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June 17, 2011

The Honorable Tom Harkin
Chairman
Senate HELP Committee
428 Dirksen Senate Office Building
Washington, DC 20510

The Honorable Mike Enzi
Ranking Member
Senate HELP Committee
428 Dirksen Senate Office Building
Washington, DC 20510

Dear Chairman Harkin and Ranking Member Enzi:

On behalf of One Voice, the joint effort between the National Tooling and Machining Association (NTMA) and the Precision Metalforming Association (PMA), thank you for the opportunity to provide comments on the Senate discussion draft of the Workforce Investment Act (WIA) dated June 8, 2011. NTMA and PMA's combined 2,500 member companies manufacture high-quality precision crafted parts, stampings, fabrications, assemblies and tooling for today's global industries, such as automotive, medical, telecommunications, energy and defense. NTMA is a \$40 billion industry employing 440,000 workers at 16,000 facilities and PMA member companies are part of a \$113 billion metalworking industry that provides more than 500,000 jobs. Businesses in these industries are located in all fifty states and average 50-60 employees per facility.

Your leadership and efforts to move WIA are critical to addressing the immediate needs of thousands of manufacturers around the country. A One Voice December 2010 poll of our members revealed that 85% of respondents expected to face challenges in 2011 recruiting qualified employees. A separate informal survey of roughly 40 companies in our industry showed 315 job openings in just three Central Ohio counties (Ashland, Richland, Crawford). As the economy recovers, filling current job openings and ensuring we have a stable pipeline of qualified employees is essential to ensuring growth and stability for future years. NTMA and PMA represent in-demand industries with job openings across the country who serve as the foundation of our national industrial base.

For this reason, One Voice takes a comprehensive approach to workforce development: including Recruitment, Assessment, Training, Placement, and Retention. We encourage officials

at all levels to also take this approach when addressing how we recruit the youth into the pipeline for emerging in-demand industries, placing the right candidates in jobs that match their skills, and improving incumbent worker training and worker retention. WIA officials should also concentrate on working with industries to help build a workforce pipeline to meet the needs of today and the future. Without direct input from regional companies, local WIA officials will not be able to meet the short or long term workforce needs in the community.

We urge officials at all levels to focus on small business incumbent worker and recruitment programs that make up the majority of employers in the country. Specific outreach to small and medium sized manufacturers could help fill immediate vacancies however, as many of these businesses do not have the internal resources to meet either their current or future recruitment needs as compared to larger companies.

WIA Staff Draft Section Specific Comments:

Information Sharing – Section 116(c)(2) The State shall require the local boards for a planning region to share, consistent with State law, employment statistics, information about employment opportunities and trends, information about the skill requirements of existing and emerging in-demand industry sectors and occupations, information on the skills and workforce development activities, and any skill or services gaps, in the planning region, and other types information that would assist in improving the performance of all local areas in the planning region on the performance accountability measures established under section 131(c).

Comments: Local boards should also partner with individual companies and business trade associations who can serve as valuable resources for data on specific industries, particularly regarding future trends.

Local Workforce Development Board, Membership – Section 117(b)(2)(A)(iii) – are appointed from among individuals nominated by local business organizations and business trade associations;

Comments: This is an important point as national and regional trade associations have intimate knowledge of their industries' needs and trends. Especially in regions with high concentrations of specific industries, a representative or their designee, from a business trade association should serve as a Member of the Local Workforce Development Board.

Youth Innovation and Replication Grants to Eligible Entities – Sec. 143(b)(3)(B)(ii)(III) – A nonprofit organization with expertise serving eligible youth, including a community-based organization or an intermediary.

Comments: Eligible entities should also include non-profit education foundations affiliated with specific industries. For example, the National Tooling and Machining Foundation and Precision Metalforming Association Educational Foundation both provide direct grants and sponsorships for youth programs to train and attract a new generation of workers to their industries. The NTMA and its members founded the National Robotics League (<http://www.gonrl.org>) to help change misperceptions about manufacturing and attract students to high-paying technical careers. WIA officials should include innovative programs such as the National Robotics League into its strategy to recruit the youth into manufacturing industries.

Establishment of One-Stop Delivery Systems – Sec. 221

Comments: In general, small and medium sized manufacturers in particular will benefit from a more clearly defined “system” because they do not have the resources to put such systems in place. However, these should include competency-based apprenticeships in coordination with industry standards. WIA officials should continue to support the development and use of industry-specific and skill-specific standards accepted by individuals, industry and educators. Further, grants under this Act should also go towards training state and local WIA officials on the specific skill standards and needs for select high concentration and emerging in-demand industries. WIA officials should give preference to funding programs that use specific skill standards established for their industry.

Allowable Statewide Employment and Training Activities – Sec 234(a)(3)(A)(i)(III) – developing and implementing industry sector strategies (including strategies involving industry partnerships, regional skills alliances, industry skill panels, and sectoral skills partnerships) in which representatives of multiple employers for a specific industry sector or group of related occupations;

Comments: This provision is essential to meeting the needs of small and medium sized manufacturers. Certain industries have high concentrations in certain regions. In the case of NTMA and PMA, many of our members are in AZ, CA, FL, IL, IN, MA, ME, MI, MO, NY, OH, PA, TX, and WI. In 1995, our Associations established with industry partners The National Institute for Metalworking Skills (NIMS) as the nation’s only ANSI accredited developer of precision manufacturing skill standards and competency assessments representing over 6,000 companies. NIMS certifies individual skills against standards and accredits programs that meet its quality requirements. WIA officials at all levels should work with business trade associations and other skills standards groups to develop the needs for their industries in areas of high concentration and emerging in-demand industries.

Skill Level Assessment – Sec. 234(c)(2)(C) – initial assessment of skill levels (including literacy, numeracy, and English language proficiency), aptitudes, abilities, and supportive service needs;

Comment: WIA officials should work with stakeholders to develop an assessment review of the aptitudes of workers to better direct an individual toward employment which best fits their skills. Especially in regions with high concentration of specific industries, WIA officials and local boards should work with employers to establish an additional assessment of skill training and skill-specific credentialing based on these assessments to make an individual work-ready.

Thank you in advance for your consideration of these comments on these critical issues. Our members increasingly express their concerns about reauthorization of the Workforce Investment Act and programs and partnerships which help fill their needs as employers. We look forward to continuing to work with you and your staff to provide any information you need.

Sincerely,



William E. Gaskin
PMA President



Dave Tilstone
NTMA President