



April 20, 2026

The Honorable Tim Walberg
Chairman
House Committee on Education and the
Workforce
Washington, D.C., 20515

The Honorable Bobby Scott
Ranking Member
House Committee on Education and the
Workforce
Washington, D.C., 20515

Dear Chairman Walberg and Ranking Member Scott:

On behalf of the National Association of Counties (NACo), the National Association of Workforce Boards (NAWB), the National League of Cities (NLC), the U.S. Conference of Mayors (USCM), and the U.S. Workforce Associations (USWA), we write to provide recommendations for the reauthorization of the Workforce Innovation and Opportunity Act (WIOA). WIOA is a critical tool that empowers local governments, workforce boards and other vital local stakeholders to connect individuals with in-demand skills training and education needed by employers.

A thoughtful reauthorization of WIOA—one that balances the needs of workers, learners, employers and their communities—is critically important to our members who serve an integral role in the legislation’s implementation.

As the committee continues to discuss how best to modernize our nation’s workforce system for the future, we urge you to consider the following:

Sufficiently Resource the Public Workforce System

Currently, about seven million Americans are seeking employment, with an estimated 6.9 million openings that businesses are struggling to fill. Through Local Workforce Development Boards (LWDBs) and the more than 2,000 American Job Centers across the nation, our members are helping nearly three million job seekers access quality training and supportive services needed to secure family-sustaining employment. Unfortunately, funding for core Title I WIOA programs eroded steadily over the past several decades, and inflationary pressures have significantly compounded these trends. Increasing investment in WIOA remains an essential way for Congress to ensure that employers have the skilled talent they need to succeed while also supporting some of our most vulnerable and underserved populations’ participation in the wider economy. This is especially important as the national labor force participation rate continued declining over the last year.

Adequate funding for the public workforce system will also help the Committee realize other reauthorization goals, including increasing the availability of high-quality education and training opportunities, ensuring that state and local workforce systems can respond to immediate and longer-term challenges, helping implement Workforce Pell and apprenticeship investments through the WIOA system and responding to expanded work requirements for SNAP and Medicaid beneficiaries.

A newly updated WIOA must substantially strengthen the investment in our nation's public workforce ecosystem to sufficiently meet the needs of today's workers and businesses. Unfortunately, the House's WIOA reauthorization proposal (H.R. 8210) proposes only current enacted funding levels for WIOA Title I Adult and Youth accounts and includes a 4.5% cut to the Dislocated Worker account—an aspect of the proposed legislation that would undermine the public workforce system's ability to respond to significant changes in the economy and labor markets precipitated by Artificial Intelligence (AI). WIOA legislation has historically authorized funding level increases for each year during the law's authorization period. These proposed funding levels for core WIOA Title I programs have broad support, including several analyses highlighting that funding for WIOA could and likely should be even higher—not only to account for these existing needs but to also keep pace with other developed nations that dedicate considerably higher percentages of GDP for workforce development than the United States.¹

Training Requirement for Adult and Dislocated Worker Formula Funds

Our organizations share the goal of improving the efficiency of the publicly funded workforce system and maximizing the availability of training services. We are disappointed to see no additional changes to the training requirement language in H.R. 8210. We strongly believe that a federal mandate would not achieve its intended objective and would be counterproductive, harming some of the nation's most vulnerable and underserved populations that WIOA prioritizes. Limiting the inclusion of supportive or wraparound services, which are critical to successfully completing education and training programs funded under WIOA, will make it more difficult to achieve the legislation's goal of placing more individuals in training. Additionally, a federal training mandate runs counter to the core principles of federal workforce development legislation. The legislation is designed to foster a coordinated and aligned workforce development system under the management of state and local entities, best equipped to understand and respond to the distinct needs of the people and businesses they serve.

Our organizations' members understand the unique employment needs of the local areas they serve, and a federal mandate would remove the local authority necessary to tailor WIOA services to reflect those unique needs. Furthermore, the populations primarily served by WIOA often face barriers outside of skills and education training, requiring supportive services to successfully complete their programs.

We remain concerned that current funding levels are insufficient to meet the demand generated by a new federal training mandate, expanded work requirements and the coordination functions necessary to support successful implementation of broader skills development initiatives noted elsewhere in this letter.

¹ See also: <https://www.nlc.org/resource/how-hard-to-fill-infrastructure-jobs-impact-building-our-future/>; <https://info.jff.org/hubfs/Policy/240321-Policy-SE-WorkforceDevelopmentRecs-FullDesign-JA-v6.pdf>; <https://www.brookings.edu/articles/should-the-federal-government-spend-more-on-workforce-development/>.

We strongly recommend that a federal training mandate not be included in WIOA reauthorization for the following reasons. If a mandate is included, we strongly recommend that it be substantially lower than previous proposals. Additionally, the underlying definition should be expanded further to recognize the critical role supportive services and other key functions of the public workforce system have in ensuring successful access to and completion of training experiences. We also recommend that a training mandate more fully account for all forms of training underway in a local area, especially skills development opportunities created through the direct or indirect leveraging of WIOA resources.

Local Workforce Development Area (LWDA) Redesignation and Single State Designations

Workforce development boards and related local areas necessarily reflect the communities they serve and provide locally developed solutions. We strongly oppose the redesignation and single-state designation processes as structured in H.R. 8210, which eliminate the eligibility criteria and quality assurance guardrails previously required for such designations, including labor force participation and population thresholds that ensured single-state designations were reserved for states with demonstrated need. As outlined, these provisions circumvent the voices of local stakeholders, job seekers and employers. If a redesignation provision must be maintained, we believe a third “fallback” option must be included that allows local stakeholders to negotiate and propose alternative LWDAs for consideration as part of a wider redesignation process. Any fallback option for LWDA redesignation must necessarily garner the support of a majority of LWDBs within a state to ensure that the needs of local communities are prioritized.

Taken together with other aspects of H.R. 8210, such as block grant pilot authorities outlined elsewhere in the current draft legislation, we remain extremely concerned that these provisions will eliminate aspects of current WIOA law that are intended to ensure underserved and marginalized populations are effectively served by the public workforce system, regardless of where they may reside within a state.

To address this risk, we believe that any provisions intended to facilitate changes to LWDAs or eliminate local workforce system infrastructure entirely must result in improved outcomes for participants and employers, including the ability to maintain or exceed current levels of service delivery. States electing to pursue LWDA redesignation, or similar efforts, must be required to attest to these broader objectives and must be evaluated based on these measures within a timeframe that feasibly allows for the reconstitution of an LWDA should a state fail to meet its goals for participant outcomes and service delivery. Finally, we strongly recommend that guardrails around single-state designation be substantially strengthened—clarifying that only states with a population of one million or fewer, or three or fewer LWDBs, may do this—to ensure that rural communities and other historically underserved areas within states are not harmed.

State-level Set-Asides

In addition to the existing Governor’s 15 percent Reserve Fund, H.R. 8210 would allow for an additional 10 percent of WIOA Title I funding to be reserved at the state level for a variety of uses. This has the practical effect of increasing the overall state-level set-aside allowance to 25 percent and would leave even fewer resources for local entities to implement WIOA with fidelity. While we appreciate that certain local stakeholders could be eligible applicants for some of these funds, we remain concerned that these provisions will further reduce resources available at the local level, further exacerbating the challenges noted elsewhere in this letter. We also remain concerned that allowing states to use WIOA’s existing Governor’s reserve funding to meet the related state matching requirements erodes the ability of WIOA to leverage additional state funding for training and employment opportunities.

Our organizations therefore strongly recommend that the current 15 percent Governor’s Reserve—which was increased in the last reauthorization after states struggled to fully spend these funds under WIA—should be maintained.

Digital Literacy

Digital literacy skills are crucial in today's workforce, enabling employees to effectively navigate, evaluate and utilize digital tools and information, fostering efficiency, innovation and adaptability in a rapidly evolving technological landscape. We strongly support expanding the definition of foundational skills to explicitly include digital literacy skills.

Eligible Training Provider Lists

To ensure all eligible training providers (ETPs) and programs position youth and adults to secure high-quality employment opportunities, WIOA should be amended to include specific and more consistent requirements for providers seeking inclusion on the Eligible Training Provider List (ETPL). We recommend establishing clear thresholds and incentives to ensure that all providers and programs provide quality training opportunities that adequately prepare individuals for jobs and career advancement opportunities. We believe that such criteria and accountability measures are attainable, applicable to all ETPs regardless of type and reflect the populations that are predominantly served by WIOA and the public workforce system.

Additional Flexibility for Local Governments and Workforce Boards

Flexibility for local governments and workforce boards is crucial as it allows them to tailor workforce development strategies to meet specific needs and respond swiftly to evolving economic conditions and employment challenges. We support clarifying LWDBs’ budgetary authority over the administration of adult, dislocated workers and youth workforce development activities within LWDBAs, as well as the increases for incumbent worker and on-the-job training caps included in current legislative proposals. We also support allowing for public outreach and marketing of federally funded workforce initiatives to increase the public’s awareness of and familiarity with these opportunities.

Our organizations also support a more inclusive definition of opportunity youth (OY) and the ability to use Individual Training Accounts (ITAs) for youth populations. We were encouraged to note that the mandated split of funds between eligible youth populations was slightly modified, we believe greater flexibility should be provided regarding this requirement. In addition, we remain extremely concerned regarding the overly prescriptive approach to youth work experiences outlined in H.R. 8210. Greater flexibility is needed to successfully operationalize this provision and create high-quality career exposure and experiential work-based learning opportunities for youth participants. As currently structured, such requirements may present a significant disincentive for employers to engage with public workforce systems. We, consequently, recommend greater flexibility be afforded to local stakeholders to implement these requirements.

One-Stop Delivery System

Our organizations were encouraged to note that H.R. 8210 would allow LWDBs to serve as one-stop operators and believe this change must be included in any final legislative proposal for WIOA reauthorization. We also believe it is critical that future legislation provide greater flexibility for LWDBs to expand access to services through a network of affiliated locations, such as libraries and community colleges, and to allow the use of virtual services where appropriate. However, we continue to strongly recommend dedicated funding for the WIOA mandated physical infrastructure

costs of one-stop centers. Dedicated funding for this purpose would free-up funding for training and supportive services.

We appreciate the House's work to date to reauthorize WIOA. We look forward to working with you to thoughtfully and meaningfully update our nation's public workforce system. If you have any questions or would like to discuss these recommendations further, please do not hesitate to reach out to our staff: Jared Grigas (NACo) at jgrigas@naco.org, Gail Ravnitzky Silberglied (NAWB) at silbergliedg@nawb.org, Stephanie Martinez-Ruckman (NLC) at martinez-ruckman@nlc.org, Kathy Amoroso (USCM) at kamoroso@usmayors.org, or Chris Andresen (USWA) Chris.Andresen@dutkogr.com.

Sincerely,



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