To: Biden-Harris U.S. Department of Labor Agency Review Team  
From: National League of Cities  
Re: Policy Areas of Importance to Cities, Towns and Villages  
Date: January 11, 2021

As the voice of America’s cities, towns and villages, representing more than 200 million people across the country, the National League of Cities (NLC) looks forward to working with the Biden-Harris Administration and with the team at the U.S. Department of Labor. Cities exist at the forefront of economic changes sweeping across America and have unique insight and understanding of the challenges and opportunities facing workers and businesses. Under the Workforce Innovation and Opportunity Act, cities and local workforce boards represent the ‘last mile’ of federally funded investments in workers and have perhaps the greatest influence on the ultimate success of these investments. City leaders are best positioned to see the critical linkages between education, workforce training, and labor market demand, and city leaders are hopeful that the next Secretary of Labor will consider cities as core partners and implementers of an agenda that advances the interests of all workers and employers across the country.

As cities look to partner with the Administration in the first 100 days and beyond, we hope that the following areas will be taken into consideration:

**Direct Fiscal Relief to Cities, Towns and Villages**
Cities are the engine of our nation’s economy and essential to America’s economic recovery. From infrastructure like roads and water to libraries and schools, to workforce development centers and childcare, cities towns and villages create the conditions that drive new business, spur innovation, and attract talent and investment. However, America’s communities are hurting. As the findings of NLC’s 2020 City Fiscal Conditions report reveals, America’s cities are experiencing the fiscal consequences of the coronavirus pandemic-downturn at an unprecedented speed – and like recent recessions, it will take years for municipal budgets to recover from the impact of COVID-19. Cities, towns and villages across our country need direct fiscal relief to communities of all sizes to ensure that essential city services and important community-anchoring programs can remain in operation.

**Regular Communication with Stakeholders and Increased Staffing Capacity**
Local leaders are committed to intergovernmental partnership, through federalism, requiring a cooperative partnership among local, state and federal governments that must be strengthened through all levels of government. Local leaders look forward to working collaboratively with the Biden-Harris Administration and in a manner that recognizes the importance of a federal-local partnership. As such, we hope that the Department of Labor will institute regularly stakeholder meetings, as well as include cities at the table when rules are being crafted to provide their important perspective and to ensure that rules are effective, implementable, offer local flexibility, avoid a “one-size-fits-all” approach and avoid any unfunded mandates.

As businesses and workers get back on their feet cities need a strong partner that can help enforce laws that ensure workers receive compensation for their labor and educate business owners on best practices to ensure compliance. As cities work to stabilize their local economies post COVID-19, we need divisions like Wage and Hour and Occupational Safety and Health Administration fully staffed to help our residents.

**Continued Partnership with Local Elected Officials on Workforce Policy and Labor Market Data**
The COVID-19 pandemic has disproportionately impacted workers and those trying to enter the workforce who were already vulnerable: young workers, people of color, immigrants, gig workers, under-or long-term unemployed and those who work in sectors characterized by unpredictable and low-wage work. Local elected
Continued Investment in Apprenticeship Programs
With unemployment rates at historically high levels, the Biden Administration can strongly invest in programming that will put Americans on a path to skilled, good-paying jobs through apprenticeship programs that provide a pathway to successful careers, including industry and sector partnerships and pre-apprenticeship programs for workers with barriers to employment. Registered apprenticeships have an 80-year history as an effective approach to meeting growing workforce needs and connecting workers to good jobs and careers. With increased funding and awareness in recent years, apprenticeships continue to grow in number and expand into new and emerging industries including health, technology, finance and transportation. Cities, towns and villages seek increased federal investment and commitment for these time-tested programs to address workforce needs across diverse American communities. Cities, town, and villages are a critical part of the infrastructure needed to scale Register Apprenticeship, and federal investments should reflect the vital role cities play in bringing together employers and educators to meet critical workforce needs.

Expand Pell Grants to Include High-Quality, Shorter-Term Programs
Expand Pell grants and other financial aid programs to cover workforce skills training connected to strong labor-market demand and outcomes, such as short-term programs leading to in-demand credentials. Many higher education and short-term certificate training programs are not covered by financial aid, but they are often the stepping-stone to workforce re-entry, a better job and a meaningful wage. The Department of Labor, in partnership with the Department of Education, can also promote stackable short-term credentials that connect to degree programs that provide long-term opportunities for career progression. We strongly encourage the department to focus on program quality and equity. By expanding the Pell grant program, the federal government can ensure that more individuals gain access to critical training and education so they can access skilled jobs that remain unfilled in our communities. Such opportunities, if well-designed, can promote new opportunities for traditionally underserved populations, and for workers with high barriers to employment. COVID-19 has highlighted that workers especially need more support to respond to changes in technology that require updated skill sets.

Create New Pathways to Success
Create new pathways to successful careers for unemployed and underemployed Americans through expanded investments in skills training and wraparound supports, such as childcare and transportation. Addressing the needs of Opportunity Youth, 16- to 24-year-olds who are not employed and not in school, is a critical component of this work, as is addressing the downstream consequences of mass incarceration via continued/expanded reentry employment and training efforts. By creating skills training and new pathways to technical jobs for individuals facing barriers to employment, President-elect Biden can meet urgent employment gaps that exist across America’s communities. Additional wraparound services like expanded childcare can be a game changer for individuals who might not otherwise be able to enter the workforce. The COVID-19 pandemic has highlighted the workers most likely to struggle are those in essential but low wage frontline positions, who have...
preexisting health conditions or childcare responsibilities that preclude them from working, where women of color are dramatically overrepresented.

**Partner with the U.S. Department of Education to Address Workforce Continuum**
The Department of Labor, in close partnership with the Department of Education (ED), has an important role to play in promoting and supporting local connections between the K-12 system and higher education institutions and the public workforce system, as well as programs under the Carl D. Perkins Career and Technical Education Act. City leaders look forward to working with the Administration on local efforts to scale apprenticeship, work-based learning and other career-focused programs that marry education and job training as well as support wrap-around services that enhance student success and credential attainment and reconnect dropouts with educational pathways. This includes programs like Summer Youth Employment, that provide important opportunities to our nation’s youth each summer and in some cases year long and supporting a resumed partnership with the Office of Career, Technical, and Adult Education at ED in strengthening education pathways for Opportunity Youth. Expanding investments in local initiatives as well as federal technical assistance must also prioritize serving workers with barriers to employment.

**Supporting Essential Workers**
Many of those now deemed essential workers, like grocery store employees, delivery drivers, and home health care workers, have historically been low wage jobs and may not be covered by traditional workplace protections. Some sectors we have relied on for vibrant communities, like the restaurant industry and boutique shopping, have been decimated by the pandemic. And the pandemic has dealt a striking blow to a childcare sector that was already struggling and not meeting the needs of all families. Research shows that 4.5 million childcare slots could be lost permanently. And further still, city employees who are vital to the daily operations of our nation’s municipalities are faces furloughs due to inaction of Congress on direct fiscal relief to cities, towns and villages. As the Administration works to support essential workers, it is critical to take a broad view of the workers, industries and services that will be paramount to our strong local economic recovery.

**Partner with the U.S. Department of Health and Human Services on Substance Use and Mental Health**
Despite passage of the federal Mental Health Parity and Addiction Equity Act (Parity Act) over a decade ago, implementation and enforcement of the law have been uneven, and thus, people needing care for mental health (MH) or substance use disorders (SUD) often face discriminatory insurance barriers. The Parity Act mandates that health insurance plans’ standards for MH and SUD benefits be comparable to, and be no more restrictive than, the standards for other medical/surgical benefits. Yet individuals and families seeking care across the country are often rightly overwhelmed by the difficulty in finding accessible and affordable treatment for MH/SUDs through their insurers. To improve coverage and access, DOL and CMS should improve consumer education, awareness, and information about the Parity Act so consumers know their rights, can meaningfully access the benefits available under their plans, and can file complaints and appeals when they are unable to access those benefits in a timely and reasonable manner.

**Partner with the U.S. Department of Transportation on Infrastructure Jobs**
As the Biden-Harris Administration looks to address the growing infrastructure needs of our nation roads, bridges, water systems and broadband, a critical component of that work addressing the skills that will be needed to fill the jobs that are created through this work. 4.6 million additional trained workers will be needed by 2022 to keep pace with current hiring needs in the infrastructure sector alone, to say nothing of the need with additional investments. It is imperative that the Department partner with the Department of Transportation in ensuring that there is a sufficient pool of trained workers to fill the essential jobs that will be created through this work.