

# ALA American Library Association

June 15, 2015

The Honorable Thomas E. Perez  
Secretary of Labor  
United States Department of Labor  
200 Constitution Avenue, NW  
Washington, DC 20210

The Honorable Arne Duncan  
Secretary of Education  
United States Department of Education  
400 Maryland Avenue, SW  
Washington, DC 20202

RE: Workforce Innovation and Opportunity Act Notice of Proposed Rulemaking, April 16, 2015,  
**RIN 1205-AB73**

Dear Secretary Perez and Secretary Duncan:

The American Library Association (ALA) and the Chief Officers of State Library Agencies (COSLA) thanks you for this opportunity to comment on the Notice of Proposed Rulemaking (NPRM) dated April 16, 2015 implementing the Workforce Innovation and Opportunity Act (WIOA).

## Introduction:

The ALA represents 55,000 members and is the national voice for all of America's libraries including public and private libraries, K-12 school and post-secondary libraries, and general and specialized libraries.

COSLA is an independent organization of the chief officers of state library agencies which are responsible for statewide library development. COSLA's mission is to provide leadership on issues of common concern and national interest, to further state library agency relationships with the federal government and national organizations, and to initiate, maintain and support cooperative action for the improvement of library services.

America's libraries commend the Department of Labor (DOL) and Department of Education (ED) for their extraordinary work drafting this NPRM.

The proposed regulations, for the most part, are clear. They will prove useful as libraries begin the process of working with local workforce investment boards, state workforce investment boards, local and state government officials, and one-stop centers to help implement WIOA.

As described in the NPRM, America's libraries are well positioned to play an essential role in the implementation of WIOA, including:

- Eligible training partners,
- Non-mandatory one-stop partners,
- Models of digital technology enhancement implementation,
- Local or consortium-based Adult Education and Family Literacy Act service providers, and
- Leadership-training grant recipients.

These workforce roles will not be new to libraries, since most are doing one or more of the activities identified, often in collaboration with state and local adult education or workforce development partners. WIOA provides a critical opportunity to build library capacity to partner more deeply and serve more job seekers and workers in getting the training and support needed to succeed in today's global economy.

This response to the NPRM is divided into three additional sections. The first focuses on the role that libraries already play in the workforce development system. We provide statistical data and anecdotal examples, including how libraries can and have partnered with one-stop centers, and provided a wide range of services needed by job seekers. The second focuses on elements of the rule that America's libraries believe require further clarification. The letter closes with further information on how America's libraries, the ALA and COSLA plan to work with their local, state and federal partners to ensure the successful implementation of WIOA.

### The Role of Libraries in the Workforce Development System:

America's libraries constitute a critical national infrastructure that advances education, employment and entrepreneurship, personal empowerment and community engagement (i.e. The E's of Libraries™). This work is done through more than 16,700 public buildings that exist in the smallest and most remote towns and in the largest and most dense cities. Nearly all offer the public wired and wireless Internet access. Public libraries provide an average of 20 public Internet access computers and have dedicated digital resources and technology training that support workforce development, digital literacy and online certifications to advance individual careers. Moreover, within these libraries there are more than 136,000 staff members that develop and provide a diverse range of locally relevant resources and services.

Libraries play a significant role in lifelong learning and public engagement. A 2010 report entitled *Opportunity for All: How the American Public Benefits from Internet Access at U.S. Libraries* (<http://www.ims.gov/assets/1/assetmanager/opportunityforall.pdf>) released by the Institute of Museum and Library Services, funded by the Bill and Melinda Gates Foundation and conducted by the University of Washington, documented that millions of Americans benefit from library computers and Internet access. And we expect even greater need in the future, as more employers require online applications, technology becomes an increasingly important component of the world of work, and as low-income individuals struggle to gain access to the latest technologies.

Among the report's key findings:

- Seventy-seven million people, or nearly one-third of the U.S. population ages 14 and older, used a public library computer and internet services in one year – providing a technological lifeline to people in need.
- Forty percent of respondents – 30 million people – used library computers and internet access for employment or career purposes, including job searches, submitting online job applications and receiving job-related training.
- Forty-two percent – or 32.5 million people – used library technology resources to help achieve their education goals. For example, nearly 37 percent of these people relied on library computers to learn about college degree or certificate programs.

The Online Computer Library Center (OCLC) further reported in 2010 that 300,000 Americans receive job-seeking help at public libraries every day – and 2.8 million times each month public libraries are used to support small businesses

[http://www.oclc.org/content/dam/oclc/reports/2010perceptions/2010perceptions\\_all.pdf](http://www.oclc.org/content/dam/oclc/reports/2010perceptions/2010perceptions_all.pdf)

[The Digital Inclusion Survey](http://digitalinclusion.umd.edu), (<http://digitalinclusion.umd.edu>), conducted by the ALA and the University of Maryland, builds on nearly two decades of research on the evolution of public library technology services and finds significant investments in workforce development services in public libraries nationwide, including the fact that:

- 96% offer online job and employment resources
- 78% offer programs to help people apply for jobs
- 72% offer programs to help people use online job resources
- 59% offer programs to help people use business resources
- 50% offer programs on small business development

A December 2013 Pew Internet study <http://libraries.pewinternet.org/2013/12/11/libraries-in-communities/> affirms that libraries are particularly valued by those who are unemployed, retired, or searching for a job, as well as those living with a disability and internet users who lack home internet access. Fifty-six percent of internet users without home access say public libraries' basic technological resources (such as computers, internet, and printers) are "very important" to them and their family. Nearly half (47%) of job seekers say library help finding or applying for a job is "very important" to them and their families.

In addition to statistics, examples of library services and impacts range from the commonplace to the extraordinary. We provide here just a few representative state and local examples below. Of course, the impact of libraries will be substantially increased as they become more integrated into the nation's workforce development system.

#### *State of New Jersey*

With funding from the Broadband Technology Opportunities Program (BTOP) and collaboration with the New Jersey Community College Consortium (NJCCC), the New Jersey State Library delivered over 1,000 job readiness computer skills workshops. Over 10,000 state residents accessed the online career resources at public libraries. This included approximately 44,000 user sessions, 9,400 resumes, and 183,000 job searches. In addition, over 36,500 searches were conducted using online small business and entrepreneurial resources available through New Jersey libraries.

Recently New Jersey governor Chris Christie announced that New Jersey's libraries would receive \$2.5 million from the State Department of Labor so that libraries can connect local residents to their Employment Service office, one-stop, and other workforce development providers.

#### *State of New York*

Similarly, the New York State Library's "BroadbandExpress@yourlibrary" project established public access computer and teleconferencing centers in 30 libraries in economically distressed communities, and put five broadband-equipped "e-Mobile" computing training units on the road for rural locations and underserved communities. Together, these facilities reached more than 715,000 residents and nearly 600 people who participated in library jobs programs went on to secure employment.

#### *State of Idaho*

The Idaho Commission for Libraries leveraged BTOP funding to work with the Idaho Office for Refugees to train refugees to coach their peers one-on-one in digital literacy and computer use in

Nepali, Burmese, Arabic, French, Swahili, and a dozen other languages. This resulted in more than 2,000 training sessions, linking refugees with on-line job search, education and citizenship resources.

#### *State of Florida*

The Division of Library and Information Services licenses a Career Transitions program for publicly funded libraries which allows users to explore career paths. They can obtain school and training program information, learn how to develop resumes and cover letters, develop interview skills and apply for jobs. It is estimated that more than 12,000 individuals will take advantage of these free learning sessions, that more than 13,000 job searches will be performed, and that 8,500 applications for jobs will be submitted through the Career Transitions program.

#### *Tulsa, Oklahoma*

The Tulsa City-County Library System has helped 9,662 Tulsans find jobs in fiscal year 2014. This is more than are employed by the American Airlines Maintenance Base, the county's largest private employer. A needs assessment of library users found that 10 percent of library users were helped getting a job or a promotion; 15 percent used the library when they were looking for a job; 22 percent used the library for career and leadership assistance; and 60 percent said they would use the library if they were searching for a job.

#### *Charlotte/Mecklenburg County, North Carolina*

In fiscal year 2014, the Charlotte Mecklenburg Library system offered 2,443 workforce development and computer skills classes to 10,755 customers. So far this fiscal year, the library system has offered 1,960 workforce development and computer skills classes to 8,237 customers.

This has been accomplished through dedicated Job Help Centers in its main library and two branch libraries, where customers can get in-depth workforce development assistance, including access to workforce development dedicated computers. The Library works closely with Charlotte Works, Goodwill Industries, the Charlotte Housing Authority, Crisis Assistance Ministry, the Urban League, Charlotte School of Law, Legal Services of the Southern Piedmont, Central Piedmont Community College, the University of North Carolina at Charlotte, the North Carolina State Library, Charlotte Mecklenburg Schools, and others to provide classes and information sessions related to workforce development.

Each of the 20 Charlotte Mecklenburg libraries offers some type of workforce and job seeking support including classes on topics as varied as resume creation, interviewing skills, how to get along with coworkers, Microsoft Office Suite, behavioral interviewing, dressing for success, how to repair your credit, and expungement, as well as many other informational and educational opportunities.

#### *New York, New York*

In May, the New York City Department of Small Business Services (SBS) announced a partnership with the Brooklyn, New York, and Queens Public Libraries to provide free on-site business courses in eight languages, and training for library staff to help them assist immigrants looking to start or grow their own businesses. According to the libraries, this initiative is part of a larger undertaking to enhance, improve and make more robust their career and business services to immigrants. According to the SBS, libraries are the natural choice for this program because of their role as neighborhood anchors and as safe, welcoming institutions for immigrants, who might be less trusting of other government entities. So far, 25 branch libraries in the three boroughs have implemented the programing.

### *Carson City, Nevada*

Nevada's Working Capital (NWC) project is a collaboration with Western Nevada College (WNC) and the Manufacturing Skills Institute (MSI), the 501(c) 3 affiliate of the National Association of Manufacturers (NAM) and the Virginia Manufacturers Association (VMA), to help fill workforce training needs for area manufacturers. This is being done through an apprenticeship portal that fosters community-based learning in highly focused science, technology, engineering and mathematics (STEM) skills, and essential for local manufacturing jobs.

Three primary elements comprise Nevada's Working Capital (NWC) apprenticeship program. First, the public library serves as a central location that leverages its technology and special programs to expose patrons to design and experimentation fostering STEM learning that is expressly relevant to local manufacturers. Second, at the library, patrons can access additional practice, outside of school or work, with specialized engineering design software (SolidWorks). And third, patrons can have formal learning opportunities that are linked from the library that directly lead to a Manufacturing Technician 1 (MT1) certificate, a nationally portable and NAM endorsed credential demonstrating understanding of essential industry-wide technical skills for existing and emerging employers in advanced manufacturing industries.

### *Hartford, Connecticut*

The Hartford Library offers a wide range of services, designed to help residents qualify for employment. These include Internet access, job search assistance, on-line job application assistance, resume writing, career counseling and test preparation services. Among the special services the library offers are an ex-offender employment and retention program; computer, numeracy, and verbal literacy classes; GED preparation; an online high school diploma program; and immigration and citizenship assistance. Last year 4,039 individuals used the library to apply for jobs, 3,053 were referred to jobs, 4,258 received job search assistance, and 594 were referred to the library's computer class.

### *Middletown, Connecticut*

The Russell Library noted that a large gap in services to unemployed individuals occurred when the local One Stop closed its doors in Middletown. The Russell Library then worked with a wide range of service providers, including the Connecticut Department of Labor and Workforce Alliance (the local workforce investment board) to establish a weekly job fair, and to provide career counseling and services to Middletown residents. Russell, like many other libraries in the state of Connecticut, has stepped up to provide programming that supports jobs and career training as state funding cuts slashed similar services. In Middletown, the city provides block grant funding to support the library's career and jobs programming.

### *St. Paul, Minnesota*

The Northstar Digital Literacy Assessment Project grew out of the library's engagement in a citywide literacy and workforce effort. The online assessment modules offer a credentialing opportunity, and the sponsoring organizations serve as proctors. Dozens of organizations – workforce, library, adult literacy, etc. - from across the United States are sponsors, and the program itself was developed with input from employers. The Northstar digital literacy standards have also been adopted as the standard for the employability and career development competency domain for Minnesota's State Adult Diploma.

### *Cecil County, Maryland*

The Cecil County Library system developed a full range of services to meet the needs of service men and women and their families. These included a military resource collection with books, learning materials and other resources that address the unique challenges of military life; computer

classes that focus on using the Internet, email, and other basic computer literacy skills; one-on-one tutoring for computer literacy; and a career center where those with military experience can market their skills to employers.

*Asotin County, Clarkston, Washington*

The Asotin County Library opened its Job and Career Catalyst Center early this year, and in the first four months 72 people worked one-on-one with a career coach. Twenty-three have found jobs and eight others have had interviews. As of May 2015, there have been 353 coaching sessions of which 111 focused on resume development and 146 focused on how to conduct a job search.

The library offers Microsoft IT Academy courses and certification tests as well as other digital literacy courses. One hundred forty-two students participated in a wide range of Microsoft Office courses. More than a dozen students have certified and many more are awaiting testing.

*Snohomish County, Washington*

The Sno-Isle Library System, which serves Snohomish County, has had a long relationship with its local workforce development system. The library's deputy director sits on the WorkSource Snohomish Board of Directors and the manager of youth services sits on the Snohomish STEM Network.

Fourteen of the library system's 21 branches are certified WorkSource connection sites, and WorkSource links directly to Sno-Isle Libraries from their menu of services. Among the classes and programs offered at 11 sites are work readiness for teens, interviewing preparation, resume and correspondence writing, job application assistance, and assistance to older workers. Sno-Isle is working with WorkSource youth programs to provide counseling and one-on-one assistance with homework, the GED, computer/technical literacy, and other library services to young people.

This relationship helped residents immensely after the Oso Landslide. Working through the Darrington Community Library, WorkSource provided 25 classes with up to 30 people in each class, and was able to connect out of work residents with jobs either in their community or elsewhere.

As Department of Labor Employment and Training Administration Assistant Secretary Jane Oates said in 2010, "Permanent partnerships between public libraries and One-Stops are a long overdue effort at the federal level, although we are delighted that this is something that has been taking place informally across the country. These partnerships have been extremely useful and we hope they continue to strengthen and grow."

Further, Linda Strong, JobLink Unit manager with the North Carolina Department of Commerce's Division of Workforce Development noted: "People may not have heard about One-Stops, which breaks my heart, but they do know about libraries. Some of the benefits that One-Stops derive from this partnership include longer library hours that allow access beyond One-Stop office hours, better and more technological access, and the fact that parents can work on their job search while children are engaging in productive activities. We consider libraries to be extensions of One-Stops in North Carolina." Needless to say, ALA and COSLA agree.

## Areas in Which Further Clarification Is Needed:

The NPRM raises several concerns about which America's libraries request clarification.

### *1. Inadequate Focus on Libraries as Eligible Training Providers*

While the Workforce Innovation and Opportunity Act is clear that libraries shall be considered eligible training providers for purposes of program implementation (see 29 USC 3272), the proposed regulations fail to mention libraries on a regular basis. For example, § 680.410 of the proposed rule fails to mention libraries among those entities that may be considered "potential providers."

To ensure that decision makers responsible for selecting training providers are sufficiently aware of the role that libraries can play, **the ALA respectfully requests that the Department of Labor list libraries among potential training providers whenever and wherever it is applicable.**

America's libraries feel strongly that this clarification must be made in the regulations for three reasons. The first is to ensure that the regulations reflect the law as written. The second is to ensure that state and local workforce boards consider libraries as eligible providers whenever moving forward with a training or education program. The third is that libraries add value to all partnerships they enter. Libraries exist in every city, town and community; have a reliable infrastructure; and are proven to be efficient, effective and trusted.

### *2. Qualification Metrics Required of All Eligible Training Providers*

Throughout the NPRM reference is made to eligible training providers and the metrics necessary to ensure that they meet basic training provider eligibility requirements. The question that immediately arises is whether the eligible training provider reporting requirements apply during the first year of WIOA implementation?

It is ALA's understanding that libraries, like all other eligible training providers, will be required to provide performance data documenting the types of training provided and the outcomes. This data is necessary so that states and localities can be certain that eligible training partners provide a level of training that will ensure employment opportunities for participants.

While ALA supports this requirement, it is important to note that until passage of WIOA, libraries were not eligible training partners. Libraries, however, did provide significant career and workforce development training to unemployed, underemployed and low-income residents. Some libraries maintained intake, achievement and outcome data, but it is not universal, since these services often were provided as part of the general activities of libraries.

**The ALA requests that DOL and ED explicitly clarify that the reporting requirements may be waived by states and localities for libraries when developing their lists of eligible training providers in the first year.** Unless such a waiver is granted, libraries, in a practical sense, will be prevented from providing training with WIOA funding and the regulations will undermine the intent of the law to recognize and include libraries as eligible providers.

### *3. Enhanced Digital Literacy*

As the NPRM repeatedly states, libraries are at the forefront of providing their clients with access to digital technology and digital literacy skills training. Libraries have a proven track record of success providing these kinds of services and should be acknowledged as the premier provider of digital literacy services and training.

**The ALA requests that DOL and ED explicitly identify libraries as possible providers of enhanced digital literacy training and services.**

*4. Can Libraries Be One-Stop Partners and Career Services Providers?*

The regulations are clear that One-stop centers may choose not to provide career services. Instead they may contract with another provider to ensure that appropriate career services are offered. However, it is not clear whether one-stop partners can actually provide those services, and if those services might be considered an in-kind contribution to the one-stop that would satisfy the partner requirements.

**The ALA requests that the regulations specifically permit libraries to provide career services, as appropriate, and in the event that the library is also a one stop partner, that these services be considered a one-stop partner contribution as required by WIOA.**

How America's Libraries and the ALA Will Contribute to the Successful Implementation of WIOA:

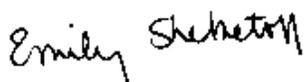
As has been documented in this letter, America's libraries are enablers and catalysts of opportunity and progress. They do this by expending substantial resources on workforce development resources and assistance, and developing and delivering services responsive to local needs.

Libraries support their entire community, but they also target special and often hard to serve populations such as migrants, veterans, youth, and persons with disabilities. They assist employers by meeting specific education and training needs for their workers, hosting job fairs, and providing economic development assistance. They contribute to healthier communities by addressing family and individual literacy and numeracy needs, providing financial skills training, and fostering civic engagement.

The ALA intends to remain a significant partner at the federal level by responding to regulations and requests for information and assistance by the U.S. Departments of Labor and Education. In addition, we intend to engage our sister state and local organizations like the National Association of State Workforce Agencies, the National Association of Workforce Boards and the National Association of Workforce Development Professionals. The ALA and COSLA will serve as a conduit for information sharing between the national, state and local levels. From our perspective, nothing could be more important to the success of WIOA than to ensure that information relevant to the implementation of WIOA is properly shared with libraries and library staff across the country.

Thank you again for this opportunity to comment on the April 16 Notice of Proposed Rule Making. We look forward to your responses.

Sincerely yours,



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Washington Office



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