a question of how far do you take veteran priority of service in a self-service world.”

CHAPTER 5: CONCLUSIONS

This final chapter provides a summary of key study findings and conclusions, as well as future steps ETA should consider with respect to evaluating POS. It is very important to note that this study was undertaken prior to DOL's issuance of the Final Rule on POS for covered persons in the *Federal Register*. This makes some of the study's findings possibly moot or obsolete. For example, the complaints from national associations and state/local workforce officials about a lack of formal rules to guide POS implementation are moot. Findings from analysis of WIASRD data and site visits could also no longer apply.

Analysis of WIASRD Data. The analysis of WIASRD data on WIA Adult and Dislocated Workers was aimed at better understanding variation among veterans and non-veterans in participant characteristics, service utilization, and outcomes. These analyses show that veterans differ on some key characteristics from other WIA users – for example, veterans are more likely to be:

- male;
- in the two oldest age categories (45 to 54 years old and 55 years or older);
- white and non-Hispanic;
- have education beyond high school (though data were missing on education for about one-quarter of non-veterans and one-third of veterans);
- have a disability;
- not employed at registration; and
- an Unemployment Insurance (UI) claimant or exhaustee.

Analyses of WIASRD data indicate that (for PY 2003-05) WIA veteran and non-veteran exiters had generally similar patterns of service receipt:

- With regard to the WIA Adult Program, veterans were slightly less likely to receive intensive services (68.7 percent for veterans versus 74.5 percent of non-veterans), to

receive training services (53.3 percent for veterans versus 56.5 percent of non-veterans); and to establish ITAs (22.1 percent for veterans versus 27.1 percent of non-veterans).

- With regard to the WIA Dislocated Worker Program, patterns of receipt of service for veterans and non-veterans were very similar (i.e. less than a two percentage point difference between veterans and non-veterans on receipt of intensive services, training, and ITAs).

It is important to keep in mind that higher or lower levels of service receipt by veterans do not necessarily indicate that veterans are or are not receiving priority of services under the WIA program—their needs may be different.

Finally, veteran and non-veteran exiters exhibited very similar patterns in terms of pre- and post-employment rates (i.e., less than a three percentage point difference in employment rates between WIA veterans and non-veterans in both the WIA Adult and Dislocated Worker programs). However, veterans earned substantially more before entering the program, as well as after exiting the Adult and Dislocated Worker Programs. The higher average earnings before entry into WIA may reflect that veterans enrolling in WIA come to the program with more work-related experience and educational qualifications – and hence, perhaps also may have less need (or desire) for training services.

Regression analysis of WIASRD data was used to determine if veterans were more or less likely to receive intensive services and training than comparable non-veterans. We found that veterans are less likely to receive intensive services than comparable non-veterans, but among customers who receive intensive services, veterans are more likely to receive training. These results must be interpreted with caution, because the different service rates for veterans may be due to differences in characteristics that were not measured.

Interviews with Veterans' and Workforce Organizations. Project staff conducted telephone interviews between March and May 2009 with representatives from the four veterans'

organizations: Disabled American Veterans; Veterans of Foreign Wars (VFW) of the United States; the American Legion; and Vietnam Veterans of America. In addition, representatives of two workforce organizations were interviewed: the National Association of State Workforce Agencies and the National Association of Workforce Boards. Major findings were:

- POS notification on the DOL website (i.e., referred to as “Questions & Answers”) was not viewed as sufficiently detailed or clear – several veterans’ organizations suggested that ETA needed to issue formal regulations (i.e., a final rule on POS) including clearer guidance for individual ETA programs.
- Information/knowledge of POS at WIBs/One-Stop Career Centers is sometimes incomplete or incorrect. DOL is not viewed as having sufficiently “promoted” POS.
- DOL has not come up with methods to ensure POS is enforced at state/local levels – as a result, there is considerable variability across states in whether and how POS is implemented.
- A further challenge cited by several of the organizations, is that even if there is a strong commitment to enforcement of POS, it is sometimes difficult to determine if veterans are in fact receiving POS.
- Finally, there is a need for ongoing technical assistance and training on what POS means and how to implement it.

Findings from Site Visits to Seven States and Local Areas. During site visits to seven states and local workforce areas within each state, the research team gathered information and conducted interviews aimed at building an in-depth “on-the-ground” understanding of implementation of POS at the state and local levels. The states and local areas visited were selected purposively and included:

- Kansas (Area II – Heartland Works [Junction City])
- California (Golden Sierra Job Training Agency [Auburn])
- Virginia (Virginia Beach-Norfolk-Newport News, VA-NC Metro Area)
- Alaska (Anchorage, AK Metro Area)
- Florida (Jacksonville, FL Metro Area)
- Ohio (Toledo, OH Metro Area)
- New Jersey (Newark-Union, NJ-PA Metro Division)

States varied significantly in their approaches to serving veterans; many state activities that were intended to enhance services to veterans were not directly tied to POS, but their intent was to increase services to veterans. States and local workforce areas conducted intensive outreach and recruitment efforts to bring veterans into One-Stop Career Centers, and once they were there, provided ready access to case managed services (often provided by DVOPs/LVERs):

- All states visited had strong veteran outreach programs intended to bring more veterans into the One-Stop Career Centers. Relevant activities include job fairs, participation in TAP sessions, outstationing staff at VA facilities, development and use of public service announcements, and making presentations and distributing brochures at other human service agencies serving veterans.
- In all states, workforce agencies tried to identify veterans upon entry to One-Stops. Veterans were then offered the opportunity to see DVOPs and LVERs. Although DVOP and LVER services do not represent POS, quick access to these staff usually reduces the time before a customer can pass through core and intensive services and receive training.

However, in the absence of regulations, states and local areas were not certain what activities constituted POS. Some states developed clear POS policies, but others simply passed on the ETA information from Training and Employment Guidance Letters (TEGLs) and the “Q and As” (from ETA’s website), which were not very specific and did not carry the weight of regulations. As the site visits under this study were nearing an end, VETS issued the Final Rule on POS and ETA began to provide training to state and local staff on POS through webinars. States sometimes struggled with the fact that POS is mandated in JVA, but the WIA statute specifies priority for other groups, e.g., public assistance recipients and other low-income individuals.

Some states and local areas had very specific POS approaches to serving veterans:

- Six of the seven states put a hold on job listings for at least 24 hours and only provided access to the listings to veteran customers and to staff who would try to place veterans in these jobs.
- Veterans often have the opportunity to use special rooms or computers at One-Stops, which means that if a One-Stop Center is crowded, veterans are able to conduct self-service activities more quickly.

- Several of the states had special funds available for providing more intensive services and training for veterans: For example, over the past 15 years, in California, the Employment Development Department (EDD) has awarded grants to, on average, 10 to 12 public, private nonprofit, and private for-profit organizations to provide employment and training services specially targeted on veterans.
- Of the states visited, the most distinctive and explicit policies with regard to priority of service for receipt of WIA-funded training were in Alaska and Ohio. In Alaska, the state policy stipulates for priority of service to be implemented in the WIA Adult and Dislocated Worker Programs once 65 percent of WIA funding has been obligated within a given program year. Similarly, in Ohio the state policy is once a workforce area has entered a limited funding situation, defined as WIA funding for the program year being 75 percent obligated, a priority system takes effect and governs the enrollments to ensure that those most in need receive intensive and training services. Hence, in these states, when there is scarcity of WIA funding for training, these requirements can translate into a greater probability of veterans receiving WIA-funded training.

Finally, states and local workforce areas identified a number of challenges to implementing POS effectively. First, because the final rule was not yet issued (or had just been issued) at the time the site visits were conducted under this study, state and local officials were concerned that they did not know precisely what was meant by POS and how to monitor compliance. Second, state and local agency staff were concerned that even after VETS issued regulations, other agencies, such as the U.S. Department of Health and Human Services, would not issue regulations, and other One-Stop partners would not view POS as important or required. Third, several One-Stop staff suggested that veterans or eligible spouses are sometimes reluctant to identify themselves as veterans, thus making it hard to provide them with POS. The rules for a qualifying spouse are somewhat complicated, making it difficult to determine eligibility using a simple questionnaire or form. Finally, resources for workforce investment programs have declined in inflation-adjusted terms for many years, making it difficult to adequately serve all the potential customers in need of services.

Future Activities. Now that the POS regulations have been in place for over a year (since December 2008), it might be worthwhile to conduct some additional research on implementation of POS by state and local workforce agencies. Analysis of WIASRD data after the regulations were issued would ordinarily be of interest, but in the short run the severe recession and the availability of ARRA funds will make interpretation of research results difficult at this time. Interviews with the veterans' and workforce investment organizations could be updated to learn these organizations' views on the regulations, as well as technical assistance and training provided by ETA. A new round of site visits to states and local workforce areas would also be of interest. Visits to the same seven states would be useful to learn if the regulations have changed behavior in the states and local areas that did not undertake as big an effort as other states. An alternative to site visits would be to conduct a round of telephone interviews with states or possibly an Internet-based survey of all states on the status of POS implementation, challenges to implementing POS, and recommendations that state/local workforce areas might have to improve POS and services provided through the workforce system for veterans. Finally, it might be useful to obtain the views of veterans toward POS and their general level of satisfaction with services received either by conducting focus groups or a large-scale survey effort. It is, however, important in conducting focus groups or a survey to recognize that veterans may be unaware or only have a vague understanding of POS and of the possible services they may be eligible to receive through the workforce system. Should ETA determine such a survey would be useful, the final appendix of this report provides a starting point for launching such a survey of veteran and non-veteran customers of the One-Stop system (including a sampling methodology and instrument that could potentially be used or modified to ETA's specifications).

APPENDIX A:

**DISCUSSION GUIDE FOR DOL/ETA OFFICIALS, NATIONAL WORKFORCE
DEVELOPMENT ASSOCIATIONS, AND VETERANS' ASSOCIATIONS**

APPENDIX A:

DISCUSSION GUIDE FOR DOL/ETA OFFICIALS, NATIONAL WORKFORCE DEVELOPMENT ASSOCIATIONS, AND VETERANS' ASSOCIATIONS

Question for Federal DOL Officials

1. What policies exist at the federal level to implement the priority of service provisions in JVA? Please provide a copy of TEGLs and/or other documents that set policies or provide guidance to regional offices, states, or local areas.
2. To what extent have the Department of Labor's two agencies with primary responsibility for employment assistance to veterans, VETS and ETA, collaborated to provide priority of service to veterans?
3. To what extent are State and Local Workforce Boards fully aware of the POS provision? Do they use their strategic plans and policy-making authority to effectively implement it?
4. To what extent are veterans aware of the priority of service provision with regard to obtaining services through the workforce investment system?
5. To what extent is the workforce investment system (particularly services provided through the One-Stop Career Centers) giving priority of service to veterans? What does priority of service mean when it comes to the provision of services through local WIBs and One-Stop Career Centers?
6. Do you believe that all assets within the workforce investment system are being effectively used to serve veterans? Are there differences between the way in which veterans and non-veterans are treated within the workforce investment system? Are WIBs and One-Stop Career Centers going beyond simply referring veterans to VETS representatives?
7. To what extent do you believe states/local areas have targeted and well-coordinated strategies for serving veterans? What happens, for example, when WIA funding for training runs low – do veterans get priority for remaining available training funds?
8. In local areas where there have been base closures, does the One-Stop Career Center system integrate its service delivery with the TAP program?
9. Have federal staff provided training or other technical assistance on how to apply the priority of service provision? Have training or technical assistance been provided for states? For WIBs/One-Stop Career Center staff? If so, please describe.
10. Has the inclusion of Priority of Service requirements in the Formula Review Tool resulted in better monitoring of veterans' outcomes by grantees?

11. Has your office conducted any analyses of data comparing service mix or employment outcomes for veterans compare to non-veterans? If so, how do employment outcomes compare to results before POS was enacted? Has the priority of service provision impacted the "mix" of services available to veterans? How do quantities and mixes of services provided to veterans compare to those provided to non-veterans? How do quantities and mixes of services provided to veterans compare to those provided to veterans prior to implementation of POS?
12. What challenges does the workforce investment system face in applying the priority of service provision? Do you have any suggestions for overcoming these challenges?

Questions for Regional DOL Officials

1. In addition to policies/guidance issued by the national office, has your regional office issued special guidance to states within your region to implement the priority of service provisions in JVA? If so, please provide a copy of this guidance.
2. Within your region, to what extent have the Department of Labor's two agencies with primary responsibility for employment assistance to veterans, VETS and ETA, collaborated to provide priority of service to veterans?
3. To what extent are State and Local Workforce Boards within your region fully aware of the POS provision? Is there variation across states/local WIBs? Do states within your region use their strategic plans and policy-making authority to implement it?
4. Within the states in your region, to what extent are veterans aware of the priority of service provision? Is there variation across states within your region?
5. Within the states in your region, to what extent is the workforce investment system (particularly services provided through the One-Stop Career Center delivery system) giving priority of service to veterans? How much variation is there across states and local areas in your region? What does priority of service mean when it comes to the provision of services through local WIBs and One-Stops?
6. Do you believe that all assets within the workforce investment system are being effectively used to serve veterans? Within your region, are there differences between the way in which veterans and non-veterans are treated within the workforce investment system? For example, are WIBs and One-Stop Career Centers going beyond simply referring veterans to VETS representatives? Is there variation across states or local areas?
7. To what extent do you believe states/local areas within your region have targeted and well-coordinated strategies for serving veterans? What happens, for example, when WIA

funding for training runs low – do veterans get priority for remaining available training funds?

8. In states and local areas within your region where there have been base closures, does the local workforce investment system/One-Stop Career Center system integrate its service delivery with the TAP program?
9. Have federal regional staff provided training or other technical assistance on how to apply the priority of service provision? If so, has this training or technical assistance been provide for states within your region? For WIBs/One-Stop Career Center staff? If so, please describe.
10. Within the states in your region, what role do Disabled Veteran Outreach Program (DVOP) specialists and Local Veterans' Employment Representative (LVER) play in the One-Stop Career Center to ensure veterans receive priority of service for all One-Stop services?
11. Has the inclusion of Priority of Service requirements in the Formula Review Tool resulted in better monitoring of veterans' outcomes by grantees?
12. Has your regional office conducted any analyses of data comparing service mix or employment outcomes for veterans compare to non-veterans? If so, how do employment outcomes compare to results before POS was enacted? Has the priority of service provision impacted the "mix" of services available to veterans? How do quantities and mixes of services provided to veterans compare to those provided to non-veterans? How do quantities and mixes of services provided to veterans compare to those provided to veterans prior to implementation of POS?
13. What challenges does your regional office and the workforce investment system within your region in general face in applying the priority of service provision? Do you have any suggestions concerning how these challenges could be overcome?

Questions for National Workforce Development Associations and Veteran's Organizations

1. Does your organization have knowledge of how Priority of Service (POS) has been implemented within the One-Stop Career Center system? If so, please discuss.
2. Has your organization conducted or sponsored any special studies that have assessed POS implementation within the workforce investment system at the federal, state, or local levels? If yes, what have these studies generally concluded? If available, please provide a copy of any reports detailing study findings?
3. Is your organization aware of other studies/reports that have examined POS implementation within the workforce investment system? If so, who conducted these studies and how can we obtain a copy of reports from these studies?
4. What additional policy guidance or technical assistance is needed by state and local workforce investment agencies to effectively implement POS for veterans within the workforce investment system?
5. Does the structure of the One-Stop Career System create any barriers to implementation of POS (e.g., bringing many partners together, existence of state/local flexibility, other priorities built into the law)? If so, please discuss.

APPENDIX B:
STATE SITE VISIT DISCUSSION GUIDE

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STATE SITE VISIT DISCUSSION GUIDE

Introduction/Purpose Statement: *Our visit here today is part of a U.S. Department of Labor (Employment and Training Administration) funded evaluation of implementation of the Priority of Service requirements under the Jobs for Veterans Act (JVA) in One-Stop Career Centers. DOL contracted with Capital Research Corporation, a policy research firm located in the Washington, D.C. metropolitan area – along with its subcontractors The Johns Hopkins University Institute for Policy Studies and the Lewin Group -- to conduct this study. The evaluation is intended to provide a better understanding of how veterans are provided access to workforce investment services through the One-Stop Career Center system. We are conducting site visits to seven states and seven local areas as part of this study. In addition to these site visits, we are also analyzing several large-scale databases to understand trends across all states. During our site visits to each of the seven states, we are talking to state workforce officials, and then visiting one locality within the state to discuss service delivery for veterans through the One-Stop Career Center system, with a specific focus on services delivered through the Workforce Investment Act (WIA), the Employment Service (ES), and the VETS programs. Our aim is to learn from your experiences, not audit or judge your programs.*

Confidentiality Statement: *Before beginning the interview, we want to thank you for agreeing to participate in the study. We know that you are busy and we will try to be as focused as possible. We have many questions and are going to talk to many people, so please do not feel as though we expect you to be able to answer every question. In addition, before we start, we want to let you know that though we take notes at these interviews, information is never reported with the name of the respondent. The views you express will be kept confidential, and nothing we publish in this evaluation will identify you or reveal statements you make to us. When we write our reports and discuss our findings, information from all interviews is compiled and presented so that no one person could be identified. Do you have any questions before we begin?*

From each interviewee, collect the following contact information (and a business card, if available):

- *Name*
- *Position*
- *Agency/Organization*
- *Address*
- *Telephone/FAX*
- *Email*

1. What are the distinguishing characteristics about the state's workforce and veteran population, including:
 - Unemployment rate; recent mass layoffs and plant closings; general availability of job openings (including occupations in which there are shortages)
 - Recent/planned military base closures/realignments – their size, timing, and effects on the state and specific regions within the state
 - Size/characteristics of the veteran population; concentration of veterans within the state

2. Please provide a general overview of the structure of the One-Stop Career Center System in the state:
 - How many full-service and satellite centers are there across the state?
 - Are they structured the same way? If not, please discuss differences across centers?
 - Are ES offices/staff integrated into the One-Stop Career Centers, in stand-alone offices, or both? Does the structure vary across the state? If the ES is in stand-alone offices, are ES (including DVOP/LVER) staff outstationed on a regular basis to One-Stop Career Centers?

3. Are there a specific set of policies that exist at the state level to implement the priority of service provision in JVA? If yes, could we have a copy of these policies? If not, are they needed? Please provide a general overview of how priority of service is administered within the One-Stop Career Center system in the state. Is POS administered the same in all local areas/One-Stop Career Centers across the state? If not, how does POS administration vary and why?

4. Do One-Stop Career Centers within your state use the same outreach methods to inform veterans and non-veterans about available services? Are there any special outreach efforts used to inform/recruit veterans? .Is it any easier or more difficult to get veterans (versus other One-Stop Career Center customers) to come in and use One-Stop Career Center services in the state? If so, why?

5. What does priority of service mean when it comes to the provision of services through the One-Stop Career Center system in the state? What processes are in place at One-Stop Career Centers to ensure the priority of service provision is being applied?

6. Has the priority of service provision impacted the "mix" of services available to veterans within the One-Stop Career Center system your state? If so, how and why? How do quantities and mixes of services provided to veterans compare to those provided to non-veterans? How do quantities and mixes of services provided to veterans compare to those provided to veterans prior to implementation of POS?

[Request readily available data for recent program year(s) comparing service mix for veterans versus non-veterans.]

7. What happens when One-Stop Career Center/WIB funding in a local area for intensive or training services runs low – do veterans get priority for remaining available intensive/training funds? How does veteran status rank compared to other factors such as income in providing priority of service?
8. Has the state provided training on how to apply the priority of service provision? If yes, please describe the types of training provided (e.g., who receives training, duration and frequency of training; and content of training).
9. Does the state have any special practices or procedures with regard to “marketing” veterans to businesses for job openings? If yes, please describe.
10. Are any One-Stop Career Centers within the state currently involved or been involved in the past with the TAP program? If so, please describe the interaction and the extent to which the One-Stop Career Center system has integrated service delivery with the TAP program.
11. Does the One-Stop Career Center system in the state offer any other special services or activities for veterans that we have not yet described? What other services are available to veterans through other state programs? Please briefly discuss these other programs and the extent to which such programs are provided through or linked with the One-Stop Career Center system in the state.
12. Are there any procedures/services the One-Stop Career Center/WIB/ES uses that are particularly effective in assisting veterans to gain employment and/or improve earnings?
13. Finally, from the perspective of the state, is the workforce investment system giving priority of service to veterans? Please provide available data to support your view (i.e., that the system is or is not giving POS to veterans). If not, where are the gaps in the system and what can be done to improve the system? Are all assets (programs/services) within the One-Stop Career Center system being used? What challenges does the One-Stop Career Center system face in applying the priority of service provision? Does the state have any suggestions for improving how POS is implemented in the workforce investment system?

APPENDIX C:

**LOCAL SITE VISIT DISCUSSION GUIDE:
PROGRAM OFFICIALS FROM THE LOCAL WIB
AND ONE-STOP CAREER CENTER(S)**

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Introduction/Purpose Statement: *Our visit here today is part of a U.S. Department of Labor (Employment and Training Administration) funded evaluation of implementation of the Priority of Service requirements under the Jobs for Veterans Act (JVA) in One-Stop Career Centers. DOL contracted with Capital Research Corporation, a policy research firm located in the Washington, D.C. metropolitan area – along with its subcontractors The Johns Hopkins University Institute for Policy Studies and the Lewin Group -- to conduct this study. The evaluation is intended to provide a better understanding of how veterans are provided access to workforce investment services through the One-Stop Career Center system. We are conducting site visits to seven states and seven local areas as part of this study. In addition to these site visits, we are also analyzing several large-scale databases to understand trends across all states. During our site visits to each of the seven states, we are talking to state workforce officials, and then visiting one locality within the state to discuss service delivery for veterans through the One-Stop Career Center system, with a specific focus on services delivered through the Workforce Investment Act (WIA), the Employment Service (ES), and the VETS programs. Our aim is to learn from your experiences, not audit or judge your programs.*

Confidentiality Statement: *Before beginning the interview, we want to thank you for agreeing to participate in the study. We know that you are busy and we will try to be as focused as possible. We have many questions and are going to talk to many people, so please do not feel as though we expect you to be able to answer every question. In addition, before we start, we want to let you know that though we take notes at these interviews, information is never reported with the name of the respondent. The views you express will be kept confidential, and nothing we publish in this evaluation will identify you or reveal statements you make to us. When we write our reports and discuss our findings, information from all interviews is compiled and presented so that no one person could be identified. Do you have any questions before we begin?*

From each interviewee, collect the following contact information (and a business card, if available):

- *Name*
- *Position*
- *Agency/Organization*
- *Address*
- *Telephone/FAX*
- *Email*

A. GENERAL BACKGROUND ON THE LOCAL WIB AND ITS ONE-STOP CAREER CENTER SYSTEM

1. What is the geographic area served by the WIB and distinguishing characteristics about the local area, including:
 - Unemployment rate; recent mass layoffs and plant closings; general availability of job openings (including occupations in which there are local shortages)
 - Recent/planned military base closures/realignments – their size, timing, and effects on the local workforce and One-Stop Career Center
 - Size/characteristics of the veteran population

2. Please provide general overview of the structure of the One-Stop Career Center System:
 - How many full-service and satellite centers serve the local area?
 - If there is more than one One-Stop Career Center, are they structured the same way or different? How?

3. Are there a specific set of policies that exist at the state or local WIB level to implement the priority of service provision in JVA? If yes, could we have a copy of these policies? If not, are they needed?

4. Please provide a general overview of how priority of service is administered within the WIB and the One-Stop Career Center system.

B. SPECIFIC QUESTIONS ABOUT SERVICES DELIVERED AT EACH ONE-STOP CAREER CENTER INCLUDED IN THE LOCAL SITE VISIT (NOTE: SOME LOCALITIES MAY HAVE MORE THAN ONE CAREER CENTER -- IF THERE IS MORE THAN ONE CAREER CENTER, TWO CAREER CENTERS WILL BE VISITED; QUESTIONS BELOW MAY BE ANSWERED BY WIB OR ONE-STOP CAREER CENTER STAFF)

1. How many total paid staff work at the One-Stop Career Center (i.e., are co-located at One-Stop Career Center), and if available, please provide a breakdown of staff co-located at the One-Stop Career Center for the following programs/services:
 - WIA
 - ES/VETS – Are Disabled Veteran Outreach Program (DVOP) specialists or Local Veterans' Employment Representatives (LVER) located at the One-Stop Career Center? If so, how many and is there a full-time presence? If part-time, how many hours are they at the One-Stop Career Center each week? How many other ES staff are there?

- If data are readily available – provide # of staff and role of other co-located staff at the One-Stop Career Center for other employment and training programs and other programs/agencies
2. About how many customers are served by the One-Stop Career Center (e.g., estimates by day, week, month, and/or annually)?
 - Total One-Stop Career Center customers
 - Number/proportion who are veterans
 - How do the characteristics and service needs of the veteran population compare to non-veterans served through the One-Stop Career Center – if readily available, provide data for current/recent year on characteristics the veteran population versus non-veteran population?
 3. Does your One-Stop Career Center use the same outreach methods to inform veterans and non-veterans about available services? Are there any special outreach efforts used to inform/recruit veterans within the local area? Does your One-Stop Career Center receive referrals of veterans from other programs, military facilities, employers, or other sources? If so, please describe these referral sources.
 4. Is it any easier or more difficult to get veterans (versus other One-Stop Career Center customers) to come in and use One-Stop Career Center services? If so, why?
 5. When a customer first comes to the One-Stop Career Center, how and when is it determined he or she is a veteran? Is the process always the same?
 6. Are veterans generally aware of the priority of service provision when they first come into the One-Stop Career Center? If yes, where do they learn about priority of service?
 7. If they are not aware of priority of service when they come in, does your One-Stop Career Center staff inform them about the priority of service provision? If so, when and who informs the veteran of the POS provision?
 8. Please describe the typical way in which veterans versus other (non-veteran) customers flow through services at your One-Stop Career Center (i.e., from recruitment/assessment into training and job search/placement, etc.)? [Note: If readily available, please provide a flow diagram that shows the typical flow of veterans through the system from the point of intake.] Please highlight any differences in flow, services, or who provides services for veterans versus non-veterans.
 9. What does priority of service mean when it comes to the provision of services through your One-Stop Career Center? What processes are in place at the One-Stop Career Center or within the WIB to ensure the priority of service provision is

- being applied?
10. Has the priority of service provision impacted the "mix" of services available to veterans within the One-Stop Career Center? If so, how and why? How do quantities and mixes of services provided to veterans compare to those provided to non-veterans? How do quantities and mixes of services provided to veterans compare to those provided to veterans prior to implementation of POS? [Request readily available data for recent program year(s) comparing service mix for veterans versus non-veterans.]
 11. What happens when One-Stop Career Center/WIB funding for intensive or training services runs low – do veterans get priority for remaining available intensive/training funds? How does veteran status rank compared to other factors such as income in providing priority of service?
 12. Are One-Stop Career Center/WIB/ES staff provided training on how to apply the priority of service provision? If yes, please describe the types of training provided (e.g., duration and frequency of training; and content of training).
 13. Does the One-Stop Career Center/WIB/ES have any special practices or procedures with regard to “marketing” veterans to businesses for job openings?
 14. If not yet discussed already, how, if at all, do DVOP/LVER staff get involved in providing services at the One-Stop Career Center? What role, if any, do DVOP/LVER staff play in One-Stop Career Center to ensure veterans receive priority of service for all One-Stop Career Center services?
 15. Is the One-Stop Career Center/WIB currently involved or has it been involved in the past with the TAP program? If so, please describe the interaction and the extent to which the One-Stop Career Center system has integrated service delivery with the TAP program.
 16. Does the One-Stop Career Center/WIB offer any other special services or activities for veterans that we have not yet described?
 17. How do the employment outcomes for veterans using the One-Stop Career Center compare to non-veteran customers? If outcomes differ, why? How do employment outcomes compare to results before POS was enacted? [If readily available, please provide data for recent program year(s) for veterans versus non-veterans – note that this may related to only WIA-enrolled veterans.]
 18. Are there any procedures/services the One-Stop Career Center/WIB/ES uses that are particularly effective in assisting veterans to gain employment and/or improve earnings?
 19. Finally, from the perspective of the WIB/One-Stop Career Center/ES, is the

workforce investment system giving priority of service to veterans? If available, please provide available data to support your view (i.e., that the system is or is not giving POS to veterans). If not, where are the gaps in the system and what can be done to improve the system? Are all assets (programs/services) within the One-Stop Career Center system being used? What challenges does the One-Stop Career Center system face in applying the priority of service provision? Does the One-Stop Career Center/WIB/ES have any suggestions for improving how POS is implemented in the workforce investment system?

APPENDIX D:
STATE SITE VISIT SUMMARIES

STUDY OF PRIORITY OF SERVICE UNDER THE JOBS FOR VETERANS ACT SITE VISIT SUMMARY -- ALASKA

State: Alaska

Dates of Visit: 10/1-10/3/2008

- **State Geography/Population.** Alaska is the largest state in the United States in land area (more than twice as large as Texas, the next largest state). It is one of the least populated states (ranked 47th), with an estimated population of 683,478 (in 2007). Alaska is the least densely populated state, at 1.1 people per square mile.¹³ According to the 2000 U.S. Census, 69% of single-race Alaska residents were white and 16% were Native American or Alaska Native, the largest proportion of any state. Multiracial/Mixed-Race people are the third largest group of people in the state, totaling 7% of the population. Alaska has the highest percentage of veterans among states in the US – 17 percent of the civilian labor force are veterans. State administrators estimated that about 80 percent of the veterans in the state reside in the Anchorage/Mat-Su area. Finally, Alaska is the 6th wealthiest state in terms of per capita income.
- **State Economy.** The oil and gas industry dominates the Alaskan economy, with more than 80% of the state's revenues derived from petroleum extraction. Alaska's main export product (excluding oil and natural gas) is seafood (primarily salmon, cod, Pollock and crab). Manufacturing is limited, with most foodstuffs and general goods imported from elsewhere. Employment is primarily in government and industries such as natural resource extraction, shipping, and transportation. Military bases are a significant component of the economy in both Fairbanks and Anchorage. There is also a growing service and tourism sector. According to the Alaska Department of Labor and Workforce Development, Alaska's seasonally adjusted unemployment rate in August 2008 was 6.9 percent, (compared to 6.1 percent, nationally). Alaska's estimated payroll job count in August was 342,200. Although Alaska's payroll job growth has slowed in 2008, gains in the oil industry continued to fuel modest overall gains. High oil prices have created job growth and budget surpluses for the state, which have helped cushion declines in the construction and seafood processing industries, and slowdowns in several other areas.¹⁴ There are seasonable swings in employment, with typically higher employment levels in the summer. There is also high in-and out-migration to the state.
- **Structure of Workforce Development System.** Alaska is a single-WIB state (note: it formerly had two workforce areas, including a "balance of state" workforce area). The state has a total of 23 One-Stop Career Centers (referred to as Alaska Job

¹³Background on Alaska's geography, population, and economy comes from Wikipedia (at <http://en.wikipedia.org/wiki/Alaska>).

¹⁴ Alaska Department of Labor and Workforce Development, press release September 19, 2008 (available at: <http://labor.state.ak.us/news/2008/news08-71.pdf>).

Centers), five of which are considered to be full-service centers (note: at one point, the state had 25 One-Stops, but two of these centers recently closed). The One-Stop operator is the state's Wagner Peyser/ES Program. All of the centers have ES/Wagner Peyser and WIA staff – most (especially the satellite centers) have a small numbers of staff (less than 10 ES and WIA staff combined). The number of staff and partnering agencies varies across the One-Stop Centers (note: more detail about the structure and composition of the One-Stop Career Centers is provided later in this summary). The state's WIA Adult, Dislocated Worker and Youth Programs provide only part of the training resources in the state; other training resources include: the State Training and Employment Program (STEP), \$6-7 M; NEG, \$6M; and a High Growth Job Training Grant, \$7M. The Wagner Peyser Program has been flat funded for a long time – which has translated into a steady decline in inflation-adjusted funding, resulting in cuts in program staff and increasing reliance upon automated self-service. One of the big shifts in recent years with respect to delivery of services has been a move from staff-assisted services to an emphasis of customers doing as much as possible on their own within resource rooms. In fact, as discussed below, one aspect of service delivery that is distinctively different for veterans (versus non-veterans) is that they are more likely to interact one-on-one with Job Center staff (usually a veterans representative) and sometimes receive job development services (note: by comparison, a relatively small proportion of non-veterans would receive staff-assisted services, usually when they are in need of intensive or training services). With respect to serving veterans, there has been a steep decline in the number of veterans representatives (DVOPs/LVERs) – decreasing over the past 10 years from 12 FTE to 9 half-time staff (i.e., 4.5 FTE veterans representatives), with the veterans representatives spending the other half of their time in ES positions. The state has attempted to spread these veteran representatives across One-Stop centers as broadly as possible by deploying them ½-time. The steady decrease in “veterans representatives” has created challenges at One-Stops to provide the types of one-on-one, case-managed services that veterans often want (and expect) when they come into Centers.

- **State Level Policies on Priority of Service.** A set of state policies has been developed and distributed regarding POS for veterans. The state's WIA Annual Plan includes requirements with regard to providing Priority of Service to veterans. There has also been specific policy guidance issued pertaining to priority of service for WIA dislocated workers and adults. This policy guidance includes definitions of “veteran” and “eligible spouse” (based on an ETA TEGGL):
 - **Veteran** is an individual who served in the active military, naval or air service, and who was discharged or released from such service under conditions other than dishonorable, which may include National Guard or Reserve personnel.
 - **Military Spouse** is an individual who is married to an active duty service member including National Guard or Reserve personnel on active duty. The surviving spouse of an active duty service member who lost his/her life while on active duty service is considered to be a military spouse.

This policy guidance also includes a stipulation for priority of service to be implemented in the WIA adult and dislocated worker program once 65 percent of WIA funding has been obligated within a given program year. For example, under the WIA Adult program, the policy guidance is as follows:

- *In the event WIA Adult Program funding becomes sixty-five percent (65%) obligated, and other One-Stop partner agency funding is unavailable, the Chief of Field Operations, Employment Security Division (ESD), will implement the following priority of service when providing WIA Adult program participants with intensive and/or training services:*
 - (1) *Veterans or a military spouse who are low-income;*
 - (2) *Individuals with disabilities who are low-income;*
 - (3) *Public assistance recipients;*
 - (4) *Other low-income individuals; and*
 - (5) *Individuals who are not self-sufficient.*
- *The Jobs for Veterans Act does not change the requirement that individuals, to include veterans and military spouses, must first qualify as eligible under the WIA Adult Program before participation.¹⁵*

The state has had to invoke the 65 percent provision the last several program years – and for the current program year, the 65 percent threshold was reached during the first quarter of the program year. Though notification of the 65 percent provision has gone out to One-Stops, it does not appear (based on interviews at several One-Stops) that non-veterans have as yet been denied training under WIA as a result of this provision. This is, in part, due to the fact that the state has a variety of other training funding sources that can be used, including a state-funded training program (STEP), NEG funding, and a HGJTI grant. With regard to POS in the Wagner Peyser/ES Program, there is a statewide policy to place a hold on release of job orders to the general public for 24 hours so that veterans have a first chance at applying for the job opening. In addition, as discussed below, at the time of entry into a One-Stop, veterans are to be identified as early as possible (note: this is done usually by having each customer completing a slip of paper with identifying information, including checking off if he/she is a veteran), and then veterans are to be provided preference (“moved to the head of the line”) with regard to meeting one-on-one with One-Stop staff (if available, a veterans representative) and use of self-service computers. The fact that Alaska is a single-WIB state and that the One-Stop system is operated in all localities by the Employment Service facilitates uniform implementation of POS across One-Stop Centers.

- **Outreach to Veterans.** There are some special outreach efforts to bring veterans into One-Stop centers (note: see the file for a full listing developed by the Department on outreach activities to veterans):
 - Veteran representatives (DVOP/LVERs) are part of the teams that conduct Army Career and Alumni Program (ACAP) and Transition Assistance Program (TAP) workshops at local bases. During these sessions, veterans representatives inform soon-to-be-discharged veterans about the employment, training, and support

¹⁵ State of Alaska, Department of Labor and Workforce Development, Policy Number 310.00, “WIA Adult Program Participant Eligibility and Priority of Service,” August 19, 2005.

- services available through the One-Stop system. They also indicate that veterans receive priority when they come to One-Stops and often provide the name and contact information of the veterans representative at the One-Stop closest to the base. For example, at one of the Job Centers in Anchorage, the veterans representative facilitated 3-day ACAP seminars at Fort Richardson (Army), and TAP seminars at Elmendorf AFB (Air Force). On average, veterans representatives from this One-Stop attend three ACAP/TAP sessions per month (with average monthly attendance of 100 transitioning service members).
- Other special outreach efforts for veterans vary across the state – One-Stop staff make presentations within the prison system, at homeless shelters, and at VA facilities (such as drug and alcohol treatment programs). One-Stop staff also make sure that partnering agencies, particularly those serving veterans, are aware of services available for veterans within One-Stops. There are over 100 partnering agencies in the Anchorage/Mat-Su area that have been notified of services available via the One-Stop.
 - In Anchorage, an Annual Veterans’ Job Fair is conducted (the past year there were 65 employers and over 1,000 veterans in attendance). Veterans representatives are also sent to other job fairs to promote services available through the One-Stop Career Center system.
 - As part of the UI claims process (which is conducted by telephone or on-line), the claimant indicates whether he/she is a veteran and whether he/she wants to be referred to a veterans representative. If the box is checked, an automatic referral will be triggered, which results in a call from the veterans representative and, likely, the scheduling of an in-person visit by the claimant to meet with the veterans representative. In addition, all claimants must put an on-line resume onto the state’s system, which identifies the claimant as a veteran. Veterans representatives also review veterans’ on-line resumes for quality.
- **Overview of How POS is Administered/Implemented in the One-Stop System.** According to state administrators and administrators at One-Stops visited as part of this study there are several ways in which One-Stops ensure POS:
 - *Veterans Identified and Moved to the Head of the Line for Services.* When customers initially arrive at a resource room in a One-Stop Center they are asked to complete a short intake slip (1/4 of a sheet of paper) in which they check off if they are a veteran (note: there is no place to indicate whether a customer is an eligible spouse of a veteran). If the individual is only interested in conducting a search of job listings or using other self-service features of the One-Stop, whether he/she is a veteran will not have much of an effect. However, if there is not a self-service terminal available, the veteran may be able to use a terminal set aside especially for veterans. For example, the Muldoon and Midtown Job Centers (in Anchorage) each have a Veterans’ Job Lab, which offer several PC workstations that are set aside for use by veterans. If the veteran is in need of case management or more intensive services, they will move ahead of other non-veterans with regard to seeing an ES staff person (usually a veterans representative). There are posters in One-Stop hallways and self-service areas highlighting services available within the Center and through veterans

- representatives. One of the biggest differences between veterans and non-veterans in how they are treated is that, if desired by the veteran, one-on-one case managed services are available from practically the moment they walk into a Center (where these same one-on-one services would normally be available to non-veterans further along, generally if they are going into training, have special needs, or experience difficulty in securing a job).
- *Twenty-Four Hour Hold on Job Listings.* A 24-hour hold is placed on all job orders coming to the ES unless the business submitting the job order requests immediate dissemination of the job order. During this 24-hour hold, veterans will have an opportunity to review and apply for the job order. Veterans representatives maintain a roster of veterans and their job preferences so that they can match veterans to appropriate job orders – and veterans are either called or e-mailed to notify them within the 24-hour period of job orders. In some instances, the veterans representative will make a call on behalf of the veteran to the employer to introduce the veteran and perhaps even advocate on his/her behalf. According to one veterans representative interviewed at a One-Stop, matching job orders to veterans and making calls to employers can make the critical difference in terms of the veteran getting an interview and landing a job.
 - *Provision of One-on-One Services and Job Development Services.* Perhaps the most important manifestation of POS within the One-Stop system is the rapid referral of those in need of staff-assisted services to a case manager – usually a veteran representative. Sometimes veterans come into the One-Stop with an expressed desire to see a specific veterans representative, who they may have learned about in a TAP/ACAP session, from a partnering agency (such as a VA Center), or by word-of-mouth from another veteran. If the veterans representative is available, the veteran will normally be able to see the veterans representative immediately or will be scheduled for the next available slot. If a veterans representative is not available at the One-Stop (there are only 9 half-time veterans representatives in the state, so there is not coverage at all of the 23 One-Stops in the state), the veteran will receive preference over other customers to meet with ES/WIA staff (if available, often veterans prefer a staff person who is a veteran, even if they are not a veterans representative). As noted above, veterans representatives will often work closely with veterans to assist customers in securing a job and this may even involve calls to employers to identify appropriate jobs for a veteran or to encourage the employer to hire a specific veteran for a job opening.
 - *POS for Veterans Implemented in WIA Adult and Dislocated Worker Program When 65% of Funds Are Obligated.* As noted above (see specific policy above), when funds become 65 percent obligated veterans receive preference over non-veterans for intensive and training services.
 - *Other Special Services for Veterans.* Several One-Stops in the state have set aside a room or distinctive area with self-service terminals that only veterans can use. For example, in the Midtown One-Stop (in Anchorage), an area has been set aside apart from the regular customer self-service area (referred to as the VIP room), where there are four self-service computers for exclusive use by veterans.

- *Business Connection Activities to Promote Hiring of Veterans.* A special unit located at the full-service One-Stop Centers is responsible for interacting with employers and securing job listings (referred to as the “Business Connection”). This unit conducts a number of activities, especially related to marketing Job Centers to employers and seeking out job orders. Members of this unit conduct outreach with area businesses that are federal contract recipients to both educate them regarding the Federal Contractor Job Listing Program (FCJLP) and to promote the advantages of hiring veterans. They also, promote the advantages of using Alaska Labor Exchange System (ALEX) to post job openings. This unit provides daily job alerts via email to LVER/DVOPs and partner agencies (such as, Veterans Industries, Department of Veterans Affairs, Army Career and Alumni Program, Division of Rehabilitation, and Guard and Reserve representatives). It also responds to out-of-state veteran inquiries about the Alaska labor market and employment opportunities. This unit also has established relationships with LVERs/DVOPs in other states to assist with veteran relocation efforts and developed procedures to assist out of state veterans with ALEX job search activities. Members of this unit also provide direct referrals of veterans by contacting hiring managers.
- *Special Mailing.* A special mailing was made to 380 returning National Guard members to inform them that they were potentially eligible for WIA dislocated worker assistance (but only 2 percent of these National Guard members contacted a One-Stop).
- **Number of Veterans Served and Mix of Services Received.** An estimated 11-12 percent of those served through the One-Stop system over the past several years have been veterans (which is below the estimated 17 percent veterans in the civilian population). The state has not conducted detailed analyses of characteristics or services received by veterans. From discussions with state and One-Stop officials, anecdotal evidence suggests that veterans are much more likely to receive staff-assisted services, in particular, one-on-one counseling with regard to job search/development with a veterans representative. State administrators noted that a small percentage of veterans are reluctant to identify themselves as veterans when they first come into One-Stop Centers. One state official noted that veterans sometimes do not want to be “singled out,” which could be a bad thing during their military service.
- **Do Veterans Receive Priority for Intensive/Training Services When Funds Run Low?** As noted above, the state has a policy that required POS to kick in when WIA Adult and Dislocated Worker funding is 65 percent obligated. The state has issued notice to the One-Stop System that this provision should be implemented during the last few program years (including for the current program year). It is not clear, however, that implementing this rule has had much of a direct effect on whether veterans versus non-veterans receive training services – discussion with state and one-stop operators indicate that because of the availability of a variety of training sources (including a state-funded training) that non-veterans have not generally been denied training as a result of this provision so far.

- **Training/TA on Priority of Service.** One-Stop Staff receive training and technical assistance on POS from a variety of sources:
 - *Specialized Training of Veterans Representatives in Denver.* DVOP/LVERs have attended training at the National Veterans Training Institute (NVTI) in Denver. During various training modules veterans representatives are briefed about provisions of priority of service and provided in-depth training on effective methods for serving veterans. These staff return to their One-Stops and provide training to other staff at the One-Stop on how to effectively recruit and serve veterans. The Department has also brought NVTI instructors to Alaska for training of both veterans representatives and management.
 - *“Intra-Learn” Web-based Training for ES Staff.* All new ES staff are required to complete courses on a web-based training system, referred to as “Intra-Learn.” Three courses specifically include modules and references to the need to provide Priority of Service for veterans. ES staff are tested at the end of each training module and receive an upgrade in pay and status once they have successfully completed the various required training modules (and tests associated with each module). Prior to the implementation of Intra-Learn, ES had a series of PowerPoint slides that focused on POS and effective delivery of services to veterans. The Department is in the process of implementing the Intra-Learn system as a requirement for all new WIA employees.
 - *One-Stop Academies.* Each year, the state sponsors a workshop (referred to the “One-Stop Academy”) in each major region of the state to provide one-stop staff (including staff from partnering agencies) information and training on policies and effective delivery of service. Academy presentations include workshops that focus on POS and delivery of services to veterans within the One-Stop system.
 - *Monthly Staff Meetings.* One-Stops have monthly staff meetings involving WIA/ES staff and partners, during which POS and veterans services may be discussed. For example, officials at the Gambill Job Center noted that each month a veterans representative discusses veteran service issues (including POS) for about 5 to 10 minutes.

- **Monitoring POS.** The DOL Regional Office and State monitor from time to time that POS is being provided in the delivery of One-Stop services:
 - The DOL Regional Office outstations a federal VETS rep, called a “DVET” to the state workforce agency office. The DVET conducts a monitoring site visit to at least two full-serve Job Centers each year. As part of this visit several questions are asked concerning meeting POS requirements. The DVET had several observations concerning implementation of POS with Alaska:
 - The DVET has received *no* complaints over the past four years from veterans or other veterans’ organization concerning denial of POS for veterans served by One-Stops in the state.
 - The DVET indicated that USDOL does not sufficiently advertise POS on its website or elsewhere, so veterans may not be fully aware or understand key provisions of POS.

- The DVET has concern that as resources become more scarce (particularly if there is a loss of the various training funds that supplement WIA), that POS could become more of a problem (i.e., there could be heightened competition for training funds between veterans and non-veterans).
 - There is the potential in the future for competition between Alaskan non-veterans and incoming out-of-state veterans for pipeline construction jobs (an estimated 15,000 new jobs if the natural gas pipeline is agreed to). Alaska has had a policy in place that encourages training and job placement of Alaskans over out-of-state residents. This preference for in-state residents could potentially put out-of-state veterans at a disadvantage (vis-à-vis in-state non-veterans) when it comes to filling pipeline jobs and various training programs that will be implemented to ensure that there are no shortages of skilled workers.
 - The DVET indicated there is a need for ETA to provide additional regulation and clarification of POS requirements
 - The Alaska Workforce Investment Board certifies One-Stop Career Centers every two years. As part of this process, questions are asked pertaining to POS implementation and availability of services to veterans. The Department also periodically reviews data on the percentage of veterans served in the WIA and ES Programs (by state region and One-Stop), but does not generally conduct more detailed statistical analyses (e.g., of types of services received by veterans or outcomes).
- **Challenges to Implementing POS in One-Stop Career Centers.** A number of challenges were identified by state and local workforce officials:
 - Veterans do not always identify themselves as veterans when they enter One-Stops – they may not want to be singled out or may feel that veteran status could hurt their chances of securing a job.
 - Eligible spouses are often difficult to identify. The form used to collect several identifiers and demographic characteristics when an individual enters the One-Stop does not include a question to determine if the individual is an eligible spouse of a veteran. The definition of an eligible spouse is also long and convoluted, which makes it difficult to ask and apply to new customers entering the system.
 - Some administrators at the state and local levels perceive that there is a lack of clear guidance from DOL on key definitions relating to POS and how the provision should be applied within a One-Stop setting. For example, according to one state official: “ETA has not provided adequate guidance on POS....It is difficult to take the Q&As on ETA’s website and tell staff what it means in terms of serving someone The VETS unit within DOL does not seem to be talking with ETA. I need to be able to give my people clear guidance...we need to be able to translate POS to requirements and procedures...my people need something a little more concrete with regard to POS.”

- While ES and WIA staff have at least some basic understanding of POS, One-Stop partners are not always aware of the provision and may face mandates to serve other special populations (such as welfare households, the homeless, mentally-ill, and low-income households). Even WIA Program staff face requirements to serve other special subpopulation of non-veterans, including youth, unemployed/dislocated workers, disable individuals, and low-income/welfare populations. One-Stop staff need to balance among various specially targeted populations.
- With regard to future implementation of POS (as envisioned in the ETA web cast), there are several potential added burdens/costs for the state and One-Stops –
 - Identifying “eligible spouses” will add burden to the intake process of One-Stops. Currently a short form is used, which will need to be updated to have new customers check a box similar to the one checked for veterans. However, the definition of “eligible spouse” is lengthy and difficult to understand.
 - New data elements will need to be added to the state’s data system to track eligible spouses.
 - The orientation provided when new customers enter the One-Stop will need to be changed to affirm upfront that the veteran and eligible spouses have POS – and this could lead to a feeling of “entitlement” on the part of veterans. In addition, the nearly 90 percent of customers served who are not veterans may feel slighted--so it will be important to take care in how veteran and non-veterans are informed about POS.
 - The state will probably have to alter the “65 percent” rule in current use, because it does not appear to meet the requirement that POS not only be enforced when training and other funds becomes tight.

Key Findings from the Focus Group (conducted in Anchorage, Alaska):

- **Attendee Characteristics** – A total of 8 individuals attended the focus group, which was held in a conference room at the Muldoon Job Center (in Anchorage). Attendees were recruited by the One-Stop and included individuals who had recently used One-Stop services. All of the attendees were male; there was a mixture by age; most had been in the military for periods of five or more years (and two for over 15 years); different service branches were represented; and there was a mix of attendees by race/ethnicity. Because focus group participants were invited by the One-Stop, it not clear that views expressed are generally representative (and probably are somewhat more favorable than what might be expected if the group had been randomly selected among past One-Stop customers).
- **Receipt of Priority Affirmed.** All of the customers felt they had received priority of service over non-veterans at the One-Stop. Several indicated that they had first heard that they would receive “priority” over non-veterans at the One-Stop during an ACAP/TAP session. Some of the experiences related by attendees with respect to POS were the following:

- One attendee indicated he came to the One-Stop in “dress uniform” to help ensure that he received priority – “I came here (the One-Stop) in dress uniform – sure enough it worked, I hardly stepped in the door and they helped me.”
- Another attendee felt that his veteran status helped him to get one-on-one service “Instead of pointing to a bank of computers...I got to talk to a veterans representative...veterans seem to get more contact with staff.”
- “As soon as I wrote down that I was a veteran [i.e., on an intake slip completed at the time of entry into the One-Stop), I was sent back to talk to a veterans representative.”
- **Lots of One-on-One Attention and Help with Referral to Jobs.** Most of the attendees felt that the main benefit of POS was that they received staff-assisted services tailored to their individual needs.
 - Most stressed the importance of being able to work with staff that were either a veterans representative or someone who was a veteran; once they had been referred to a particular veterans representative, several indicated that they only came to the One-Stop to see that veterans representative:
 - “Who is better to understand the needs and preferences of a veteran, than another veteran?”
 - “It was nice to have someone that understands the needs of a veteran – for example, we haven’t had to use a resume in the military.”
 - “I prefer a veterans representative (to other staff)...I would only come in to the One-Stop to see my veterans representative.”
 - Attendees particularly cited help they had received in searching for jobs; in some instances, veterans representatives directly contacted employers to see if job vacancies existed and/or to advocate on behalf of the veteran.
 - “I thought the services offered by the veterans representative were outstanding...the veterans representative set me up with two different jobs and I was offered both.”
 - “My veterans representative helped me to revise my resume, gave me job leads, and told me how much various jobs pay.”
 - “The veterans representative made a call to the employer for me to help break the ice...this helped my resume to stand out from others received by the employer.”
 - “I was very pleased with the services I received...I tell other vets to come here (to the Job Center)...The Job Center was about the only place available to me within the community that I could go for job help.”
 - “When you apply for a job here (at the Job Center), they make a phone call to the employer...that is the main thing.”
 - Veterans representatives helped some attendees to better understand and adjust to the civilian job market. When some veterans are coming out of the military they are used to “military talk” and may have a tough time translating their skills into qualifications for specific jobs. One attendee noted that employers often electronically screen resumes and that it is necessary to have

certain catch words/phrases in your resume to get an interview. Another attendee noted

- Attendees found out about the Job Center mostly from other veterans (word of mouth) and during workshops held as part of ACAP/TAP sessions.
- None of the attendees attended a group orientation session at the One-Stop to learn about resources available at the One-Stop. They learned about available resources at the One-Stop mainly from Resource Room staff and their veterans representative.
- One attendee received what he considered to be an “assessment” and no attendee had as yet received training. Nearly all of the assistance provided by the One-Stop related to finding a job.
- One attendee noted that some employers have a strong preference for individuals who have lived in Alaska for at least one year because of fear the individual will not stay through the harsh winter.
- One attendee noted that a veteran could be at a disadvantage for certain jobs under the “Native American Claims Act.” Jobs funded by the Bureau of Indian Affairs, for example, give preference to Native Americans.
- The process by which veterans can apply for federal job openings and receive preference over non-veterans was viewed as fragmented.

STUDY OF PRIORITY OF SERVICE UNDER THE JOBS FOR VETERANS ACT SITE VISIT SUMMARY -- CALIFORNIA

State: California

Dates of Visit: 10/29-30/2008

- **State Geography/Population.** California is the largest state in terms of population, with an estimated population of about 36.5M (as of September 2007). The state has the most veterans in total numbers (at 2.148M veterans as of September 2007),¹⁶ but is ranked near the bottom among states (49th) in terms of percentage of the adult civilian labor force that are veterans (8%).¹⁷ There are pockets of the state where there are large concentrations of veterans, particularly the San Diego, Sacramento, and Los Angeles metropolitan areas (note: the percentage of veterans by county ranged, according to the 2000 Census, from as high as 21 percent in two counties to a low of 7 percent in two counties; details on the percentage of veterans by county are provided in a notebook EDD assembled as background on the state for the site visit).
- **State Economy.** California has a large, diversified economy. (According to state officials, the state has the 5th largest economy in the world.) The state has been a bellwether for the deteriorating condition of the U.S. economy, with the state's economic conditions taking a downturn over a year ago, well before the general economic slowdown hit much of the rest of the country. The subprime mortgage crisis hit the state early (including large layoffs from at mortgage lenders Countrywide and Indy Mac) – and as a result, employment in the finance and construction industries have been hard hit. Employment has also fallen off in resource-based industries (such as timber and fisheries), airlines, automobile dealerships, media, restaurants, and most recently the closure of Mervyn's statewide (a department store). General economic conditions have deteriorated throughout much of the state over the past year, with a steady string of large company layoffs (note: a large notebook was provided by EDD which contains detailed information about economic conditions, including layoffs and unemployment rates by county). In the first 10 months of 2008, over 1,000 WARN notices affecting over 56,000 workers statewide were issued. The unemployment rate in the state was 7.7% as of September 2008 (well above the rate for the United States, 6.1%, and over two points above the state rate in September 2007, 5.6%). There are pockets of high unemployment within the state – running as high as one-quarter of the workforce (in Imperial County, an agricultural region near the Mexico border) – with 10 of California's 58 counties suffering unemployment rates of 10% or higher (as of September 2008). Despite predictions of significant dislocations, the Base Realignment and Closures (BRAC) 2005 round of closures/realignments has as yet to have much impact on the state. Veterans have generally done a little better with respect to unemployment (e.g.,

¹⁶ Source: Veterans Administration; available at:
http://www.va.gov/budget/report/2007/Part_I/VETMap_2.pdf

¹⁷ Source: U.S. Census Bureau, 2006 American Community Survey.

for the 12-month period ending in August 2008, the average unemployment rate for veterans 4.6 percent versus 6.3 percent for non-veterans). With regard to veterans, unemployment is particularly a problem for younger veterans (in the 20-24 year old range) and for recently separated veterans (particularly those returning from the conflicts in the Middle East).

- **Structure of the Workforce Development System.** California's workforce development system is highly decentralized, featuring considerable local discretion with regard to how service delivery systems are structured and the extent to which various partners are engaged in the One-Stop service delivery system. There are a total of 49 Workforce Investment Areas in the state (note: there has been some consolidation in recent years with the number of workforce areas decreasing from 52 to 49). Seven of these workforce areas are located in the Los Angeles metropolitan area. There are a total of 168 One-Stop Career Centers in the state (150 comprehensive, 15 specialized (i.e., serving special populations such as youth or migrant and seasonal farm workers), and 3 mobile One-Stops (that can serve remote, rural areas)). The number of One-Stops has dropped by about one-half since 2001, when there was about 300 One-Stops providing services in the state. One-Stop Career Center operators are typically city or county governments, though centers are also operated by the state Employment Development Department (EDD), the state agency that receives Wagner-Peyser/ES funds, and nonprofit community-based organizations. California received early One-Stop planning and implementation grants (dating back to 1995). Despite these grants, there is quite a bit of variability across the state in terms of the extent of WIA/ES integration of services and the other partners engaged in the One-Stop system. According to state officials, there is still a fair degree of "silo-ing" of funding and programs in local areas across the state. In addition, there are still some stand-alone ES offices in localities served by One-Stop Centers (in part, because of leases and funding constraints. To try to bring greater service integration and collaboration to local workforce areas, the state has initiated a "Learning Laboratory" initiative in 12 workforce areas (beginning 7/1/08), which features a single case record for customers served by the ES and WIA and an integrated assessment process (note: see Section 2 of the notebook, which provides additional details about the Learning Lab initiative). The state is looking to roll this initiative out to other local areas in the next few years. The entire workforce development system has been adversely affected by decreases in funding (both actual and inflation-adjusted) in recent years. WIA has been particularly hit by steep decreases – dropping by 40% from PY2000-01 (\$629M) to 2007-08 (\$361M). The current year – because of rapidly deteriorating economic conditions – has featured a sharp rise in WIA funding (\$426M, in 2008-09). Wagner-Peyser funding has gradually declined since 2000 (but not as much as WIA funding) – from \$89M in PY2000-01 to \$80M in PY 2008-09. VETS funding has been flat in nominal terms. Thus, in inflation-adjusted terms, the WIA, ES, and VETS Programs have seen their funding erode significantly since 2008. California also has a state-funded training program (referred to as the Employment Training Panel), which is targeted on incumbent worker training and is funded by employer contributions tied to the unemployment insurance tax base. A total of 81 of the 150 comprehensive One-

Stops in the state have veterans representatives (DVOPs, which are referred to as Veteran Employment Service Specialists (VESS), and LVERs, which are referred to as Veteran Workforce Specialists (VWS)). Overall, there are about 180 veterans representatives across the state – 101 full-time DVOPs; 56 full-time LVERs; 13 half-time DVOPs; and 7 half-time LVERs. The numbers of veterans representatives located at One-Stops varies substantially – e.g., in the Golden Sierra workforce area, the Roseville One-Stop has 4 full-time veterans representatives and the Auburn One-Stop has none. As discussed below, the flow of veterans through One-Stops is largely left up to each workforce area and One-Stop, and depends to some extent on whether a veterans representative is available on site at the One-Stop. Where a veterans representative is available, one of the most distinguishing aspects of service delivery is that veterans are much more likely to receive case management services throughout their involvement in services in the form of interaction with a vet re (note: this is discussed later in the report).

- **State Level Policies on Priority of Service.** EDD has issued three policy guidance memoranda that pass along the federal guidance received with regard to Priority of Service (all three are in the notebook provided by the state): (1) a June 2003 memorandum (“One-Stop Service Priorities for Veterans”), which provides a one-page overview of the requirements of the Jobs for Veterans Act (JVA); (2) a September 2003 memorandum (“Implementing the Veterans’ Priority Provisions” (PL 107-288), which passes on TEGL 5-03 to each local area; and (3) a July 2004 memorandum, which notifies local areas of the ETA guidance in the form of a series of Questions and Answers. Each WIB is required, as part of its annual plan, to state local policies and procedures to ensure the JVA POS requirements are being met. The basic strategy of the state has been to make sure that local areas are aware of federal policies (i.e., a straight pass through of DOL guidance, such as the Q and As issued on the ETA website, without interpretation by the state). State officials noted the fact that “guidance” (in the form of TEGLs) was issued by ETA rather than regulation issued in the *Federal Register* made it more difficult to be definitive with local areas about the specific definition and requirements with regard to ensuring POS for veterans:

“Guidance provided through TEGLs do not have the authority of regulations issued in the *Federal Register*. Because no statutory regulations were issued by DOL, we could only release guidance. In addition, DOL indicated when it first issued its guidance on POS that regulations would be issued shortly...we waited and waited for regulations, but they did not come...normally, you don’t have as long of a delay for issuance of regulation. We did not want to interpret federal law...we normally wait for federal regulation to come out...the delay and lack of regulation made it more difficult for us.”

If, and when, DOL issues additional regulations, EDD will pass the regulations immediately on to local workforce areas and require compliance. Overall, the state has not issued policies beyond what has been set forth in ETA guidance. The main requirement for local areas is that they implement a 24-hour hold on release of job

orders to the general public so that veterans have the first chance at applying for jobs listed within CALJOBS. Local areas establish their own criteria for implementing POS for training.

- **Outreach to Veterans.** The specific method for outreach to veterans – and the extent to which veterans are explicitly informed about their right to POS within the workforce system – is left to each local area. The state has developed two brochures (see the hardcopy case file) that are specifically aimed at informing veterans about employment, training, and support services available through the labor exchange (Wagner-Peyser) and WIA systems. These brochures are made available at One-Stops, job fairs, VA hospitals, military bases, and other outreach sessions that inform the general public and veterans about eligibility and services. Specific types of outreach aimed at veterans include:
 - **Presentations by Veterans Representatives at TAP sessions.** A total of 776 TAP sessions were conducted by EDD staff at 25 military bases in the state last program year. A total of 27,400 soon-to-be-released military personnel attended these sessions (of which about one-half stay in California after they leave the military). EDD veterans representatives attend TAP workshops and make presentations. The topics covered, which are tightly controlled by the Department of Defense, include an overview of labor exchange and training services available at One-Stop Career Centers, including availability of veterans representatives and the requirement that local workforce areas are to provide special assistance and priority for veterans.
 - **Veteran Job Fairs.** EDD sponsored 10 job fairs for veterans the past program year (attended by over 4,000 veterans) around the state. These special job fairs are called “Honor a Hero, Hire a Veteran Job and Resource Fairs.” During these fairs, EDD has a table that distributes brochures and provides information about veteran services available through the One-Stop system. There are also several hundred other job fairs in the state (open to the general public) during which brochures and other information are disseminated about employment and training services available for veterans.
 - **“Key to Career Success Campaign”.** US DOL and DoD launched a nationwide campaign entitled “Key to Career Success” in 2005. The campaign was intended to heighten veterans’ awareness of the variety of services available in One-Stop Career Centers and to help ensure priority of service. Under this campaign, a Veteran’s Key to Career Success access card was attached to a brochure distributed to transitioning military personnel, demobilizing military reserve, and national guard members, and recently separated veterans through the TAP program and military branch pre-separation sessions. This card is intended to help veterans locate the nearest One-Stop Career Center in their local community and lists DOL’s toll-free help line. The card is also designed to ensure that One-Stop Career Center staff immediately recognize veterans and ensure their access to the full range of employment and training services.
 - **Other Outreach Efforts.** Veterans representatives make sure businesses are informed about veterans flowing into and through the One-Stop system.

Veterans representatives keep One-Stop partners informed about veteran services and preference given to veterans within the workforce system. In some areas, veterans representatives go to prisons and community events (“Stand-downs” focusing on homeless veterans) to make sure that veterans and the general public are aware of workforce services available to veterans. Veterans representatives may also be outstationed several days a week to military bases or VA facilities; for example, one of the four veterans representatives at the Roseville One-Stop Center is outstationed 4 days per week at a satellite employment center located on the campus of a facility that was formerly an air force base (Mather AFB). One-Stops also receive referrals of clients from VA hospitals, particularly of veterans involved in or completing rehabilitation.

- **Overview of How POS is Administered/Implemented in the One-Stop System.**

Across the state, there is much discretion extended to local WIBs and One-Stops in terms of how service delivery is structured, client flow, and ways in which priority of service is ensured. The state encourages veterans to use the entire workforce system (i.e. extending beyond case managed services delivered by DVOPS/LVERs). According to state administrators and officials interviewed at the two One-Stops visited (Roseville and Auburn One-Stops), the specific procedures for implementing POS are determined mostly at the local level (within the general policies/guidance issued by USDOL). Below, we highlight the main ways in which priority of service is provided.

 - *Veterans Identified at the Time of Entry into the One-Stop and Extended Priority of Service.* When customers initially arrive at a resource room in a One-Stop Center, they are identified as a veteran, though there is no standard sign-in sheet used across One-Stops in the state. Small numbers of veterans and eligible spouses may not realize they are veterans – especially some who did not see combat and spouses who may be unfamiliar with the POS coverage of spouses. In addition, a few veterans may not be willing to self-identify as veterans. In the two One-Stops visited (in Roseville and Auburn), each new customer is asked to complete a short intake slip (one-half of a sheet of paper) in which they provide basic identifying information, including checking off if they are a veteran (note: there is no place to indicate whether a customer is an eligible spouse of a veteran). This information is entered into a tracking system. The client flow and way in which POS is administered differs for the two One-Stops because the Roseville One-Stop (a comprehensive, full-service one-stop) has 4 full-time veterans representatives on-site and available to meet with incoming veterans, while the Auburn One-Stop has no veterans representatives on site.
 - **The Roseville One-Stop** aims to get all veterans to see one of its four veterans representatives (administrators estimate that 90 percent of vets do so). If a veteran self-identifies on the ½ page tracking sheet, the One-Stop “Greeter” checks the scheduling software to see if any of the four veterans representatives is immediately available to meet with the veteran. If a veterans representative is available (which is often the case) the veteran is immediately scheduled to see the veterans

representative; if not, the veteran will likely be scheduled to meet with a veterans representative the next day (or when it is next convenient for the customer to meet). During the initial meeting with the veterans representative the veteran will be provided with a one-page form (called the “Veteran Intake Sheet,” a copy of which is in the site visit file). On the front side of this sheet the veteran provides some basic identifying information, as well as service-related information (including service branch, service status, date of military service, whether he or she has a service-connected disability, education level, occupation, and minimum starting salary). The veterans representative interviews the customer for about a half hour to obtain additional background and to make an initial assessment of the veteran’s barriers to employment and service needs. The reverse side of the Veteran Intake Sheet is completed by the veterans representative, identifying barriers to employment, whether the veteran is part of a targeted veteran group (e.g., homeless, female, minority, transitioning vet, etc.), specific services provided and/or referrals needed, whether the individual is enrolled in “case management,” and additional case notes. If the veteran is in need of case management or more intensive services, he/she is seen by the veterans representative as needed. There are posters in One-Stop hallways and self-service areas highlighting services available within the Center and through veterans representatives. One of the biggest differences between veterans and non-veterans in how they are served is that, if desired by the veteran, one-on-one case managed services are available from practically the moment they walk into a Center (where these same one-on-one services would normally be available to non-veterans further along, generally if they are going into training, have special needs, or experience difficulty in securing a job). If the veteran is interested in moving on to training, the veterans representative normally guides the individual through the process of applying for WIA-funded (or other funded) training, increasing the likelihood of the individual completing all the necessary steps to enter training. Another service often needed by veterans is “de-mil-ing” of resumes (that is, help with translating skills and experience accumulated in the military to civilian applications).

- **The Auburn One-Stop** (a satellite office, with 3 staff) does not have a veterans representative. While veterans are similarly identified at the point of intake they receive basically the same services as any other customer at the One-Stop. Information on veterans who come to the One-Stop is transmitted to the Roseville veterans representatives about once per month. If the veteran would like to meet with a veterans representative and receive case management through a veterans representative, he/she is referred to the Roseville One-Stop (about a half hour drive away) for services described above.

- *Twenty-Four Hour Hold on Job Listings.* A 24-hour hold is placed on all job orders coming to the ES (and entered into the CALJOBS system). During this 24-hour hold, veterans have an opportunity to review and apply for a particular job order, and employers only receive matches on veterans for listed positions. Veterans representatives maintain a roster of veterans and their job preferences so that they can match veterans to appropriate job orders – and veterans may be either called or e-mailed to notify them within the 24-hour period of job orders. According to one veterans representative interviewed at a One-Stop, the effectiveness of the 24-hour hold depends in part on the search process used by employers – the hold can make a difference for veterans if an employer searches for candidates the first 24 hours and if the employer tends to hire the first qualified applicant. The veterans representative also noted that employers using the ES often tend to hire quickly, and thus, the 24-hour hold can make a difference.
- *Provision of One-on-One Services and Job Development Contact (JDC) Services.* Where a veterans representative is available within the One-Stop (which is not always the case across One-Stops in California), perhaps the most important manifestation of POS within the One-Stop system is the rapid referral of veterans to a DVOP/LVER for case management services. If the veterans representative is available, the veteran is usually able to see the veterans representative immediately or is scheduled for the next available slot. As noted above, veterans representatives often work closely with veterans to assist them in securing a job, and this may involve calls to employers to identify appropriate jobs for a veteran or to encourage the employer to hire a specific veteran for a job opening (referred to as JDC).
- *Veterans Receive One-on-One Help to Obtain Training and Preference for Training If WIA Funds Are Short.* The state has not issued specific guidance on what One-Stops should do if WIA training funds run short, but has passed along ETA guidance that stipulates that veterans should receive POS when it comes to employment and training services. Each WIB has discretion with regard to restricting or not restricting funds for training for veterans as appropriate. With regard to the Roseville One-Stop, circumstances have not yet arisen whereby veterans and non-veterans have competed for scarce training dollars. If a veteran and non-veteran had the same circumstances and dollars were scarce, then the veteran would, according to state and One-Stop administrators, receive preference. The one-on-one case management services provided by veterans representatives can give veterans a “leg up” with regard to going through the steps required to be approved for training. The process can be fairly demanding, with particular emphasis on demonstrating a strong commitment to undertaking training and a need for training in order to enter a high demand occupation. A veterans representative can be of considerable assistance in helping a veteran to complete the necessary paperwork and interview to qualify for training. In addition, because of this case management assistance, a veteran is likely to get into training faster than a non-veteran, as much as 4 to 6 weeks earlier.
- *Special Grants to Serve Veterans (Recently Separated Veterans Solicitation for Proposals).* Over the past 15 years, EDD has awarded grants to, on average, 10 to

- 12 public, private nonprofit, and private for-profit organizations to provide employment and training services specially targeted on veterans. The purpose of these solicitations is to select, through a competitive process, eligible applicants that are qualified and prepared to use the funds in innovative ways to provide services to recently separated veterans discharged within the past 4 years. During the most recent round of grants \$2M was awarded (note: the notebook provides additional details on the grants awarded and grantee organizations).
- *Use of State Veterans Representatives to Serve Local Areas without Veterans representatives.* There is a shortage of DVOPs/LVERs in the state, and as a result, not all One-Stops have a veterans representative. EDD has used state WIA (15 percent) funds to pay for an additional 11 state Veterans representatives (each ½ time, so 5.5 FTE), who have been deployed throughout the state to meet needs of veterans, especially in areas that do not already have veterans representatives.
 - **Number of Veterans Served and Mix of Services Received.** Overall, California has a relatively low percentage of veterans (ranked 49th in the nation in terms of the percentage of veterans in the population), but there are some pockets of the state where there are high concentrations of veterans. Statewide, about 8 percent of the customers registered in CALJOBS are veterans, which is about the same percentage as veterans represented in the civilian labor force. In 2008, there were 119,314 veterans in the CALJOBS database. At the Roseville One-Stop, an estimated 10% of customers coming into the One-Stop are veterans. About 10% of One-Stop customers enrolling in training are also veterans. State and One-Stop officials indicated that veterans are much more likely to receive staff-assisted services, in particular, one-on-one counseling with regard to job search/development with a veterans representative.
 - **Do Veterans Receive Priority for Intensive/Training Services When Funds Run Low?** As noted above, veterans are much more likely to receive case management – and so to the extent that case management constitutes intensive services veterans would be more likely to receive intensive services than non-veterans. As a result of one-on-one assistance, veterans also may receive help navigating their way through the process of applying for training and may move into training faster and at higher rates than non-veterans. However, the policies with regard to priority of service for intensive and training services are left to individual workforce areas to determine.
 - **Training/TA on Priority of Service.** One-Stop Center staff receive training and technical assistance on POS from a variety of sources:
 - *Specialized Training of Veterans Representatives in Denver.* DVOP/LVERs have attended training at the National Veterans Training Institute (NVTI) in Denver. During various training modules veterans representatives are briefed about provision of priority of service and provided in-depth training on effective methods for serving veterans. These staff return to their One-Stops and provide training to other staff at the One-Stop on how to effectively recruit and serve veterans.

- *Monthly Staff Meetings.* One-Stops have monthly staff meetings involving WIA/ES staff and partners, during which POS and veterans services may be discussed. For example, officials at the Roseville One-Stop noted that it is typical for one of the four veterans representatives to provide an update on veteran services.
- **Monitoring POS.** EDD conducts annual monitoring visits to one-stops. As part of this process, questions are asked pertaining to POS implementation and availability of services to veterans. The Department also periodically reviews data on the percentage of veterans served in the WIA and ES Programs (by state region and One-Stop), but does not generally conduct more detailed statistical analyses (e.g., of types of services received by veterans or outcomes).
- **Challenges to Implementing POS in One-Stop Career Centers.** A number of challenges were identified by state and local workforce officials:
 - Veterans do not always identify themselves as veterans when they enter One-Stops. Female veterans, those who were not involved in combat, those with less than honorable discharges, and eligible spouses sometimes do not self-identify.
 - Eligible spouses are often difficult to identify. The form used to collect several identifiers and demographic characteristics when an individual enters the One-Stop does not include a question to determine if the individual is an eligible spouse of a veteran.
 - State administrators noted the lack of regulation provided by ETA with regard to implementation of POS. As discussed above, ETA issued guidance in the form of TEGLs and Q & A that did not have the full force of regulation, and it was anticipated that ETA would eventually issue regulation that would provide more definitive guidance that could be passed along to local areas. (The draft notice was published in the *Federal Register* in August 2008, but final regulations have not yet been issued.)
 - With regard to future implementation of POS (as envisioned in the ETA web cast), the state has submitted a comment regarding the need for clarification on whether widows of veterans killed in action are to be included as “eligible spouses.”
 - With the exception of the most recent program year, there has been a steady decrease in inflation-adjusted funding for employment and training services (e.g., WIA and Wagner-Peyser funding). As a result, staffing levels – including DVOPs and LVERs – have decreased in recent years, as well as funds to provide training. This has generally made it more challenging to provide intensive one-on-one services and training needed by veterans (and non-veterans, as well) served through the One-Stop system.

STUDY OF PRIORITY OF SERVICE UNDER THE JOBS FOR VETERANS ACT SITE VISIT SUMMARY -- FLORIDA¹⁸

State: Florida

Dates of Visit: 1/21-23/09

- **State Geography/Population.** Florida is the fourth largest state in terms of population, with an estimated population of about 18.3M (as of July 2008).¹⁹ The state also has the second largest and fastest growing veteran population, with 1.9 million veterans (1,876,000 as of January 2009).²⁰ Overall, about 8 percent of Wagner-Peyser participants are veterans (or “eligible person” or “transitioning service member”),²¹ and the state reports that about 4 percent of its WIA customers are veterans. Additionally, close to 10% of those involved with Operation Iraqi Freedom and Operation Enduring Freedom are from Florida.²²

The regional workforce boards (RWBs) with the most veterans in the population, based on the 2000 census, are Workforce Central Florida (RWB 12), Worksource (RWB 8), and the Broward Workforce Development Board (RWB 22). Many who leave the military in Florida choose to stay there. This is one reason for the large number of veterans in RWB 8 (the metropolitan Jacksonville area), along with the services available for veterans there. There are currently 20 military bases across the state. After the most recent Base Realignment and Closure (BRAC) actions, Florida lost one base, but gained more personnel than they lost, because the BRAC brought more people into the state to work at the remaining bases.

- **State Economy.** Florida’s unemployment rate reached 8.1 percent in December 2008, up drastically from 3.6 percent the prior year and the highest it has been for over 16 years. Orlando, Pensacola, Jacksonville, and Miami all have unemployment rates below the Florida average but above the U.S. average. According to a January press release, “construction losses...[(which are a] react[ion] to declines in the housing market [)]....account for almost 30 percent of job losses in the state.”²³ Declines in the trade, transportation, and utilities sectors have accounted for nearly as many job losses. Other industries that lost many jobs in 2008 include: “professional and business services...manufacturing, financial activities...leisure and

¹⁸ Florida staff could not be reached to obtain responses to all queries raised by the site visitors.

¹⁹ Annual Estimates of the Resident Population for the United States, Regions, States, and Puerto Rico: April 1, 2000 to July 1, 2008: <http://www.census.gov/popest/states/tables/NST-EST2008-01.xls>.

²⁰ Source: Untitled Florida report dated January 2009 and Florida’s State Veterans’ Program Plan of Service Narrative.

²¹ Source: DRAFT: Wagner-Peyser ETA9002/VETS200 Report. Available at: http://www.floridajobs.org/Reports/wpereports/ETA9002_VETS200_PY08Q1.pdf

²² Source: Returning Veterans and Their Families With Substance Abuse and Mental Health Needs – Florida’s Action Plan, January 2009, page 5.

²³ Source: Florida’s December Employment Figures Released, available at: http://www.floridajobs.org/publications/news_rel/LMS%20Release%202001-23-09.pdf

hospitality...information...total government...and other services.”²⁴ Plants are closing throughout the state. Florida has also been recently struck by Tropical Storm Fay and a series of hurricanes.

- **Structure of the Workforce Development System.** Florida’s Workforce Development System is composed of 24 regions, which have approximately 78 full-service One-Stop Career Centers and 14 satellites. Some regions have as many as five or six One-Stop Career Centers, but other areas (especially rural areas) utilize mobile units as One-Stops; about half the Regions have one such mobile unit. With regard to staffing, the AWI staff at the One-Stop Centers is mostly from Wagner-Peyser (employment service) and Veterans Employment and Training Service (VETS). Other staff members are RWB employees or contract staff. The Wagner-Peyser and VETS staff are state employees, but they are managed by the local staff. Florida provides an \$88,250 “incentive award” to “encourage the improvement” of workforce services for veterans (as is optional under Veterans’ Program Letter 02-07).²⁵

The Workforce Development System has had some recent changes. For one, the number of One-Stops in the state has decreased recently due to funding constraints. Moreover, the state has been less able to sustain its “work first” philosophy as the number of jobs has decreased and the demand for training has increased.

Another change is that about half the One-Stops (and about half the RWBs) are beginning to provide direct core and intensive services (along with Wagner-Peyser staff), rather than using vendors. This was permitted by a recent change in a Florida statute. Prior to the law, One-Stops were required to outsource work.

- One-Stop Career Centers include a variety of highly integrated services. In Florida, the employment service is fully-integrated into the One-Stops. In some areas, the Department of Children and Families (DCF) staff is also collocated in One-Stop Career Centers (DCF is the state agency responsible for Florida’s Temporary Assistance for Needy Families (TANF) Program). In such cases, the DCF staff provide services such as eligibility determination and benefits for welfare transition, food stamps, and Medicaid; then, the One-Stop provides the workforce development services. The workforce development system also works closely with the Department of Education. This includes partnerships for grants and data sharing. Some funds have also been provided for regional boards to incorporate unemployment insurance (UI). Currently, the One-Stop Career Centers connect customers to UI through the phone or Internet, but they do not process applications. With regard to trade adjustment assistance (TAA), the program is not as large in

²⁴ Source: Florida’s December Employment Figures Released, available at: http://www.floridajobs.org/publications/news_rel/LMS%20Release%2001-23-09.pdf

²⁵ Source: Florida’s State Veterans’ Program Plan of Service Narrative, Pages 7-8 and Veteran Program Letter No. 02-07, available at: <http://www.dol.gov/vets/vpls/VPLs/VPL%202-07.pdf>

Florida as it is in other states (Florida only has a few petitions each year). However, this could change with the changes recently enacted in the stimulus package to include the service industry, which is large in Florida. The Florida workforce development system also entails some partnerships that target veterans (discussed later).

Each region has disabled veterans' outreach program (DVOP) and local veterans' employment representatives (LVER), known collectively as veterans representatives. Some veterans representatives are half-time, but they are usually full-time in larger areas. In Regions with few veterans representatives, the veterans representative will often travel with mobile One-Stops to rural communities. Many times, the veterans representative will have a dedicated schedule that is advertised at the satellite and on the state website. As of January 2009, the state had 69 full-time equivalent DVOPs and 51.5 LVERs; the number of FTE veterans representatives ranges from one in RWBs 3, 6, and 19 to 13.5 in Region 8 (the Jacksonville area).²⁶

Employment services at Florida One-Stops are sometimes provided online, so customers (including veterans) do not always need to come in to the One-Stops. If a customer does come in, the state has not provided an intake form (so there is no uniform way to identify veterans). Instead, the intake process varies by RWB. Some RWBs use different forms depending on the type of services the customer wants. Enrollment is mostly automated. Because of a desire to serve veterans and meet priority of service requirements, greeters at the One-Stops generally inquire about veteran status immediately upon entry so that a veteran can be referred to a veterans representative if desired.

The training funded through One-Stops is mostly done by vendors. About 75 percent of this vendor-provided training is provided by community or vocational colleges.

- **State Level Policies of Priority of Service.** The state does not have a specific policy for the RWBs to provide POS. However, the state assists RWBs with interpretation of POS, especially through training. Along those lines, the state will be providing training on POS now that the new regulations have taken effect. The state also monitors POS, and has each regional board explain in its two-year report how POS is implemented.
- **Outreach to Veterans.**
 - **Transition Assistance Program (TAP).** Transitioning members of the uniformed services and their spouses who are retiring within 24 months and transitioning members and their spouses who are separating within 12 months are served by the TAP program. There are currently 11 locations providing TAP services in Florida, serving approximately 6,600 transitioning veterans

²⁶ Untitled document provided by Florida. Updated on January 21, 2009.

each year, and staff who participates in these programs is trained and certified by the National Veterans' Training Institute in Denver.²⁷ One state administrator viewed TAP sessions as the first manifestation of POS. The sessions are staffed by veterans representatives and are mandated to last for two days (although some regions, such as Pensacola, sponsor an extra day of training). Additionally, the TAP is "associated [with] Family Support/Service Centers[, which] are considered One-Stop Career Center Satellites." In Jacksonville, veterans representatives hold four TAP sessions each month and assist approximately 60 veterans in each session.

The state tracks veterans who participate in TAP sessions. This includes reviewing resumes to identify barriers to employment (e.g. if the veteran has held a large number of jobs). The state also identifies overloaded TAPs and divides them when appropriate. During a focus group, TAP participants said that the resume assistance and mock interviews were useful.

- **Veteran Job Fairs.** There are both veteran-specific job fairs and regular job fairs where veterans have exclusive access for the first few hours. Some veteran job fairs have entailed partnerships with Military STARS (a company that organizes job fairs for and provides other employment services for veterans)²⁸ and Hire Veterans First (a VETS program intended to "raise employer awareness of the value of hiring [veterans]")²⁹. In Jacksonville, there are several large military job fairs (with around 300 employers and 800-900 veterans).
- **Stand-downs.** The state has served approximately 1,500 homeless veterans through "stand-downs," which are held annually in every major metropolitan area.³⁰ Stand-downs entail the provision of a multitude of services for homeless veterans at the VA, health clinics, parks, etc. For example, stand-downs have included providing dental services, assistance with obtaining stimulus benefits, and clothing. The state partners with a large variety of entities to provide these services. Many of the stand-downs use mobile units, provide assistance with resumes, and help the veterans with their job searches. Veterans representatives are there to work with the homeless veterans and begin case management. ETA programs work with the stand-downs and help implement them. Florida has applied for reimbursement for nine stand-downs and has funded others themselves.

²⁷ Source: Florida's State Veterans' Program Plan of Service Narrative (undated).

²⁸ Source: Military STARS website, "About Us", available at:
http://www.militarystars.com/about_us.htm

²⁹ Source: "President's National Hire Veterans Committee Expands Nationwide Communications Campaign", 10/26/2004. Available at:
<http://web.archive.org/web/20041211163342/http://www.dol.gov/opa/media/press/vets/VETS20041716.htm>

³⁰ Source: Florida's State Veterans' Program Plan of Service Narrative, Page 12.

- **Marketing veterans to employers.** Veterans representatives are part of the business services teams that reach out to employers. Veteran services workers also reach out to employers on their own, depending on the region. They also distribute handouts to employers regarding the hiring of veterans.

- **Other Outreach Efforts.**
 - Veterans representatives have identified veterans on their own and through collaboration with other groups. For instance, they track transitioning service members in the TAP programs (even though those members are not yet veterans). Moreover, when a veteran files telephonically for UI, the veteran is automatically registered for Wagner-Peyser services, and veterans representatives can see that the veteran has been registered.³¹ The VA also shares data with the regions on veterans.
 - Veterans representatives go to VA offices and reach out to a variety of places where one would expect to find veterans (such as “homeless shelters, correctional centers, work-release programs, and DOD family support centers”³²). Veterans representatives also have out-clinics at VA hospitals, colleges, and county service offices. If they are not collocated, a veterans representative will usually go for a half-day or a day each week. Veterans representatives also provide briefings for veteran service operators and visit the American Legion and other veterans organizations. They also have focus groups for veterans at the community groups that they work with to discuss services provided at One-Stops.
 - Florida has VA Vocational Rehabilitation and Employment (VR&E) DVOP Coordinators out-stationed at six VA VR&E Centers. These staff members perform a variety of tasks, including facilitating efforts of the VR&E and One-Stop Career Centers (working with staff at both). They also assist with case management and with the monitoring of VR&E activities within the workforce system.³³
 - The state has one DVOP who works with incarcerated veterans. In collaboration with the Department of Corrections, the DVOP is stationed in areas with the largest numbers of veterans being released from incarceration. The DVOP organizes and provides a variety of workforce services for incarcerated and/or transitioning incarcerated veterans.³⁴ If a recently released veteran is moving to a new region, the DVOP notifies staff in that region.

³¹ Annual Report - Federal Programs: Workforce Investment Act (WIA) and Related Workforce Programs Program Year 2007 – 2008, page 16.

³² Source: Florida’s State Veterans’ Program Plan of Service Narrative, Page 12.

³³ Source: Florida’s State Veterans’ Program Plan of Service Narrative, Pages 9-10.

³⁴ Source: Florida’s State Veterans’ Program Plan of Service Narrative, Pages 11.

- Florida launched a website called “Florida Vets First” which provides links to information on the benefits and services veterans can receive including those provided through the workforce development system.³⁵
 - Florida is also considering telephoning veterans, “supplementing the calls being made by the U.S. [Department of Veterans Affairs] to returning veterans to ensure [that veterans] are aware of their federal, state, and local benefits and services.”³⁶
- **Region 8 (Jacksonville) RWB and One-Stop Career Centers.** With over 158,000 veterans in the area, more than any other RWB in the state, veterans are a high priority in Region 8. With 13.5 FTE veterans representatives (4.5 LVERs and 9 DVOPS), Region 8 has more veterans representatives than any other RWB. Some of the outreach efforts in Jacksonville were discussed above. Veterans representatives have reached out to homeless shelters and veterans service organizations (such as the American Legion), and they visit a correctional institution once a month. Veterans representatives are out-stationed at a Fleet Family Support Center, two bases, and a community college; they also assist with the “Post Deployment Health Assessments (PDHAs) at National Guard units”.³⁷ The RWB has also partnered with various local groups to “centraliz[e] resources and information for area veterans.” This collaboration, called First Coast Veterans, has entailed the creation of a Resource Guide and website for veterans in the region.³⁸ The state also provides the veterans representatives with a contact list of veterans who have been identified on line that the veterans representatives can call. Veterans representatives explain One-Stop services at TAP sessions, and the services available for veterans are discussed on the Worksource web site.

The Region 8 veterans representative staff has started collecting email addresses, which they have found to be particularly effective. When opportunities are available, the veterans representatives can now contact thousands of veterans at the same time. Veterans have responded well to the emails. For example, many veterans now wait in lines at job fairs to meet with the veterans representatives.

- **Overview of How POS is Administered/Implemented in the One-Stop System.**
 - ***Structure of the Region 8 (Jacksonville) One-Stop delivery system.*** The Regional WIB serves an area with a population of 1.4 million, of which over 150,000 are veterans; 25,197 customers come into the eight One-Stop Career Centers in the region each year. Of the 76,100, about 11,000 are veterans.

³⁵ Source: Florida’s State Veterans’ Program Plan of Service Narrative, page 15 and <http://www.floridavets.org/first.asp>

³⁶ Source: Returning Veterans and Their Families With Substance Abuse and Mental Health Needs – Florida’s Action Plan, January 2009, page 10.

³⁷ The Worksource Comprehensive 2-Year Plan, page 82.

³⁸ Worksource Annual Report, page 15.

One staff member expected that the veterans have better skill levels and work histories than other customers. However, another employee added that there is also an increasing number of disabilities amongst veterans.

The Region 8 area is growing, and it is on the receiving end of BRAC. The WIB includes 7 full-service One-Stops and one intensive service One-Stop. The One-Stops are similarly structured. The WIB also has about 10 access points with varying degrees of services. Some access points are community colleges, and the WIB is attempting to create access points at faith-based and community-based organizations (such as by training their staffs).

Because of funding constraints, 97 percent of the customers only receive core services. There are probably about 100,000 registrations for Wagner-Peyser services. Approximately 3,000-3,500 customers receive training each year. This is a small number, and there is a need for training, but the training is costly; at about \$750,000-\$1,000,000 per year, the training costs make up about 8 percent of the overall budget. About one-third of the training funds come from TANF (Florida permits TANF funds to be used for training low-income groups). They use individual training accounts (ITAs), which are vouchers, for most of the training, except for employed worker training. They are mandated by the state law to spend a certain amount of their WIA funds on training each quarter.

- Although the Region believes in rapid attachment to the labor market, they do not think that their job ends there. They approach employers to see if they can upgrade the skills of employees (i.e. incumbent worker training). Last year, they trained about 3,000 people in key occupations (requiring high skill and providing high wages). The average wage after training is about \$19/hour.

The Jacksonville One-Stop houses several organizations and services. Because of the large number of services, WIA and Wagner-Peyser staff is often able to refer customers to other organizations within the same building. These services and organizations include:

- Vocational Rehabilitation, which takes referrals from the One-Stop staff. The VR staff includes 2 people who work a total of four days per week.
- The Florida Department of Children and Families (DCF) is housed next door. The DCF determines eligibility and then sends recipients to the One-Stop for workforce services. They work closely with the One-Stop staff. Originally, one DCF staff member was housed in the One-Stop.
- A senior citizen program called “Experience Works” is present at the One-Stop Career Centers. Two participants serve as greeters in the One-Stop Center we visited.
- Childcare. Although the One-Stop has an MOU with them, and the One-Stop staff asks them for advice, the childcare

program is not as integrated as Wagner-Peyser. They have three workers at the One-Stop Career Center we visited.

- The Early Learning Coalition, which mostly works with childcare providers.
- Independent Living Resources serves customers with disabilities. The staff comes to the One-Stop Career Center on a rotating basis.
- One-Stop staff members with special responsibilities include: a staff member funded by WIA and North Florida Career Advancement Accounts (CAA) who works with military spouses, one staff member who works with community colleges, and a staff member who works closely with businesses (funded through Worksource).

As noted above, RWB 8 has 17 DVOPs and LVERs on staff with 13.5 FTEs. While some of the veterans representatives are fully devoted to veteran services, the Region 8 WIB finds it very helpful to have some veterans representatives who work half time with Wagner-Peyser customers. Such veterans representatives can be placed on bases where they can also serve veterans' spouses and children. Moreover, they can serve areas that cannot support full-time veterans representatives.

- *Veterans Identified at the Time of Entry into the One-Stop .*
 - The state does not have a specific POS policy, other than requiring the RWBs to meet the requirements specified in Department of Labor guidance and regulations. According to the Florida's State Veterans' Program Plan of Service, all veterans are identified at the time of entry into the One-Stop (the state stresses during training that One-Stop staff must ask a customer if he or she is a veteran); "special needs" veterans (identified through the "needs-based approach" and with the Employ Florida Marketplace (EFM) computer system) are then "referred to the [veterans representative] for the appropriate services." Veterans are registered in EFM and those "with barriers to employment will be provided with the necessary initial assessment and the required documented intensive case management services."³⁹ In some regions, the DVOP/LVERs generally prefer to see veterans first, so they try to be in the One-Stop on busy days. The state also encourages veterans representatives to go through customer lines to identify and serve veterans. Some regions also have veterans-only resource rooms.
 - **Region 8 (Jacksonville area) One-Stop Career Center.** When a customer first walks into a Region 8 One-Stop Career Center, a greeter immediately asks if the customer is registered with Worksource and if the customer is a veteran. Customers usually identify if they are a

³⁹ Source: Florida's State Veterans' Program Plan of Service Narrative, Page 3.

spouse of a veteran. Veterans representatives also work in the resource room where they can identify spouses (and assist with intake).

If the customer is not a veteran, then he or she is sent to the resource room, where the person is offered services (such as self-service computers and workshops). If the non-veteran requests training, he or she first receives core services. The One-Stop also provides an orientation, explaining that there are other services available if the customer cannot find a job. Later on, the customer could receive WIA orientation and progress through intensive services and training.

In contrast, if a veteran walks in, the vet is immediately offered an opportunity to meet with a veterans representative, which veterans almost always accept. The veterans representatives are usually available within a few minutes. If available, the veterans representative makes sure the customer is a veteran and then provide an “interview...evaluat[ion]...and registrat[ion].”⁴⁰ If the veterans representative is not immediately available, and if there is no other staff appropriate for the veteran customer, then the staff provides the veterans representative’s card and asks if the veteran would like to make an appointment or wait in the resource room.

- *Twenty-Four Hour Hold on Job Listings.* The state previously had a twenty-four hour hold on job listings, but eventually came to view this as a disservice to employers. Currently, Florida’s computerized job listing service (called “Employ Florida Marketplace”) does not permit RWBs to have a 24-hour hold. For this reason, Region 8 ended this aspect of POS around two years ago. Employers can still search Employ Florida Marketplace for veterans, and this sometimes occurs.
- *Provision of One-on-One Services and Intensive Services.* Much of this was discussed in the previous section, *Veterans Identified at the Time of Entry into the One-Stop*. In addition, Florida provides specific “Job Skills Workshops and Job Clubs for veterans”.⁴¹
 - **Region 8,** For separating veterans, counseling first begins after the TAP sessions with the two staff that serve on the base. At the One-Stop office, the veterans representative conducts an intensive assessment with all veterans who desire it. The veterans representative starts the veteran with core services and makes a determination of whether intensive services are required. A veteran who has recently left the service typically receives intensive services, while veterans who have been out of the service longer usually require fewer intensive services.

⁴⁰ Worksource Comprehensive 2-Year Plan 2007-2009, page 82, available at: http://www.worksourcefl.com/files/WorkSource_2_Year_Plan.pdf

⁴¹ Source: Florida’s State Veterans’ Program Plan of Service Narrative, page 4.

The veterans representative does not immediately focus on quick job placement unless appropriate. Depending on what kind of intensive services are needed, the veterans representative asks about such issues as disabilities and health status, the veteran's family situation (e.g. if the veteran has a spouse), and UI. The veterans representative assesses the veteran's skills to determine how they are transferable into the civilian workforce. If the veteran would like to apply for disability payments through VA, he or she is sent online or given the appropriate forms by the veterans representative. Alternatively, the veterans representative sometimes refers the veteran to a specific person at the VA clinic (with whom the veterans representative has a close relationship). This is helpful, because veterans are typically reluctant to deal with the bureaucracy of the VA. Veterans representatives also inform veterans about the GI Bill benefits and other services available.

- *Job Development Contact Services.* The veterans representatives perform a daily search on behalf of veterans for new jobs. If a good potential match is found, they then send an email to and sometimes call the veteran. Such a process was described in Region 8, where veterans representatives contact veterans who are among the top five candidates for a position (only occasionally do One-Stop staff do this for non-veterans).
- The veterans representatives also review new registrations in Employ Florida Marketplace daily. Veterans representatives receive an alert when a veteran logs onto the Florida Marketplace system. The veterans representatives inspect the applications to make sure they are complete, and they sometimes contact veterans to see if they need additional services (especially if the veteran has contacted the One-Stop by email or letter).
- Business services staff of the RWBs have set aside specific staff to work with employers. DVOP/LVERs are a part of these teams and make sure that employers are aware of veterans who are interested in and qualified for listed jobs. Additionally, the veterans representatives “take the...lead” of the Hire Veterans First campaign, and the state plans on conducting a media campaign to encourage the hiring of veterans.⁴²
 - **Region 8.** The veterans representative performs an intensive search for jobs for veterans in the community. They ask employers about job openings, because some employers do not list jobs at One-Stop Career Centers. Veterans representatives may also call employers to inform them about a veteran customer at the One-Stop.

Region 8 workers also corroborated that the veterans representative staff is included in the marketing effort of each office. One staff

⁴² Florida's State Veterans' Program Plan of Service Narrative, Pages 4 and 5.

member believes that this collaboration gives them a more professional face for employers (rather than if the staff separately contacted employers multiple times). They also have brochures that market veterans to employers and other market consultants that reach out to employers will mention the talented pool of veterans available.

- *Priority of Service for Training (Region 8)*. All customers seeking training go through an intensive assessment to ensure that they have the background to pursue the desired career. While there is no formal POS regarding training, veterans representatives do personally speak with the training staff if the veteran needs training. There are also other funding sources available for training veterans, such as the VA Vocational Rehabilitation (about a three-week process, preceded by intensive services from veterans representatives) and the GI Bill. Region 8 has the largest number of veterans enrolled in training in the state.
- *Special Grants and Programs to Serve Veterans*. The Florida State Board has also partnered with Florida's three grantees (two in Jacksonville and one in Cocoa, totaling \$650,000) of the federal Homeless Veteran Reintegration Program (HVRP). According to the DOL's website, HVRP is intended to help homeless veterans "obtain meaningful employment" and to bolster other services to homeless veterans.⁴³ Staff from One-Stops either goes to grantees, or the grantees have a presence at the One-Stops. The state has also given four grants to RWBs to "develop innovative, employed worker training programs" for various special populations, including veterans.⁴⁴ Finally, Florida has created the "Military Family Employment Advocacy Program" to provide a variety of workforce services to the family of those in the military. This program operates out of seven One-Stops, all close to bases.⁴⁵
 - **Region 8**. The region has several special grants and services for veterans including:
 - A \$25,000 grant for a "Disabled Vets Marketing Campaign."⁴⁶
 - Funding for the Career Advancement Account (CAA) project for military wives, which a One-Stop staff member described as a huge success. Additionally, the One-Stop has a staff member solely devoted to working with military spouses. She is located in the South Side One-Stop, but she is responsible for the entire region.
 - Entrepreneurial classes out of the University of North Florida. This is a six-week course for veterans about how to manage a business plan, get it underwritten, and launch it. Several veterans have started businesses after this program.

⁴³ Source, Homeless Veterans' Reintegration Program Program Highlights, available at: http://www.dol.gov/vets/programs/hvrp/homeless_veterans_fs.htm

⁴⁴ AWI Report, page 76

⁴⁵ Source: Quick Facts: Workforce Services – Military Family Employment Advocacy Program.

⁴⁶ Worksource Comprehensive 2-Year Plan 2007-2009, available at: http://www.worksourcefl.com/files/WorkSource_2_Year_Plan.pdf

- Special grants from the Veterans Workforce Investment Program to help veterans obtain wireless certification and to assist female veterans with electrician certification.
 - Employment services available through the Ticket to Work program for social security disability insurance (SSDI) and supplemental security income (SSI) recipients. Region 8 has been encouraging disabled customers, including veterans, to use this program, which provides support for many of the services offered at One-Stops as well as by other providers.
- *Partnerships to Help Serve Veterans.* In addition to the collaboration discussed above with the Homeless Veteran Reintegration Program, in Marion County, there is a partnership with the utility companies and the Florida Workforce Energy Commission. Utility companies estimate that about half of their current employees will soon retire. They are working closely with the staff from TAP to target veterans and to get veterans into technical training. A similar partnership to provide employment opportunities for veterans is occurring with the Department of Corrections.

- **Region 8.** Although they do not have outstationed staff at these organizations, they do have monthly contact with veteran service organizations including Disabled American Veterans (DAV), American Veterans (AMVETS), Florida Department of Veteran Affairs (DVA), and the American Legion. Those organizations also come to the One-Stops to see how they can assist veterans. The One-Stop staff also performs BRAC work. Finally, two members of the Region 8 board have worked for veterans organizations.

More generally, the veterans representatives attempt to go beyond providing employment services, with the belief that additional supportive services are needed for successful continued employment. They also look at the needs of veterans' spouses and the veterans' childcare, disability, and income needs.

- **Number of Veterans Served and Mix of Services Received.** During the reporting period from July 2007 – September 2008, there were 1,104,946 participants in Wagner-Peyser, including 90,246 “veterans, eligible persons, and [transitioning service members (TSMs)]”. As can be seen below, veterans typically received more Wagner-Peyser services than overall participants received. Nearly four percent (3.9 percent) of veterans were “referred to federal training,” and 4.4 percent were referred to a federal job, although only a small portion eventually received either. A large percentage of campaign veterans, special disabled veterans, and recently separated veterans were “referred to a federal contract job” (between 16 percent – 18.5 percent) although very few actually “entered into [a] federal contractor job.” Not shown in the table, veterans have about the same entered employment rate as the overall Wagner-

Peyser population (61 percent versus 62 percent), but they have a higher 6-month employment retention rate (81 percent in comparison to 78 percent).⁴⁷ With regard to participants in the WIA Adult and Dislocated Worker Programs, in PY 2007-2008, veterans had lower outcomes than overall participants across several measures (average earnings and the entered employment, employment retention, and employment and credential rates).⁴⁸

**Table A: ⁴⁹
Wagner-Peyser Services Received
(July 2007 – September 2008)**

	Total Participants	Total Veterans, Eligible Persons, and TSMs
Received workforce information services	66.0%	66.7%
Received staff assisted services	86.7%	87.3%
Career guidance	12.2%	18.6%
Job search activities	63.2%	66.5%
Referred to employment	54.2%	56.0%
Received intensive services	*	5.9%
Referred to WIA services	1.4%	1.5%

* Data unavailable

- Do Veterans Receive Priority for Intensive/Training Services When Funds Run Low?** The state notes that veterans are to receive priority of service, but they leave it up to the local RWBs to implement their own policies. The state Veterans’ Program Plan of Service Narrative states that “eligible veterans will also receive priority in all Dept. of Labor (DOL) employment and training programs operating in the One-Stop Career Center, e.g. WIA, etc.”⁵⁰

In their two-year plans, regions are required to identify how they will prioritize services for veterans. The state reviews these plans to see if veterans receive priority.

⁴⁷ Source: DRAFT: Wagner-Peyser ETA9002/VETS200 Report. Available at: http://www.floridajobs.org/Reports/wpreports/ETA9002_VETS200_PY08Q1.pdf

⁴⁸ Annual Report - Federal Programs: Workforce Investment Act (WIA) and Related Workforce Programs Program Year 2007 – 2008, pages 49 and 71.

⁴⁹ Source: DRAFT: Wagner-Peyser ETA9002/VETS200 Report. Available at: http://www.floridajobs.org/Reports/wpreports/ETA9002_VETS200_PY08Q1.pdf

⁵⁰ Source: Florida’s State Veterans’ Program Plan of Service Narrative, Page 4.

- **Training/TA on Priority of Service.**

- *Quarterly trainings.* As discussed in Florida’s State Veterans’ Program Plan of Service Narrative, all One-Stop Career Center staff will “be trained and tasked to identify veterans, specially disabled veterans and veterans with barriers to employment, and ensure that the necessary positive workforce services are provided...[;] One-Stop partners and service providers will [also] be trained to identify veterans with barriers and, in most cases,...to refer these veterans to the DVOP staff for services.”⁵¹ The state provides quarterly regional training for everyone regarding veterans’ issues; one of the first issues discussed is POS. They always receive a good turnout from management staff. They also encourage the frontline and executive staff to attend. In addition, the state provides on-line training periodically and conducts quarterly forums.⁵² Finally, Florida provides One-Stop Career Center staff with an online manual (called the “State Veterans’ Services Program Guide”).⁵³
- In addition, the state monitors about one-quarter of the regions each year. During the visit, the state raises POS and difficult POS issues.
- In Region 8, all new staff receive training. Every new non-veteran staff has to go through tier 1 training, which is provided online and includes a module on veteran services (including POS) and responsibilities to veterans. Each One-Stop in the RWB has a local veterans representative who is responsible for staff training.

- **Monitoring POS.**

- The state prepares a quarterly report on various measures and indicators of Regional Workforce Boards on WIA, Wagner-Peyser, and TANF. One focus of this “Balanced Scorecard Report” is the employment and earnings of veterans.⁵⁴ The state also looks at the number of veterans entering One-Stops and receiving training in comparison to customers overall; if the veterans numbers look low, they will speak with the relevant RWB. The Balanced Scorecard Report also includes a customer satisfaction survey, which may include a veteran component.⁵⁵

Beyond the federally-required assessments, Florida also conducts site visits to a portion of One-Stops to review veterans’ services and receives “Manger’s Report[s] on Services to Veterans” from LVERs.⁵⁶ Moreover, during site visits, they look for a sign asking if customers are veterans.

- **Challenges to Implementing POS in One-Stop Career Centers.**

⁵¹ Source: Florida’s State Veterans’ Program Plan of Service Narrative, Pages 2 and 12.

⁵² Source: Florida’s State Veterans’ Program Plan of Service Narrative, Page 3

⁵³ Source: Florida’s State Veterans’ Program Plan of Service Narrative, Pages 2 and 12.

⁵⁴ AWI 2007 Report

⁵⁵ AWI Report

⁵⁶ Source: Florida’s State Veterans’ Program Plan of Service Narrative, Page 3

- Some regions have large retiree populations. One administrator suggested a special competitive grant for serving unique populations (such as retirees). Some of the older veterans are not computer literate, although the veteran staff is there to help them get online.
- Because some younger veterans have post-traumatic stress disorder (PTSD) there may be a lag time after leaving the military before they enter a One-Stop Career Center. However, once at the One-Stop Career Center, these veterans do not have problems using the offered services.
- The regional boards may view the new federal POS regulations as an additional burden. However, at least one administrator views them as an additional tool for enforcing and monitoring POS.
- Florida has a lot of agricultural areas that do not have large veteran populations, so there are fewer problems there.
- The customer base has shifted and the workforce system has to shift services to address their needs. Because of the Internet, 56 percent of customers want to exclusively use the Internet. Customers are asking for different services than provided before. Veterans and other customers would like networking opportunities with similar job-seekers. Customers are better educated and have better work histories. Some are already employed and are just looking for new better opportunities.

STUDY OF PRIORITY OF SERVICE UNDER THE JOBS FOR VETERANS ACT SITE VISIT SUMMARY -- KANSAS

State: Kansas

Dates of Visit: 1/26/09 – 1/27/09

- **State Geography/Population.** Kansas is the 33rd most populous state, with a population of 2.8 million (July 1, 2008 Census estimate). The state is sparsely populated, ranking 40th among all states at only 34 persons per square mile. Kansas is ranked in the middle among states (26th) in terms of the percentage of its population who are veterans – 11.4 percent of the adult civilian labor force are veterans (versus 10.4 percent for the U.S. as a whole.⁵⁷ There are several large military bases in Kansas, including Ft Riley, Ft. Leavenworth, and Ft. McConnell, as well as three VA hospitals. The characteristics (such as educational level) of military personnel vary across bases, which affect the strategies for helping base personnel make the transition to the civilian workforce. At Fort Leavenworth, for example, most of the military personnel leaving the service are officers, with most (95 percent) having a Bachelor's, Master's, or Doctorate degree. In contrast, at Fort Riley, nearly all military personnel transitioning are enlisted men (most without college or advanced degrees). There is roughly an even distribution of officers and enlisted personnel at Fort McConnell. Kansas has had no recent base closings, and in fact, is expected as a result of BRAC, to receive an influx of new military personnel (by 2012, Fort Riley is expected to receive an additional 13,000 soldiers).
- **State Economy.** The two largest industries in Kansas are state government and healthcare. In contrast to much of the rest of the United States, Kansas' economy has held up relatively well during the recession. Despite the deep recession that has gripped most of the rest of the country, the manufacturing and construction sectors have continued to provide employment growth. The unemployment rate, while increasing somewhat in recent months, is low relative to trends for the country as a whole (in January 2009 [the time of the site visit], Kansas' unemployment rate was 5.8 percent compared to 7.6 percent nationally; by March 2009, the rate was slightly higher at 6.1 percent, but compared favorably to 8.5 percent unemployment rate nationally). To take full advantage of the still expanding construction sector, representatives from the state's Department of Commerce have recently been in negotiations with the builder's union to create apprenticeships for upcoming construction projects. In April 2009, the sector will need several thousand carpenters, electricians, and for ironworkers for some major construction projects. The meetings with the builder's union centered on creating positions especially for veterans aged 18

⁵⁷ Source: U.S. Census, American Community Survey, 2006; percent of civilian population 18 years and older who are veterans. No date was available on the percentage of veterans for the local area that was visited.

to 24, who are returning from deployments in Iraq and Afghanistan (nationally, an estimated 16.8% of veterans in this age group are unemployed).

- **Structure of the Workforce Development System.** At the state level, WIA and ES/Wagner-Peyser services are administered under the Kansas Department of Commerce; the Unemployment Insurance Program is overseen by the Kansas Department of Labor. The two departments function almost entirely separately at both the state and local levels (e.g., One-Stops do not offer UI claims processing). Kansas' workforce development system consists of five service delivery workforce areas, each with a different community organization serving as the operator of the local area. The five operators are the Local Area I Workforce Investment Board (Area I), Heartland Works (Area II), Kaiser Group (Area III), the Workforce Alliance of South-central Kansas (Area IV), and Dynamic Education Systems, Inc (Area V).⁵⁸ There are a total of 23 One-Stop Centers spread across the state, five of which are considered to be full-service One-Stops (one in each WIB). There are no separate Wagner-Peyser/ES offices in the state (i.e., ES/DVOP/LVER staff are co-located with WIA staff at the One-Stop Centers). In addition to the One-Stop Centers, there are two mobile One-Stop RVs (one housed in the Western part of the state and operated by the Department of Commerce, the other housed in the east and owned and operated by a partner organization).
- **Veterans representative Staffing/Organization in the State and One-Stop System.** There are currently 11 LVERs in the state and 15 DVOPs. The number of LVERs and DVOPs has substantially declined over the past several decades (in 1977, there were 65 DVOPs and LVERs; by 1995, the number had decreased to 43; and today the number of veterans representatives stands at 26 statewide). Each of the full-service One-Stops contain at least one DVOP or LVER. At non full-service Centers, a DVOP or LVER comes in at least once per week. One-Stop staff in Kansas are divided into three functional teams: a "Welcome" team which conducts initial intake and assessments of customers; a "Skills Assessment" team which conducts a more in-depth evaluation of obstacles to employment, identifies potential services, and refers customers to appropriate services; and a "Business Services" team which conducts employer relations and outreach. DVOPs function as case managers on the skills assessment team, while LVERs function as job developers on the business services team. In 2006, the Department of Commerce implemented a training program aimed at upgrading skill and pay of existing DVOPs and LVERs. This initiative also enabled the department to institute new minimum qualifications for newly-hired DVOPs/LVERs, requiring that they have at a least a Bachelor's degree. To transform the skills sets of existing DVOPs/LVERs, the Department instituted a "Career Development Technician Apprenticeship Program," wherein staff signed agreements they would participate in over 4,000 hours of classroom and OJT instruction (over a two-year period). Staff who successfully completed the program received a job title increase and 10 percent pay raise each of the two years of the program. The effects of this program have been four-fold: (1) enabling the Department to provide pay raises

⁵⁸ The five WIB are based in Great Bend, Kansas City, Pittsburg, Topeka, and Wichita.

to its DVOPs and LVERs despite state-set pay freezes in place at the time, (2) teaching employees valuable new career development skills, (3) allowing the Department to require that all new hires have a Bachelor's degree or equivalent training to be on-par with their existing DVOP and LVER staff, and (4) encouraging some underperforming staff to retire or seek other jobs without the state having to wade through the burdensome administrative paperwork required to terminate state employees.

- **State Level Policies on Priority of Service.** Kansas has issued the following policy with regard to POS: *“Priority of service to veterans and other covered persons will be provided within the context of existing policies, operational management, and related work processes. Veterans and other covered person must meet WIA eligibility guidelines and if seeking Adult funds, must meet the low-income priority system, if in effect. A covered person shall be given priority with respect to any qualified job training program, over non-veterans for the receipt of employment, training, and placement services provided under that program, notwithstanding any other provision of law (20 CRF 4215(a)(3)). The term covered person means any of the following individuals:*
 - (1) A veteran; and*
 - (2) The spouse of any of the following individuals:*
 - a. Any veteran who died of a service-connected disability;*
 - b. Any member of the Armed Forces serving on active duty who, at the time of application for assistance is listed, and has been so listed, for a total of more than 90 days as:*
 - i. Missing in action,*
 - ii. Captured in line of duty by a hostile force, or*
 - iii. Forcibly detained or interned in line of duty by a foreign government or power;*
 - iv. Any veteran who has a total disability resulting from a service-connected disability; or*
 - v. Any veteran who died while a disability so evaluated was in existence.*

Certain targeting provisions are derived from a statutory mandate that requires a priority or preference for a particular group of participants or requires spending a certain portion of program funds on a particular group of participants. These are mandatory priorities. For example, under the Workforce Investment Act there is a mandate that if ‘funds allocated to a local area for Adult employment and training activities... are limited, priority shall be given to recipients of public assistance and other low-income individuals for intensive services and training services.’ For these programs with mandatory priorities, the veteran’s priority is applied as follows:

- 1. An individual meeting both the veterans’ and the mandatory priorities or spending requirement or limitation should obtain the highest preference for the program.*

2. *Non-veterans within the program’s mandatory priority should receive a preference over eligible veterans outside the program-specific mandatory priority or spending requirement or limitation.*
3. *Eligible veterans outside the program-specific mandatory priority or spending requirement or limitation should receive priority over non-veterans outside the priority or spending requirement or limitation (once the spending requirement or limitation is met).*

Therefore, in the event funds become limited in relationship to the anticipated population to be served (as determined by the WIB), the WIB will implement a priority system. The priority waiting list contains a variety of applicant information, which includes: date of inquiry; name; contact information; potential eligibility status (adult, dislocated worker, and demographics including veteran status, etc.). Priority will be given to Adult recipients of public assistance, other low-income individuals and to individuals 55 and over. The first group to be served will be Veterans meeting one or more of the categories. The second group to be served will be a Covered Person meeting one or more of the categories. The third group to be served will be a Non-veteran meeting one or more of the categories. In order to prioritize individuals within each group, points are given for each category the individual meets. The individual with the highest points in the group is served first. If the points for individuals within the group are equal, the earliest application date will be served first. The fourth group to be served will be Veterans meeting none of the categories.”

State and local staff indicated that veterans are generally familiar with Priority of Service provision (or at least that they will be afforded some level of priority over non-veterans) due in part to attendance at TAP sessions, word-of-mouth with other veterans, signs posted in One-Stops, and the orientation they receive to One-Stop services. Veterans representatives noted that veterans may not always be clear about what priority of service specifically entitles them to in terms of services. For example, veterans may not fully understand that low-income status is considered first with regard to qualifying for training under the WIA Adult Program and within those who are low income, that veterans receive priority over non-veterans.

- **Outreach to Veterans.** Veterans learn about One-Stops and services available to veterans by the following means:
 - **TAP Sessions.** TAP workshops are conducted in three different sites across the state: Fort McConnell, Fort Leavenworth, and Fort Riley. Sessions at Fort McConnell and Fort Leavenworth are conducted monthly, while those at Fort Riley are conducted once each week. A TAP instructor (often a DVOP/LVER from a nearby One-Stop), using the nationally-standardized TAP curriculum, provides an overview of veteran services available at One-Stops. Several PowerPoint slides provide an overview of One-Stop services, identifying specific types of employment and training services available for veterans. Veterans are encouraged to visit One-Stop Centers and are told that they will get first referrals to job opening and preference over non—veterans for training.

- **DVOP Contact to Veteran Self-Registrants.** When veterans self-register via the Internet for Wagner Peyser services in Kansas Works, a DVOP is automatically notified in the locality in which the veteran registers. The DVOP will follow up with a call to the veteran to inform them of the services available through the One-Stop and particularly veteran services. The DVOP will also check to see if the veteran has special needs or faces barriers to employment, and if so, will encourage the veteran to come into the One-Stop to meet with a vet rep.
- **Media Advertisement.** The Department of Commerce runs quarterly advertisements in nine newspapers across the state detailing the One-Stop services available to veterans. A LVER in Hays, Kansas has a radio call-in show focused on employment and services available for Veterans.
- **Job Fairs for Veterans.** The Department of Commerce sponsors outreach events, particularly job fairs that are specially targeted on veterans. Each year, job fairs exclusively for veterans are held around the state. For example, in November 2008, there were five Veterans job fairs conducted across the state on the same day with a total attendance of 1,000 Veterans and 200 employers. In April of 2009, the Department is partnering with the Kansas City, Missouri WIB to have another Veterans Job Fair day during which 125 employers and over 600 Veterans are expected to attend. There are also an annual homeless Veterans “stand-downs” in Topeka and Kansas City, during which the Department of Commerce and partnering organizations set up a tent-city and inform homeless Veterans about all services available to them, including housing, employment, legal, and medical services. A “field” One-Stop office is set up at the stand-down, which include computers that enable veterans to register for the ES, search for job openings, and complete resumes with help from a DVOP.
- **Linkages to Businesses.** The state developed a brochure for Kansas businesses detailing the advantages of hiring Veterans. The state also developed a brochure for Veterans informing them of how to market their skills and work experiences to employers. (Note: both of these brochures are available in the site visit materials obtained). The Department has created additional marketing materials such as pens, clocks, and t-shirts featuring the “Hire the Vet” logo. In the more rural areas of the state, veterans representatives know many of the employers personally and can use these connections to assist veterans in securing jobs.
- **“Vet Links” Website.** A website currently under development, called “Vet Links,” will provide information about all services available for Veterans, including training, education, job search, marriage counseling, financial aid, and business advice. An on-line questionnaire will enable veterans to explore their eligibility for various programs and services, and will then automatically generate a resource list with contacts for the veteran – including referrals to the One-Stop system.
- **Warriors Transition Battalion.** This special initiative located at Ft. Riley is designed to help nearly 500 wounded military personnel (returning from Iraq and Afghanistan) to make the transition to the civilian sector. A full-time

DVOP has been assigned to this program to provide one-on-one help that is particularly aimed at helping veterans to obtain training and job search assistance.

- **Overview of How POS is Administered/Implemented in the One-Stop System.**

A visit to the Junction City Workforce Center, supplemented by discussions with state officials, provided details about the flow of veterans through the One-Stop System.

Client Flow Through the One-Stop. Near to the Welcome Desks of each One-Stop in the state is posted an 8 by 10 inch sign (developed by the state) that details basic provisions of Priority of Service. The One-Stop sign-in sheet contains a column indicating Veteran status. At the One-Stop visited (in Junction City), there is a separate check box on the sign-in sheet to indicate that customers are the covered spouses for the purposes of priority of service. Upon signing in at the One-Stop, customers are asked to self-identify as Veterans by a greeter and indicate their status on the sign-in sheet. Next, customers complete a form that inquires about Veteran status, identifies barriers, and measures eligibility and receipt of other VA services. The Junction City One-Stop has a private conference room space in where veterans are able to meet with DVOPs. While the one-stop does not have specially designated computer terminals for veterans, if terminals are fully utilized, veterans receive priority for usage.

After sign-in and completion of the form, the customer is sent to an ES staff person to review the questionnaire form, discuss barriers, and make an initial assessment of whether the customer should be referred to the DVOP for a more in-depth assessment and possible case management. If the ES worker determines that the veteran does not face barriers, they are encouraged to use the self-services available at the One-Stop and they may get additional case management from the ES staff, but do not generally see a DVOP. However, if the veteran was to specifically request to meet with a vet rep, he or she would be immediately scheduled for such a meeting. Because of the scarcity of veterans representatives, DVOP services are reserved for veterans with barriers to employment. At the state and in One-Stop Centers, the policy is not simply to refer all veterans to DVOP for case management services. Rather, there is intent that veterans make full use of ES/Wagner Peysner and One-Stop services available in the self-help Resource Room.

If the veteran is referred to a DVOP, he or she has a more detailed interview covering barriers to employment and potential services that could address such barriers. The DVOP then makes an informed decision about whether the veteran is in need of continuing case management services – and if this is the case, the DVOP would add the veteran to his/her case management caseload. The DVOP would then develop a plan of service with the veteran. If training is needed, the customer is referred to WIA for eligibility determination (note: see above for priority for receipt of WIA training when funding is limited).

Veteran Priority for Job Listings with the ES. Under state policies, there is also a hold on release of job orders submitted by employers so that veterans gain a head start over non-veterans in applying for job openings. Employers can submit job orders on-line via the web or by telephone (or in-person) to ES staff. For online posting of job orders, there is a 24-hour hold during which only veterans are able to see the postings. During this 24-hour period, veterans whose qualifications and skills match those of the job order are automatically emailed by the system to alert them of the job opening. In addition, employers receive a list of matched job seekers with veterans listed first (followed by non-veterans). Non-Veterans do not receive an e-mail alert during this 24-hour period, and cannot search for the position in the online database during the 24-hour hold period. If an employer calls in a job order or submits a job order in-person to ES staff rather than using the online system, this is referred to as a “staff-assisted job order.” Staff-assisted job orders are placed on a 4-hour hold, during which time the staff member taking the job order is to do a job match against veterans registered with the ES and call each veteran who matched the qualifications of the post.

- **Number of Veterans Served and Mix of Services Received.** The number of veterans served in Kansas has been decreasing over the past several years. In 2008, roughly 6,000 veterans registered with ES services. By comparison, in 1995, 26,000 veterans registered. In addition, there have been an increasing number of National Guard members needing services after extended tours of duty (around one year at a time). The department runs a reintegration program for these National Guard members.
- **Do Veterans Receive Priority for Intensive/Training Services When Funds Run Low?** Veterans are more likely to receive case management than non-veterans – and so, to the extent that case management constitutes intensive services, veterans would be more likely to receive intensive services than non-veterans. As a result of one-on-one assistance, veterans also may receive help navigating their way through the process of applying for training and may move into training faster and at higher rates than non-veterans. Under the WIA Adult Program, low-income veterans would be at the top of the list to receive training. According to state workforce officials, a rescission in WIA funding has affected the availability of ITA funds for the current program year. For example, the statewide WIA budget allocated to ITAs was reduced by over 50 percent from the previous program year, from about \$125,000 last year to \$54,000 this year. The major effect of these cuts has been a shift to giving priority of workforce services to individuals who qualify as low-income. Low-income veterans still have priority among the broader population of qualifying low-income individuals.
- **Training/TA on Priority of Service.** The State VETS Coordinator personally conducts one-on-one orientation meetings for each new DVOP and LVER (within two weeks of job start). He also routinely conducts refresher meetings from time to time on priority of service and other veteran services topics with non-Veteran (i.e., ES/WIA) staff at One-Stops across the state. In addition, within their first two years

of employment, DVOPs and LVERs must attend workshops at the National Veterans Training Institute (NVTI) in Denver, during which they participate in four sessions totaling 18 days.

There is also cross-training of ES/WIA staff members so that they are aware of the priority of service and services for veterans. DVOPs and LVERs also provide updates and guidance on veteran services/client flow/POS to their co-workers during monthly One-Stop staff meetings. Each ES/WIA staff person is given a “policy field guide” that contains information about the priority of service provision (and other state policies). Finally, all DVOPs and LVERs across the state meet at least once bi-monthly, and often meet monthly, to discuss veteran service issues.

Each year, the Department hosts a Continuing Education Conference that covers a variety of topics. All One-Stop staff, partners, and anyone who works with veterans are invited to attend. The first day of the conference is led by a NVTI staff member (from Denver). During this day-long conference, staff receives background and discusses veteran services, including Priority of Service.

- **Monitoring POS.** The State VET coordinator conducts quarterly reviews of service logs and reports to see whether the priority of service is being administered correctly. The reports reviewed include the 9002 and the Vets 200), and specific areas reviewed include the total number of veterans who are registered or the ES, receive job referrals, and receive case management services. Reviews are conducted of each level of the workforce center process: regional, site, and staff.

The state VETS coordinator also conducts site visits to One-Stops to monitor implementation of priority of service and veteran services in general. During these visits, he checks the office activities to see whether extra activities and services such as workshops are being conducted for veterans.

Also, the federal VET representative (for Kansas) conducts site visits to a sample (about one-fifth of One-Stops in the state each year) of One-Stops that house a full-time DVOP or LVER to review veteran services provided by DVOP/LVERs. This federal VET rep also conducts desk audits of other One-Stops that do not have a permanent DVOP/LVER. The federal VET rep also conducts quarterly reviews of reports on job entry rates and percentage of Veterans receiving intensive training to make sure that Veterans are being adequately served.

- **Challenges to Implementing POS in One-Stop Career Centers.** Overall, POS was not viewed by state or local personnel as a major challenge – the more pressing problem with regard to serving both veterans and non-veterans was the decrease in overall resources for the workforce system in recent years and decreasing staff. A number of issues/challenges were cited by state and local workforce officials with regard to serving veterans:

- First, identifying eligible spouses of Veterans has proved to be difficult in some instances.
- General funding cuts in the Department of Commerce budget (i.e., WIA rescissions) have presented a challenge, constraining available funding for intensive services and training (for veterans and non-veterans, alike).
- Administrators noted some difficulties finding eligible dislocated workers who are veterans, and noted that they would like to find ways of making more veterans aware of the availability of dislocated worker services and the fact that priority of service applies within this program as well.
- A broader challenge in obtaining employment for veterans is that many veterans want a career and a high paying job since they have substantial skills, training, and education, and sometimes these paths are not as easy to come by, as veterans would like. The more educated veterans (with college degrees) tend to have slightly more realistic expectations about how their skills translate and recognize that they may not be as valued financially in the private market as they would like. It has been particularly difficult to find employment for veterans who return with PTSD or traumatic brain injuries.

STUDY OF PRIORITY OF SERVICE UNDER THE JOBS FOR VETERANS ACT SITE VISIT SUMMARY -- NEW JERSEY

State: New Jersey

Dates of Visit: 4/15-16/2009

- **State Geography/Population.** New Jersey is the nation's most densely populated state (with 1.171 persons per square mile in 2007). The northern portion of the state is part of the nation's largest metropolitan area (New York-New Jersey-Long Island Metropolitan Area with 18.8 million residents). In addition, the southern region of the state is part of the fifth largest metropolitan area in the nation (the Philadelphia-Camden-Wilmington Metropolitan area with a population of 5.8 million). Overall, in 2007, the state's population was estimated at 8.7 million. The state has a high median household income (\$67,142 in 2007 compared with \$50,740 for the U.S.) and a relatively low poverty rate (at 8.5 percent in 2007 versus 13.0 percent of the U.S.). However, there are several areas of NJ with very high concentration of poor – Newark, Camden, Patterson, and Jersey City. New Jersey is ranked 49th in terms of the percentage of its population who are veterans – 8.0 percent of the adult civilian labor force are veterans (versus 10.4 percent for the U.S. as a whole.⁵⁹ Still, there are several areas within the state where there are concentrations of veterans and retired veterans – in particular, near the six major military bases (Ft. Monmouth, Ft. Dix, Earle Depot (a major weapons storage facility), Ft. McGuire, Ft. Lake Hurst, and the Cape May Coast Guard Facility) and the state's one VA hospital (in East Orange). The Toms River area has particularly high concentrations of veterans. Fort Monmouth is scheduled to be closed as part of the most recent BRAC action (with personnel being moved to Aberdeen, MD).
- **State Economy.** In recent years, the state's economy has generally been in better condition when compared to the national economy (e.g., on unemployment rate), but the recent economic downturn has taken hold of the state. New Jersey was initially substantially affected by the downturn of the financial services industry (centered in and around New York), but in recent months the downturn has spread from the financial services sector and adversely affected employment across a full range of other industry sectors within the state. There has been a marked recent downturn in new home construction and significant deterioration in employment in the retail sector (with closures of stores such as Linen and Things, Drugfare, Cross-cutters, Circuit City). Employment in New Jersey has been sharply down in recent months and for the past year. February 2009 marked the 13th consecutive month of decline in employment, and the state's unemployment rate moved above the national rate for the first time since October 2006. The New Jersey unemployment rate rose by nearly one percentage point from January's 7.3 percent to 8.2 percent in February (just above the U.S. rate of 8.1 percent). Job loss in February was widespread, with declines

⁵⁹ Source: U.S. Census, American Community Survey, 2006; percent of civilian population 18 years and older who are veterans. The Newark-Union, NJ-PA Metro Area was ranked 511th of 528 metro areas with 7.0 percent veteran.

recorded in eight of the 10 super (industry) sectors. The largest contractions occurred in professional and businesses services, manufacturing, construction, and financial activities.⁶⁰ According to state officials, the large numbers of new claims for Unemployment Insurance benefits have strained the UI claims system and brought many new customers to the One-Stop system. The unemployment rate is highest in the south of the state (in the Cape May area), but is also highly seasonal, and expected to fall as the summer months approach. There is some concern in coastal communities about being unable to bring in temporary foreign workers to fill seasonal slots this coming summer due to possible curbs on such visas by USDOL.

- **Structure of Workforce Development System.** New Jersey has a total of 19 WIBS spread across its 21 counties. The WIBS are generally at the county-level, with the following exceptions:
 - Morris, Sussex, and Warren Counties are covered by one WIB.
 - Somerset and Hunterdon Counties are covered by one WIB.
 - Atlantic and Cape May counties are covered by one WIB.
 - Essex County has two WIBs: the City of Newark is separate WIB and the balance of the county is covered by a separate WIB.
 - Hudson County has one WIB, but two One-Stop operators (one for Jersey City and one for the balance of the county).

The state has a total of 24 full-service One-Stop Career Centers, as well as an estimated six satellite One-Stop Centers (note: this local site visit was to the City of Newark One-Stop Center). Every One-Stop is covered by at least one vet rep, with most One-Stops having a part-time LVER and a full-time DVOP. Statewide, there are a total of 10.5 FTE LVERS (19 individual LVERS, most of whom allocate half their time to being a LVER and the other half of their time to serving regular Wagner Peyser participants) and 32.5 FTE DVOPs (33 individual DVOPs). By comparison, just five years ago, the state had a total of about 48 DVOPS and 24 LVERS (and all were full-time). Most One-Stops now have a part-time LVER, but a few have full-time ones. The state currently has three unfilled vet rep positions due to state hiring freeze. It also has been unable to fill many other state Wagner Peyser/ES positions due to a hiring freeze on state employees that has been in effect for about the last 3 years. This has meant that the state has had to return funding to the federal government that has gone unspent for these positions – and has meant that federal funding has decreased for vet rep and ES positions over time because funds have gone unspent. It has also meant that it has been more difficult for One-Stops to provide one-on-one services for job seekers (including veterans and non-veterans). There are no stand-alone ES offices – Wagner Peyser and WIA operations are fully integrated within the One-Stop system. The main partners within the One-Stop System are WIA, Wagner Peyser/ES, and VETS. In most instances the vocational rehabilitation program is also a partner at One-Stops. Other One-Stop partners sometimes include: Older Workers programs and WorkFirst New Jersey (offering

⁶⁰ Source: State of New Jersey Department of Labor and Workforce Development, Press Release, “Marc-25-09 Employment in NJ Fell in February; Unemployment Rate at 8.2 percent).

employment-related activities for TANF, FS, and General Assistance recipients). UI claims are no longer taken at One-Stops, though some customers still come to One-Stops to submit claims (in which case, they may enter a claim using a computer at the One-Stop or call to submit a claim over the telephone) and/or resolve payment claims/payment issues. Each WIB chooses a One-Stop operator, who then enters into a memorandum of agreement with partners. County or city governments are the operators in all local areas (there are no non-profit operators). WIA and WP in reality pay all of the expenses, though other One-Stop partners are supposed to share the expenses. In addition to the hiring freeze for state workers (which has over time eroded the numbers of Wagner Peyser staff and veterans representatives), the WIA Program has suffered a gradual decrease in funding, which has also led to cutbacks in WIA staff in local areas. The stimulus package recently announced by the Obama Administration will bring new funding to the WIA Program and is expected to reverse the downward trend in WIA staffing. New Jersey has several special training initiatives that are in addition to those funded under the WIA Program (note: none of these are specially targeted on veterans, though similar to the WIA Program, veterans receive preference over non-veterans once eligibility requirements are met):

- The Workforce Development Partnership Program, funded from state UI Trust Funds, offers training principally for dislocated workers, but 10% of the funds can be used for training for disadvantaged workers. Under this state initiative, customized and employer-based training is offered.
- The Self-Employment Assistance Program, also funded by UI Trust Funds, provides 4 to 6 weeks of classes to prepare UI claimants to become entrepreneurs. Participants must be a UI claimant and profiled and those participating are not eligible for extended UI benefits.
- Teacher Certification Program: This is a new initiative being planned with stimulus funds. It will target people affected by the downturn in the financial sector. Up to 90 individuals will receive short-term training to be certified as math teachers for intermediate and high schools.
- **State Level Policies on Priority of Service.** A set of state policies has been developed and distributed regarding POS for veterans through the Department's web-based "portal" system. (Note: One-Stop Directives are issued by the state to One-Stop Operators, directors, etc. via the Internet through a "portal" system). The state's policies mirror the language of DOL's Training and Employment Guidance Letter (TEGL). The guidance sets out POS eligibility for veterans and covered persons and provides additional guidance on what is meant by POS in terms of veterans receiving priority. In particular, the state policies emphasize that after specific eligibility requirements are met within a given program (e.g., meeting of income eligibility or the definition of a dislocated worker) that programs with federal funding must then give priority to veterans and covered spouses. State officials observed that DVOP/LVER staff are fully knowledgeable and understand POS requirements, but there may need to be more training of Wagner Peyser and other One-Stop partners' staff on POS. State officials noted several trends across One-Stops in the state:

- Veterans are not typically formally informed about “Priority of Service” as part of the intake process into the One-Stop System – though they may learn that they have “priority” during TAP workshops or through discussions with other veterans.
- Veterans are asked whether they are veterans when they are initially greeted at One-Stops and most veterans seem to self-identify as veterans. Core services, job seeking, etc. are provided by the first staff person who comes into contact with the individual. The strategy is not to send someone to a vet rep unless the veteran requests such a meeting or faces a particular obstacle to employment (that could be addressed by the vet rep). If veterans have special needs, then they are referred to veterans representatives for case management services and referral to other services.
- There is no requirement that veterans get in touch with the vet rep, but veteran customers are informed at multiple points about the vet rep and the types of assistance that can be provided by a vet rep. If the veteran does not see the vet rep, then the vet rep will try to make contact at some point with the veteran to see if any special services/help is needed.
- One-Stops do not generally have signs notifying customers of the veteran’s priority of service (and the state has not created such a sign for use by One-Stops). One-Stops have a scan card for every One-Stop customer, which tracks the services each individual receives. For example, when an individual participates in a group activity, he/she scans this card, which records his/her participation in the state’s database.
- There is a 24-hour hold on job orders: Employers can submit job orders via the Internet or by phone. The vet rep may release the job order before the 24 hours elapses if no qualified matching veteran is found; the system releases the job order automatically to the general public once the 24- hour period lapses. The search for matching veterans is statewide – and each veteran matching a particular job order is emailed a notification of their match, which indicates that they should contact a local vet rep if they are interested in the job opening. The 24-hour hold is uniform: employers cannot select against it. The way that this works is that the order is totally suppressed for 24 hours (i.e., no one, not even veterans, can view it in the database) or until it is released. Thus, the only way that a veteran would know about the job order would be through notification/hearing about it from a vet rep.
- The heaviest customer volume in most One-Stops is at the Center’s opening in the morning. In some offices, several staff will go through the line and ask customers what services they are in need of and direct them to specific services. They refer to this process as “triage.” This includes identifying veterans who may be waiting in line and sending them to a vet rep or the WP staff before other non-Veterans are served.
- Training services are provided via the One-Stop Operator. If a customer (veteran or non-veteran) is identified as needing training, ES staff will typically refer the customer to the One-Stop Operator, who will assess the individual and, if appropriate, refer the individual to a training provider.

- **Outreach to Veterans.** There are some special outreach efforts to bring veterans into One-Stop Centers:
 - The state has assigned several staff (including a DVOP) to assist with instruction during Army Career and Alumni Program (ACAP) and Transition Assistance Program (TAP) workshops held for transitioning military personnel at local bases. During these sessions, soon-to-be-discharged veterans learn about the employment, training, and support services available through the One-Stop system. The main facilitator is a state employee who is a DVOP. A local DVOP or LEVR will usually attend a TAP workshop to introduce himself or herself and explain services available through the One-Stop System.
 - Many job fairs are held around the state throughout the year and some of these fairs are targeted exclusively at veterans. In addition, local armories have job fair events that the DVOPs and LVERs attend.
 - The state is looking at a new initiative that would feature a youth coordinator to outreach to youth 23~24 years old who are veterans.
 - A DVOP is out-stationed full-time from the state office to the East Orange VA Hospital. The DVOP's job is to inform veterans of services available through the One-Stop/workforce development system. The DVOP can register veterans with the ES, and provide the full range of ES/Wagner Peyser services at the hospital. She can and often does refer individuals to the local One-Stop offices for additional services – especially job leads and training services.
 - Job seekers can register for the ES and search job orders on their own without coming into a One-Stop. The ES/WP database is a web-based system, so anyone can register on their own via the web. If an individual job seeker self-identifies as a veteran when registering and does not come into a One-Stop to receive services, there is a 60-day close-out report that is provided to veterans representatives on a monthly basis that identifies veterans whose cases are about to close (i.e., cases will close at 90 days if no additional service is received). The purpose of this list is to alert veterans representatives of veterans about to close out and to provide an opportunity for the vet rep to contact the veteran (whether the veteran has or has not been into a One-Stop) to find out what if any additional services the veteran might need. A vet rep will look over this list, identify individuals where he knows the situation, and call to find out what is going on with the other cases, with the goal of having a face-to-face meeting to either provide services or close the case.

- **Overview of How POS is Administered/Implemented in the One-Stop System.** The following provides an overview the City of Newark One-Stop and details of how customers flow through the One-Stop, including how POS is being implemented:
 - *Background on the Newark One-Stop and Operations.* The One-Stop operator is the City of Newark, though the center is located in a state-owned building. The Newark One-Stop is quite a bit bigger than most other One-Stops in the state, offering programs/services that may not be offered at other one-stops

(e.g., case management for TANF cases, an ex-offender program, and the state's Workforce Development Program). The primary geographic area served by the Newark One-Stop is the City of Newark, though customers also come from outside the city (from Newark County), and in some instances, from New York and Pennsylvania. There is a second One-Stop that serves residents of the county (Essex County), which is located in East Orange (about 10 minutes away). Some residents of the City of Newark are served by this One-Stop, while some Essex County residents (i.e., living outside the City of Newark) come to the Newark One-Stop for services. The Newark One-Stop is providing services for about 800 customers per day (compared to about 500 per day before the economic downturn). Essex County's unemployment rate in February 2009 was 8.7%; however the rate is quite a bit higher for the City of Newark (in the double digits according to One-Stop administrators). Employment trends in Newark are much impacted by trends in New York City (particularly recently by the layoffs in the financial services industry). Several area hospitals have also recently closed, further adding to job losses in Newark (and Essex County). There are no military bases in or around the City of Newark, but the VA Hospital is in nearby East Orange. In addition, the VA regional office is located in the City of Newark. Both of these VA facilities provide referrals of veterans to the One-Stop. The partners locating staff at the Newark One-Stop are: WIA, Wagner-Peyser/ES, DVR, and Unemployment Insurance (UI). There are a total of nearly 100 staff (98) at the One-Stop spread across these 4 programs – ES: 32 staff; WIA: 40; UI: 11; and DVR: 15 (all of these staff are full-time). The Newark One-Stop outstations its only DVOP to the VA regional office (located in Newark); the Newark One-Stop has a ½ time LVER located at the One-Stop (who has a current caseload of 519 veterans). There is also a vacant DVOP position at the Newark One-Stop that cannot be filled because of the state's hiring freeze (this position has gone unfilled since August when the DVOP retired). The ½ time LVER is the only vet rep available at the One-Stop to serve veterans, though when needed (e.g., when the LVER is absent), Wagner-Peyser staff fill in and serve veterans. The caseload of the LVER is large (about 500 veterans), in part because he oversees a number of veterans who are enrolled for a year or longer in a substance abuse recovery program run at a VA facility (in nearby Lyons, NJ). The LVER checks up on the clients every six weeks to see what they are doing and how they are progressing. Most of the veterans served by the LVER are Vietnam veterans (in the age range of 45-60); significant numbers face serious obstacles to employment (including substance abuse issues, being ex-offenders, and lacking high school degrees and/or basic skills). Veterans hear about the One-Stop from various sources – during TAP sessions; word-of-mouth from other veterans; and at job fairs.

- *Client Flow Through the One-Stop.* All new customers (whether veteran or not) attend a Re-employment Orientation when they first come to the Newark One-Stop Center. This orientation is held Monday through Friday, twice a day and lasts roughly 45 minutes. During this orientation, a Wagner

Peysner/ES staff presents a PowerPoint presentation that provides an overview of services available at the center (including veteran services). The orientation staff asks if there are any veterans attending the session. During the session, each attendee completes an ES registration form. So that veterans are identified, the registration form completed by veterans is color-coded (green); while non-veteran customers complete a form that is copied on regular white paper (note: the forms contain the same information). All of those attending the orientation receive a scan card, which is used to track subsequent services. After the orientation, customers return to the main desk at the entrance to the One-Stop to request services and/or set up an appointment with ES staff. Veterans and non-veterans are free to request programs and services that they want and/or to use self-service computers to search for jobs. To ensure that veterans receive the services they need (and priority of service), orientation staff notifies the LVER of each veteran attending the initial orientation, including those who may request to meet with a vet rep or have special needs/barriers to employment. If a veteran requests to see a vet rep following the orientation, the front-desk will immediately schedule the veteran for a meeting with the LVER (note: if the ½-time LVER is not available, the veteran will be scheduled to meet with a regular ES/Wagner Peysner employment counselor). The duration of this initial meeting varies – from about 20 minutes to 1 hour if the veteran faces serious barriers to employment. According to vet rep staff, most veterans seem to know they have priority of service by the time that they meet with the LVER. Because of special arrangements with community organizations and support service providers, according to the LVER, veterans tend to receive a richer mix of services than non-veterans and, if they face serious barriers to employment, tend to receive more one-on-one attention and referrals to a fuller range of services (e.g., if homeless, the veteran will be referred to a homeless service provider; if they have substance abuse issues, they will be referred to a VA facility for treatment). With regard to job placement, if appropriate, the LVER will contact employers directly to market individual veterans for job openings. Veterans follow the same basic flow as non-veterans through services, but have priority to receive intensive and training services over similarly qualified non-veterans. If they are interested in and in need of training, veterans (and non-veterans) must first take the TABE test and then meet with a counselor for assessment and to be authorized for training. Like non-veterans, veterans must also go through self-directed job search before being authorized to receive training assistance. The TABE is generally scheduled to be taken within one week, with the pre-assessment soon after. Typically, veterans have a wider range of training resources than non-veterans (including the GI Bill).

- **Do Veterans Receive Priority for Intensive/Training Services When Funds Run Low?** There are no specific state policies with regard to when WIA funds run low. However, in general once eligibility requirements are met for specific programs, veterans receive priority over non-veterans for services. For example, low-income veterans would receive priority over low-income non-veterans for training under the

WIA Adult Program. The WIB does not have a “threshold” of WIA training funds above which it restricts training funds to non-veterans. In the last program year, the WIB had obligated its WIA training funds by September; when funds are fully obligated, veterans are told to come back at the beginning of the next program year, when they will be first in line for these services. When WIA training dollars run out, there are several other sources of funds available, including the state’s Workforce Development Program.⁶¹ The Newark One-Stop also sponsors a forklift-training program – veterans go to the head of the line for the forklift training and can be placed in training within 24 hours of coming to the One-Stop.

- **Marketing Veterans to Businesses.** An important role of the LVER is to go to employers and ask, “Do you want to hire Vets?” There is an effort to try to team the LVER with the business reps and LVERs/DVOPs sometime meet with employers to urge that employers hire a particular veteran that meets a job opening.
- **Training/TA on Priority of Service.** One-Stop staff receive training and technical assistance on POS from a variety of sources:
 - *Specialized Training of Veterans representatives in Denver.* DVOP/LVERs attend training at the National Veterans Training Institute (NVTI) in Denver. During various training modules, veterans representatives are briefed about provisions of priority of service and provided in-depth training on effective methods for serving veterans. These staff return to their One-Stops and provide training to other staff at the One-Stop on how to effectively recruit and serve veterans.
 - *An Annual State DVOP/LVER Conference.* There is an annual one-day conference of veterans representatives from across the state. POS and veteran services are covered. LVERs returning to their One-Stops, present an update on what they have learned to other One-Stop staff.
 - *Quarterly In-Person Meetings and Weekly Conference Calls Held with One-Stop and Workforce Development Managers.* These meetings and conference calls focus on issues and problems that emerge in one-stop operations and provide a forum for dissemination of information to One-Stop managers, including information relating to veteran services.
 - *Planned Webinar System.* The Division of One-Stop Coordination and Support is developing a webinar system, that will serve as a training venue for veterans service issues (including POS) and a range of other issues.
- **Monitoring POS.**
 - The state veterans’ coordinator reviews the ES-202 report to examine numbers and types of veterans served.

⁶¹ In addition, the state has a unique program called the tuition waiver program – dislocated workers who need to build credentials get free admittance into state four year and community colleges for individual classes as long as there is an unfilled seat (have to pay student fees and for books, but not for tuition).

- Within the One-Stops, veterans representatives review the quarterly reports for their local area, including numbers and types of veterans served, services received and outcomes. The LVER at the Newark One-Stop receives a report each month that shows veterans who have not received a service for 60 days and will be closed out at 90 days (with a soft exit if no service is received). The LEVR runs through this report and will call veterans who appear on the report whose status he is unsure of to check on their employment status and to see if they need any addition services.
 - During semi-annual monitoring visits to One-Stops in the state, the state inquires about services for veterans and priority of service.
 - There is a newly implemented “Future Works” data system, which brings together ES/WP, TAA, and WIA data into one system and allows for state and local program managers to customize reports to their needs. The system is real-time and provides a highly flexible report generating capability. State and local administrators can closely monitor and analyze service delivery patterns, client characteristics, outcomes, and other characteristics for any special population, including for veterans.
- **Challenges to Implementing POS in One-Stop Career Centers.** A number of challenges were identified by state and local workforce officials:
 - With respect to serving veterans, there has been a steep decline in the number of veterans’ representatives (DVOPs/LVERs) – decreasing over the past 5 years from 48 DVOPS (to 32.5 FTE DVOPs, currently) and from 24 fulltime LVERs (to 10.5 FTE). Five years ago, each One-Stop generally had two DVOPs and a full-time LVER. The steady decrease in “veterans representatives” has created challenges at One-Stops to provide the types of one-on-one, case-managed services that veterans often want (and expect) when they come into One-Stop Centers. In some instances, One-Stops have had to use Wagner Peyser staff to provide individualized/intensive services that might otherwise had been provided by a vet rep. Also, looking ahead, the workforce system will need to respond to the largest deployment in the state’s history of reserve forces which will be coming back to the state beginning at the end of this month – which will further stress the workforce system and already stretched veterans representatives.
 - To further complicate staffing issues, the Governor has created a one-day per month furlough for the coming year (2 days have been approved for this year; 12 more will be approved for next year). This will affect services available for all customers (including veterans), complicating efforts to provide one-on-one/intensive case management services. The furlough is across the board throughout the state for state employees (though some “essential” employees such as health care workers, corrections staff, and SSDI processing staff are exempted). The Governor has not exempted positions that are totally federally funded (e.g., DVOPs, LVERs, ES/WP), which will mean that funding for these positions will go unspent and go back to the federal government.

- With many One-Stops and WIBs spread across the state, there are some natural communication challenges in spreading the work about veteran services and priority of service. The One-Stop operators are mandated (by the state) to meet with their partners once per month to discuss One-Stop services/flow, including services to veterans. The local offices are also emailed about policy changes and reminders. If something is a priority, the state attaches a return notification to show that the email was viewed.
- POS needs to be explained to all staff, even regular staff. Veterans' staff gets more attention and training than local Wagner Peyser staff on POS and veteran services.

STUDY OF PRIORITY OF SERVICE UNDER THE JOBS FOR VETERANS ACT SITE VISIT SUMMARY -- OHIO

State: Ohio

Dates of Visit: 11/17-18/2008

- **State Geography/Population.** Ohio is the seventh largest state in terms of population, with an estimated population of about 11.5M (as of 2007).⁶² The state has nearly 1M veterans (at 992,000 veterans as of September 2007),⁶³ and is ranked 32nd in terms of percentage of the adult civilian labor force that are veterans (11.1% compared to a national average of 10.4%).⁶⁴ Most of the veteran population is located in the urban areas, especially Cleveland (metropolitan population of 2.3M), Cincinnati (2.1M), and Columbus (1.7M).
- **State Economy.** Ohio is a major producer of machines, tires and rubber products, steel, processed foods, tools, and other manufactured goods (including numerous automobile plants that are suffering job losses). While there is considerable emphasis on production of capital goods, there is also production of consumer goods. The state has been hard hit in recent years by large-scale closings and downsizings, particularly in the automotive and manufacturing sectors. Ohio is also recognized for its health care services, due to several flagship hospitals (including the Cleveland Clinic) that operate in the northeast region of the state. General economic conditions have deteriorated throughout much of the state over the past year. The unemployment rate in the state was 7.3% as of October 2008 (ranked 42 among states, above the rate for the United States, 6.5%). There are pockets of high unemployment within the state -- for example, among the state's 88 counties, the October 2008 (seasonally unadjusted) unemployment rates ranged from a low of 5.0 percent in Delaware, Geauga, and Mercer counties to a high of 10.5 percent in Pike County.⁶⁵ The Base Realignment and Closures (BRAC) 2005 round of closures/realignments has not had and is not expected to have much impact on the state (in fact, it is estimated that BRAC will bring an additional 895 jobs to the state). State officials noted that veterans have generally a slightly lower unemployment rate than the general civilian population, but unemployment rate is high among recently, separated young veterans (in the 20-24 year old range).
- **Structure of the Workforce Development System.** Ohio's workforce development system is decentralized, featuring considerable local discretion with regard to how service delivery systems are structured and the extent to which various partners are engaged in the One-Stop service delivery system. The workforce development

⁶² U.S. Census Bureau, "Annual Estimates of the Population for the United States, Regions, States, and Puerto Rico: April 1, 2000 to July 1, 2007.

⁶³ Source: Veterans Administration; available at:
http://www.va.gov/budget/report/2007/Part_I/VETMap_2.pdf

⁶⁴ Source: U.S. Census Bureau, 2006 American Community Survey.

⁶⁵ Source: www.lmi.state.oh.us/LAUS/Ranking.pdf

system (including ES, WIA, and the One-Stop System) is administered and monitored at the state level by the Ohio Department of Job and Family Services (ODJFS). There are a total of 19 Local Workforce Investment Areas (LWIAs) in the state, which includes one “balance of state” workforce area (Area 7) which is made up of about half of the state’s counties (and are spread across every region of the state). There are a total of 90 One-Stop Career Centers in the state -- 30 full-service centers (referred to as Tier 2 centers) and 60 satellite centers (referred to as Tier 1 centers). There are no stand-alone ES offices in the state (i.e., ES/Wagner Peysner services are provided at One-Stops). The full-service centers feature extensive involvement and integration of ES, WIA, TANF, and educational providers (note: see below for details about partnering arrangements at the Toledo One-Stop, which was visited during the site visit). There are a total of 75 veterans representatives (67 DVOP/8 LVERs) in the state (note: the number of veterans representatives have fallen substantially in recent years, from 133 veterans representatives in 2002). All veterans representatives are full-time (i.e., there are no half-time veterans representatives)⁶⁶ and there is at least one vet rep located in each of the 30 full-service One-Stop Centers. All of the 60 satellite centers are served by a vet rep (though most do not have a full-time vet rep) – sometimes veterans representatives will have regular office hours one or more days a week at satellite centers or meet with veterans at the closest center by scheduled appointment. The numbers of veterans representatives located at full-service One-Stops varies – e.g., there was one DVOP and one LVER assigned to the Toledo (Lucas County) One-Stop. At the state level, there are 3 veteran coordinators assigned to monitor veterans representatives and oversee/monitor veteran services at One-Stops across the state (note: each coordinator is responsible for one of the three regions). As discussed below, the flow of customers through One-Stops is largely left up to each workforce area and One-Stop, but generally, with an emphasis on having veterans and non-veterans use self-service to the fullest extent possible, and thereby focusing veterans representatives on providing case managed services to veterans that are most in need (e.g., disabled or homeless vets).

- **State Level Policies on Priority of Service.** The basic strategy of the state has been to make sure that local areas are aware of federal policies (i.e., a straight pass through of DOL guidance, without interpretation by the state). Each DVOP/LVER has been provided with a policy book that defines POS requirements and provides guidance on delivery of veteran services. See below (following the discussion of outreach to veterans) for details about how POS is administered at the state/local levels.
- **Outreach to Veterans.** Specific types of outreach aimed at veterans include:
 - **Presentations by Veterans representatives at OTAP and TAP sessions.** Regular TAP sessions are held every 2 weeks (26 per year) at Wright-Patterson AFB (the only location in the state where TAP sessions are held). A vet rep from the local area attends each TAP session for about ½ to one day, providing an overview of labor exchange and training services available at One-Stop Career

⁶⁶ The state made the transition to full-time veterans representatives about four years ago in part because of concern that ½ time veterans representatives may focus too much of their attention on providing services for non-veterans (i.e., beyond ½ time that was allocated).

Centers, including highlighting availability of veterans representatives and the requirement that local workforce areas are to provide priority of service for veterans. Ohio also sponsors Ohio Transitional Assistance Program (OTAP) workshops that last 2 to 3 days each at various locations throughout the state.⁶⁷ Any veteran or spouse of a veteran, regardless of when they exited from the military, may attend these workshops. These sessions (which typically involve 20-30 veterans) are aimed at helping unemployed or underemployed veterans with job search and connecting veterans to the One-Stop system (and other veteran services). Attendees are registered in the state's ES/Wagner Peyser management information system (referred to as Sharing Careers and Opportunities Training Information or SCOTI), as well as participate in workshops focusing on effective job search methods, resume development, and job interview skills (including mock interviews). Veterans representatives from One-Stops organize and make presentations at the OTAP workshops. Priority of service is discussed at these workshops, along with the employment, training, and support services available through One-Stops. A total of 10 OTAP sessions were held in the Toledo area the past year (and many other OTAP sessions were held around the state).

- **Veterans Job Fairs.** A total of 25 to 30 veterans job fairs are held around the state each year – usually during “Hire a Vet” month (which is November of each year). Employers set up tables at these job fairs and veterans go from table to table to inquire about job and training opportunities. During these fairs, One-Stop staff also distributes brochures and provides information about services available through the One-Stop system. For example, The Lucas County One-Stop (in Toledo) sponsors a veterans job fair each year, the most recent had 60 employers represented and was attended by 350-400 veterans. In addition to these veterans job fairs, there are several hundred other job fairs held each year throughout the state (open to the general public) during which brochures and other information are disseminated about employment and training services available for veterans (and nonveterans). At some job fairs a separate table is set up for veterans to visit and meet with a vet rep.
- **Other Outreach Efforts.** Veterans representatives make sure businesses are informed about veterans flowing into and through the One-Stop system. Veterans representatives attend rapid response sessions (in response to WARN notices), during which the veterans representatives often hold special workshops or individual meetings with veteran employees to discuss dislocated worker services and other services available through the One-Stop system. Veterans representatives keep One-Stop partners informed about veteran services and preference given to veterans within the workforce system. Veterans representatives go to VA facilities, homeless shelters, and other veteran-serving agencies to make sure that staff are aware of services available through One-Stops. VA rehab facilities often make referrals of job-ready veterans (who have received rehabilitative services) to One-Stop Centers. Finally, in Lucas County (and other areas), the Veterans Service Commission is co-located at the One-Stop

⁶⁷ OTAP was created because TAP sessions cover veterans who are about to separate from the military, while there are many other veterans in the state in need of help finding a job or upgrading skills. In addition, there is only one base in the state where regular TAP sessions are held (Wright-Patterson AFB).

Center. This Commission provides a wide range of support services for veterans (e.g., pays rent/utilities, provides transportation, dispenses food vouchers, and makes referrals to the VA and other service providers). It makes regular referrals of veterans to WIA and other One-Stop partners, and also receives referrals of veterans from the various One-Stop partners. Finally, the state's ODJFS website has a special page for veterans, which website advertizes job fairs and OTAP sessions, as well as describes job seeker/business services available through the One-Stop system and how to contact veterans representatives.

- **Overview of How POS is Administered/Implemented in the One-Stop System.**

The state encourages veterans to use the entire workforce system (i.e. extending beyond case managed services delivered by DVOPS/LVERs). According to state administrators and officials interviewed at the Lucas County One-Stop, because of the limited (and declining) number of veterans representatives assigned to One-Stops, the underlying service delivery strategy is to focus vet rep case management services on veterans with substantial barriers to employment (such as disabled, homeless, or long-term unemployed/underemployed veterans). Each One-Stop has considerable discretion in terms structuring service delivery approaches/flow for both veterans and non-veterans. As discussed below, Ohio has several special initiatives that target training resources on veterans. Below, we highlight the mains ways in which priority of service is provided.

- **Veterans Identified at the Time of Entry into the One-Stop, But Initially Guided to the Resource Room Unless They Face Serious Barriers to Employment.** When customers initially arrive at a resource room in a One-Stop Center, they are asked whether they are a veteran and complete a sign-in sheet in which they check off a box on veteran status. The bullet that follows highlights the general flow of veterans through the One-Stop serving the Toledo area (which is generally reflect of the philosophy and flow of veterans at other One-Stops across the state):

- *Lucas County One-Stop* – The Lucas County One-Stop, run by a community-based organization (specializing in provision of mental health services), is a Tier 2 (full-service) center that serves Toledo and the surrounding area. The service area is all of Lucas County, which totals about 450,000 persons. Residents just over the border in Michigan and Indiana also use the One-Stop, as do some resident from bordering counties. A local administrator indicated that the One-Stop was busy because of its central location (in downtown Toledo), the comparatively high unemployment rate, and the variety of services offered there. The One-Stop receives about 3,200 visits per month, with about 1,000 new customers coming each month to the One-Stop for services. An estimated 11 percent are vets (which is comparable to the portion that veterans make up in the service area – note: there are an estimated 39K veterans residing in the county). The county has experienced several significant downsizings (the most recent and current one is a loss of 875 jobs paying \$28-40 per hour at a Jeep assembly plant). A total of 21 partners are located at the One-Stop, including the ES, WIA, several education providers, the TANF work participation program, the Veterans Service

Commission, and others. The basic approach and flow of veterans through the One-Stop follows: In the Lucas County One-Stop, there are color-coded client case files (containing blank client forms), which are handed to each customer by the One-Stop greeter (note: there are different color coded folders for veterans, older workers, dislocated workers, youth, and for all others).⁶⁸ Each incoming veteran and non-veteran goes to a room next to the greeting area to complete the various forms in their color-coded packet. A registration form is completed (which asks if the customer is a veteran or a spouse of a veteran), which is later entered into the SCOTI system by intake staff at the center. Once the client completes the intake forms (which takes about 20 minutes), they are encouraged to use the self-service resources of the resource room. The One-Stop resource room has several staff assigned, who provide a brief orientation to the use of the workstations and other resources/service providers available within the One-Stop. One of the resource room staff members is referred to as a “vet champion” who provides special assistance and guidance to veterans using the Resource Room and also tries to identify veterans with barriers to employment.⁶⁹ An underlying belief that guides service delivery at the One-Stop is that job seekers who come into the One-Stop for assistance have already undertaken at least some job search on their own which has not yet proven to be successful. Hence, while there is an emphasis on self-services, staff circulates through the resource room of the One-Stop throughout the day to provide one-on-one help and to identify individuals in need of intensive and training services. Like non-veterans, veterans are encouraged to use the resource room. In addition, there is a separate room that is part of the resource room that is set aside for veterans use (e.g., for meetings between a veteran and Resource Room staff). If veterans are identified as having a serious barrier to employment (either on their initial visit or subsequent visits), they are sent to a vet rep for further assessment. Also, when they initially come to the One-Stop and specifically request to see a vet rep, if one is available, they will be scheduled to see the vet rep that same day (or as soon as possible). Veterans representatives will meet with veterans referred by the resource room staff initially for 30-60 minutes to gain additional background on their situation and to determine the types of assistance that may be needed. If the veteran does not have special barriers or needs, they are typically directed back to the resource room; if the veteran faces significant barriers to employment, the vet rep will enroll the veteran in intensive services and begin to provide one-on-one case management. (Note: See file for a chart showing the veteran job seeker customer flow through the One-Stop Center in Toledo).

⁶⁸ Veterans’ folders contain veteran (and spouse of veteran) information sheet, a flier that explains barriers to employment (and provides an opportunity to self-identify barriers), a referral list, and information on OTAP.

⁶⁹ The vet champion is not a vet rep and also provides assistance to non-veterans within the Resource Room; this position is funded through the One-Stop operator and was created in response to the large number of veterans served in the local area.

- **Twenty-Four Hour Hold on Job Listings.** A 24-hour hold is placed on all job orders coming to the ES (and entered into the SCOTI system). During this 24-hour hold, veterans have an opportunity to review and apply for a particular job order, and employers only receive matches on veterans for listed positions. Veterans representatives maintain a roster of veterans enrolled in intensive services and their job preferences so that they can match veterans to appropriate job orders – and veterans may be either called or e-mailed to notify them within the 24-hour period of appropriate job orders.
- **Priority Given to Veterans When WIA Funding Becomes Tight.** Once a workforce area has entered a limited funding situation, defined as WIA funding for the program year being 75 percent obligated, a priority system takes effect and governs the enrollments to ensure that the those most in need receive intensive and training services. The policy in effect in Lucas County (which is similarly applicable in all other counties and workforce areas in Ohio is as follows):
 - *WIA Regulations Part 663.600 and ODJFS WIA Guidance Letter #2-2000 require that the Lucas County Workforce Investment Board (WIB) determine when a limited funding situation exists and define who will be given priority of service when funds are limited.*
 - *Policy: A limited funding situation shall be deemed in effect when Lucas County Workforce Investment Act (WIA) Adult funding has expended and/or obligated 75% of the available Adult funds for Intensive and/or Training services. Obligated shall be defined as the amount of money for registered participants that it would take to finish the Intensive and/or Training services to that customer. The funds will be monitored at the end of each quarter to determine if they are limited. Once the county has entered a limited funding situation, the priority system shall take effect and govern the enrollments to ensure those most in need are served. Priority for intensive and training services will be given to those WIA eligible adults who are low income, as defined in the WIA Act, Section 101 (25) or receiving public assistance, and are county residents. As with all enrollments, veterans will be given preference.*
 - *Action: When a limited funding situation exists and the priority of service is instituted, staff and subcontractors must enroll into intensive and training services only those core customers who are receiving public assistance or are considered low income, with preference given to veterans. The public assistance or the reason for low income must be documented in the participant files. Veteran status must also be documented. Core services will remain open to the universal customer.*
- **Veterans Short-term Training Program (VSTP) and Veterans Rapid Response (VR2) Program.** Two programs have been established within Ohio that are specifically focused on supplementing and extending additional training funds to veterans. These programs were created, in part, because the state was concerned that there was not sufficiency training funds available for veterans and to help ensure that veterans received priority of service when it comes to training services.⁷⁰

⁷⁰ In addition, local workforce areas or One-Stops may mount special training or service programs for veterans. For example, the Lucas County One-Stop recently received a grant to develop and implement the

- *Veterans Short-term Training Program (VSTP)* - A portion of the Governor's Discretionary funds has been allocated to VSTP to assist WIA-eligible veterans in securing employment in higher skill level jobs. Activities and services may include: short-term training; on-the-job or customized industry-specific training; supportive services needed to successfully complete a training activity or retain a job; funding for gaining a civilian-equivalent license or certification; and skills gap training. To ensure the availability of a comprehensive array of services, co-enrollment in the local WIA Program is mandatory when enrolling a veteran in VSTP. Under VSTP, total training expenditures per veteran customer may not exceed \$3,000. VSTP funds cannot be used for training that occurs after June 30th of the program year in which the veteran is enrolled in VSTP training (i.e., training must be confined to a single program year, so the type of training support is short-term in nature). With co-enrollment in WIA, VSTP funds could be used to pay for the portion of training that is completed prior to June 30th, and the supplemental funds, such as WIA, could be used for any training that occurs on or after July 1. Under VSTP, funds for support services cannot exceed \$500; if required supportive services exceed that amount, other local WIA and non-WIA funds may be used to supplement VSTP funds.
- *Veterans Rapid Response (VR2)*- A portion of Rapid Response funds have been set-aside for WIA-eligible veterans who have been classified as dislocated workers (including recently separated veterans). Activities and services may include: long-term training (much longer than is possible under VSTP); on-the-job or customized industry-specific training; supportive services needed to successfully complete a training activity or retain a job; funding for gaining a civilian-equivalent license or certification; and skills gap training. To ensure the availability of a comprehensive array of services, co-enrollment in the local WIA dislocated worker program is mandatory when enrolling in VR2. Local policies dictate the types and amounts of training expenditures. Training under VR2 can cost up to \$6,000 per year and last for up to three years (a total potential cap of \$18,000) – though training typically under this program lasts for 2 or fewer years and costs quite a bit less. Under VR2 funds for supportive services cannot exceed \$3,000; if required supportive services exceed that amount, other local WIA and non-WIA funds may be used to supplement VR2 funds.

Neither VSTP nor VR2 is an entitlement program. All veterans must be determined suitable as well as eligible. Determining if a veteran is suitable is a local decision. One-Stop partner staff and other Service Delivery Point staff identify eligible veterans who are in need of short/long-term, on-the-job, or

Pathways to Employment program. The program, which targets disabled veterans in the Toledo area, has a budget of \$450,000 and a goal of serving 200 disabled veterans. During its initial recruitment phase (the program was just starting up at the time of our visit), staff has reached out to disabled veterans through the Veterans Service Commission (located at the One-Stop Career Center), a VA clinic, and other programs serving veterans in the community. This program provides funds for training for disabled veterans (which may be supplemented by other sources, such as the GI Bill, WIA, and Pell Grants).

customized training. Staff completes an initial assessment of the veteran to determine need and eligibility for enrollment in VSTP/VR2. Initial intake and assessments must be conducted according to the local WIA eligibility requirements, such as self-sufficiency, priority of service, and core/intensive/training services policies. All veterans enrolled must meet local Workforce Investment Board (WIB) WIA eligibility criteria and all those in training must be co-enrolled in the local WIA Program. All veterans enrolled must be provided SCOTI Labor Exchange intensive services and intensive job search services by ODJFS. Funds for VSTP and VR2 are allocated upfront to WIA areas, in amounts based upon historical VSTP/VR2 activity. The amount allocated includes a 10% allocation to help cover administrative funds. WIA areas may request additional funds if their initial allocation is expended. A VSTP/VR2 Grant Coordinator at the state level approves each local areas request for funding of an ITA, OJT, Customized Training, or supportive service.

- **Monster.Com Collaboration.** The state has entered into a partnership with Monster.Com (referred to as “Ohio Means Jobs”), which results in the automatic posting of resumes of job seekers registering with the ES in Ohio. Under this agreement, Ohio employers have access free-of-charge to nearly 4 million resumes posted on the system (by Ohio residents, as well as residents in nearby states). The state has worked with Monster.Com so that an automatic sorting routine has been implemented that displays veterans before similarly-qualified non-veterans in the listings of resumes shown to employers searching the system. Under this agreement, resumes are sorted into three categories in terms of their appropriateness for job openings – high, medium, and low relevance – and within each of these categories, veterans are shown first, followed by non-veterans. There is some concern at the state-level that if new more stringent POS requirements are implemented at the national level that it will be necessary to undertake expensive new programming in the Monster.Com system to meet federal requirements (or alternatively, that it may be necessary to terminate the collaboration because requirements cannot be met).⁷¹

- **Number of Veterans Served and Mix of Services Received.** As noted earlier, Ohio is near the average in terms of its overall percentage of veterans (ranked 32nd in the nation, with about 10% of the civilian population being veterans) and there are some pockets of the state with higher concentrations of veterans. The state officials monitor the 9002 and Vet 200 reports to assess number of veterans served and service mix. Generally, 10-12 percent of the veteran customers of One-Stops receive

⁷¹ There is also some concern that the sorting routine used in matching job seekers to job vacancies in Ohio Means Jobs (OMJ) could be interpreted as not fully providing priority of service for veterans because employers view non-veterans with high relevance to a each job order are listed before veterans with medium relevance. At the visit to the local area, two additional concerns were raised about potential long-term effects of OMJ on POS for veterans: (1) OMJ could over time reduce the one-on-one interaction provided to veterans within the One-Stop system (for example, veterans may register in SCOTI, so they would be matched to job orders, but not take full advantage of other services available through the One-Stop); and (2) OMJ could eventually largely supplant/replace the ES job listing/search function which would effectively eliminate the 24-hour hold on job orders for veterans.

intensive services. State and One-Stop officials indicated that veterans are much more likely to receive staff-assisted services, in particular, one-on-one counseling with regard to job search/development with a vet rep.

- **Do Veterans Receive Priority for Intensive/Training Services When Funds Run Low?** As noted above, veterans are more likely to receive intensive and training services than non-veterans. As discussed earlier, once training funds are 75 percent obligated, veterans receive priority of service. In addition, the VR2 and VSTEP Programs provide training exclusively for veterans (see above).
- **Training/TA on Priority of Service.** One-Stop Center staff receive training and technical assistance on POS from a variety of sources:
 - *Specialized Training of Veterans Representatives in Denver.* All new DVOP/LVERs (once they have completed their 120-day probationary period) attend specialized training at the National Veterans Training Institute (NVTI) in Denver. During various training modules held over a 2-week period, veterans representatives are briefed about priority of service and provided in-depth training on effective methods for serving veterans. These staff returns to their One-Stops and provide training to other (non-vet) staff at the One-Stop on how to effectively recruit and serve veterans.
 - *Training/Monitoring Provided by 3 State Veteran Program Managers.* The state is divided into three geographic regions (used to be 4) and a Veteran Program Manager is assigned to each region. These 3 Program Managers provide training to One-Stop staff (including partner agency staff) on effective delivery of services to veterans, including requirements related to priority of service. These managers advocate for veterans within the One-Stop system to ensure that they receiving priority and regularly monitor the percentage of veterans being served by One-Stops (versus all customers) and whether veterans are receiving priority. The state vet coordinators also provide three days of orientation and training for each new veterans representative (referred to as Veterans Representatives Orientation Workshop, VROW).
 - *Policy Book.* DVOPs/LVERs have each been provided a policy book that sets out policies and procedures (including TEGs) with regard to serving veterans.
 - *Video Conferencing.* Each month (and sometimes bi-weekly), the state sponsors a videoconference for workforce staff across the state (in One-Stops and other locations); some sessions have focused on services to veterans, including POS.
 - *Monthly Staff Meetings.* One-Stops have monthly staff meetings involving WIA/ES staff and partners, during which POS and veterans services may be discussed. For example, every 3rd Friday, there are staff meetings at the Lucas County One-Stop. These meetings involve program updates, cross-trainings, and other exchanges among various partnering organizations. The veterans representative makes presentations from time to time on various topics, including effective delivery of services for veterans and discusses POS.
- **Monitoring POS.** The state officials monitor the 9002 and Vet 200 reports to assess number of veterans served and service mix. The state also closely monitors the

percentage of veterans that enter training. During the One-Stop recertification process, One-Stops are asked about priority of service, as well as the services and the flow of veterans through the service delivery process. The three veteran service coordinators (each covering about one-third of the state) regularly monitor local policies and procedures with respect to veteran services and POS, as well as review data on services provided to veterans. Finally, the DVOPs/LVERs across the state serve as the “eyes and ears” with respect to implementation of POS and services for veterans – any emerging problems/challenges are reported by veterans representatives to the coordinators.

- **Challenges to Implementing POS in One-Stop Career Centers.** A number of challenges were identified by state and local workforce officials:
 - DOL needs to issue regulation, rather than just guidance on POS – According to one official: “DOL needs to say, this isn’t guidance, this is the law...Technical letters (TEGLs) do not carry the full weight of regulation issued in the Federal Register.” One-Stops and partnering agencies are in the position where they have to interpret what is meant by priority of service – and this results in differences of interpretation across states and One-Stops. At the same time, there is some ambivalence on the extent to which regulation and guidance could cut down on state flexibility – for example, one state administrator saw a benefit in giving states some flexibility in implementing POS (i.e., by allowing Ohio to continue policies that are working well).
 - New regulations issued by DOL could alter what is collected on One-Stop customers – increasing burden on staff and customers. Careful thought should be given to reporting requirements. There is some concern that changes could make it difficult or impossible to maintain the collaboration with Monster.com or lead to substantial costs for the state in terms of new programming of the Monster.com application to meet revised POS requirements.
 - The state does not want veterans to lock into a veterans representative, but rather use the full range of One-Stop services (including, as appropriate, veterans representative assistance). According to one administrator: “We are not old school, which was – you are a vet...go see a veterans representative.” Also, the state does not want to give veterans the impression that priority of service means “entitlement” to training, jobs, or other services. One state administrator noted: “There is a question of how far do you take veteran priority of service in a self-service world.”
 - One state administrator observed there was a lack of coordination across agencies and programs at the national level, which complicates POS implementation at the state/local levels: “Every partnering program seems to have its own guidance” with respect to veteran services and priority. DOL issuance of regulations does not mean that partnering agencies will necessarily adhere to these regulations – according to one administrator: “My concern is that there is an expectation that if DOL issues regulations that everyone will follow...TANF Program administrators see themselves under DHHS guidance... programs listen to their funding sources.”

- There is a need for closer monitoring of federal contractors to make sure that they are meeting requirements to post job opportunities so that veterans have a chance to apply for such jobs.

STUDY OF PRIORITY OF SERVICE UNDER THE JOBS FOR VETERANS ACT SITE VISIT SUMMARY -- VIRGINIA⁷²

State: Virginia

Dates of Visit: 3/24/09 – 3/25/09

- **State Geography/Population.** By 2008 population estimates, Virginia was the 12th most populous state, with 7.7 million people. The Northern Virginia / District of Columbia Metropolitan Statistical Area is the 9th largest in the country (2008 population of 5.4 million), and the Hampton Roads area was the 35th largest (2008 population of 1.7 million people). Virginia has a high median household income, and ranked 9th in the nation at \$59,575 in 2007 (compared to a national median of \$50,740). The state's poverty rate was low relative to the U.S. national rate (9.9 percent compared to 13.0 percent among all people).

Virginia is the nation's 14th most densely populated state (with 194.8 persons per square mile in 2007). There is considerable variation in population density across the state, with high concentrations in the Northern Virginia area and eastern costal areas (Virginia Beach/Norfolk / Newport News area, broadly referred to as "Hampton Roads"), and relatively low concentrations in the central and western areas of the state.

Virginia is ranked 4th in the nation in terms of the percentage of the population over the age of 18 who are veterans. According to U.S. Department of Veterans Affairs statistics, there are over 800,000 Veterans in the state. Six of the nation's top 10 areas of highest veteran concentration were located in Virginia. The city of Hampton, near the country's largest naval station, had the greatest concentration of veterans of all U.S. cities in 2000, at 27.1 percent of the adult population.⁷³ The other five areas in Virginia of high veteran concentration were Virginia Beach (21.7 percent), Norfolk (19.9 percent), Newport News (19.9 percent), Chesapeake (18.9 percent), and Portsmouth (18.4 percent).

There are over 48 military installations in the state, with most concentrated in the Tidewater area and the DC metropolitan area. Major military installations include:

Army:

Fort A.P. Hill (Fredericksburg), Fort Lee (Petersburg), Fort Eustis (Newport News), Fort Myer (Arlington), and Fort Belvoir (Alexandria)

Navy & Marine Corps:

⁷² Virginia staff could not be reached to obtain responses to all queries raised by the site visitors.

⁷³ Source: U.S. Census Bureau, Decennial Census, 2000;
http://factfinder.census.gov/jsp/saff/SAFFInfo.jsp?_pageId=tp12_veterans and
<http://www.census.gov/prod/2003pubs/c2kbr-22.pdf>

MC Combat Development Command (Quantico), Marine Corps Officer Basic School (Quantico), Marine Corps Base Quantico (Quantico), Naval Surface Weapons Center (Dahlgren), Yorktown Naval Weapons Station (Yorktown), and HQ MC/Henderson Hall (Arlington)

Air Force:

Langley AFB (Hampton)

Coast Guard:

Group Atlantic Area (Portsmouth), Fifth Coast Guard District (Portsmouth), Maintenance & Logistics Command (Norfolk), National Pollution Funds Center (Arlington), Coast Guard Finance Center (Chesapeake),

Telecommunication & Information Systems Command, Group Eastern Shore,

Group Hampton Roads, Marine Safety Office Hampton Roads, and Reserve Training Center Yorktown.

There are three VA Hospitals in the state, located in Hampton, Richmond, and Salem. Veterans in the Northern Virginia area are serviced by Veterans hospitals in West Virginia (Beckley and Martinsburg) and the District of Columbia.

In the most recent round of base realignment and closure (BRAC) actions, the state has mainly made gains, including a \$5 million hospital construction project to replace the Walter Reed facility (which will generate 6,200 jobs), and growth at Fort Belvoir, Fort Lee, and MCB Quantico. The one major loss was the closing of Monroe, resulting in the reassignment of 2,400 personnel to Fort Eustis.

- **State Economy.** Manufacturing has traditionally been a major industry across the state. In the “58 Corridor”⁷⁴, the area west of Interstate 95, furniture and textile manufacturing are the major industries. In the southwest part of the state, coal, oil, and gas production are major industries. Agriculture, timber, and paper manufacturing are also large industries.

In Newport News, the site of the local one-stop visit in this study, the major industries are government (DoD), healthcare, and ship building and repair. Two years ago, a major Ford plant in the area closed, which led to the layoffs of 2,400 direct Ford employees and an additional 2,000 supplier employees.

In March 2009, the unemployment rate in Virginia reached 6.9 percent, up from 6.4 percent in January and 5.1 percent in December of last year.⁷⁵ Between December and January, the state lost 72,500 non-farm jobs. However, there is considerable variation in unemployment rates across the state. In some areas of the state, unemployment is much higher: in Danville, the unemployment rate is currently 18 percent. In seven of the past twelve months, unemployment insurance claims have been at an all-time state high.

⁷⁴ The 58 Corridor follows U.S. Route 58, which runs east to west along the southern border of Virginia.

⁷⁵ By comparison, the national unemployment rate in January was 8.5 percent.

- **Structure of the Workforce Development System.** There are 15 local workforce investment areas (LWIAs) in Virginia, though historically there have been as many as 17 (two areas were recently combined into one shortly before our visit). There are 33 comprehensive One-Stop Career Centers in the state. Over the past two years, the state has been transitioning administration of WIA from the Virginia Employment Commission (VEC) to the Virginia Community College System. Prior to VEC, WIA was administered by the Governor’s Employment and Training Department under Secretary of Health and Human Services. In many cases, One-Stops also house Virginia State Department of Veterans Services staff, whose role is to provide veterans with information on benefit entitlements (e.g., disability, educational). There are no residency rules for WIBs, so One-Stops can serve individuals from surrounding states.

Each One-Stop is administered by a consortium of partners, and VEC is often one of the partners. Consortia for administration of One-Stops must have at least three WIA “mandated” partners, but beyond this specification, there are no statewide requirements for administration of services. Rather, the partner organizations decide amongst themselves how they prefer to administer services. Most One-Stops have Wagner-Peyser (WP) staff for delivering core services.

The WIB for Norfolk, the site of the local One-Stop visited for this report, has VEC offices in Norfolk and in Chesapeake. The WIB has a total of 15 DVOPs and LVERs, with four of the DVOPs and eight of the LVERs based in the Norfolk office.

The Norfolk One-Stop visited for this report is a consortium of VEC, The Department of Rehabilitation Services, the City of Virginia Beach (the grant recipient and a “CLEO”), and Opportunity Inc., the staff organization for the WIB that is a special purpose unit of the local government. Opportunity Inc. serves as both the managing partner and fiscal agent. The One-Stop serves Virginia Beach, Norfolk, Portsmouth, Chesapeake, Suffolk, Allaway County, and Southampton. Staff for the One-Stop often split their time between VEC offices and the One-Stop itself, which are located on the same street. There is currently a committee examining the possible collocation of the two offices. The One-Stop has 21 WIA staff, with six staff from additional partnering agencies. These include one full-time VRS staff member, two VEC members (one full-time ES staff and a DVOP or LEVR that alternate days onsite), one Adult Education tester, one Adult Education GED class instructor, one Older Worker (SESCP) program person, and one Education Opportunity Center staff member (funded by the Virginia Tidewater Consortium to help customers apply for financial aid). Last year, the site served 4,600 new customers. Intensive services included 900 served via adult funding and training dollars, 124 via Dislocated Workers from formula funding, and 350 via Rapid Response funding given after the Ford plant closing.

The other One-Stop visited on this site-visit is located in Franklin, Virginia within a Tidewater Community college campus. The One-Stop has a WIRED grant from the

U.S. Department of Labor, and is in the process of bidding on a “Youth Build” grant to provide career readiness training, skills training, and other types of training to disadvantaged youth. Opportunity, Inc. has one room at the campus on a full-time basis and uses another room on a part-time basis. The main industry in the Franklin area is pulp and paper. Roughly 60 customers a day use this One-Stop, though numbers are considerably lower on later days in the week (around 20 customers on Fridays). There are sometimes resource shortages for customers, particularly in terms of computer access. The site would like to have Vets Reps come once per month to administer services. The Trade Act Representative at the site mentioned that there are not many newly separated veterans served; rather, most are retirees. Though the site does have authority to establish individual training accounts (ITAs) for training, they sometimes refer clients to the Suffolk One-Stop for intensive training.

Statewide, there are 32 total ES offices, 27 of which have DVOP or LEVR staff. Some of these staff members are out-stationed at military bases. Services available with WP funds include labor exchange services (a virtual One-Stop that is web-based with an applicant database that interacts between the WIA and WP systems, and pulls job posting information from various internet websites) and the Extensive Labor Market System.

- **State Level Policies on Priority of Service.** The state does not have a specific Priority of Service requirement that addresses Veterans only. Rather, each local WIB establishes its own policies for Priority of Service, though these policies must follow state and federal guidelines (e.g., TEGs issued by ETA). The state passes these guidelines and memorandums through to local sites, which develop their own POS policies and submit them to the state for approval.

Highlights from the state plan include:

The State does not pre-determine priority of service for local boards. Rather, Virginia’s Priority of Service Policy states that in the event that adult funds are determined to be limited, the LWIB must develop a priority of service policy. At a minimum, the policy must grant first priority to individuals who are receiving public assistance or are classified as “low-income” in accordance with WIA definitions. Additional priorities may also be set for specific populations, such as individuals with significant barriers to employment or for participants interested in training for occupations that are in demand in the area.

... Priority of service, as mandated by Training and Employment Guidance Letter (TEGL) No. 5-03, is the responsibility of all employment and training programs receiving federal funds, i.e., to give veterans priority in program(s) participation if they meet the eligibility requirements. This TEG was discussed at our statewide Veteran Partners Conference held May 2-3, 2006, in Richmond, Virginia. The VEC takes steps to ensure that veterans receive priority of service in all of the services that it provides and standards of performance governing VEC services to veterans have been negotiated with the Veterans Employment and Training

Service (VETS). Successfully exceeding these standards documents veterans' preference by the VEC. This priority of service is implemented through priority file search for job referral and priority referral to potential job opportunities.

- **Outreach to Veterans.** Outreach to veterans at the state level is conducted for key subgroups. Specific groups that are targeted include incarcerated offenders, homeless vets, and veteran units returning from Iraq and Afghanistan.

Local staff conduct outreach at Vet Centers, TAP classes, VA Hospitals, job fairs (including Vet job fairs conducted by DVOPs and LVERs), Wounded Warrior Program, service provider sites (e.g., family resource centers, the Salvation Army), and for the homeless via "stand-downs". There are roughly 5 to 10 Vet job fairs per month conducted around the state; at general job fairs there is generally a booth for veterans to learn of specific services for them. At the local One-Stop in Norfolk, roughly 25 percent of the LVER's job is dedicated to outreach. The LEVR that we interviewed conducted 16 to 20 job fair per year across the region.

Transition Assistance Program (TAP): There are nine TAP sites in the state that conduct a total of 300 workshops per year for retiring and separating veterans. Although departing service members receive TAP services at their last assignment, a substantial proportion of TAP participants in Virginia elect to remain in the state, as is reflected in Virginia's high proportion of veterans in its population. Eighty percent of TAP sessions are conducted by LVERs and DVOPs. The remainder are led by contractors. Norfolk holds the largest TAP session. TAP sessions in Virginia are always conducted with two facilitators. This is due in part to large class sizes (averaging 70 participants), but also as a way to provide training for new facilitators through paired instruction.

Yellow Ribbon Program: This program serves Virginia National Guard troops returning from Afghanistan and Iraq. State official found that Virginia National Guard members, who are not eligible for TAP, were often unaware of employment services provided by VEC and the One-Stop system. Last summer, the state began the Yellow Ribbon Program, which sends Veterans representatives to National Guard deployment sites across the United State to conduct outreach about One-Stop services for individuals who will be returning to Virginia and to begin pairing them with Veterans services across the state. Since inception, the program has sent staff members to Fort McCoy, Wisconsin and Aderberry, Indiana. Most returning Guard members have served abroad for between nine and 12 months. On these visits, staff also conducts outreach to National Guard members who are recalled *before* deployment and to local service organizations to educate them about services available for veterans when they return. While other states conduct this type of outreach to deployment sites within their borders, Virginia staff thought their program was unique for traveling to deployment sites in *other* states.

- **Overview of How POS is Administered/Implemented in the One-Stop System.**
 - *General Flow Statewide.* When veterans enter the One-Stop Career Center, the staff conducts a triage to see if the services of a DVOP or LVER are needed. If no DVOP or LVR is available, or if it determined that a veteran does not need services from a DVOP or LVER, then an ES or WIA staff member provides services. For Wagner-Peyser ES services, there is a series of questions that customers must answer, including questions about veteran status for the labor exchange services. Depending on how individuals answer these questions, they may get asked WIA qualifying questions regarding veteran status. The state is currently trying to create a system that would automatically transfer information entered for ES services to the WIA questionnaire responses, but the qualifications and categories are inconsistent between the two programs.
 - *Flow at the Norfolk One-Stop.* Customers enter the office, sign in on a log, and fill out a basic information sheet that includes an indicator for veteran status. (Note: the log does not include an indication for veteran status). The customer then attends an orientation during which they speak with partner organizations (veterans representatives, business service, WIRED reps, Older Service, etc.) about the various services available. Next, the customer fills out his or her information in the Virtual One-Stop System, which contains questions pertaining to veteran status. After this information is entered, intake triage occurs as staff members validate that all information entered is accurate and confirms veteran status. The staff member then informs the customer about services available, including one-on-one WIA services and training. Staff then schedule appointments for upcoming services, including time to see a DVOP or LVER. A DVOP who is based in the nearby VEC offices comes in to the One-Stop offices twice a day to speak with veterans. On average, two to six veterans come through the One-Stop each day. The majority of veterans served by the DVOP and LVER (20 to 40 per day) go directly to the VEC offices down the street from the One-Stop.
 - *Job Order Holds and Automatic Matching.* Every job order taken for ES and WIA customers goes into a hold for veterans until a DVOP, LVER, or other staff member (if neither a DVOP nor a LVR is available) reviews it. As decided by the state, job orders may stay in a veteran hold for a maximum of 48 hours. During this hold, automatic matching in the job database system (called the “Virtual One-Stop System” or “VOS”) between job postings and qualified individuals is conducted only against veteran records. This provides veterans with priority of service for labor exchange services.

The local One-Stop visited in Norfolk for this evaluation does not have a written POS statement. The local officials we interviewed are awaiting

training and technical assistance from the state now that formal federal POS policies have been made final.

- **Do Veterans Receive Priority for Intensive/Training Services When Funds Run Low?** According to the local site visited, there is no need for priority for intensive services: everyone who requests intensive services receives them. Local staff noted that POS would only apply to training provided through individual training accounts (ITAs).
- **Training/TA on Priority of Service.** Training on the 48-hour job hold for veterans and the automated matching processes are part of the overall training process for WIA and ES staff. The state conducts three to four training sessions per month in the field, and occasionally brings local staff to the state office for training. POS is discussed at these events. VEC has sent DVOPs, LVERs, and some ES staff to the National Veterans Training Institute (NVTI) in Denver. The local One-Stop visited reported having conducted no staff trainings on POS to date, as it is awaiting formal training from the state.
- **Monitoring POS.** State staff at the VEC monitors the 9002 and 200 reports to look for consistency in application of the POS requirements. There is an unwritten policy that state staff conducts interviews of staff at 20 percent of offices each year. In the future, this will increase to reviews of 80 percent of offices each year, though these new audits will be desk audits. Each WIA region is reviewed once per year, though not every office is reviewed. Staff commented that since eligibility and priority of service must occur before veterans are identified, it is not possible to measure whether veterans are truly receiving priority of service. If veterans are turned away at some point, they will not show up in employment, retention, and earnings measures *after* receipt of services, but this tells the program nothing about who has *tried* to get services. There is thus no data available to truly measure the POS.
- **Challenges to Implementing POS in One-Stop Career Centers.** One area of confusion mentioned by both state and local staff is that by their interpretation, the employment service and WIA have different definitions of who should get priority of service. It was not clear to site staff how such discrepancies should be resolved. Local staff did not feel that WIA staff was well-informed about the POS. State staff noted that in some cases, veterans may not indicate their veteran status, making it impossible to identify them for the purposes of priority of service. A final area of concern mentioned by state staff regarded training difficulties. Recently, there has been high staff turnover due to a loss of funding, and staff were concerned that this hampers training efforts. The interviews for Virginia were conducted shortly after the new federal rules on priority of service became final. Staff at both the state and local levels expects that additional guidance from DOL will be forthcoming and enable the state to perform more specific POS training and for both state and local level staff to understand the requirements for appropriate POS.

- **Focus Group with Veterans.** In addition to meeting with state and local workforce officials, the research team conducted a focus group with two veterans served by the Norfolk local One-Stop. Questions asked during the session included background demographics and employment history, specific services received from the One-Stop, and impressions of the quality of service provided.

*Phil's Background and Service Experience:*⁷⁶

Phil served in the navy for 22 years. Four years and three months of this length of service was active duty, while the rest was reserve time. After his active duty time, Phil left the military for 10 years. He then rejoined as a reservist during the first Gulf War, in which he served as a flight engineer. Phil worked for several years in the private sector. When he was laid off three years ago, he turned to the Virginia Employment Commission office for employment services. The VEC offices referred him to the One-Stop facility. He is currently receiving services from the One-Stop and collecting unemployment insurance.

Phil found services easier to access at the One-Stop than at the VEC for two major reasons:

- The VEC processes roughly 800 people per day, making it difficult to access resources. For example, at the One-Stop, Phil was almost always able to find an open computer, while at the VEC there would often be a line for computers.
- At the VEC, Phil would not always see the same staff person during each visit. However, at the One-Stop he has developed a relationship with a specific employment counselor.

He noted that prior to receiving services as a veteran at the One-Stop, he had to register upfront at the VEC office. Phil experienced trouble finding his DD214 (separation) documentation, which made evidentiary claims for pension purposes difficult.

Don's Background and Service Experience:

Don grew up in Detroit, Michigan where he worked as an automotive technician for Volvo / Pinna. He joined the military after a series of layoffs in Michigan, and he continued working in the military for 20 years. Military service brought Don to Virginia Beach, where he lived from 1984 until 1987, and then again beginning in 1992. In 1992, he got a job with General Dynamics Electric Boat Company. During his time at General Dynamics, he was laid off and then rehired three separate times. The first lay off was rescinded, and he never lost a day's work. Following the second layoff, he was, he was immediately rehired into another

⁷⁶ Names of the veterans have been changed

department of the company. In December 2008, the company had another round of layoffs, and this time it did not rehire him.

After the layoff, Don first went to a Rapid Response session, and he later went to the Norfolk One-Stop. He worked with a career developer and a business-to-business developer to obtain a job manufacturing railroad equipment. Though he received some services from Veterans representatives, most of his services came through the general One-Stop staff. The Virginia Workforce Program paid for Don to participate in the WorkKeys Certification Program, which certifies proficiency in various skill sets. The program costs \$350, and he achieved a gold rating (the highest possible score) on the test. Don commented that though his first two experiences with One-Stop services were not helpful, this past time was very useful.

APPENDIX E:

**OMB CLEARANCE PACKAGE AND SURVEY INSTRUMENT FOR
TELEPHONE SURVEY OF VETERAN AND NON-VETERAN CUSTOMERS
OF ONE-STOP CAREER CENTERS**

SUPPORTING STATEMENT FOR PAPERWORK REDUCTION ACT 1995

SUBMISSION FOR TELEPHONE SURVEY OF VETERAN AND NON-VETERAN CUSTOMERS OF ONE-STOP CAREER CENTERS

The U.S. Department of Labor's Employment and Training Administration (ETA) is seeking Office of Management and Budget (OMB) approval to collect survey data from customers served by DOL-funded One-Stop Career Centers. The proposed survey will provide data necessary for a current Department of Labor-funded evaluation effort to assess whether veterans are receiving Priority of Service (POS), as specified under the Jobs for Veterans Act (JVA). Under JVA, DOL is required to "evaluate whether covered persons are receiving priority of service." The survey is intended to provide direct feedback from veterans (i.e., "covered" persons under JVA) concerning their perspectives on whether they received POS, the timeliness of services received, satisfaction and helpfulness of services, and recommendations for service delivery improvements. Non-veterans are also being surveyed to determine the extent to which there is variation in responses for veterans in comparison to non-veterans.

The Employment and Training Administration (ETA) of the U.S. Department of Labor has contracted with Capital Research Corporation, a small business located in Arlington, Virginia that specializes in research and evaluation studies, and its subcontractor, The Johns Hopkins University Institute for Policy Studies, to conduct an evaluation of Priority of Service for covered individuals. The evaluation is intended to provide a better understanding of how veterans are provided access to the full array of workforce services through the One-Stop Career Center system, including those administered by other federal agencies. The study is an action item ETA identified in response to the recommendations the Government Accountability Office (GAO) made in report number GAO-06-176⁷⁷ to improve accountability and help states integrate veteran services in One-Stop Career Centers. The survey data collected through this effort are a vital component of this overall evaluative study and, together with other statistical analyses of DOL/ETA databases and conduct of site visits to seven states and local workforce agencies, will provide a comprehensive picture of whether and how POS is being implemented through the One-Stop Career Center System and various workforce investment programs administered by ETA.

The survey will be administered by telephone to randomly selected customers of One-Stop Career Centers in seven states. Sample customers will also have the choice of completing the survey online. States will provide contact information on veteran and non-veteran customers who used One-Stop Career Centers over a six-month period. From this list, a random sample of veterans (i.e., covered persons as defined by JVA) and non-veterans will be selected. Sample customers will receive an introductory letter informing them of the survey and offering the opportunity to complete the survey online. The survey will gather data from veterans and non-veterans on: types of services received,

⁷⁷ GAO, *Veterans' Employment and Training Services: Labor Actions Needed to Improve Accountability and Help States Implement Reforms to Veterans' Employment Services*, Report GAO-06-176, December 2005.

customer rating on the quality of services received, overall customer satisfaction with services, and whether the customer was asked about his/her veteran status. In addition, veterans will be asked about whether they received priority of services, types of staff (Disabled Veterans' Outreach Program [DVOP], Local Veterans Employee Representative [LVER], and other staff) from whom services were received, whether the veteran felt he/she was afforded priority with respect to viewing/applying for job openings and obtaining training, and to provide other comments with respect to POS and services One-Stop Career Center services received. As discussed in more detail in Section A of this submission, it would not be possible to gather perspectives from a randomly selected group of One-Stop Career Center customers of sufficient sample size (i.e., to conduct analyses using statistical procedures) with the resources available using any other method, such as focus groups with customers.

A final evaluation report will provide an analysis of the survey data integrated with statistical analysis of large-scale ETA databases (for Workforce Investment Act exiters) and qualitative findings from site visits to states and local workforce areas.

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The Jobs for Veterans Act (JVA) requires that the U.S. Department of Labor "evaluate whether covered persons are receiving priority of service."⁷⁸ The study is an action item ETA identified in response to the recommendations the Government Accountability Office (GAO) made in report number GAO-06-176⁷⁹ to improve accountability and help states integrate veteran services in One-Stop Career Centers.

The proposed telephone survey (with a web option) will provide data essential to the Congressionally-mandated evaluation of POS, which would be difficult and inefficient to collect using any other method. In addition, no other single means of data collection would yield data with sufficient sample size (estimated at 1,200 respondents) that would make it possible to determine with statistical precision the views of veterans concerning POS and, for example, differences between veterans and non-veterans in ratings with respect to discrete services and overall satisfaction.

This type of survey could possibly be conducted effectively through mail and/or web-only surveys. However, these alternatives increase the timeframe and can have

⁷⁸ Jobs for Veterans Act, was enacted into Public Law 107-288 on November 7, 2002.

⁷⁹ GAO, *Veterans' Employment and Training Services: Labor Actions Needed to Improve Accountability and Help States Implement Reforms to Veterans' Employment Services*, Report GAO-06-176, December 2005. Data collection for this study was conducted between January and November 2005, so study results and findings are somewhat dated.

several potential drawbacks. Depending upon the population, mail surveys do relatively well with regard to response rates using multiple contact attempts (over a minimum of 8 weeks via mail versus 2-3 weeks via telephone). In addition to the longer timeframe (compared to a telephone administration) needed to conduct a mail survey, a significant disadvantage of mail surveys is the self-selection bias that emanates from perceived burden and topic salience. Mail surveys also offer respondents the chance to preview the questions before completing the questionnaire. This can also lead to self-selection bias since respondents who feel less engaged by the topic are less likely to participate.

While a web-only survey can reduce the administration timeframe (compared to mail surveys), it can have similar self-selection bias issues to a questionnaire administered by mail. However, the main challenge of conducting web-only surveys is that computer and Internet access is not universal and access (or lack of access) often reflects race/ethnic and socioeconomic differentials. Another disadvantage of web surveys is that they require both literacy and computer literacy, which can be an issue for some populations.

Another possible approach would be to conduct the survey in-person rather than by telephone. This approach would be much more costly than conducting telephone interviews (both for the contractor and respondents). Such in-person interviews would not be feasible within the budget for this survey.

Given the type of population we would like to sample, the telephone collection methods presents the most efficient and timely method and affords less potential for self-selection bias.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

The survey of veteran (and non-veteran) customers of the One-Stop Career Center system is a new collection. The survey will be used to provide standardized and statistically valid data for analyses of veterans' (and non-veterans') experiences in the One-Stop Career Center system and the workforce investment system. The purpose of the survey is to provide data necessary from a randomly selected group of One-Stop customers to determine (with statistical precision) the following information for veterans and non-veterans:

1. Types of services received,
2. Customer rating of the quality of services received,
3. Overall customer satisfaction with services, and
4. Whether the customer was asked about his/her veteran status and the timeliness of this inquiry.

In addition, for veterans only, the survey will be used to determine:

1. Whether veterans believe they received priority of services;
2. Types of staff (DVOP, LVER, and other staff) from whom veterans received services; and
3. Whether veterans felt they were afforded priority with respect to viewing/applying for job openings and obtaining training.

This survey will be one of three key data sources in the evaluation of POS, integrated with statistical analysis of large-scale ETA databases (for Workforce Investment Act exiters) and qualitative findings from site visits to states and local workforce areas. The survey results (and overall evaluation report) will be used by ETA to meet its Congressionally-mandated responsibility to report on the extent to which (and how) the workforce investment system is providing veterans with POS. In addition, all results and materials developed from the analyses of this data collection effort are intended to reach multiple audiences, including:

- ETA and DOL staff,
- Policymakers at the state and federal levels of government looking to design programs; and services to be responsive to the needs of veterans;
- Veterans groups and associations; and
- Community colleges, technical colleges, workforce investment agencies and organizations, and other similar training-providers.

The final report (which will include the survey results) will be posted on the ETA website. The survey, and the report it informs, will help ETA better understand whether and how POS is being implemented at the state and local levels. The survey results will help ETA, states, and local workforce investment areas to identify potential problems/challenges to providing POS and effectively serving veterans, and inform possible changes to policy, strategies, and service delivery to enhance program performance and cost-effectiveness of services provided to veterans through the One-Stop Career Center system. A copy of the telephone survey is attached, which provides the specific questions that will be asked of each survey respondent.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.

Data collection will be accomplished through the use of Computer Assisted Telephone Interviewing (CATI) with an option to complete the survey online.

CATI systems collect responses 100 percent electronically. The systems also perform a number of functions to avoid errors including:

- Providing correct question sequence;
- Automatically executing skip patterns based on prior question answers (which decreases overall interview time and consequently the burden on respondents);
- Recalling answers to prior questions and displaying the information in the text of later questions;
- Providing random rotation of specified questions or response categories (to avoid bias);
- Ensuring that questions can not be skipped; and
- Rejecting invalid responses or data entries.

The CATI system lists questions and corresponding response categories automatically on the screen, eliminating the need for interviewers to track skip patterns and flip pages. Moreover, the interviewers enter responses directly from their keyboards, and the information is automatically recorded in the computer's memory.

CATI allows the computer to perform a number of critical quality assurance routines that are monitored by survey supervisors, including tracking average interview length, refusal rate, and termination rate by interviewer, and performing consistency checks for inappropriate combinations of answers.

Sampled customers will be provided with the option to complete the survey online. Internet surveys provide convenient access that makes it easier for many respondents to participate. This can reduce the burden for those individuals who are typically not available during normal calling hours and/or wish to complete the survey on their own time. The online version offers a number of features including:

- ◆ Executes complex logic, similar to traditional CATI programs;
- ◆ Controls "real time" reporting (top line summaries and graphs);
- ◆ Data can be delivered in a variety of usable formats for analysis, including SPSS, SAS, Excel, or Access;
- ◆ Exceptional scalability and performance;
- ◆ Support for customer inquiries via email and toll-free number (normal business hours) and
- ◆ State of the art data security.

Respondents access the survey through the contractor's website, where they are protected by a strict data security system. Using an ID tracking system, respondents can access the survey and, if they choose, abandon and return at a later time to the place in the survey that they left. Every precaution is made to ensure data collected on the Internet remains both secure and confidential. The contractor's host server is stored in a secure location. Only those given a personal identification number (PIN) can enter the survey. When the PIN is entered, the respondent is moved to a non-public directory. When entered, the data interfaces with a script located on a second non-public directory accessible only to the contractor's system administrator. As each survey is completed,

survey responses are downloaded off-line. Once a survey is submitted, the PIN used to access the survey becomes invalid, and the survey cannot be re-accessed. These measures make it extremely difficult for someone to access the responses of another respondent.

The online version of the survey will be designed to be integrated with data collected via CATI. All survey data will be on a stored on a computer that is protected by a firewall that monitors and evaluates all attempted connections from the Internet. Confidential information about the survey respondent (name and telephone number, only) will be maintained in a separate data file and apart from the survey data so that it is not possible to link particular responses to individual respondents. Once the survey is completed, all confidential data on each respondent will be destroyed. The entire survey database will be encrypted so that any data stored will be further protected.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in item 2 above.

The information being requested is not otherwise available. There is no other systematic survey of veterans focused on POS or use of One-Stop Career Centers by veterans. There is no existing information on individual veterans in the context. The data and insights gathered through this survey will be invaluable in supplementing the statistical analyses of administrative data and qualitative assessments that have resulted from interviews conducted with state/local workforce agency officials and representatives of veterans' organizations. Hence, without this survey, ETA would not have the full range of information needed to assess implementation of POS within the One-Stop Career Center system, and, if indicated, to make changes in policies or guidance relating to POS implementation at the state and/or local levels.

It should be noted that some administrative data already exist with respect to veteran versus non-veteran characteristics, types of services received, and outcomes for Workforce Investment Act (WIA). The ETA contractor has analyzed this administrative data source (WIASRD) and conducted analyses comparing veterans and non-veterans on these dimensions. However, the administrative data available do not permit analyses of veteran views on POS or quality/satisfaction of services received. The existing data is not satisfactory to report to Congress on the extent to which POS requirements set for under JVA are being fully met by the workforce development system.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

This information collection will have no impact on small business or other small entities. All respondents will be individuals (i.e., recent customers of One-Stop Career Centers in selected states).

6. Describe the consequences to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles in reducing burden.

Without this data collection, ETA would not have the full range of information needed to gauge the impact of the veterans Priority of Service provision. This survey instrument is the only way we have of measuring the views and experiences of individual veterans who have received services from the One-Stop system and being able to contrast that information with the experience of non-veterans. Given the significant expenditures involved in implementing the workforce investment system and the importance that Congress, DOL/ETA, veterans' organizations, and the public places on serving veterans through this system, the proposed data collecting effort is of critical importance.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- **requiring respondents to report information to the agency more often than quarterly;**
- **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **requiring respondents to submit more than an original and two copies of any document;**
- **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years ;**
- **in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause this information collection to be conducted in any manner listed above.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR

1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years – even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

[DOL/CRC INSERT Fed Reg INFO HERE] Notification of this survey was published in the Federal Register, Vol. XXX, No. XXX, (Day, Date: pp. XXX – XXX), a copy of which is Attachment XX. Readers were given 60 days from the date of publication to submit comments. These comments will be summarized once we obtain them.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Survey respondents will receive no payments or gifts.

10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The One-Stop Career Center customers who will surveyed will be assured that their responses will be held in confidence within the limits of the law. Identities of survey respondents will not be shared. The survey data will be on a stored on a computer that is protected by a firewall that monitors and evaluates all attempted connections from the Internet. Confidential information on each survey respondent (name and telephone number, only) will be maintained in a separate data file and apart from the survey data so that it is not possible to link particular responses to individual respondents. Once the survey is completed, all confidential data on each respondent will be destroyed. The entire survey database will be encrypted so that any data stored will be further protected. Finally, access to any data with identifying information will be limited only to contractor staff directly working on the survey.

Participation in the survey is voluntary. All findings in any written materials or briefings will be presented at the aggregate level and it will not be possible to link

specific responses to individual respondents in any way. The Contractor will not include any identifying information such as names, addresses, telephone numbers, or social security numbers in the database delivered to DOL.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers these questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive, personal, or private nature included in this survey.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

Below is the estimate of the respondent burden for completing the grantee survey. The survey will be conducted with 1,500 randomly selected customers of One-Stop Career Centers in seven states. The customers will be WIA Adult and Dislocated Worker Program exiters who received intensive and/or training service through the One-Stop Career Center system and exited in a six-month period prior to the administration of the survey. The estimated response rate is 80 percent – yielding valid responses from a total of 1,200 One-Stop Career Center customers (800 veterans and 400 non-veterans). The estimated response time for the survey is 20 minutes.

Category	Sample Size	Response Rate	Number of Respondents	Frequency	Time Per Respondent	Total Burden Hours
Veterans	1,000	80%	800	Once	20 minutes	267
Non-Veterans	500	80%	400	Once	20 minutes	133
Total	1,500	80%	1,200	Once	20 minutes	400

- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage and rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 13.**

The total annualized cost to respondents for the survey is presented below. This estimated cost is based on average hourly earning of production and nonsupervisory workers in September 2009.⁸⁰

Category	Total hours	Average Hourly Wage	Total Annualized Cost
Veterans	267	\$18.68	\$4,988
Non-Veterans	133	\$18.68	\$2,484
Total	400	\$18.68	\$7,472

13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information. Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**

⁸⁰ Based on Bureau of Labor Statistics data (<ftp://ftp.bls.gov/pub/suppl/empsit.cesebb2.txt> (as of 10/21/09)).

The proposed data collection for the telephone surveys will not require the respondents to purchase equipment or services or to establish new data retrieval mechanisms. Survey content is based on the respondents' experiences, opinions, and factual information. Therefore, the cost to respondents solely involves answering the questions on the survey.

- (a) We do not expect any total capital and start-up costs.
- (b) We do not expect extensive time spent on generating, maintaining, and disclosing or providing the information.

- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**

The proposed data collection will not require the respondents to purchase equipment or services or to establish new data retrieval mechanisms. These costs are not expected to vary.

- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

We do not expect respondents to purchase equipment or services in order to respond to this data collection effort.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate cost estimates from Items 12, 13, and 14 in a single table.

The only cost to the Federal government associated with this data collection is the overall cost of the contract with Capital Research Corporation to conduct the evaluation of the Priority of Service Provision of the Jobs for Veterans Act. The telephone survey of One-Stop Career Center customers is one part of this research contract. The total estimated cost to the federal government of conducting the evaluation of the Priority of Service Provision of the Jobs for Veterans Act is \$499,837, which is the total contractor

cost of conducting the evaluation effort. This cost estimate includes \$159,994 for the design and conduct of the survey, which includes \$10,556 for development of the questionnaire; \$8,445 for the preparation of OMB clearance materials; \$117,769 for interviewer training, sample locating, and interviewing costs; and \$23,224 for the processing, editing, and cleaning of ITA2 survey data. The table below provides additional details about the total estimated costs for the POS-JVA study.

STUDY TASK	ESTIMATED COSTS
Study Design	\$40,741
Conduct Site Visits to States and Local Workforce Areas	\$97,116
Conduct Analysis of Large Scale Existing ETA Data (WIASRD Database)	\$45,512
Design and Conduct Survey with Veteran and Non-Veteran Customers of One-Stop Career Centers	\$159,994
Analyze/Synthesize Survey, Site Visit, and Database Analysis Results	\$82,791
Prepare Final Report	\$60,773
Brief ETA on Study Findings	\$12,911
Total Study Costs	\$499,837

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

This is a new request.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and end dates of the collection of information, completion of report, publication dates, and other actions.

The survey analysis will focus on taking information collected through the surveys and presenting it in summary formats that allow ETA, veterans organizations, and other interested parties to quickly grasp the views of veteran versus non-veterans with respect to their experiences in using One-Stop Career Centers. We will use tables, charts and graphs to illustrate the results. A statistical software package such as SAS, SPSS-PC, or Stata will be used to conduct the analyses. Our analysis will also integrate the findings from other data collection activities to provide a comprehensive assessment of POS implementation in the One-Stop Career Center system, including interviews with

veterans' organizations, site visits to states and local workforce agencies, and analyses of administrative record data maintained on exiters from the Workforce Investment Act (WIA).

The survey analysis will take place in April and May 2010, immediately after the survey is completed.

Once the survey results are analyzed and these results are fully integrated with results from other data collection activities, a final report will be developed and finalized by June 2010. The final report will present results from the survey, and synthesize results with the other qualitative and quantitative analyses conducted under the evaluation effort. The final report, which will be submitted in Microsoft Word and PDF formats, will contain an executive summary, objectives of the study, the evaluation methods used, analyses of the survey, site visits, and large-scale data analyses (of WIASRD database), and related findings, conclusions, and recommendations. We anticipate that the final report will include cross state/local area comparisons and examples highlighting particularly successful models/practices for effectively serving veterans within a One-Stop Career Center setting. Finally, the key findings of the study will be presented in an oral briefing for ETA staff.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

We will display or cite the OMB approval number and expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

B1. Respondent Universe and Sampling Methods

Describe (including a numerical estimate) the potential respondent universe and any sampling or other respondent selection methods to be used. Data on the number of entities (e.g., establishments, State and local government units, households, or persons) in the universe covered by the collection and in the corresponding sample are to be provided in tabular form for the universe as a whole and for each of the strata in the proposed sample. Indicate expected response rates for the collection as a whole. If the collection had been conducted previously, include the actual response rate achieved during the last collection.

The target population for this survey is adults (both veterans and non-veterans) who use One-Stop Career Centers funded by the Department of Labor in the states of Alaska, California, Florida, Kansas, New Jersey, Ohio, and Virginia. The objective is to select a representative probability sample of both veterans and non-veterans in each of the seven states.

The sampling frame for the selection of veterans and non-veterans will be the list provided by state agencies overseeing the One-Stop Career systems in each state. The sampling frame will be WIA Adult and Dislocated Worker Program exiters for a six-month period prior to the administration of the survey, who received WIA intensive and/or training services provided by the One-Stop Career Center system.

We propose to select a sample of 1,000 veterans and 500 non-veterans in total from the seven states. With an 80% response rate, a sample of 800 veterans and 400 non-veterans will be the expected number of completed interviews. The total sample of veterans will be allocated to each of seven states in proportion to the number of veterans in that state who used the One-Stop-Career Center and similarly the number of non-veterans will be allocated in proportion to the number of non-veterans using the Center. Table 1 shows the population and sample sizes for the seven states.

The expected response rate is 80 percent. This data collection has not been previously conducted. The expected response rate is based on DOL/ETA's minimum response rate for the American Customer Satisfaction Index (ACSI) survey, which was used to meet the customer satisfaction measurement requirements under the Workforce Investment Act. Similar to the proposed survey, the ACSI survey was a telephone survey of WIA Title I-B participants. As set forth in its guidance to states for the ACSI survey, DOL/ETA required states conducting this survey to obtain a minimum of a 70 percent response rate: "The minimum response rate is 70 percent. The response rate is calculated as the number of respondents with *complete* customer satisfaction information divided by the total number in the sampling frame. A survey is considered *complete*

where valid answers are provided by respondents for each of the core questions outlined by ETA.”⁸¹

TABLE 1: POPULATION AND SAMPLE SIZES FOR THE SEVEN STATES FOR THE PRIORITY OF SERVICE (POS) SURVEY OF VETERANS AND NON-VETERANS

No.	State	Veterans		Non-veterans		Total Sample
		Population (2007)	Sample	Population (2007)	Sample	
1	Alaska	86	23	2,518	23	46
2	California	2,228	589	20,678	230	819
3	Florida	438	116	9,069	93	209
4	Kansas	71	20	1,283	15	35
5	New Jersey	258	68	4,514	44	112
6	Ohio	470	124	6,785	65	189
7	Virginia	226	60	2,685	30	90
	Total	3,777	1,000	47,532	500	1,500

Note: 2007 population is based on the number of WIA Adult and Dislocated Worker exiters in PY 2007 receiving intensive or training services, as reported by states in the Workforce Investment Act Standardized Record Data (WIASRD) data system.

Other guidance to states for the conduct of the ACSI survey included the following provisions:

- Participant customer satisfaction responses must be collected by way of telephone interviews;
- Participants should be contacted as soon as possible on or after the last expected service date and no later than 60 days after the closure date. Closure date is another term for the last expected service date;
- States must complete a minimum of 500 surveys during the program year to

⁸¹ U.S. Department of Labor, “Guidance on Capturing Satisfaction Results: Using the American Customer Satisfaction Index to Measure Customer Satisfaction” (Guidance expired February 28, 2009).

accurately assess performance on the ACSI;

- If sampling is used, states must randomly select participants to obtain the desired number of completed surveys -- states are required to determine the appropriate sample sizes and sampling percentages using the required response rate and the required number of completed interviews; the sampling methodology used to select potential respondents for the surveys must ensure the consistent random selection of a sample of participants eligible for the surveys.
- A letter in advance of the survey should be sent out informing the customer that he or she can expect to receive a telephone call about his or her satisfaction with the services; states should place a phone number on the letter, suggesting that customers call if they need help or call if their phone numbers changed;
- Attempts must be made to contact all eligible participants in the sample to avoid introducing bias, with a minimum of five follow-up attempts is required, involving various times of the day before closing the record;
- Respondents must be told that responding to the survey is voluntary and that the information they provide will be kept confidential; and
- The interview for the ACSI survey should be limited to 15 minutes or less.

Through the survey software, we will be able to track response rate our survey. We anticipate a response rate of 80 percent, which is slightly above the (minimum) 70 percent response rate required of states in the ACSI survey. The slightly higher response rate (versus the ACSI survey) is expected because we plan (1) to provide respondents with an additional method for responding to the survey – respondents will be able to respond by telephone (as is the case of the ACSI survey) or to an Internet-based survey application; and (2) up to 20 calls will be made to each individual in the sample (versus a total of five calls required under the ACSI survey). It is also important to note that the 70 percent response rate for the ACSI survey was a minimum response rate required of states (which state could exceed).⁸²

2. Describe the procedures for the collection of information including:

- **Statistical methodology for stratification and sample selection,**
- **Estimation procedure,**
- **Degree of accuracy needed for the purpose described in the justification,**
- **Unusual problems requiring specialized sampling procedures, and**
- **Any use of periodic (less frequent than annual) data collection cycles to reduce burden.**

⁸² See B.3. below for additional details about steps to be taken to ensure a high response rate to the survey.

For the selection of veterans and non-veterans in each state, the population of veterans and non-veterans will be stratified by gender creating four strata for sample selection. The required sample of veterans will be allocated to each of the two gender strata in proportion to the number of eligible male and female veterans in the state. The allocation is shown below. Let N_h be the number of veterans in the population in state h . Let N_{hm} be the number of males and N_{hf} be the number of females. Let n_h be the allocated sample that is to be selected in state h . Let the number of male veterans and female veterans to be selected in state h be n_{hm} and n_{hf} respectively. We

have $n = n_{hm} + n_{hf}$. Under proportional allocation, $n_{hm} = n_h \frac{N_{hm}}{N_h}$ and $n_{hf} = n_h \frac{N_{hf}}{N_h}$.

We expect that the veteran sample will be predominantly male whereas this may not be the case for non-veterans. Therefore, the allocation of the sample of non-veterans will not be proportional to male and female non-veterans in the population. Male non-veterans will be oversampled. The allocation of the sample of non-veterans to the two strata is shown below. Let m_h denote the sample size of non-veterans allocated to state h in proportion to the number of non-veterans in the state. Let m_{hm} and m_{hf} denote the number of male and female non-veterans in the sample respectively. These are computed by taking

$$m_{hm} = m_h \frac{N_{hm}}{N_h} \text{ and } m_{hf} = m_h \frac{N_{hf}}{N_h}.$$

The allocation may be modified based on the actual distribution of non-veterans in each state at the time of sample selection. **A simple random sample of veterans will be selected in each of the two strata in each state. Similarly, a simple random sample of non-veterans will be selected in each of the two strata in each state.**

For producing population-based estimates, each responding veteran and non-veteran will be assigned a sampling weight. This weight combines a base sampling weight and an adjustment for nonresponse. The base weight will be the reciprocal of the probability of selection. The response rates in each stratum will be monitored during data collection. As far as possible nonresponse adjustment to the sampling weights of respondents will be done within a stratum.

The base sampling weight for a responding male veteran in state h is $\frac{N_{hm}}{n_{hm}}$. Out of the

n_{hm} male veterans in the sample, let the number of respondents be n_{hmr} , the number of nonrespondents be n_{hmnr} and the number not considered eligible for the survey be

n_{nmne} .

The nonresponse-adjusted weight for the responding male veterans in state h is

$$\frac{N_{hm} (n_{hmr} + n_{hmmr})}{n_{hm} n_{hmr}}$$

Similar adjustments will be made in other strata. In some states, collapsing strata by gender will be considered if the number of respondents in the stratum is zero or very small relative to the sample size. The nonresponse-adjusted weights will be used for all statistical analyses.

Variance estimation based on stratified random sampling design used for the selection of veterans and non-veterans. We propose to use SUDAAN software for computing estimates and standard errors.

The sample of completed interviews with 800 veterans will provide estimates of population percentages with a margin of error no greater than plus or minus 3.5 percentage points at the 95% confidence level. The sample of completed interviews with 400 non-veterans will provide estimates of population percentages with a margin of error no greater than plus or minus 4.9 percentage points. If we are comparing the veterans and non-veterans, then with a sample of 1,000 veterans and 500 non-veterans the minimum detectable difference with 80% power will be 8.5 percentage points when we do a two-sided statistical test at 5% level of significance. It is assumed that the percentage for one of the groups is 50%.

We have two populations, one of veterans and the other non-veterans. We are selecting stratified simple random samples from each of these populations, and we compute estimates and variance estimates using SUDAAN software. We have given below the mathematical formula for computing the variance of means and totals.

Let H denote the number of strata created for sample selection. Let N_h denote the number of veterans in the population in stratum h . Let n_h denote the number of veterans in the sample (completes) in stratum h . Let N denote the total population veterans over all strata. That is $N = \sum_{h=1}^H N_h$. Let y_{hi} denote the value of a characteristic of interest for veteran i in the sample. The estimator of the population mean of y is given by

$$\bar{y}_{st} = \frac{\sum_{h=1}^H N_h \bar{y}_h}{N}$$

where \bar{y}_h is the sample mean based on sample of n_h veterans in stratum h . The variance estimator for estimating the variance of \bar{y}_{st} is given by

$$v(\bar{y}_{st}) = \frac{1}{N^2} \sum_{h=1}^H N_h^2 (1 - f_h) \frac{s_h^2}{n_h}$$

where f_h is the sampling fraction in stratum h and is equal to $\frac{n_h}{N_h}$ and s_h^2 is the sample variance in stratum h and is given by

$$s_h^2 = \frac{\sum_{i=1}^{n_h} (y_{hi} - \bar{y}_h)^2}{n_h - 1}$$

where y_{hi} is the value of the i^{th} observation in stratum h .

The estimator for estimating population total of y is given by

$$\hat{Y} = \sum_{h=1}^H N_h \bar{y}_h$$

and the variance estimator is

$$v(\hat{Y}) = \sum_{h=1}^H N_h^2 (1 - f_h) \frac{s_h^2}{n_h}.$$

No specialized sampling procedures are required to correct any unusual problems. This is a one-time data collection effort and will not require periodic data collection cycles.

3. Describe methods to maximize response rates and to deal with issues of non-response. The accuracy and reliability of information collected must be shown to be adequate for intended uses. For collections based on sampling, a special justification must be provided for any collection that will not yield “reliable” data that can be generalized to the universe studied.

In order to attain the highest possible response rate, a study strategy with the following major components will be followed. Sample customers will receive a personalized advance letter explaining that he/she was selected to participate in the survey and the purpose of the survey. Sample customers will also have the choice of completing the survey online. The initial contact script has been carefully developed and refined to be persuasive and appealing to prospective respondents. Interviewers will identify survey sponsorship as the Department of Labor. The interviewing content and skip patterns have been carefully designed to only ask relevant questions depending on the respondent's answers to previous questions to reduce respondent burden. Only thoroughly trained and experienced interviewers, highly motivated and carefully monitored, will conduct the interviewing. Interviewers will be trained on how to overcome initial reluctance, disinterest or hostility during the contact phase of the interview. The contractor will make up to 20 call attempts to ring-no-answer numbers, and shall leave an approved message on answering machines according to study protocol.⁸³

⁸³ Study strategies to maximize response rates based on industry best practices. See Dillman, D (2009) Mail and Telephone Surveys. The Total Design Method. New York: Wiley; Groves and Couper (1998)

The CATI program will record all refusals and interview terminations in a permanent file, including the nature, reason, time, circumstances, and the interviewer. This information will be reviewed on an ongoing basis to identify any problems with the contact script, interviewing procedures, questionnaire items, etc. Also, the refusal rate by interviewer will be closely monitored. Using these analyses, a “Conversion Script” will be developed. This script will provide interviewers with responses to the more common reasons given by persons for not wanting to participate in the survey. The responses are designed to allay concerns or problems expressed by the telephone contacts.

The contractor will implement a refusal conversion plan in which each person selected for the sample who refuses to participate will be re-contacted by the contractor approximately one-to-two weeks following the refusal. The contractor will use the Conversion Script in an attempt to convince the individual to reconsider and participate in the survey. Only the most experienced and skilled interviewers will conduct the refusal conversions. Exceptions to refusal conversion will be allowed on an individual basis if for some reason the refusal conversion effort is deemed inappropriate.

There will be maintenance and regular review of outcome data in the reporting file so that patterns and problems in both response rate and production rates can be detected and analyzed. Meetings will be held with the interviewing supervisory staff and the study management staff to discuss problems with contact and interviewing procedures and to share methods of successful persuasion and conversion.

The sampling methods described above will yield reliable data that can be generalized to the universe studied (Adult One-stop Career Center customers in the seven states).

Non-Response Analysis

The actual difference between respondents and non-respondents on estimates will not be known. In this instance, nonresponse bias is typically explored using indirect measures. Should this study not reach the 80% response rate expected, we will complete nonresponse analysis using various demographic characteristics. This comparison of the characteristics of the completed and non-completed cases from the sample will be conducted to determine whether there is any evidence of significant non-response bias in the completed sample.

The sample elements will include age, gender, ethnicity, race, veteran status, employment status prior to program participation, highest school grade completed, and services received (e.g., intensive and training services). A comparison of the characteristics of all cases in which an interview had not been completed with those that had been completed can be employed using these variables. Analysis of the

Nonresponse in Household Survey, New York, John Willey & sons (p.21); Hox, J.J and De Leeuw, E. (194) A Comparison of Nonresponse in Mail, Telephone and Face-to-Face Surveys – Applying Multilevel Modeling to Metaanalysis. *Quality and Quantity*, 28, 329-344.

characteristics of respondents and non-respondents to the survey should identify whether there is any evidence of significant non-response bias in the most likely areas: age, gender, ethnicity, race, veteran status, employment status prior to program participation, highest school grade completed, and services received (e.g., intensive and training services). This analysis will suggest whether any weighting or other statistical adjustment needs to be made to correct for non-response bias in the completed sample.⁸⁴

We will keep track of response rates by state, veteran and non-veteran, and gender. During data collection, if we find that in some strata response rates are low, every effort will be made to increase the response rates in those strata to reduce the nonresponse bias in overall estimates. We plan to keep track of types of nonrespondents like refusals along with reasons for refusal, unable to contact, unable to respond etc. The type of nonresponse and reasons for nonresponse might help in nonresponse bias analysis. The analysis will be according to the OMB guidelines.

The size of the nonresponse bias in the sample respondent mean of a characteristic of interest is a function of the nonresponse rate and the difference between the respondent and nonrespondent population means. An estimate of the bias in sample mean based only on the respondents is given by

$$B(\bar{y}_r) = \frac{n_{nr}}{n}(\bar{y}_r - \bar{y}_{nr})$$

where \bar{y}_r is the mean based only on respondents, \bar{y}_{nr} is the mean based on nonrespondents, n is the sample size and n_{nr} is number of nonrespondents.

If there are several attempts to collect data, then, we will keep track of the respondents at each wave and compute the estimates based on respondents at the end of each wave. These estimates will be compared, and the difference in the estimates at the end of each wave will provide the estimated size and direction of the bias in the estimates. For example, if we have 4 waves of data collection, then we compute four means \bar{y}_1 , \bar{y}_2 , \bar{y}_3 , and \bar{y}_4 based on cumulative increasing sample sizes n_1 , n_2 , n_3 , and n_4 . We will look at differences $(\bar{y}_1 - \bar{y}_2)$, $(\bar{y}_2 - \bar{y}_3)$, $(\bar{y}_3 - \bar{y}_4)$ where \bar{y}_4 is the final estimates based on all n_4 respondents. These differences might help to assess the size of the difference between \bar{y}_4 and the sample mean we would have obtained if we had 100% response to the survey. If there is no large difference in the estimates based on early respondents and respondents after repeated attempts, this may be an indication that the bias in estimates is not large. We will also compare initial respondents with initial refusals with respect to gender, race and age. We will also look at the mean of respondents who originally refused to respond to the surveys but later responded (refusal conversions).

⁸⁴ The use of indirect measures such as demographics to conduct nonresponse analysis is supported in the literature. See O’Neil, G. and J. Dixon (2005). Nonresponse bias in the American time Use Survey. ASA Section in Survey Research Methods (p2958-2966). [www.bls.gov/tus/papersandpubs.htm]; Groves, R.M. (2006). Nonresponse Rates and Nonresponse Bias in Household Surveys. *Public Opinion Quarterly*, 70, 646-675.; and Kasprzyk, D and Geisbreecht (2003). Reporting Sources of Error in U.S. Government Surveys. *Journal of Official Statistics*, 19(4), pp 343-363.

We plan to make comparisons between respondents and nonrespondents available in the 7 sampling frames in the 7 states that the survey is being conducted. Since gender has been used as a stratification variable, the comparison of respondents and nonrespondents by gender will show whether proportionately more male veterans are responding than female veterans and also whether more male non-veterans than female non-veterans are responding. We will also look at some frame characteristics like age and race for both respondent and nonrespondent veterans and non-veterans if these data are available on the sampling frame obtained from different states. If there are substantial differences in response rates for race and/or ethnicity groups, then we will examine survey data to see whether there are differences in survey responses between respondents in different race/ethnicity groups or different age groups. This analysis does not give any information on whether the respondents and nonrespondents within a race/ethnicity group or age groups are similar. But if there are differences between these groups, a poststratification adjustment by race or age within each stratum may reduce bias due to nonresponse assuming that within these groups respondents are similar to nonrespondents. Depending on sample sizes in these groups, we may use poststratification adjustment within strata. Variance estimation will then be done using the poststratification option.

There is no known data from an external source with which we can compare the estimates obtained from the survey based on respondents and to assess the bias based on the difference between the known value and the estimate from the survey. We will examine the use of multivariate modeling of response depending on the availability of respondent and nonrespondent frame variables on the state sampling frames of different states.

4. Describe any tests of procedures or methods to be undertaken. Testing is encouraged as an effective means of refining collections of information to minimize burden and improve utility. Tests must be approved if they call for answers to identical questions from 10 or more respondents. A proposed test or set of test may be submitted for approval separately or in combination with the main collection of information.

A pretest will be conducted of 9 people (veterans and non-veterans) who used the One-Stop-Career Center, to ensure the CATI script and online version are functioning properly and the data is being collected accurately. The pretest will consist of the entire survey process from sample management to tabulation of results. Any problems encountered during the pretest of the questionnaire will be resolved before the survey is put into the field.

5. Provide the name and telephone number of individuals consulted on statistical aspects of the design and the name of the agency unit, contractor(s), grantee(s), or other person(s) who will actually collect and/or analyze the information for the agency.

The following individuals have reviewed technical and statistical aspects of procedures that will be used to conduct the Telephone Survey Of Veteran And Non-Veteran Customers Of One-Stop Career Centers:

Statistical aspects of the design:

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Technical aspects of the design:

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The agency responsible for receiving and approving contract deliverables is:

Employment and Training Administration
U.S. Department of Labor
Frances Perkins Building
200 Constitution Avenue, NW
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STUDY NUMBER 4842
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Version 1

TELEPHONE SURVEY OF VETERAN AND NON-VETERAN
CUSTOMERS OF ONE-STOP CAREER CENTERS

TELEPHONE NUMBER: ____ - ____ - ____ - ____ - ____ - ____

Interviewer: _____

Interview Date: ____/____/____

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CONTACT INFORMATION:

Name
Telephone Number
Date of visit
Sample version

Introduction

- S1. Hello, may I speak to [CONTACT PERSON]? I am calling on behalf of the Department of Labor. I am with Abt SRBI, a national research firm, and we are conducting a 20-minute survey of recent customers of a government funded [READ IN CENTER NAME].
- 1 Speaking
 - 2 New person comes to phone [Skip to S3]
 - 3 Not available – schedule call back [SCHEDULE CALL BACK]
 - 9 (vol) Refused [THANK AND TERMINATE THE INTERVIEW]
- S2. Participation in this quick customer satisfaction survey is completely voluntary. Your individual answers will be kept completely confidential and will not affect any current or future access to the [READ IN CENTER NAME] services in any way. The information you provide will help us evaluate and improve the services provided by the [READ IN CENTER NAME].
- [Skip to Q1]
- S3. Hello, I am calling on behalf of the Department of Labor. I am with Abt SRBI, a national research firm, and we are conducting a 20-minute survey of recent customers of a government funded [READ IN CENTER NAME]. Participation in this quick customer satisfaction survey is completely voluntary. Your individual answers will be kept completely confidential and will

not affect any current or future access to the [READ IN CENTER NAME] services in any way. The information you provide will help us evaluate and improve the services provided by the [READ IN CENTER NAME].

- Q1. According to our records, you visited the [READ IN CENTER NAME] between [READ IN: Date and Date] to get help finding a job or to get free vocational training? Is that right?
- 1 Yes
 - 2 Yes visited, but not sure of the exact date
 - 3 No, never been [PROBE, IF STILL NO, NOTE COMMENTS, THANK AND TERMINATE THE INTERVIEW]
 - 8 (vol) Don't Know [THANK AND TERMINATE THE INTERVIEW]
 - 9 (vol) Refused [THANK AND TERMINATE THE INTERVIEW]
- Q2. What month and year did you first visit the One-Stop?
___# MONTH (1-12) 18 = DK; 19 = RF
___# YEAR (1998-2009) 998=DK, 999=RF
- Q3. Are you still using services that were provided by the center or that you were referred to and enrolled in off site?
- 1 Yes (SKIP TO Q4)
 - 2 No
 - 8 (vol) Don't Know
 - 9 (vol) Refused
- Q3A. What month and year did you stop using services that were provided by the center or that you were referred to and enrolled in off site?
___# MONTH (1-12); 18 = DK; 19 = RF
___# YEAR (1998-2009) 998=DK, 999=RF
- Q4. When you first came to the One-Stop, were you asked if you are a veteran?
- 1 Yes
 - 2 No
 - 8 (vol) Don't Know
 - 9 (vol) Refused
- Q5. When you first came to the One-Stop, were you asked if you are the spouse of a veteran?
- 1 Yes
 - 2 No
 - 8 (vol) Don't Know
 - 9 (vol) Refused

[CATI: IF Q4 = 1 OR Q5 = 1 ASK Q6. OTHERS SKIP TO Q7.]

- Q6. Within how many hours of first entering the One-Stop were you asked about your veteran status?

_____ # HOURS (0 = immediately; 1 = 1 hour or less; 2 = 2 hours; 3 = 3 hours; 4 = 4 hours; 5 = 5 hours or more; 8 = Don't Know; 9 = Refused)

Q7. Are you a veteran of the armed forces?

- 1 Yes
- 2 No
- 8 (vol) Don't Know
- 9 (vol) Refused

Q8. Are you the spouse or widow/widower of a veteran of the armed forces?

- 1 Yes
- 2 No
- 8 (vol) Don't Know
- 9 (vol) Refused

Q9. Which of the following services did you receive? [MULTIPLE MENTION]

	Y	N	DK	R
1 Orientation to services	1	2	8	9
2 Self-service use of resource room with computers and reference materials	1	2	8	9
3 Staff-assisted use of resource room with computers and reference material	1	2	8	9
4 Assessment services (i.e., tests to find out what career might be best for you)	1	2	8	9
5 Counseling services	1	2	8	9
6 Case management	1	2	8	9
7 Career exploration	1	2	8	9
8 Resume preparation assistance	1	2	8	9
9 Job search assistance/coaching on how to look for/find a job	1	2	8	9
10 Occupational skills job training	1	2	8	9
11 Job placement or job referral	1	2	8	9

[If no "Yes" selection for Q9.1-Q9.13, skip to Q10; Q9A will be asked for each "yes" in Q9]

We would like you to rate the quality of the services that you received on a scale of 1 to 5, where 1 indicates that the services were very poor and 5 indicates that the services were outstanding.

Q9A. How would you rate...[Read in: Q9 "yes"; continue for each "yes" selection in Q9] .. (would you give it a 1, 2, 3, 4, or 5)? (Repeat scale as needed)

- 1 1
- 2 2
- 3 3
- 4 4
- 5 5
- 8 (vol) Don't Know
- 9 (vol) Refused

Q10. Overall, thinking about your whole experience, on a scale from 1 to 5 where 1 is completely unsatisfactory and 5 is completely satisfied, how would you rate your experience(s) with the One-Stop system?

- 1 1
- 2 2
- 3 3
- 4 4
- 5 5
- 8 (vol) Don't Know
- 9 (vol) Refused

[If Q10 = 1 or 2 ask Q10a, else skip to Q11]

Q10 A. Why did you give the One-Stop System a rating of [Read-in from Q10]?
[RECORD RESPONSE VERBATIM]

-
- 8 (vol) Don't know
 - 9 (vol) Refused

[Skip to instructions before Q13]

Q11. Where you offered all of the services you felt you needed?

- 1 Yes (SKIP TO Q13)
- 2 No
- 8 (vol) Don't Know (SKIP TO Q13)
- 9 (vol) Refused (SKIP TO Q13)

Q11A. What additional services would you have liked to receive or made available?
[RECORD RESPONSE VERBATIM]

-
- 8 (vol) Don't Know
 - 9 (vol) Refused

[Continue to Q13 if Q7 or Q8 = 1 (Yes); else skip to Q20]

Q13. Do you believe you received preference or special treatment over some or all other One-Stop customers because of your veteran status?

- 1 Yes, Some
- 2 Yes, All (SKIP TO Q14)
- 3 No (SKIP TO Q15)
- 8 (vol) Don't Know (SKIP TO Q15)
- 9 (vol) Refused (SKIP TO Q15)

Q14. Which of the following services or activities do you believe you received priority for because of your veteran status?

	Y	N	DK	R
1 Quicker access to self-service resources	1	2	8	9
2 Quicker access to staff assistance with computer and reference material	1	2	8	9
3 Priority or quicker access to workshops	1	2	8	9
4 Priority or quicker access in receiving one-to-one counseling/assessment	1	2	8	9
5 Priority or quicker access in receiving vocational training	1	2	8	9
6 Priority in receiving job listings or job referrals	1	2	8	9
7 Other [RECORD SUBJECT'S RESPONSE VERBATIM] _____	1	2	8	9

- Q15. Were you referred to special staff for veterans including the local Veterans' Employment Representative (LVER) or Disabled Veteran Outreach Program (DVOP) staff, sometimes called "vet reps"?
- 1 Yes
 - 2 No (SKIP TO Q18)
 - 8 (vol) Don't Know (SKIP TO Q18)
 - 9 (vol) Refused (SKIP TO Q18)

- Q16. Did you receive services from the veteran representatives (DVOP/LVER) staff?
- 1 Yes
 - 2 No (SKIP TO Q18)
 - 8 (vol) Don't Know (SKIP TO Q18)
 - 9 (vol) Refused (SKIP TO Q18)

- Q16A. What services? **[RECORD SUBJECT'S RESPONSE VERBATIM]**
-
- 8 (vol) Don't Know
 - 9 (vol) Refused

- Q16B. How would you rate the services you received from the veteran representatives on a scale of 1 to 5, where 1 indicates that the services was very poor and 5 indicates that the service was outstanding?
- 1 1
 - 2 2
 - 3 3
 - 4 4
 - 5 5
 - 8 (vol) Don't Know
 - 9 (vol) Refused

- Q17. Which of the following statements best describes how you felt about the use of the veterans staff services versus the use of the One-Stop services?

1. "I was steered to use the veterans staff services only."
2. "I was steered to use the One-Stop services only." or
3. "I was steered to use both the veterans staff services and the One-Stop services."
8. (vol) Don't Know/Not Sure
9. (vol) Refused

Q18. Do you feel that you were given the first opportunity to view and apply for job openings listed at the Employment Service or One Stop because of your veteran status?

- 1 Yes
- 2 No
- 8 (vol) Don't Know
- 9 (vol) Refused

Q19. Do you feel that you were given priority for enrollment or placement in vocational classroom or on-the job-training because of your veteran status?

- 1 Yes
- 2 No
- 8 (vol) Don't Know
- 9 (vol) Refused

Q20. Do you have any other comments about your experience with the One-Stop system you would like to share with us? **[RECORD RESPONSE VERBATIM]**

- 8 (vol) Don't Know
- 9 (vol) Refused

Now, just a few last questions for statistical purposes...

D1. INTERVIEWER: RECORD SEX IF KNOWN. IF NOT KNOWN, ASK: Are you...?

1. Male
2. Female

D2. How old are you?

1. Record age (18 to 97; 97=97+)
98. (vol) Don't Know
99. (vol) Refused

D3. Do you consider yourself to be of Hispanic, Latino or of Spanish origin?

1. Yes
2. No
8. (vol) Don't know

9. (vol) Refuse

D4. Which of the following best describes you? (You may choose one or more.)

1. American Indian or Alaska Native
2. Asian
3. Black or African American
4. Native Hawaiian or Other Pacific Islander
5. White
6. Other Specify: _____
8. (vol) Don't know
9. (vol) Refuse

D5. What is the last year or grade of school you completed?

1. Less than high school graduate
2. High school graduate (GED)
3. Some college
4. Trade/technical/vocational training
5. College graduate
6. Post Graduate work/degree
8. (vol) Don't know
9. (vol) Refuse

D6. Which of the following categories best describes your total 2009 household income before taxes? Was it...

1. Less than \$25,000
2. \$25,000 to less than \$35,000
3. \$35,000 to less than \$50,000
4. \$50,000 to less than \$75,000
5. \$75,000 to less than \$100,000
6. \$100,000 or more
8. (vol) Don't know
9. (vol) Refuse

That concludes the interview. Thank you for participating.