

To Whom It May Concern,

On behalf of the Michigan Works! Association, I am writing in response to Docket Number: ETA 2022-0003, Wagner-Peyser Act Staffing.

The proposed rule as written would end Michigan's long-standing service delivery model which uses local staff to ensure quick and efficient responses. Michigan Works! agencies would no longer be able to deliver Wagner-Peyser Employment Services, and instead, State of Michigan staff would become responsible for these functions at reduced staffing capacity and resources compared to the existing model.

We anticipate at least 20 of the 99 Michigan Works! American Job Centers will be forced to close, primarily those serving rural communities.

Michigan residents who are most vulnerable would encounter forced discontinuation of critical workforce services, with 80% of Michigan Works! agencies expecting to reduce services to veterans, 62% eliminating and 18% reducing immigrant and refugee navigator services, 63% eliminating and 31% reducing Clean Slate services for formerly incarcerated people, and 86% of Michigan Works! agencies having to reduce the more than 9,000 career awareness events we coordinate – mostly for youth and college students – including the award-winning MiCareerQuest events.

Additionally, a dramatic reduction of business services can be expected if the proposed rules are put into effect. For example, 88% of Michigan Works! agencies would be forced to decrease assistance with recruiting and retention services, 100% would be forced to reduce and eliminate job fairs, and 87% would be forced to cut support of industry-led collaboratives.

If implemented, the new staffing rule would also result in job loss across the existing workforce system in Michigan, as we anticipate the separation of approximately 220 full-time equivalent employees. The proposed rules would reduce staffing capacity to roughly 90 full-time state merit staff who will have to assume a caseload of nearly 1,000 people per year without the direct connections to other programs, or funds to serve businesses and job seekers.

What follows are comments that our workforce system in Michigan has developed in response to this proposed rule change.

Sincerely,



Ryan Hundt, CEO
Michigan Works! Association