



Date: January 26, 2015

Attn: John V. Ladd, Administrator, Office of Apprenticeship
Room N-5311
Employment and Training Administration, U.S. Department of Labor
200 Constitution Avenue, NW
Washington, DC 20210
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Re: Public Comments on Collection for Pre-Apprenticeship-Pathways to Success, New Collection

Submitted by: The Local Initiatives Support Corporation (LISC)

Thank you for the opportunity to offer comments on data collection for Pre-Apprenticeship-Pathways to Success. The Local Initiatives Support Corporation (LISC) supports this effort to provide local human services providers and members of the public with useful, clear, and comprehensive information about quality pre-apprenticeship programming in their community.

If you have any questions about our public comments, please contact Seung Kim, Program Director for Family Income & Wealth Building at (312-422-9579) or skim@lisc.org.

ABOUT LISC

Established in 1979, LISC is one of the nation's largest nonprofit community development support organizations, dedicated to helping community residents transform distressed neighborhoods into healthy places of choice and opportunity. With local offices in 30 cities and partners throughout Rural America, LISC mobilizes corporate, government and philanthropic support to provide local community development organizations with loans, grants and equity investments; local, statewide and national policy support; and technical and management assistance.

LISC's leadership in supporting innovative, evidence-based economic opportunity programs nationwide has been recognized by a diverse array of foundation, corporate, and federal-agency funders. In 2010, LISC was one of the inaugural recipients of a federal Social Innovation Fund intermediary grant to support the expansion and strengthening of our Financial Opportunity Centers (FOCs). Our FOC model provides integrated employment services, financial coaching, and income supports access to low- and moderate-income neighborhood residents through accessible, trusted, and culturally competent community-based organizations.

Ten years after piloting the model in Chicago, LISC's network of FOCs now comprises over 75 Centers in 33 cities across the country. These organizations provide a wide range of workforce development services, including job readiness, pre-apprenticeship or "bridge" programming, technical

skills training, and ongoing employment coaching to facilitate success on the job and career advancement. LISC's FOC network partners blend funding from LISC and locally-raised sources; many also receive Workforce Investment Act funds through federal competitive grants or connections with their state or local workforce agency.

As part of this work, LISC has embarked on an initiative to support and strengthen pre-apprenticeship and “bridge” programming within its Financial Opportunity Center network. Across the 75 Centers, employment coaches report that too many families in their communities are financially struggling, yet have difficulty accessing community colleges, apprenticeships and other “middle-skills” job training outlets due to academic readiness barriers and logistical barriers like access to high quality child care and transportation. Our partners’ pre-apprenticeship and bridge programs are designed to provide industry-contextualized foundational instruction in areas including reading, math, computer skills, and English proficiency, so that neighborhood residents can qualify for and succeed in training that will ultimately lead to industry-recognized credentials, a career pathway, and family-supporting employment.

COMMENTS

We offer the following observations based upon over 10 years of experience working with community-based institutions to help improve the employment and financial prospects of neighborhood residents.

In addition to academic readiness barriers, individuals in the communities where LISC works often lack information about where to find basic education and pre-apprenticeship program. Unfortunately, many fall victim to the marketing claims of unscrupulous training providers offering financially-burdensome programs that appear attractive but turn out not to confer credentials, skills, or knowledge that are valued by employers. For this reason, an accurate, centralized, comprehensive database of quality pre-apprenticeship programs is especially important.

LISC suggests that ETA can enhance the quality, utility, and clarity of the pre-apprenticeship program information to be collected by being intentional about asking pre-apprenticeship programs that are submitting information to the database to:

- Indicate whether their pre-apprenticeship program offers “wrap-around” support services to participants (for example, financial coaching, income supports access, ongoing career coaching, etc.), and if so what specific services;¹
- Clearly specify which potential apprenticeships, career paths, industries, etc. that the pre-apprenticeship can lead to, and discuss how the pre-apprenticeship program fits into a career pathway;
- Clearly indicate what industry-recognized credential(s), if any, participants will receive upon completion of the pre-apprenticeship (or what credentialing/licensing exam the pre-

¹ LISC's internal data analysis from our network of Financial Opportunity Centers has found improved outcomes for participants receiving integrated employment services, financial coaching, and income supports access services compared to individuals who only participated in employment services. In the aggregate, job placement rates were 20% higher for integrated services participants compared to employment-only participants; 90-day and 180-day job retention rates were each 14 percent higher for integrated services participants compared to employment-only participants. A rigorous independent evaluation of this integrated services model is also underway, with findings about the impact on employment outcomes, financial security, and other measures due out in late 2015. Accordingly, LISC strongly supports the integration of financial coaching and other wraparound services into employment programs.

apprenticeship offers preparation for, in cases where participants are required to sit for a third-party exam in order to attain the credential);

- Indicate pre-apprenticeship program entry requirements, if any; and
- Indicate what other resources in their community exist as a “first step” toward (or “feeder” into) the pre-apprenticeship program, for database users who may be interested in a particular pre-apprenticeship program but do not yet meet the entry requirements..

Thank you again for the opportunity to provide comments. LISC looks forward to continuing to contribute to the Department’s mission of strengthening pre-apprenticeship and registered apprenticeship programs.