



# Utah Department of Workforce Services: A System Integration Model

By Mason M. Bishop

August 2020

## Key Points

- A 1992 legislative audit of Utah's 23 workforce programs delivered through six state agencies revealed system fragmentation that made it difficult for Utah residents to access key services, particularly those from disadvantaged backgrounds.
- Over the past two decades, Utah has developed a particularly innovative approach in its efforts to integrate workforce, employment, and training programs.
- The Utah Department of Workforce Services has continuously worked to integrate these programs so that residents in need can access these services through "one door," systematically reducing the fragmentation that has hampered these programs' effectiveness for decades.
- In addition to program integration, the department has also integrated federal and state monies earmarked for these services through a unique cost model.

---

Research over the past 10 years has shown that the federal government funds over 40 employment and job-training programs across a host of federal agencies.<sup>1</sup> Several programs provide broad services to an array of workers who lack skills and are unemployed or low income, while other federal programs are targeted to certain demographic or socioeconomic groups. At times, federal employment and job-training programs fund similar services targeted to similar populations through multiple federal agencies, exacerbating inefficiencies and duplication in programming.

Within the boundaries of various federal program rules and regulations, states have latitude to design and integrate service delivery systems that

patch together federal and state workforce and social services programs. That latitude is constrained to varying degrees, program by program, which means leadership and political capital are often the price for more efficient and effective service delivery designs.

To that end, some states have put in years of work to integrate programs, change organizational cultures, and maneuver through the state and local politics that accompany reforms and change. A recent American Enterprise Institute (AEI) report documented<sup>2</sup> the degree to which states were effectively integrating workforce-related agencies and programs across seven federal employment and training programs.<sup>3</sup> Clear levels of delineation

developed when grouping state levels of employment and job-training program integration by using the number of separate state agencies and delivery systems as proxies. As these patterns emerged, certain states demonstrated an intentional and strategic approach to integrated service delivery design with a continually evolving mix of programs.

One of these states, Utah, has a particularly intriguing approach and history with many lessons learned and hurdles overcome along the way. While Utah, like many states, has its own identity, culture, and population size, the approach to integrated service delivery design, its lessons, and its successes provide a model for other states to use and incorporate.

This report examines the Utah experience in integrated employment and job-training program delivery—its origins, evolution, and current status. The integration Utah has undertaken and managed for over 20 years includes (1) service delivery integration in which eligible customers of multiple federal and state workforce development programs access services through “one door” and (2) fiscal integration in which federal and state program resources are allocated using a unique cost model.

Utah’s unique history agency and program integration holds lessons useful for creating more efficient and effective workforce development approaches for other states. It also points toward the need for additional flexibility at the federal level to foster realignment and program integration.

## Utah Department of Workforce Services: The Beginning

Public workforce development, employment, and job-training programs at the federal and state levels have been continually plagued with evaluations and audits demonstrating duplication, redundancy, and fragmentation in service delivery. At the federal level, the Government Accountability Office has documented these concerns through reports over many years, specifically in 2011<sup>4</sup> and again in 2019.<sup>5</sup>

As is the case with federal overlap and duplication, the genesis of Utah’s workforce development reforms started with a Utah legislative audit in 1992.<sup>6</sup> Having identified 23 employment and job-training programs across six state agencies, the

legislative auditor found the fragmentation of these services made it difficult for employers and workers to find the services needed. Perhaps more importantly, some of the most vulnerable populations were the most deeply challenged, a problem particularly acute in Utah among displaced homemakers who needed to visit multiple agencies to qualify for, and receive, the array of financial and employment supports crucial for working toward self-sufficiency.

In a hearing before Congress in 1997, Utah state Sen. David Steele testified that he found it distressing that a “duplication of bureaucracy” kept those people needing help from receiving it.<sup>7</sup> Further, Sen. Steele identified a problem with workforce development programs, wherein the evolution and creation of multiple programs over decades included the development of bureaucracies that were a federal-state government hybrid. Sen. Steele concluded that agencies and programs were “accountable to both.” The federal and state governments were in reality “accountable to neither” and not subject to appropriate oversight.

Chief among the recommendations in the Utah legislative auditor’s report was the creation of a strategic planning committee named by the governor. That recommendation became reality in 1994 when Gov. Mike Leavitt announced the Workforce Development Taskforce and focused his State of the State address in 1995 on the overlapping and conflicting rules and regulations surrounding workforce development programs. The taskforce developed a set of principles that guided its work and included customer service, data and results, and private-sector engagement.<sup>8</sup>

These principles were important, but what was decisive was how the leaders of workforce system stakeholders at all levels responded to them. One early indicator of the uniqueness of the Utah effort was the inclusive and positive process the state created for developing reorganization concepts and public support.<sup>9</sup> A July 21, 1995, article in the *Salt Lake Tribune* highlights an important characteristic of the Utah workforce reform movement.<sup>10</sup>

In this article (see the appendix), a group of public employees in the Utah Office of Family Support (OFS)—at the time, Utah’s welfare agency—provided recommendations that envisioned OFS

as part of a new workforce agency. This is the antithesis of bureaucracy, which develops roadblocks for reform and reasons for being left alone. The main idea behind the OFS proposal was that welfare programs should be truly employment focused and move away from entitlement and dependence mentalities.<sup>11</sup>

Workforce Development Taskforce efforts led to the introduction and passage of House Bill 375 during the 1996 Utah legislative session.<sup>12</sup> Gov. Leavitt signed the bill into law, which launched a yearlong process of work groups and planning and contained a delayed implementation date of July 1, 1997, for the launch of the new department.<sup>13</sup> The legislation identified a number of agencies that would be consolidated into the new department, with the largest agencies being OFS from the Utah Department of Human Services and the Utah Department of Employment Security (DES), which housed the unemployment insurance, employment service, and labor market information programs funded by the federal government.

Another key agency targeted for integration was the Office of Job Training (OJT), housed in the Utah Department of Economic Development, which managed Utah's Job Training Partnership Act (JTPA) federal funds. Unlike OFS and DES, which were state-administered programs with services delivered by state employees, OJT funds were passed down to counties and administered locally as mandated by JTPA. Therefore, one issue that needed to be examined during the work group and planning process was the state and local bifurcation of service delivery and how that would be addressed.

During the 1997 Utah legislative session, two bills passed that refined and implemented the final Department of Workforce Services (DWS) design: substitute Senate Bill 166, "Workforce Services and Labor Commission Implementation and Amendments,"<sup>14</sup> and substitute House Bill 269, "Family Employment Program."<sup>15</sup> Senate Bill 166 further refined the organizational and service delivery structure foundation laid in the 1996 House Bill 375, primarily by keeping the Vocational Rehabilitation (VR) program out of the new department, instead calling for a future study around integration while bundling the regulatory functions of the Industrial Commission and creating a new Labor

Commission department. The latter change was a compromise due to concerns voiced by the Utah Manufacturers Association and other industry groups.<sup>16</sup> Senate Bill 166 also defined administrative and service regions, the division structure in the department, and authorized a wide range of employment, job-training, and supportive services.

Substitute House Bill 269 was a key component of creating DWS because it integrated OFS into DWS along with the array of social services programs, which, under Utah policy, focused on employment.<sup>17</sup> Chief among these was the Family Employment Program, which was Utah's answer to the recently passed Temporary Assistance for Needy Families (TANF) program under the federally enacted 1996 Personal Responsibility and Work Opportunity Reconciliation Act.

In addition to organizationally affecting the look of the new department, integration of OFS also had budgetary impacts, as funding for the TANF program at the state level dwarfed the funds received by Utah's other employment and job-training programs. The foundational design of DWS in 1997 launched one of the most integrated workforce systems in the United States.

## **The Utah Model Expands: Additional Integration from 2007 to 2016**

While armed with an understanding of the overall DWS philosophy and basic history, AEI staff visited with Utah DWS officials on-site in Salt Lake City, Utah, in November 2019. The purpose of the roundtable was to interact and understand key variables and perspectives on Utah's integrated service delivery model. While DWS started as a bold vision of integration, it did not end with the initial integration of four separate agencies.

According to the department's website,<sup>18</sup> key agencies and services integrated into the DWS model in 2007, 2008, 2012, and 2016. According to DWS officials, each addition spurred little controversy because they had public policy evidence of the benefits of the previous changes and support from lawmakers who knew constituents were being helped through higher-quality and more efficient service delivery.<sup>19</sup> Table 1 summarizes these changes.

### **Program Integration**

**Table 1. Integration of Additional Program into Utah DWS**

Year	Program Integration	Rationale
2007	Medicaid and Children's Health Insurance Program Eligibility	The integration increased coordination of employment and training programs with key health services that support low-income families in employment transitions, especially if initial employment is lower wage.
2008	Office of Refugee Services	The program prioritized refugee resettlement services in Utah and allowed for service provision to help with successful transition and inclusion into communities.
2012	Division of Housing and Community Development	This included programs that provide support to low-income adults and families, such as Community Development Block Grants, State Small Business Credit Initiative, Utah Weatherization Assistance Program, State Community Services Office, and State Energy and Lifeline.
2016	Utah State Office of Rehabilitation	The move was prompted by data showing that over 70 percent of Vocational Rehabilitation clients were also being served by DWS. This organizational change also coincided with passage and implementation of WIOA and brought a core partner program into the DWS.

Source: Utah Department of Workforce Services, "Department History 1997–2007."

Program integration can be viewed through two different lenses: (1) the macro lens, which is the implications of program integration statewide, and (2) a micro lens, which views implications of program integration at the customer level as part of one-stop service delivery. The Utah experience has important lessons for understanding how both businesses and workers can be served better through leveraging multiple programs to provide the service mix attuned to the individual customer.

**Statewide Consistent Service Delivery.** Utah's workforce development service delivery integration affords it the opportunity to better administer consistent services across the state while providing ample opportunity for regional flexibility to adapt to different population needs and economic conditions.

*Single-State Designation.* A key element of Utah's service delivery design is its designation as a "single-state area" for service delivery purposes under WIOA. This designation allows Utah to operate its

local one-stop service delivery locations, known federally as American Job Centers, by the state DWS, rather than by local public or nonprofit agencies. WIOA mandates the use of "local workforce development areas," which are difficult for governors to change unless local leaders voluntarily give up their designation. The WIOA statute affords these local leaders the control of WIOA Title I federal funds that pass through to the local workforce development area unless an egregious event occurs, such as fraud or misuse of funds.<sup>20</sup>

Utah was granted single-state area status when the department officially launched on July 1, 1997. When the WIA passed in 1998, it grandfathered all existing single-area designations.<sup>21</sup> This same provision was contained in WIOA, whereby any single-state area designated as of July 1, 2013, could remain so.<sup>22</sup>

As of 2017, eight states and the District of Columbia were designated as single-state areas.<sup>23</sup> Under both WIA and WIOA, the US Department of Labor has interpreted that states that do not meet this



grandfather provision cannot petition the department to redesignate as a single-state area.<sup>24</sup> This single-state designation, which was crucial to Utah's program integration model, is not currently available to other states under WIOA.

The single-state area designation is crucial because it allows funds to remain with the state DWS to implement the local one-stop service delivery system while working with local officials to maintain appropriate flexibility for different populations and circumstances. In particular, Utah has implemented and maintained a *consistent* one-stop service delivery system in which the programs are integrated at the state level with funds flowing to operations at the local level. Another way to think about this arrangement is to see it as a "franchise model" in which the state DWS provides the support and guidance to ensure consistent services are provided throughout the state while allowing for local leaders and staff to design the specific service mix needed by local businesses and workers.

*Integration of Labor Market Information.* Another important component identified by DWS staff that has occurred due to statewide program integration is the embedding of labor market information (LMI) into service delivery. During the 2019 roundtable, one participant stated that this was the "foundational backbone" of the integrated service delivery model. Because Utah's one-stop service delivery system contains a multitude of programs, the DWS team has used the data contained within LMI to inform employment counselors, who are working daily with low-income, unemployed, and underemployed participants. Therefore, the most appropriate individualized employment plan for each participant is developed, and the career, training, and supportive services needed to actualize the goals of the plan are identified.

DWS staff also indicated that by embedding good LMI throughout the tools employment counselors use, communications among counselors and with customers are proactive and not reactive. For instance, if a barrier to employment is identified for a particular job seeker, that issue and the resolution through changes to service provision are known by all DWS employees involved in that customer's case. This integrated communication

provides a basis for better and more efficient customer service as people get access to data-driven, one-door comprehensive services, long a goal of the federally mandated one-stop system but seldom achieved meaningfully.

*Case Management.* Connected to good communication is integrated case management. Unlike other states where separate programs and agencies mean a low-income adult participant may have as many as two to three different case managers, in Utah, each participant has one employment counselor who has access to the large array of services funded by the various employment and job-training programs.

DWS staff indicate, for instance, that a majority of individuals they serve are dually eligible for programs, especially TANF and WIOA. They expressed that having customers' case management splintered between a separate WIOA case manager and TANF case manager is not good customer service and creates unnecessary work and time for the customer. In addition to case managers themselves, Utah has one case management system in which activities and outcomes for each participant are available to both the individual employment counselor and the integrated team that may be providing services. Therefore, all DWS staff involved in a case are on the same page, and duplication of effort and staffing redundancy are virtually eliminated.

*Staff Training.* Because all staff serving businesses, workers, and job seekers in Utah belong to the same state agency and the full array of employer and training programs are housed at that agency, staff are consistently trained on programs, policies, procedures, and new initiatives. This integrated training approach is central to consistent and professional service delivery and allows the department to rapidly address issues in real time and ongoing.

The recent COVID-19 crisis presents an example. Because DWS houses the unemployment insurance (UI) program, along with the array of workforce programs—including WIOA Title I, Wagner-Peyser Employment Service, and TANF—as Congress passed Pandemic Unemployment Assistance programs, DWS had the ability to immediately train staff and implement new UI benefits. This also included strategies for reemployment and how

programming is used to support all COVID-19-affected customers.

DWS can train additional department workers on any of the COVID-19-related programs and deploy staff through cross-training and teamwork. It is a more efficient and effective means to implement new crisis-level programming, as DWS leadership has the responsibility for the entire array of programs and can make strategic decisions to meet new service mandates and opportunities.

### **Locally Flexible, Consistent Service Delivery.**

While Utah is a single-department service delivery area as designated by WIOA, in state law, Utah has nine service areas in which advisory boards provide input and oversight into local service delivery. As a result, Utah has the best of both worlds—the flexibility and efficiency afforded by statewide service delivery integration and channels for local input to ensure they meet local residents’ and businesses’ workforce and training needs.

*“One Door” for All Customer Needs.* Unlike other states where local one-stop service delivery depends on program partners negotiating and agreeing to “play in each other’s sandbox,” in Utah, businesses, workers, job seekers, and people needing social assistance all access these services through DWS. As mentioned earlier regarding case management, local flexibility allows each service region to determine how that integrated case management looks at the one-stop level. This is particularly important when comparing urban and rural settings.

In more urban DWS Employment Centers (the one-stop centers in Utah), when a customer enters the door, a triage-type approach awaits. One important principle in the Utah service delivery design is the determination of eligibility for individual programs happens “through the backdoor.” Utah does not conduct a program eligibility assessment when first interacting with a customer; instead, it conducts more of a needs assessment whereby the department determines what the person requires by way of services and then matches to the program offering those services.

For instance, a low-income adult enters an Employment Center. That person meets with an initial employment counselor to provide background on his or her situation—for example, employment

status, education background, immediate financial need and situation, and whether the person has dependents. If a small team of employment counselors needs to engage with the customer or with the customer’s case, then that can occur.

Based on this initial assessment, an employment plan or similar case management tool may be used. After determining immediate and longer-term services needed, DWS then works to determine eligibility for appropriate programs. The key is DWS access to the multitude of federal employment, training, and social services programs from which to draw resources to provide a holistic solution for the customer.

Likewise, for business customers, DWS has business development solutions in which various services are available, such as recruitment support, grants, incentives, tax credits, veterans hiring initiatives, and employee skill development.<sup>25</sup> At the local level, DWS employs workforce development specialists who focus on delivering solutions to businesses. Just like with worker- and job-seeker customers, Utah businesses have “one door” to go to for a menu of services related to workforce development. Utah businesspeople are not contacted by a myriad of separate agencies and people working on independent initiatives.

In states with separate agencies and programs, an employer may be contacted about hiring an individual with disabilities, veterans, or low-income adults with tax credit subsidies—all from different agencies and staff. In contrast, Utah has established a system in which one person can offer a menu of options to businesspeople.

*One-Worker, One-Plan Approach and Data Systems.* DWS staff highlighted the importance of workers and job seekers having only one plan with goals and services outlined. Unlike states where programs are not integrated and customers may go through multiple planning exercises with different case managers or employment specialists, every DWS customer has only one plan. It is then up to the DWS employment counselor to use the resources needed to help implement the plan with the customer.

The “one plan” concept has become especially important as programs have migrated and integrated into DWS. DWS and Office of Rehabilitation Services staff provided the integration of the VR

program as an example. Because VR was operated out of the Utah State Office of Education before the DWS merger, it had its own intake processes, case management, and employment planning. Yet, data showed that many VR customers were also customers of DWS.

With the integration of VR into DWS, while efficiency dictated maintaining separate computer case management systems, DWS and VR staff pointed out that customers are receiving one, team-based case management and staffing assistance approach that leads to *one employment goal* for the customer. Because many VR customers are also eligible for TANF or other social services assistance, they typically have a traditional DWS employment counselor and a VR counselor assigned to them who provide the full array of training and supportive services available.

This example brings to the fore another benefit of a one-plan, one-team approach. For individuals with disabilities, who have assistance needs to become fully employable, there is no confusion in Utah of where to go, and all DWS and VR facilities are disability accessible. DWS staff can build on the strengths of program experts across the full spectrum of programs. At the 2019 meeting, DWS and VR staff mentioned that organizational cultural differences affect how staff look at their own job roles and missions and how the merger of VR with DWS brings all strengths together where staff of many different programs begin to realize how they can better support each other's work.

## Fiscal Integration

Perhaps one of the most unique and innovative features of the Utah DWS integration model is how costs are shared among the large number of federal and state programs administered by DWS. This is a tremendous undertaking that the federal government approved in 1997 at the onset and has served the department well over its two-decade history.

For other states, an agency like DWS provides services using federal funds. The federal government requires that the agency uses a process known as “cost allocation” to appropriately charge the right amount of funds to the right program. Federal grant funds to states and other public, private, and nonprofit organizations are governed by

the Office of Management and Budget's (OMB) Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (known as “Uniform Guidance”). The Uniform Guidance is a “government-wide framework for grants management [and] is an authoritative set of rules and requirements for federal awards that synthesizes and supersedes guidance from earlier OMB circulars.”<sup>26</sup>

Cost allocation is defined as “the process of assigning a cost, or a group of costs, to one or more cost objective(s), in reasonable proportion to the benefit provided or other equitable relationship.”<sup>27</sup> Given the wide array of federal costs and programs that DWS administers, a process for legally allocating these costs was needed that could serve the federal government's interest in accountability and the state government's need for efficient administration.

**DWS Interaction with Federal Agencies.** The cost allocation plan for DWS was first approved in time for implementation on July 1, 1997,<sup>28</sup> receiving sign-offs from the US Departments of Labor, Health and Human Services, and Agriculture. These agencies, along with several other subagencies, continue to have federal oversight responsibilities for the programs DWS administers.

In Utah's case, however, regular reporting on expenditures has been assigned to one cognizant agency—the US Department of Health and Human Services (DHHS), which has a single point of contact to deal with cost allocation issues. This DHHS representative is responsible for coordinating with the other federal cabinet departments in reviewing, adjusting, and approving Utah cost reports. In essence, DHHS serves as the federal account representative for fiscal and cost allocation issues for DWS.

During the roundtable discussion, the DWS staff said this single federal agency pathway saved them time, confusion, and multiple communications. They indicated that anytime Utah DWS has a cost allocation issue, DHHS handles it, and DHHS, in turn, works with the requisite federal agencies to gain approvals or reconcile differences. This is a best practice that is important to Utah's integration efforts.

## Random Moment Time Samples Allocation: Methodology and Practice

The random moment time samples (RMTS) methodology solves the time sheet reporting dilemma. RMTS works under the idea that a statistically valid sample of random moments in time with random employees using a defined set of employees provides an accurate reflection of employee workload. Simply described, each day, DWS employment counselors, eligibility workers, and VR workers are polled randomly throughout the day. These polling moments are called “RMTS strikes.” When a strike occurs, the worker reports on the activity that he or she is working on at that moment.

This is how the RMTS process works. First, DWS uses a third-party vendor to use a web-based computer system to generate the RMTS strikes. DWS reports that approximately 3,550 random moments of time are used each quarter to draw a picture of activities against costs. Each day, emails are sent to random employees one minute before their moment in time.

At the allotted time, the employee answers a set of scripted questions to determine what activity he or she is doing at that moment and the funding program aligned to that activity. For instance, if an employee is working with a low-income single parent who is TANF eligible, then the strike is aligned to TANF for cost allocation purposes. If the same parent is not eligible for TANF, the strike may go against the WIOA Adult Program.

The RMTS methodology informs how costs of executive and administrative personnel are allocated. The department has what it calls “z pools,” which help allocate costs when employees are not sampled because they do not work directly with customers. These z pools provide flexibility for DWS to charge federal programs appropriately for costs that are not easily discernable due to organizational structure and employee roles.

Utah’s approved WIOA State Plan incorporates the RMTS cost allocation methodology. DWS uses RMTS data to track expenses monthly and organize costs by offices, programs, and activities. Using monthly expense reports, managers at all levels of the DWS organization can track their budgets against actual expenditures to see if spending is on track or whether budgets overestimate or underestimate actual costs. This budget and expenditure process is a key management tool overall as the comprehensive nature of DWS’s funding sources means it can make appropriate adjustments to services, initiatives, and recruitment of types of workers.

**DWS Innovation in Cost Allocation.** DWS officials provided the AEI authors with a PowerPoint DWS uses to educate new employees about the department’s cost allocation processes and how DWS integrates its financial management activities. DWS has established a hierarchical structure aligned to various cost codes to appropriately categorize costs according to the DWS structure. The purpose of identifying these different cost centers is to assign costs to separately measure the costs of activities based on the organization (divisions, offices, or units) within DWS responsible for that activity.

DWS has four ways to allocate costs: (1) using time sheets to charge programs directly for personnel costs, (2) using case counts from electronic systems, (3) examining workload, and (4) using random moment time samples (RMTS) that calculate work burdens for the entire DWS workforce

based on a statistically valid sample of randomized employee reports of work activity. Of the four options, the first three are used rarely and usually only when it is easy to apply costs against one federal program. For instance, a Medicaid-eligibility worker who is only conducting Medicaid eligibility would have costs directly allocated to the Medicaid program. However, DWS officials stated that the vast majority of DWS workers fall under the RMTS methodology for allocating costs and billing programs.

The RMTS methodology is used in lieu of burdensome time sheet reporting by employees. Without RMTS, DWS workers would need to fill out daily time sheets with estimates as to how time was spent in programs that make up the DWS budget. As the number of both federal and state programs administered by DWS has grown, the complexity of time reporting might have become a barrier to customer service diminishing the time



spent working with customers. RMTS reduced administrative burden and increased hands-on time with customers.

From the monthly expenditure reports, cost allocation processes occur quarterly, meaning calculations of costs for federal programs are apportioned four times per year and provide an ongoing picture of how programs are contributing to the overall DWS services. DWS has identified the following benefits of its cost allocation methodology and processes.

- Services are delivered through a unified, single-state agency with one leadership structure; a single, established brand; and a single set of recognizable service delivery locations (DWS Employment Centers) that make for a customer-friendly service environment.
- Service delivery is streamlined, and business and job seeker or worker customers have a one-door state agency to receive all employment, training, and supportive services needed for high-quality jobs and careers.
- Funding sources are fully braided, meaning all federal resources are used to ensure that individuals at different places receive the services mix that makes the most sense for them.
- Integrated technology solutions provide economies of scale and resources for use by DWS employees throughout the organization's hierarchy.

## Conclusion and Success Factors

Using the department's history, program documents, and feedback from DWS executives and staff, a clear set of important success factors provide insight for workforce development professionals and better operation and results for the public workforce systems in the states.

**State and Local Leadership.** From the onset of negotiations to create DWS through the recent merger of the Utah Office of Rehabilitation Services, leadership and willingness to use political

capital to achieve policy goals are absolutely essential. When the idea for a consolidated department was first explored in the mid-1990s, Utah Gov. Mike Leavitt and Lt. Gov. Olene Walker provided key leadership and personally worked with legislators, civic leaders, business leaders, and public employees to gain trust and understanding for why creating a new department was worthwhile.

Recently, DWS officials point to legislative leadership that facilitated the Office of Vocational Rehabilitation and DWS merger. The Office of Vocational Rehabilitation was facing some management issues, and Utah legislators conducted audits and program reviews that showed that VR and DWS shared common customers. The legislature then passed bipartisan merger legislation that included discussions with each agency's employees. This led to a more seamless transition and mitigated conflicts, which allowed the best of each organization's cultures to flourish and improve services for individuals with disabilities. One DWS employee summed up the leadership issue by saying that without leadership, taking on a large organizational and program integration effort is fundamentally impossible to accomplish.

**Comprehensive Integration for Improved Customer Service.** DWS officials emphasized that integration is time intensive. Employees at all levels invest significant time in accomplishing new integration efforts and maintaining practices. For instance, managing the RMTS system and the constant monitoring of RMTS strikes against the DWS budget requires constant attention to details and analysis.

Integration efforts invest significant amounts of both political capital and time. DWS meeting attendees emphasized that it is easier to maintain separate programs and "silos," meaning it is easier to administer and monitor single programs or initiatives than to figure out how to blend funds and service delivery systems. However, DWS officials stated, "It is worth it." The improvements in customer service and administrative efficiencies that lead to enhanced services to the same customers of multiple programs "is the right thing to do."

**Program and Fiscal Integration to Enhance Services for Common Customers.** While integration

does provide inherent cost savings through streamlined administrative functions and technology systems, these cost savings should not be the driving force or principle for investing in integration and streamlined services. From the onset of the creation of DWS, data have provided insight and guidance into how best to integrate programs. Data have provided important insights, such as the percentage of people who access various DWS or non-DWS programs and services.

Additionally, Utah has consistently taken a broader view of integration—addressing programs that not only provide employment and training services but also support workers with transitioning into the labor market and maintaining self-sufficiency through work. Examples of this include integration of Medicaid eligibility, low-income housing, and community development programs into DWS. By thinking holistically, Utah policymakers have continued to evolve the mission of DWS to address the

full array of services needed for low-income individuals to sustain long-term employment and career paths ultimately independent of government benefits.

**A Clear Vision and Purpose for Program and Fiscal Integration.** The Utah DWS integration example is emboldened by a vision for integration since the inception of DWS. Since its creation, political, policy, and agency leaders have provided a clear vision and purpose for DWS, which is to provide comprehensive and high-quality services to workers, job seekers, and businesses.

Particularly, DWS is grounded in the notion that federal and state employment and training programs often serve the same people. By recognizing this, challenges are no longer about separate programs and staff holding on to their share of funding for particular services; rather, the challenge becomes seamlessly braiding funding and training agency staff on how best to serve customers with all integrated resources.

## About the Author

**Mason M. Bishop** is an adjunct fellow at AEI and the owner and principal at WorkED Consulting, where he works on federal and state workforce development and higher education policies, practices, and programs. He served as deputy assistant secretary for employment and training at the US Department of Labor from 2001 to 2007.

## Appendix

**Table A1. Department of Workforce Services, State Fiscal Year 2019**

Program	Actual Expenditures	Source of Expenditures				
		General Fund	Federal Funds	DED Credit	Restricted	Transfer
NBAA - STATE OFFICE OF REHABILITATION						
NBA - SOR Executive Director	693,534	388,089	301,294	3,567	59	525
NBB - Blind & Visually Impaired	3,422,187	2,458,404	918,859	44,924	—	—
NBC - Rehabilitation Services	39,510,386	15,695,791	23,449,984	364,548	6	57
NBD - Disability Determination	13,153,531		13,153,531	—	—	—
NBE - Deaf & Hard of Hearing	2,905,104	2,347,539	329,763	181,540	4,354	41,908
NBF - ASPIRE Grant	6,693,578		6,693,578	—	—	—
TOTAL NBAA - STATE OFFICE OF REHABILITATION	\$66,378,320	\$20,889,823	\$44,847,009	\$594,579	\$4,419	\$42,490
NCAA - OFFICE OF CHILD CARE						
NCD - Early Childhood Teacher Training	109,977	109,977	—	—	—	—
TOTAL NCAA - OFFICE OF CHILD CARE	\$109,977	\$109,977	\$0	\$0	\$0	\$0
NJAA - ADMINISTRATION						
NJA - Executive Director	873,567	229,652	468,123	6,813	17,223	151,756
NJT - Administrative Support	8,549,078	2,698,182	4,018,103	58,876	155,403	1,618,514
NJE - Communications	1,188,045	300,153	626,698	9,251	23,490	228,453
NJU - Internal Audit	979,642	269,441	532,001	7,756	(4,651)	175,095
NJH - Human Resources	1,579,238	408,872	831,120	15,753	31,344	292,149
TOTAL NJAA - ADMINISTRATION	\$13,169,570	\$3,906,300	\$6,476,045	\$98,449	\$222,809	\$2,465,967
NJBA - OPERATIONS AND POLICY						
NJJ - Utah Data Research Center	532,837	522,542	—	—	—	—
NJL - Workforce Research and Analysis	2,381,881	218,410	2,010,872	15,675	339	136,585
NJP - Eligibility Services	62,938,337	18,523,673	16,740,242	840,336	687,919	26,146,167
NJD - Workforce Development	65,114,311	16,499,876	41,845,654	25,093	4,196,352	2,547,336
NJB - Facilities and Pass-Through	9,440,876	2,386,721	5,434,162	81,916	163,946	1,374,131
NJY - Information Technology	34,556,760	6,648,119	13,721,638	848,162	2,279,375	11,059,466
NJF - Temporary Assistance for Needy Families	44,767,989	5,506,512	39,261,477	—	—	—
NJS - Nutrition Assistance	96,844	48,455	48,389	—	—	—
NJG - Refugee Assistance	4,973,536	—	—			
NJW - Workforce Innovation & Opportunity Act Assistance	3,007,837	5,944	3,001,893	—	—	—
NJR - Child Care Assistance	63,212,317	894,986	62,317,331	—	—	—
NJM - Trade Training & Subsidies	499,404	—	499,404	—	—	—
NJX - Other Assistance	2,259,414	58,322	(19,957)	—	1,994,036	227,013
TOTAL NJBA - OPERATIONS AND POLICY	\$293,782,343	\$51,313,560	\$189,798,641	\$1,847,182	\$9,321,967	\$41,500,993
NJCA - NUTRITION ASSISTANCE						
NJZ - Nutrition Assistance	23,9723,636	—	239,723,636	—	—	—
TOTAL NJCA - NUTRITION ASSISTANCE	\$239,723,636	\$0	\$239,723,636	\$0	\$0	\$0
NKAA - GENERAL ASSISTANCE						
NKA - General Assistance	3,582,752	3,332,752	—	—	—	250,000

**Table A1. Department of Workforce Services, State Fiscal Year 2019 (Continued)**

TOTAL NKA - GENERAL ASSISTANCE	\$3,582,752	\$3,332,752	\$0	\$0	\$0	\$250,000
<b>NLAA - UNEMPLOYMENT INSURANCE</b>						
NLA - Unemployment Insurance	15,529,745	6,574	1,399,507	402,408	1,124,356	—
NLJ - Adjudication	3,320,133	802,726	2,322,894	29,451	70,183	94,879
TOTAL NLAA - UNEMPLOYMENT INSURANCE	\$18,849,878	\$809,300	\$16,319,401	\$431,859	\$1,194,439	\$94,879
<b>NRAA - OPERATION RIO GRANDE</b>						
NRA - Operation Rio Grande	8,322,770	8,322,770	—	—	—	—
TOTAL NRAA - OPERATION RIO GRANDE	\$8,322,770	\$8,322,770	\$0	\$0	\$0	\$0
<b>NSAA - HOUSING AND COMMUNITY DEVELOPMENT</b>						
NSA - HCD Administration	1,040,613	58,723	491,981	(67,039)	556,948	—
NSC - Community Development	6,529,992	268,721	5,315,150	427,751	518,370	—
NSE - Housing Development	1,790,338	90,414	701,602	—	498,322	500,000
NSF - Community Services	3,895,252	899,924	3,432,644	—	(437,316)	—
NSG - Home Energy Assistance Target	19,061,662	68	19,040,045	21,549	—	—
NSH - Homeless Committee	27,980,841	3,924,835	2,037,058	18,140	22,000,808	—
NSN - Weatherization Assistance	8,823,335	4,748	7,951,618	866,969	—	—
TOTAL NSAA - HOUSING AND COMMUNITY DEVELOPMENT	\$69,122,033	\$5,247,433	\$38,970,098	\$1,267,370	\$23,137,132	\$500,000
<b>NTAA - COMMUNITY DEVELOPMENT CAPITAL BUDGET</b>						
NTE - Permanent Community Impact Board	53,504,657	—	—	—	53,504,657	—
TOTAL NTAA - COMMUNITY DEVELOPMENT CAPITAL BUDGET	\$53,504,657	\$0	\$0	\$0	\$53,504,657	\$0
<b>NWAA - SPECIAL SERVICE DISTRICTS</b>						
NWA - Special Service Districts	3,268,578	—	—	—	3,268,578	—
TOTAL NWAA - SPECIAL SERVICE DISTRICTS	\$3,268,578	\$0	\$0	\$0	\$3,268,578	—
<b>WORKFORCE SERVICES FUNDS</b>						
2115 - Navajo Revitalization Fund	1,680,743	—	—	—	—	—
2135 - Uintah Basin Revitalization Fund	7,603,426	—	—	—	1,680,743	—
2151 - Qualified Emergency Food Agencies Fund	1,101,936	—	—	—	1,101,936	—
2260 - Child Care Fund	4,053	—	—	—	4,053	—
2265 - Refugee Services Fund	22,451	—	—	—	22,451	—
2345 - Utah Community Center for the Deaf Fund	317	—	—	—	317	—
2355 - Individuals with Visual Impairment Fund	23,500	—	—	—	23,500	—
5110 - Unemployment Compensation Fund	154,681,055	—	4,438,270	—	150,242,785	—
7355 - Individuals with Visual Impairment Vendors Fund	123,081	—	—	—	123,081	—
Olene Walker Housing Funds (Grants)	1,573,163	—	—	—	1,573,163	—
TOTAL WORKFORCE SERVICES FUNDS	\$166,813,725	\$0	\$4,438,270	\$0	\$162,375,455	\$0
<b>DEPARTMENT TOTALS</b>	<b>\$936,628,239</b>	<b>\$93,931,915</b>	<b>\$540,573,100</b>	<b>\$4,239,439</b>	<b>\$253,029,456</b>	<b>\$44,854,329</b>

Source: Nancy Hobbs, "State Proposes New Agency to Help People Get Jobs," *Salt Lake Tribune*, July 21, 1995.



## Notes

1. Government Accountability Office, “Department of Labor Should Assess Efforts to Coordinate Services Across Programs,” March 28, 2019, <https://www.gao.gov/products/GAO-19-200>.
2. Mason M. Bishop, *Landscape Study of Federal Employment and Training Programs*, American Enterprise Institute, January 28, 2020, <https://www.aei.org/research-products/report/landscape-study-of-federal-employment-and-training-programs/>.
3. The programs include workforce Innovation and Opportunity Act (WIOA) Title I Adult Program, WIOA Title I Dislocated Worker Program, WIOA Title I Youth Program, WIOA Title II Adult Education and Literacy Program, Wagner-Peyser Employment Service program, Vocational Rehabilitation program, and Temporary Assistance for Needy Families (TANF) program.
4. Government Accountability Office, “Multiple Employment and Training Programs: Providing Information on Co-Locating Services and Consolidating Administrative Structures Could Promote Efficiencies,” January 13, 2011, <https://www.gao.gov/products/GAO-11-92>.
5. Government Accountability Office, “Department of Labor Should Assess Efforts to Coordinate Services Across Programs.”
6. Utah State Legislature, “A Review of The Coordination of Utah’s Employment and Training Programs,” [https://le.utah.gov/audit/92\\_10rpt.pdf](https://le.utah.gov/audit/92_10rpt.pdf).
7. *Hearings on Reform of the Major Federal Job Training, Adult Education, and Literacy Programs: Hearings Before the Subcommittee on Postsecondary Education, Training, and Life-Long Learning*, 105th Cong. 26 (1997) (statement of David Steele, State Senator of Utah).
8. Christopher King and Dan O’Shea, “Utah Case Study,” in *The Workforce Investment Act in Eight States: State Case Studies from a Field Network Evaluation*, vol. 2 (Washington, DC: Rockefeller Institute of Government, 2004).
9. The author participated in the Office of Family Support proposal development and drafting process.
10. Nancy Hobbs, “State Proposes New Agency to Help People Get Jobs,” *Salt Lake Tribune*, July 21, 1995.
11. Hobbs, “State Proposes New Agency to Help People Get Jobs.”
12. The 1996 Utah House Bill 375 language can be found at Utah Government Publications, “Laws of the State of Utah Passed at the 1996 General Session and 1996 Second Special Session,” 1996, <https://digitallibrary.utah.gov/awweb/awarchive?item=57464>.
13. University of Utah Law School, “Recent Legislative Developments,” *Utah Law Review* 1997, no. 4 (1997): 1175–76.
14. The 1997 substitute Senate Bill 166 language can be found at Utah State Legislature, “Workforce Services and Labor Commission Implementation and Amendments,” April 17, 1997, <https://le.utah.gov/~1997/htmldoc/sbillhtm/SBo166S1.htm>.
15. The 1997 substitute House Bill 269 language can be found at Utah State Legislature, “Family Employment Program,” <https://le.utah.gov/~1997/bills/hbillenr/HBo269S1.htm>.
16. University of Utah Law School, “Recent Legislative Developments,” 1176.
17. The author was directly involved in the development and negotiation of both SB 166 and HB 269 and has firsthand knowledge of the policy goals surrounding the Department of Workforce Services (DWS) creation.
18. Utah Department of Workforce Services, “Department History (1997–2017),” <https://jobs.utah.gov/departments/dwshistory.html>.
19. Group interview and presentations were held at DWS headquarters in Salt Lake City, Utah, on November 6, 2020.
20. Workforce Innovation and Opportunity Act of 2014, 1 USC § 106(b) (2014).
21. Workforce Investment Act of 1998, 1 USC § 116(b) (1998).
22. Workforce Innovation and Opportunity Act of 2014, 1 USC § 116(d) (2014).
23. Donna Counts, “WIOA: A Bird’s-Eye View of the State Implementation of the Workforce Innovation and Opportunity Act,” Council of State Governments, March 30, 2017, <https://knowledgecenter.csg.org/kc/content/wioa-101-birds-eye-view-state-implementation-workforce-innovation-and-opportunity-act>.
24. US Department of Labor, Employment and Training Administration, “Waivers,” <https://www.dol.gov/agencies/eta/wioa/waivers>.
25. Utah Department of Workforce Services, “Business Development Solutions,” <https://jobs.utah.gov/employer/solutions.html>.
26. Grants.gov, “OMB Uniform Guidance (2014),” <https://www.grants.gov/learn-grants/grant-policies/omb-uniform-guidance-2014.html>.
27. US Department of Labor, “Cost Allocation 101” (PowerPoint presentation), [https://grantsapplicationandmanagement.workforcegps.org/-/media/Communities/grantsapplicationandmanagement/Files/PPT-and-Attachments/PPT/Cost\\_Allocation.ashx](https://grantsapplicationandmanagement.workforcegps.org/-/media/Communities/grantsapplicationandmanagement/Files/PPT-and-Attachments/PPT/Cost_Allocation.ashx).

28. Utah Department of Workforce Services, “Making It Work: A History of the Department of Workforce Services (1996–2004),” <https://jobs.utah.gov/cdo/images/timeline/dwshistory9604.pdf>.

© 2020 by the American Enterprise Institute for Public Policy Research. All rights reserved.

The American Enterprise Institute (AEI) is a nonpartisan, nonprofit, 501(c)(3) educational organization and does not take institutional positions on any issues. The views expressed here are those of the author(s).