

June 30, 2023

Mr. Christopher Coes
Assistant Secretary for Transportation Policy
U.S. Department of Transportation
1200 New Jersey Ave SE,
Washington, DC 20590

Re: USDOT Request for Information on Transportation Equity Action Plan Update (Docket Number: DOT-OST-2023-0087-0002)

National Skills Coalition (NSC) is a national organization fighting for inclusive, high-quality skills training so that people have access to a better life, and local businesses see sustained growth. We engage in analysis and technical assistance, organizing, advocacy, and communications to improve state and federal skills policies. NSC works to build networks representing all areas of the workforce development system including businesses, workers, colleges, community organizations, public officials, and advocates. We engage these networks to craft policy proposals and mobilize them to win concrete policy change. The investments in infrastructure made by the federal government over the past two years create an opportunity to not only address crumbling infrastructure assets but also invest in a diverse, multigenerational workforce trained to power our infrastructure.

Infrastructure investments are expected to create millions of good-paying jobs over the next decade, but the success of planned infrastructure projects hinges on a new generation of workers, particularly workers of color, women, and immigrants, having access to the education, skills training, and economic supports they need to access the good jobs and careers that are created. Employers too will require workers with the skills necessary to fill new and existing jobs, especially as millions of workers in the construction trades are set to reach retirement age in the next ten years.

In order to address the growing need for additional skilled workers in infrastructure sector jobs and create equitable access to these good jobs, NSC identified five recommendations for implementation of infrastructure legislation:

- Expand equitable access to skills training offered through registered apprenticeship programs and workforce programs at community and technical colleges so that more people of color, women, and young people can access new jobs in the infrastructure field.
- Invest in industry partnerships in the infrastructure field and support their capacity to engage in equity-advancing practices. Industry partnerships have the potential to expand access to quality infrastructure careers for women, people of color and others who, historically, have not had access to these careers. Since industry partnerships intentionally broker training, hiring, and advancement opportunities between workers

and employers within a particular sector, they can be used to disrupt occupational segregation if they are equity focused.¹

- Provide economic supports to make skills training and career transitions possible. Economic supports can fill resource gaps caused by structural racial and gender inequities and exacerbated by pandemic-related job loss. For instance, investments in affordable, accessible, high-quality childcare will be essential if we want women to be part of the 21st century infrastructure workforce. These economic supports are particularly important for workers who are entering an apprenticeship or a first job in the field and have not yet realized the full earnings potential of an infrastructure career.
- Incentivize and support training, hiring, and career advancement of local residents. The Infrastructure Investment and Jobs Act (IIJA) is intended to invest in local communities – including those that have been under-resourced – so that everyone has access to rails and roads, clean water, high-speed internet, clean energy, and climate resilient infrastructure. We can bring even more benefit to local communities by incentivizing training, hiring, and career advancement of people who live in the communities where infrastructure projects are taking place for newly created infrastructure jobs.
- Collect data and report on jobs and training outcomes of federal infrastructure spending with attention to race, gender, and geography. Collecting data allows us to track the progress of efforts toward building an inclusive infrastructure workforce, federal agencies can mandate data collection on who is trained and hired through federal infrastructure spending, disaggregated by race/ethnicity, gender, geography, and other factors. When we have good data, we can use it to hold our policymakers accountable to an equitable infrastructure workforce.

When implemented together, these policy recommendations can ensure that infrastructure investments support people powered infrastructure and drive an inclusive economy.

The Need for Equity in the Infrastructure Workforce

Although many jobs within the infrastructure sector are good jobs with family-sustaining wages, long-term career progression, and economic mobility, the industry is predominantly white and male. Historical and present-day discrimination and structural racism as well as limited access to training and targeted supports, have limited Black and Latino workers' access to good infrastructure careers. And, where workers of color are represented in the infrastructure industry, they are disproportionately concentrated in lower-paying occupations that may lack opportunity for career advancement. Women, too, are significantly underrepresented in the infrastructure workforce because of several factors including unwelcoming and even hostile

¹ Skills for and Inclusive Economic Recovery: A Call for Action, Equity, and Accountability. National Skills Coalition. <https://nationalskillscoalition.org/wp-content/uploads/2020/09/09-2020-NSC-Skills-for-an-Inclusive-Economic-Recovery.pdf>.

environments and limited access to critical supportive services such as childcare that is available during non-standard work hours.

Expanding access to infrastructure jobs through training and supportive services and initiatives to eliminate barriers for people of color and women can help drive diversity in the infrastructure sector. Taken together, these efforts can help spur innovation, mitigate workforce shortages, and ensure an infrastructure workforce that draws on the full range of talent in today's demographically diverse workforce. The need is urgent: While white workers represent 72% of workers over age 55, that number shrinks to just 57% of young workers ages 16-24. If the infrastructure sector cannot compete effectively with other sectors to attract and retain workers of color, it will face an uphill challenge to meet current and future workforce needs and drive economic growth.

NSC recognizes that the Department of Transportation (DOT) has already taken steps to support greater equity in the infrastructure workforce, and NSC welcomes the opportunity to share information that can further support the Department's goals.

Equity Performance Metrics, Data Sets, Tools, and Research

1. Consider the equity-related performance measures in the Department's Fiscal Year (FY) 2024 Performance Plan and FY 2022 Performance Report (a) Which of DOT's equity-related performance measures do you think are most relevant to accomplishing the goals that are most important to you, and why? This could help inform which performance measures we focus on achieving through the Equity Action Plan.

In general, NSC's priorities are aligned with the Department's strategic objectives related to equity; however, many of the goals that fall under these objectives are insufficient to truly support DOT's focus areas: Expanding Access; Wealth Creation; Power of Community; and Proactive Intervention, Planning, and Capacity Building. In addition to sharing feedback on the ways DOT's goals support these objectives, NSC is including suggestions that can help the Department more fully meet these aims.

- NSC supports DOT's strategic objective to "support American workers and businesses to create good jobs while building stronger and more sustainable regional and local economies." Our partners know that a critical component of building stronger economies is ensuring that workers have equitable access to good jobs which includes access to training and supportive services. The Department's goal under this strategic objective to "Increase employment in transportation and warehouse sector by 7% annually" is insufficient alone. The Department should amend this goal to include a sector equity component so that not only does the transportation workforce grow, but it does so in a manner that brings more people of color and women into the good jobs within the sector.

- NSC also sees the importance of the Department’s strategic objective of “expand[ing] affordable access to transportation jobs and business opportunities by removing barriers for individuals, businesses, and communities.” The performance goal under this objective aims to reduce the cost of transportation by 5%. Achieving this goal will undoubtedly be helpful to individuals for whom transportation costs are an impediment to accessing work and training; however, barriers to transportation jobs extend beyond the cost of transportation. Measurement of the Department’s efforts to expand access to training, skills attainment, and other supportive services as well as support more welcoming working environments for workers of color and women should also be included in departmental goals.
- NSC is in alignment with DOT that policies should be put in place to “reduce the effects of structural obstacles to building wealth.” Working to ensure that more contract dollars go to small, disadvantaged businesses and rural and tribal areas is an important aspect of facilitating wealth creation in communities that face structural obstacles. Wealth creation is also built through access to good jobs which is not addressed in the performance goals. NSC encourages the Department to adopt a performance goal that seeks to drive an increase in the percentage of workers in the infrastructure sector who come from underrepresented communities including women and people of color. In order to assess the success of this goal the Department should track DOT funded training and education as well as performance related to hiring and advancement and report out demographic information disaggregated by race, ethnicity, gender, English language proficiency, income, and geography.
- “Ensuring that equity considerations for disadvantaged and underserved communities are integrated into the planning, development, and implementation of all transportation investments” is another strategic objective that aligns with NSC’s goals for infrastructure implementation. The Department’s goal under this objective of increasing the number of DOT discretionary grant applicants from disadvantaged communities who have never applied for DOT funding before by 2025 could be made more effective and impactful by seeking to increase the number and amount of funds awarded to communities who have not previously applied for DOT funding. Industry sector partnerships can play a key role in helping to achieve this goal as partners with successful grant experience can provide critical support and additional capacity to disadvantaged communities and eligible entities within a region that have not previously applied for DOT funds.

(b) DOT's performance measures are national-level measures. Which of DOT's equity-related performance measures can be helpful to influence and advance equity at a local level? Please provide examples, where available.

- The strategic objective of “empowering communities through innovative public engagement with diverse stakeholders and thought leaders to foster exchange and ownership” includes a goal that by 2030 all 50 states and the top 100 Metropolitan

Planning Organizations (MPO) adopt a quantitative equity screening component to their Statewide/ Transportation Improvement Program (STIP/ TIP) transportation planning development processes. The goal seeks to “address equity in the transportation planning process and provide opportunities for meaningful public input into transportation decisions.” If implemented well, more states and MPOs will build meaningful and ongoing relationships with individuals, businesses, and organizations in local communities. These efforts can help facilitate the connections that will be necessary for eligible entities to not only successfully apply for competitive grants that prioritize workforce and equity components but also support workforce training and create access to good infrastructure jobs in underrepresented communities.

2. Through previous requests for information and other engagements, the Department has identified data sets, research, and tools to help assess and address systemic barriers to opportunities and benefits for underserved communities through our programs and policies.

(a) What recent data sets, research, or tools that have been published should U.S. DOT consider to inform updates to the next phase of our equity work, including assessing and addressing transportation-related disparities? Information submitted via the RFIs listed above does not need to be resubmitted through this RFI.

- NSC previously released Data for an Inclusive Economic Recovery, a report that details the importance of the collection and disaggregation of data, emphasizes accountability and stakeholder engagement, and provides recommendations that have the potential to mitigate structural inequities and shape implementation of infrastructure investments if implemented. The full report can be found at <https://tinyurl.com/NSC-DIER2022>.
- DOT should use data published by the Internal Revenue Service, the Social Security Administration and the Department of Labor’s Employment and Training Administration to analyze and report on the existing demographics and wages of transportation workers, and the paths they took to get there which would help workforce development programs identify the most successful career pathways for others to enter those occupations.

(b) What are some areas where you need more robust data sets, data standards, guides, or other tools to help you influence and advance equity at a more local level (e.g., State, Territory, Tribal nation, Region, County, City, Community)?

While DOT is tracking some data from grants, there does not appear to be a coordinated effort to track the outcomes of competitive grant awards to help the public understand how many jobs are being created, what kind of training is being offered, and if the training provided and jobs created are benefitting traditionally underrepresented populations. DOT should mandate data collection on who is trained and hired through federal infrastructure spending, disaggregated by race/ethnicity, gender, geography, and other factors.

DOT should establish a handful of common measures (no more than 6-10) that every state and eligible entity that receives funding for workforce development must report on. These common measures should encompass both *individual* outcomes (program graduation rate, job placement rate, wage level, type of credential/certification earned, occupation trained for) and *system* outcomes (programs designed and launched; curricula created [should have a public repository of curricula for sharing]; number of training slots created; etc.)

In addition to this mandatory quantitative data, DOT should encourage collection and reporting on optional qualitative data that may help states and other eligible entities inform decision making. NSC suggests three categories in particular:

- Qualitative data from program participants about what inspired them to enroll in digital skills training and how they have defined success for themselves
- Qualitative data from program providers about how they define success in digital skill-building and what they have learned from trying to apply the required measures listed above
- Qualitative data from employers about how they gauge digital skills among jobseekers and workers, and their experiences hiring individuals who have completed Digital Equity Act-funded training programs.

3. Please provide examples of how you or the organization that you represent have taken action or partnered with other entities, either governmental or non-governmental, to influence and advance transportation equity. Where possible, please briefly explain how your example reflects the Department's focus areas (i.e., Expanding Access; Wealth Creation; Power of Community; Proactive Intervention, Planning, and Capacity Building).

NSC is working to craft a playbook that helps network partners understand the funding opportunities made available by the Bipartisan Infrastructure Law and how partners can work together to ensure both federal and state funding is being allocated toward workforce investments in an equitable manner. Specifically, the Playbook encourages partners to advocate for state investments in equitable transportation workforce planning, industry sector partnerships, economic supports that mitigate barriers to infrastructure jobs, local hiring practices, access to skills training and career and technical education programs and data collection to help assess program outcomes. The playbook is slated for publication in late summer/ early fall 2023.

In addition to work undertaken by NSC directly, our network partners continue to lead the way on advancing transportation equity. A few examples are included below:

Virginia Infrastructure Academy

The Virginia Infrastructure Academy (VIA) coordinates the efforts of the Virginia Community College System's (VCCS) 23 community colleges to train thousands of workers for high-demand jobs in the infrastructure sector, such as building roads and bridges, solar panel installation, and fiber broadband expansion. VIA developed a set of core competencies and credentials that give students the skills they need for entry-level infrastructure jobs. Once students are hired, then colleges will work with employers to move students through pathways to more technical, higher-paying infrastructure careers. Some of the key partners that VIA works with include Virginia Asphalt Association, Heavy Construction Contractors Association, Virginia Transportation Construction Alliance Dominion Energy, and Virginia DOT.

VCCS also works with the Virginia Economic Development Partnership's Office of Education Economics (VOEE) and the Virginia Employment Commission (VEC) to track long-term data outcomes. These new partnerships will allow VCCS to track outcomes over the course of several years – including average salaries of students before entering the program, how many students complete programs, and what jobs they have. In addition, VCCS will be able to disaggregate the data by race, ethnicity, and gender, facilitating VCCS's ability to demonstrate the long-term gains for these students and evaluate how VIA programs advance racial equity. Strong state data systems can help determine if high quality infrastructure training programs lead students, and especially students of color, to quality infrastructure careers.

The Virginia Infrastructure Academy Program is a strong example of expanding access to infrastructure jobs through training as well as an example of the power of community as VIA works throughout the state with colleges, employers and state entities to drive results.

Machinists Institute

The Machinists Institute is a program working to expand access to good infrastructure jobs by providing outreach and rapid training on job sites in parts of Washington state that are hard to reach. These programs include both classroom instruction and hands-on training in a state-of-the-art facility. The pre-apprenticeship programs typically take 12 weeks to complete, and the registered apprenticeship programs take four years to complete. Program participants are taught varying levels of skills, such as electrical and hydraulics, and how to service and fix equipment. Every graduate of the pre-apprenticeship programs thus far has been a person of color, with roughly a quarter of graduates being women.

In order to address barriers, a full-time student services specialist interacts directly with students to address any challenges they are facing, ranging from transportation issues to academic support. The program is also working to support the feasibility and design of an on-site childcare center, and has earmarked money for building and land acquisition. When the center opens, it will be geared toward providing childcare for non-traditional hours to better suit the needs of those involved on-the-job training or classes outside of regular business hours. The Machinists Institute is also working to ensure that instructors are better able to understand

the needs of participants. They have been able to bring in female and bilingual latino instructors and all potential instructors undergo implicit bias training.

Syracuse Build

Syracuse Build is a local initiative led by community partners in Syracuse, New York to support the training, hiring, and career advancement of local women and people of color in construction trades to expand access to infrastructure jobs.

Syracuse Build provides a variety of services to mitigate barriers to training and employment. For example, throughout their training, participants earn wages and receive financial empowerment coaching, have access to navigators that help address issues like transportation and childcare, and engage in networking and mentorship opportunities with local trade unions and community groups like 100 Black Men of America.

The apprenticeship readiness program also establishes a system to continuously build a local, skilled talent pool that meets the needs of employers. This is made possible through strategic planning by community partners. Leaders representing the city, employers, and trades unions collaborate to identify upcoming infrastructure jobs and evaluate demands for local workers. These partners work together to conduct research, understand industry needs, and map out a curriculum that aligns with upcoming jobs ensures buy-in from all parties that contribute to the success of residents participating in the pre-apprenticeship program.

4. Please provide examples where you see the Department's work to advance equity has impacted your organization or community, including the extent to which you have seen equity incorporated into DOT's implementation of the Bipartisan Infrastructure Law and Inflation Reduction Act. Where possible, please briefly explain how your example reflects the Department's focus areas (i.e., Expanding Access; Wealth Creation; Power of Community; Proactive Intervention, Planning, and Capacity Building).

The Department's work to advance equity is very clearly reflected in competitive grant opportunities which prioritizes applications that address how projects will support equity, create good jobs and train individuals for those jobs. NSC has been working with partners to share these opportunities and position network partners to collaborate with entities applying for competitive grant funding. The Department can better ensure that equity objectives are met – particularly the objectives to expand access and create wealth – by supporting additional tracking and reporting on outcomes disaggregated by race/ethnicity, gender, geography, and other factors.

Thank you for your consideration of National Skills Coalition's comments on the USDOT Request for Information on the Transportation Equity Action Plan. If you have any questions, please contact Megan Evans, Senior Government Affairs Manager, at megane@nationalskillscoalition.org.