

Four written public comments were received (attached).

- Recommendations from Finkle McGraw regarding the Gender Equity Policy, suggesting a clearer definition of gender equity is needed. Also suggested is not separately calling out gender identity as a unique category as it “erroneously suggests that ‘people of various gender identities’ are not included among the preceding sex-based categories of ‘women and men, girls and boys’.” Suggests for data-gathering and reporting purposes, using the term “sex” rather than “gender” as it “conveys a clearer meaning if the goal is to compare sex-based categories.”
- Recommendations from the California Immigrant Policy Center regarding:
 - The inclusion of immigrants, particularly undocumented immigrants, as a population with high-barriers to employment, and ensuring services touch immigrant communities with a high concentration of poverty and underemployment;
 - Increasing gender equity through addressing gaps in data that leave out immigrant women and girls; and
 - Developing a COVID-19 response that includes all impacted Angelenos, including undocumented immigrants
- Input from LAUSD, Division of Adult and Career Education (DACE) regarding the inclusion, as an accomplishment/ongoing action in the Annual Plan Overview’s Strategic Initiative 10 – *Creating and expanding career ladder opportunities for L.A.’s workforce to fill the demand for early childhood education positions*, DACE’s collaboration with the city in this effort by adding new early childhood education training programs at Maxine Waters Employment Preparation Center, East Los Angeles Occupational Center and West Valley Occupational Center.
- Recommendations from the Los Angeles LGBT Center for the expansion of employment development opportunities for homeless youth or youth at-risk of homelessness, including lesbian, gay, bisexual, transgender, and questioning (LGBTQ) homeless youth and LGBTQ youth at risk of homelessness by:
 - A budget allocation to community-based organizations for subsidized employment slots in the Summer Youth Employment Program; and
 - A budget allocation to community based social enterprises for subsidized employment slots in the LA:RISE Program.

Public Comments

- Recommendations from the Koreatown Immigrant Workers Alliance (KIWA) regarding:
 - The pandemic having disproportionately harmful and deadly health and economic impacts within communities already experiencing racial and economic inequity and injustice, and the need to establish a just recovery that prioritizes equity, inclusiveness, social and economic justice, and mutual well-being;
 - Doing as much as possible to ensure that immigrant Angelenos, including undocumented and LEP Angelenos, have increased access to the programs for which they are eligible, and expanding programs that include all LA workers;
 - Prioritizing programs providing wrap-around supportive services to historically underrepresented workers including Black, Limited-English-Proficient, re-entry, LGBT, and un-housed workers - some of the economically hardest-hit populations under the current pandemic;
 - The need for “culturally competent” supportive service programs;
 - Seeking increased funding for and explicitly encouraging program partnerships with unions, worker centers, and community organizations that have expertise with specific underserved populations and/or in-demand industries to coordinate supportive services programs for Black, Limited-English-Proficient, reentry, LGBT, un-housed workers, and other workers with barriers to employment;
 - Improved mechanisms to track and respond when workers file claims of wage, health-and-safety violations, or retaliation, and ensure timely investigations by appropriate agencies;
 - Investing more in partnerships that bring together community organizations, unions, worker centers, and ethnic businesses including small businesses; and
 - Prioritizing programs and organizational entities—businesses and non-profits—that prioritize and integrate climate resiliency in their workforce development programming.

I recently became aware of the [draft Workforce Innovation and Opportunity Act Year 2020-2021 Annual Plan](#).

The contents of this email are also available at <https://gitlab.com/finkle/wdb-gender-equity-plan/-wikis/LA-WDB>

Please consider these comments on the *Policy to Ensure Gender Equity throughout the Workforce Development System* located on pages 146-48 of the Annual Plan.

Annotated Policy to Ensure Gender Equity PDF (3 pages)

GENDER EQUITY DEFINED

The *Policy to Ensure Gender Equity* begins by defining "Gender Equity" as follows (emphasis added):

"Gender Equity" implies that the interests, needs and priorities of both women and men and **those who identify as women or men** are taken into consideration, recognizing the full spectrum of diversity within and between gendered groups.

In support of this definition, the document cites to The City of Los Angeles 2015 Report on the Status of Women and Girls.

However, the 2015 Report on the Status of Women and Girls is (rightly) focused on efforts to equalize women's access to resources, opportunities, economic participation, and decision-making. The 2015 Report on the Status of Women and Girls does not emphasize any efforts or needs to prioritize the interests of non-women (regardless of how they identify) or to recognize a "full spectrum of diversity".

The definition of "gender equity" in the *Policy to Ensure Gender Equity* is likely to create confusion and uncertainty among those programs that must implement the policies and procedures described in the following pages.

In particular, the definition of "gender equity" is likely to create confusion as to whether the Workforce Development System is focused on male/female occupational segregation, the wage gap between men and women, the equal participation of women, addressing the underrepresentation of women, and the like; or whether the System is unconcerned with the specific interests of women and girls, but is instead focused on advancing the interests of those who self-identify as any one of an arbitrary and uncountable number of "gender identities".

In part, "gender identities" are arbitrary and uncountable because it has become fashionable to describe various personality traits as "genders" or "gender identities".

A clearer statement might read as follows:

There is a wide spectrum of diversity among the interests and expressions of men and women. Historically, access to resources, opportunities, economic participation, and decision-making were often distributed unequally among men and women. The principle of “Gender Equity” requires that the interests, needs, and priorities of all people, men and woman, are taken into equal consideration.

POLICY STATEMENT

The *Policy to Ensure Gender Equity* continues by stating the goal of the policy (emphasis added):

The goal of this policy is to address the continuing challenge of occupational **sex segregation** in the workplace and the **gender wage gap** by integrating a gender perspective into the design, implementation, monitoring, and evaluation of all workforce development services offered through the Workforce Development System. These challenges must be addressed to ensure women and men, girls and boys, and people of various gender identities, and of all racial backgrounds, have equal opportunities to access job training and quality jobs that lead to living wage jobs with opportunities for career advancement.

BACKGROUND

The *Policy to Ensure Gender Equity* elaborates on the background behind the policy (emphasis added):

In 2015, Mayor Eric Garcetti issued an [Executive Directive](#) on Gender Equity which called on City departments to implement the Convention on the Elimination of all Forms of Discrimination against Women ([CEDAW](#)) within their organizations and throughout their operations, and services.

Annotated Copy of the Executive Directive on Gender Equity PDF (3 pages)

Continuing with the background section, the Annual Plan details the requirements for each city department head to submit an Action plan to implement a gender-sensitive strategy that (emphasis added):

- Upholds an inclusive work environment that promotes fairness and fosters the **equal participation of women** in leadership positions at all levels;
- Tracks recruitment in fields where **women remain underrepresented** (such as public safety, science, technology, engineering and mathematics) and addresses underrepresentation;
- Tracks contracts and promotes ways to ensure equal contracting opportunities for **women-business enterprises**;

- Evaluates City services to discover ways to increase gender equity parity and to promote equal opportunities for, and the **advancement of women and girls**;
- Provides any raw data regarding sex and gender on the City's open-data portal;
- Identifies and develops baseline metrics regarding the **status of women and girls**; and
- Publishes to the online Gender Equity Dashboard metrics and indicators related to the **status of women and girls**.

In light of the confusing GENDER EQUITY DEFINED section (discussed above), it's unclear whether the repeated references to "women" and "women and girls" are intended to include non-women "who identify as women".

Procedures

The Policy to Ensure Gender Equity concludes with a set of data gathering and reporting procedures.

In order to... meet the *unique needs of women and men, girls and boys, and people of various gender identities*... all Workforce Development Service Providers shall gather data and report quarterly...

First, this statement is confusing because it erroneously suggests that "people of various gender identities" are not included among the preceding sex-based categories of "women and men, girls and boys".

However, every human being is included within the sex-based categories of "women and men, girls and boys", so it is redundant to provide lip-service to "people of various gender identities" unless "people of various gender identities" have unique needs that are distinct from those of "women and men, girls and boys".

Furthermore, none of the sources of data cited in this section actually support this contention. In other words, neither the 2015 Report on the Status of Women and Girls, nor the Convention on the Elimination of all Forms of Discrimination against Women, nor Executive Directive Number 11 support the proposition that "people of various gender identities" have "unique needs" in the workforce-development context that are not already covered by the needs of "women and men, girls and boys".

As a result, the Annual Plan document would be clearer, more concise, and less confusing without referring to "people of various gender identities" in the PROCEDURES section.

Finally, Service Providers are required to gather data by "gender" rather than by "sex". However, "gender" is a confusing and unclear term in this context.

For data-gathering and reporting purposes, the term "sex" conveys a clearer meaning if the goal is to compare sex-based categories (i.e., how policies affect men/boys compared to women/girls).

In years past, the term "gender" was generally understood to refer to the sex-based categories of male and female. However, as discussed above, the term "gender" is often used to refer not to biologically-based sex categories (man/woman), but to sex stereotypes, personalities, and/or other socially-constructed features that are often attached to manhood and womanhood. See [Gender-questioning children deserve better science](#) ("Sex has a biological basis, whereas gender is fundamentally a social expression.").

For example, a person whose (biological) sex is male may consider himself to have a 'non-binary' gender based on their belief that (unlike other mammals) it is impossible to categorize humans according to biological sex. Another person whose (biological) sex is female may consider herself to have a male gender based on their inner sense of self, as expressed through their clothing and grooming choices.

As mentioned above, the number of socially-constructed genders is uncountable, being limited only by human imagination. As a result, it is difficult or impossible to use self-defined "gender" categories to collect accurate and meaningful data about occupational sex segregation, the wage gap between men and women, the equal participation of women, the underrepresentation of women, and the like.

However, in the PROCEDURES section of the Annual Plan document, it is unclear what categories a service provider should use to "Disaggregate data by **gender**" and to report on "Wage by **gender** and distribution in common jobs".

To clarify, the Annual Plan could simply replace the word "gender" with the word "sex" in the PROCEDURES section. Alternately, the Annual Plan could continue to use the word "gender", but could specify the exact categories that service providers should use (e.g., "Disaggregate data by gender (male/female)", "Wage by gender (male/female) and distribution in common jobs").

Thank you.

May 4, 2020

City of Los Angeles Workforce Development Board
Attn: AP Year 21/2020-21 Public Comment
1200 West 7th Street
Los Angeles CA 90017
Via email: EWDD.planning@lacity.org



Re: Comments on Draft Workforce Innovation and Opportunity Act (WIOA) Year 21/2020-2021 Annual Plan

Dear City of Los Angeles Workforce Development Board,

The California Immigrant Policy Center is pleased to submit comments on the Draft Workforce Innovation and Opportunity Act (WIOA) Year 21/2020-2021 Annual Plan, which strives to ensure our city's workforce development system is fully and equitably responsive to the needs of communities impacted by the changing economic and labor conditions during the COVID-19 pandemic. Importantly, the Annual Plan emphasizes the need to target workforce services towards populations historically underserved and most vulnerable to exclusion from economic recovery.

CIPC was founded in response to the 1996 passage of federal immigration and welfare laws that profoundly affected immigrants. Today, CIPC advances inclusive policies that build a prosperous future for all Californians, using policy analysis, advocacy, and capacity building. As the state's premier Immigrant Rights advocacy organization, we are committed to equity and inclusion for all immigrants to be able to learn, work, and thrive in our state's economy. Our organization has won landmark legislation to reduce employment barriers, protect labor rights in the workplace, and advance economic opportunities through equitable access to services for all of California's immigrants. Today, CIPC strives to enhance equity within the workforce development system to ensure that all immigrants, refugees, and communities of color can access meaningful job and skills training opportunities that lead to dignified careers and family-supporting wages.

Immigrants, regardless of status, contribute significantly to California's robust and growing economy. Immigrants comprise over one third of California's workforce and undocumented immigrants represent one in ten of California's workers. In Los Angeles, immigrants make up forty-four percent of the workforce. Despite these contributions, the future of our state's and city's economy is missing out by not acknowledging, valuing, and investing in the full potential of the immigrant community. Even with California's progressive worker and immigrant protection laws, the onslaught of hateful rhetoric and policies from Washington, D.C. have meant that immigrants increasingly face harassment and discrimination in the workplace and a fear of accessing public resources, including workforce and education services. These barriers are particularly significant for immigrants who are undocumented or do not have work authorization. In Los Angeles, one in five are either undocumented themselves or live with a family member who is undocumented. Pre-COVID-19, over two-thirds of undocumented immigrants were living below 200 percent of the federal poverty level (about \$51,000 for a family of four) in Los Angeles. We must enhance local strategies that reflect Los Angeles' diverse population and worker needs.

We appreciate the Annual Plan's principles of equity and accessibility, and commitment to provide economic opportunity for all Angelenos. To guide the Los Angeles workforce development system toward greater fulfillment of those principles and its strategic initiatives, our specific comments are as follows:

Include immigrants, particularly undocumented immigrants, as a population with high-barriers to employment, and ensure services touch immigrant communities with a high concentration of poverty and underemployment

In Los Angeles, lower-income neighborhoods are disproportionately impacted by COVID-19, with deaths tolls four times as high compared to the countrywide rate. Many low-income neighborhoods most vulnerable to COVID-19 are largely made up of immigrants. In one of the most impacted low-income neighborhoods, Pico-Union, immigrants make up 64.6 percent of all residents, and almost half of all residents have a median household income of \$20,000 or less. While we support LA WDB's Strategic Initiative to increase services to targeted high-barrier populations (vulnerable populations) with a geographic focus, we believe LA WDB will have the most profound impact if it explicitly includes immigrant communities. In the Annual Plan, the proposed action to expand services to high-barrier populations within the WorkSource and YouthSource Center programs acknowledges English Language Learners as a high-barrier population, but misses the critical inclusion of immigrants. We recommend that the LA WDB explicitly includes immigrants, particularly undocumented immigrants, within the focussed group of vulnerable populations, and ensure that the expansion of services is targeted towards low-income immigrants, regardless of status. In doing so, LA WDB can better ensure economic recovery and resiliency amongst Los Angeles' hardest hit communities.

Increase gender equity through addressing gaps in data that leave out immigrant women and girls

We applaud LA WDB for demonstrating a commitment to ensuring our workforce development system increases gender equity in job training programs and services and in job placement across the city. Through integrating tracking practices and sharing data that recognizes the unique experiences of immigrant women and girls, including the sectors they work in, LA WDB can improve access to quality and empowering job training and employment. However, it is imperative that LA WDB's Gender Equity Task 4 (prepare labor market information report on gender equity) focuses on employment sectors that are largely comprised of immigrant women, including domestic service, "gig" work, rideshare driving, and others. In the Annual Plan, the 2018-2019 data on WDS Training Data Segregated by Gender, Training by Gender, Participant Placement by Gender, and Placement Data by Industry Segregated by Gender all exclude the above-mentioned industries. As part of including industries overrepresented by immigrant women, the labor market information report on gender equity should include indicators of job quality, such as wage, paid family leave, paid sick leave, hazard pay, employers' history with regard to wage theft, among other indicators that shape quality and gender equitable jobs. Relatedly, we encourage LA WDB to track the employment sectors where immigrant women are underrepresented in order to better assess equity within particular employment sectors and training and placement programs. Through tracking this information, LA WDB can access more complete data on training and job placements and develop more robust labor market information reports on gender equity. In doing so, LA WDB can better understand immigrant women's unique barriers to workforce development and employment and create targeted solutions.

We recommend that the LA WDB collaborate with LA-based day labor centers, worker centers, and other immigrant women serving community-based organizations to address these data and tracking gaps, in order to achieve greater gender equity for workers and industries.

Develop a COVID-19 response that includes all impacted Angelenos, including undocumented immigrants

Within the Annual Plan's Strategies and Activities, COVID-19 recovery efforts, including the WIOA COVID-19 Keeping LA at Work Initiative, WIOA COVID-19 Disaster Recovery, and the WIOA COVID-19 Employment initiative all exclude immigrants without work authorization. Without funding that is accessible to all Angelenos, regardless of immigration status, LA WDB's recovery efforts will continue to leave out immigrant communities that are already excluded from federal and state COVID-19 economic relief. While immigrant communities are not new to economic upheaval and barriers to workforce development and quality employment, we cannot continue to abandon them. LA WDB can achieve its vision to be a national leading, equitable workforce development system by leveraging local funds to expand COVID-19 response services and recovery programs for undocumented immigrants. We commend LA WDB for shifting away from an overreliance on WIOA-funds, and encourage the WDB to invest non-WIOA funds in recovery services for undocumented immigrants. We recommend that LA WDB collaborate with day labor centers, worker centers, and other low-income immigrant serving CBOs to identify the services necessary for immigrants and their families to fully recover. In doing so, LA WDB can better ensure all Angelenos withstand the economic impact of COVID-19.

We look forward to working closely with the LA WDB to ensure that Los Angeles' workforce development system is stronger and more equitable in the aftermath of the COVID-19 pandemic. We thank you for the opportunity to submit comment. For any questions please contact Sasha Feldstein at sfeldstein@caimmigrant.org or Sheena Paul at spaul@caimmigrant.org.

Respectfully,

Sasha Feldstein
Economic Justice Policy Manager
California Immigrant Policy Center

Sheena Paul
Economic Justice Policy Coordinator
California Immigrant Policy Center



EWDD Planning <ewdd.planning@lacity.org>

AP Year 21/2020-21 Public Comment

1 message

Powers, James <spowers@lausd.net>
To: "EWDD.planning@lacity.org" <EWDD.planning@lacity.org>
Cc: "Chardiet, Laura" <laura.chardiet@lausd.net>

Mon, May 4, 2020 at 7:20 PM

Greetings City of Los Angeles Workforce Development Board:

The LAUSD, Division of Adult and Career Education has reviewed the "**Year 21 Annual Plan - Draft 01**". The Draft looks excellent. Thank you for providing us with the opportunity to offer comment.

We recommend that you add one note to the following section:

Section 2. Plan Overview

See pages **2-18 and 2-19**, regarding:

Strategic Initiative 10 – Creating and expanding career ladder opportunities for L.A.'s workforce to fill the demand for early childhood education positions

Here is the one note, which could be considered an accomplishment or an ongoing action:

L.A. Unified's Division of Adult and Career Education is collaborating with the city in this effort by adding new early childhood education training programs at Maxine Waters Employment Preparation Center, East Los Angeles Occupational Center and West Valley Occupational Center.

If you have any questions or wish further clarification, please contact me, J. Sam Powers, directly at spowers@lausd.net or by phone at 310 666 5566.

You can also contact Laura Chardiet, our program coordinator, at laura.chardiet@lausd.net

Thank you

Sam

Sam Powers
Advisor, WIOA & City Partnerships
LAUSD, Central Office
w 213 241-3740



**LOS
ANGELES
LGBT
CENTER***

Anita May Rosenstein Campus
1118 N. McCadden Place
Los Angeles, CA 90038

T: 323-993-7400
F: 323-308-4480

lalgbtcenter.org

[f @lalgbtcenter](https://www.facebook.com/lalgbtcenter)
[@LALGBTcenter](https://www.instagram.com/LALGBTcenter)
[@lalgbtcenter](https://www.twitter.com/lalgbtcenter)

Mr. Charles Woo, Chair
City of Los Angeles Workforce Development Board
Economic & Workforce Development Department
1200 W 7th Street,
Los Angeles, CA 90017

Re: City of Los Angeles Workforce Development Board Draft Year
Twenty-One Annual Plan for Program Year 2020-2021

Dear Mr. Woo,

We at the Los Angeles LGBT Center recognize the great work the Workforce Development Board (WDB) and the Economic and Workforce Development Department (EWDD) have done to target education and employment services to populations with the highest barriers to employment. We support the strategic framework that includes increasing services to targeted high-barrier populations (vulnerable populations) including individuals with a history of homelessness, formerly incarcerated individuals, underrepresented ethnic groups, single-parents, older workers, disconnected youth, and transgender and other LGBTQ individuals.

The City of Los Angeles Comprehensive Homeless Strategy specifically calls on the EWDD to expand employment development opportunities for homeless youth or youth at-risk of homelessness, including lesbian, gay, bisexual, transgender, and questioning (LGBTQ) homeless youth and LGBTQ youth at risk of homelessness. These young people need a range of services that are more accessible and more comprehensive than those currently available in the existing Workforce Development System (WDS). Community based organizations, such as ourselves, provide vital services to these young people including stabilization, housing and employment preparation services, to assist them in overcoming the challenges they face in achieving self-sufficiency.

The Los Angeles LGBT Center is proud to collaborate with the WDB and EWDD to serve these populations through the Performance Partnership Pilot P3, the Summer Youth Employment Program, the Los Angeles Regional Initiative for Social Enterprise (LA:RISE), the Jobs and Education Program for Human Trafficking Survivors, and as an active member of the Task Force on Vulnerable and Underrepresented Populations.

Working as a contractor under the Summer Youth Employment Program and LA: RISE we have found that paid internships are the best tool to

prepare disconnected and homeless youth for the workforce. Many of the participants in these programs go on to secure stable and meaningful employment. Community based programs, such as the Los Angeles LGBT Center, are ideally situated to connect with these populations and support them in their internships. We respectfully suggest that the Annual Plan for Program Year 2020-2021 include:

- 1) A budget allocation to community-based organizations for subsidized employment slots in the Summer Youth Employment Program; and
- 2) A budget allocation to community based social enterprises for subsidized employment slots in the LA:RISE Program.

We look forward to working closely with the WDB, EWDD and the WDS in the coming year. We encourage and support their continued commitment to serving underrepresented populations and making a purposeful and meaningful change in the lives of youth experiencing the highest barriers to employment.

Sincerely,



Terra Russell-Slavin
Director of Policy and Community Building
Los Angeles LGBT Center
(323) 860-5843

cc. Robert Sainz, Assistant General Manager, EWDD
Gerardo Ruvalcaba, Director of Workforce Development Division
Gregory Irish, Executive Director, WDB
Lisa Salazar, Policy Director, Office of Mayor Eric Garcetti



May 7, 2020

City of Los Angeles Workforce Development Board
Attn: AP Year 21/2020-2021 Public Comment
Via email: EWDD.planning@lacity.org

Re: Comments on Draft Workforce Innovation and Opportunity Act (WIOA) Year 21/2020-2021 Annual Plan

Dear City of Los Angeles Workforce Development Board,

In my capacity as Executive Director of the Koreatown Immigrant Workers Alliance (KIWA), I would like to submit comments on the Draft Workforce Innovation and Opportunity Act (WIOA) Year 21/2020-2021 Annual Plan. KIWA is a multi-racial worker center that since 1992 has organized and advocated with immigrant workers for better workplaces and neighborhoods.

The Annual Plan seeks to maintain its existing commitments to greater equity, especially for populations that have been underserved in the past; but this year, these efforts will take place in the context of the economic and social devastation caused by the COVID-19 pandemic. The Plan quotes the UCLA Anderson School's forecast that the leisure, hospitality, and transportation sectors will be the hardest hit in California (p. 2-1). I agree that the Annual Plan needs to pay special attention to where economic pain is being felt the most, and note that significant empirical research is emerging demonstrating that this pain is falling disproportionately not only on certain sectors but on [specific communities](#). We have seen that the pandemic has had disproportionately harmful and deadly health and economic impacts within communities already experiencing racial and economic inequity and injustice.

The Annual Plan centers a commitment to the principles of equity and accessibility as well as the critical need to provide economic opportunity for all Angelenos, and at this pandemic moment, it is clear that this points us toward the question of how to use the blueprint of the Annual Plan to address the critical needs of populations that have been hit the hardest, and in some cases, even now being formally and/or incidentally excluded from strategic planning around local and statewide economic recovery. It is to that which I now turn. Our recovery from this crisis must not aim to return to the prior arrangement of structural inequality; rather, we must do our utmost to establish a just recovery that prioritizes equity, inclusiveness, social and economic justice, and mutual well-being.

Immigrants

It is not possible to talk about the regional and state economy without talking about immigrants. Regardless of their formal status, we all know that immigrants play a huge role in both our local and state's economic vitality. In Los Angeles immigrants make up forty-four (44) percent of the workforce.

Koreatown Immigrant Workers Alliance | 한인타운노동연대 | Alianza de Trabajadores de Koreatown

1053 South New Hampshire Avenue, Los Angeles, CA 90006

Tel: 213-738-9050 Fax: 213-738-1833 www.kiwa.org



Economic recovery will be severely hampered if we do not take meet on the critical need to address the needs of immigrant workers, and along those lines, we need to be clear about both the moral and practical imperative to include undocumented immigrant workers.

Strategic Initiative 4 focuses on increasing services to targeted high-barrier populations (vulnerable populations) with a geographic focus (p. 2-8). The pandemic’s economic impact is not random—the worst consequences appear to be landing on high-barrier, vulnerable populations, often with a geographic focus. Special consideration needs to be given to undocumented workers who are being hammered by the economic devastation of the pandemic, are prohibited from participating in certain WIOA-funded Workforce Development programs, but can still participate in other programs as well as utilize other state and workforce funds. Los Angeles’s workforce development programs should do as much as possible to ensure that immigrant Angelenos, including undocumented and LEP Angelenos, have increased access to the programs for which they are eligible, and we should expand programs that include all LA workers.

Many people who are not work-authorized today may in future years attain work authorization through existing or future legislative channels. We can and should ensure that our future workforce is as prepared as possible.

Historically underrepresented workers

We need to prioritize programs providing wrap-around supportive services to historically underrepresented workers including Black, Limited-English-Proficient, re-entry, LGBT, and unhoused workers, who, not coincidentally, are some of the economically hardest-hit populations under the current pandemic. We know that historically under-represented workers also often have multiple barriers to employment. Culturally competent supportive service programs, when integrated with workforce training, will enable more under-represented workers to not only attain high-road employment but also maintain employment for the long term.

In addition to WorkSource/America’s Job Centers and YouthSource Centers’ individualized assistance with supportive services, our Workforce Development system should seek increased funding for and explicitly encourage program partnerships with unions, worker centers, and community organizations that have expertise with specific underserved populations and/or in-demand industries to coordinate supportive services programs for Black, Limited-English-Proficient, re-entry, LGBT, and unhoused workers, and other workers with barriers to employment, alongside workforce development programs. Strategic initiative 2’s focus is on Increasing employment opportunities for all Angelenos through partnerships with major economic drivers in the region. This section flags “new resources to address economic disasters” (p. 2-7). Given the disproportionately negative impact of this economic disaster on discrete communities that were already historically underrepresented, our systems should consider how



to structurally ensure that the major economic driver of economic disaster relief programs can be focused on these communities.

Good jobs

Especially in the context of the pandemic, it is vital that our workforce systems partner with our City's best employers, who can make the most of workforce development investments. Our systems should lift up exemplary employers and actively encourage best practices. Likewise, they should include improved mechanisms to track and respond when workers file claims of wage or health-and-safety violations or retaliation and ensure timely investigations by appropriate agencies. It is harmful to workers, contrary to the aims of our workforce development programs, and unfair to honest businesses to allow violators to persist. In addition, factors such as whether employers include mechanisms for worker participation in improving workplace conditions, such as labor-management health and safety committees, should be considered along with wages and other job conditions.

Small and ethnic businesses provide unique opportunities for immigrant and other underrepresented workers and make our city more socially and economically vibrant. We should invest more in partnerships that bring together community organizations, unions, worker centers, and ethnic businesses including small businesses. Often neither immigrant small business owners nor their employees have access to the workforce development system. The process of recovery from the pandemic may provide opportunities to develop new partnerships that bring together multiple employers with workforces, worker centers, and unions to create good jobs in thriving businesses.

Employ organizing principle of high environmental standard sensitive to demands of environmental justice and climate change

Strategic Initiative 9 highlights the need to train Angelenos to participate in the new green economy. It would be profoundly shortsighted to reject or deemphasize this strategic need as we climb out of this pandemic. We need to prioritize programs and organizational entities—businesses, non-profits, programs—that prioritize and integrate climate resiliency in their workforce development programming.

Thank you and I look forward to further discussions on these and other priority issues.

Yours sincerely,

A handwritten signature in black ink that reads "Alexandra Suh".

Alexandra Suh
Executive Director