Pennsylvania Department of Labor & Industry

High Priority Occupations Policy

April 2017
**Purpose**
The commonwealth’s workforce development strategy targets education and training investments to High Priority Occupations, or HPOs. HPOs are used to identify workforce programs that provide individuals with the knowledge and skills necessary to enter, maintain or advance their careers.

**Definition**
HPOs are job categories that are in demand by employers, have evolving skill needs, and are likely to provide family-sustaining wages. They are occupations that generally require some amount of training but no more than a four-year college degree. Local HPOs were identified via a two-step process (described in detail in the Background section of this document) developed by the commonwealth’s workforce development strategists.

**Background**
As mentioned previously, the commonwealth’s workforce system developed a two-step process to define HPOs. The HPO process is conducted annually to ensure that public investments keep pace with rapidly changing technology and local labor market demand.

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**Step 1**

*Occupational Data Analysis* to create a baseline list of high-demand, higher-wage occupations within each local Workforce Development Area using the best available labor force data. A detailed explanation of this analysis is provided in Box 1.

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**Step 2**

*Expert Input and Regional Factors* to identify occupations likely to emerge based on economic development investment, new labor market trends or business demand, as well as those that are too new or regionally specific to be captured by the data.
**Box 1  Occupational Data Analysis**

Annually, the Pennsylvania Department of Labor & Industry prepares a baseline list of HPOs that are in demand by employers, have evolving skill needs, and are likely to provide family-sustaining wages. This list is created using federal, state, and local labor market data as well as projections based on U.S. Department of Labor models. Occupations are selected based on the following criteria:

1. **Annual Job Openings**: To identify occupations that are in demand by employers, employment projections data are used. The thresholds were based on the total number of annual openings available across all occupations in an area. Minimum thresholds vary by local area based on the total number of annual openings available across all occupations (Appendix A):

2. **Job Quality**: The primary factor used as proxy for job quality is the provision of a self-sustaining wage. The Center for Workforce Information & Analysis, within the Pennsylvania Department of Labor & Industry, will calculate weighted self-sufficiency wages for all Local Workforce Development Areas. In areas where the self-sufficiency wage exceeds the statewide threshold ($33,086 - 200 percent of the federal poverty level for one adult and one child in 2016), the statewide wage will be used as the threshold instead.

3. **Additional Screens**: Workforce dollars should be targeted to occupations with shortages of workers, not occupations with excess supply. No single statistic definitively determines whether a workforce shortage exists in a particular area, so additional assessments are made based on the data described below. Occupations with indications of labor market slack are removed from the initial HPO list based on the following standards:
   a. **Employment loss**: With employment loss greater than 10 percent, experienced dislocated workers would be available to fill job openings. Over the 2012-2014 timeframe, average employment across all occupations increased at a rate of 1.0 percent.
   b. **Nominal wage decline**: Average wage growth across all occupations in the 2014-16 period equaled 3.9 percent. The rate of inflation equaled 1.0 percent. Therefore, nominal wage loss is one indicator of a slack labor market in particular occupations.
   c. **Occupational unemployment rates of 10 percent or higher**: From 2012-16, the average unemployment rate across all occupations was 5.2 percent. Higher levels of unemployment indicate that unemployed workers should be available for job openings.
   d. **Ratio of training completers to job openings**: A ratio of training completers to job openings should be a good indication of how well the “supply” of trained workers is meeting industry “demand.” However, the completion data is sometimes unreliable and may not capture area differences. Occupations for which significant evidence exists that the commonwealth is training more people than there are job openings were eliminated from the initial list. The threshold was set at 300 percent, or three trained individuals for every one opening.

Recognizing that data alone does not completely capture workforce trends, the second step of the HPO process aims to refine the initial HPO list based on input from workforce development and other professionals including economic developers, business and labor leaders, and educators. Critical to this effort is the contribution of local area collaborations of these professionals, who work together to define immediate and anticipated training needs and other human resource challenges.

It is critical that modifications to baseline HPO lists do not undercut the strategic focus underlying the commonwealth’s workforce reforms. Proposed additions to the HPO lists must be supported by sound rationale and documented evidence of industry demand and pay above the current wage threshold. Occupations paying below this level may be included only if (a) substantial opportunities exist for advancement into higher-level jobs or (b) opportunities exist to invest workforce dollars in ways that improve job quality and/or strengthen career advancement.
HPO Additions and Eliminations
All additions to the HPO lists are subject to approval by the Secretary of Labor & Industry. The mechanisms through which occupations may be added to or removed from an HPO list, as described below, will differ slightly based on the process timing.

Department Process
A panel of experts will review the initial HPO lists and make recommendations for additions and eliminations based on their knowledge. The rationale for adding or subtracting HPOs can include:

- Significant investment in a sector that will lead to new demand for a skilled workforce or new skill sets that could not be captured by historic data;
- Evidence that appropriate workforce development investment could substantially improve wage or work environment conditions, or promote the development of career advancement and career opportunities;
- Targeted economic development and other financial investments;
- Removal of occupations that are not a good investment of commonwealth funds or do not meet economic development and quality of life goals; and
- Research conducted for special reports that identify new and emerging occupations in a specific field that are in demand or targeted for workforce investments.

Stakeholder Process
In some cases, statistical analysis and projections can miss differences and dynamics in local labor markets. To ensure that the HPO list has appropriate input from local stakeholders, the following petition process was put into place.

1. Local Workforce Development Boards can petition the Center for Workforce Information & Analysis individually or collaboratively to add HPOs to their local list(s) based on one of three justification options described below (form found in Appendix B). Petitions must be submitted within 45 days after the initial HPO list is released, or before the date outlined by the Center for Workforce Information & Analysis. Occupations successfully added via this petitioning process will appear on the relevant local HPO list for three years.

   a) Unmet Employer Demand: Hiring activity by local employers that is not captured in traditional data sets. Justification must include letters from at least three businesses that when combined have a total number of job openings that meets the local openings threshold for each of the next three years (Appendix A). A sample employer letter is provided in Appendix C for reference.

   b) Career Pathway: Occupation represents an entry point into a career pathway leading to other HPOs. Justification must include letters from at least three businesses that when combined have a total number of job openings (specific to the petitioned occupation) that meets the local openings threshold for each of the next three years (Appendix A). A sample letter is provided in Appendix D for reference. In addition to the letters, an explanation of the career progression from the petitioned occupation to other HPOs must be included with specific mention of any job experience and/or education requirements needed to advance along the outlined career pathway.

   c) Local Workforce Initiatives/Sector Partnerships: Local efforts by a group of workforce development partners have determined a need for the occupation(s). Documentation should include why the occupation was chosen, why it is difficult to fill positions, and why it is a good career within the area. Data should include total job openings and self-sustaining wages that exceed the local thresholds (Appendix A). A sample letter is provided in Appendix E for reference.
d) Each petition will be scored in four categories: basic petition criteria, openings, wages, and employer letters and/or documentation. These categories are weighted differently based upon the type of petition being submitted (Appendix F). Each petition will be scored out of a possible 20 points.

2. **Local educational institutions (K-12 and higher education) and economic development agencies** can petition their Local Workforce Development Boards to propose adding an HPO. The petitioning organization must provide documented evidence to their Local Workforce Development Board that wage threshold and job openings criteria described in the previous section are met.

3. **Appeal process**: In the event that the Local Workforce Development Board denies a request from a local educational institution or economic development agency, these entities can appeal directly to the Center for Workforce Information & Analysis. The appeal must provide documentation of the demand for the occupation as listed above and will be reviewed by committee.

**HPO Exceptions**

*Emergency Petition Additions*

New dynamics in a labor market may emerge over the course of the year, after the HPO lists have been established. If new information or changed circumstances warrant additions, Local Workforce Development Boards may petition the Center for Workforce Information & Analysis for additions to the list outside of the initial petition period, so long as appropriate documentation and rationale is provided, including a brief explanation as to why the need is an emergency.

*Customized and On-the-Job Training*

Several workforce programs are designed to fund customized or on-the-job training that results in immediate job placement. The HPO list does not preclude programs from continuing to engage in this type of training, subject to their own program guidelines. Most programs will require that the wage floor established above be met for these training activities.

*Pre-employment, basic skills and literacy education*

The HPO list does not prevent programs that currently provide pre-employment and basic skills training, or literacy and English as a second language education, from continuing to do so. These education and training activities are governed by individual agency or program policy.

**Yearly Changes to the HPO Lists**

When the HPO lists are released each year, some occupations are new additions and others have been eliminated since the previous year. Below is a brief description of how the departments of Labor & Industry and Education are handling those annual fluctuations in the HPO list, by specific funding program.

*Workforce Innovation and Opportunity Act Training* (Department of Labor & Industry)

Approved training programs under the Workforce Innovation and Opportunity Act for the given funding year are based on current local HPO lists and managed by the Bureau of Workforce Partnership & Operations within the Department of Labor & Industry. An eligible training provider must offer a program aligned to one of the designated HPOs in their area. This connection is established solely via the CIP-SOC crosswalk tool that aligns education and training programs with the occupations that require those skill sets.

If an occupation has been removed from the HPO list, the Bureau will ensure that all participants still enrolled in the training are grandfathered through until completion, but that no new enrollees will be accepted. Local Workforce Development Boards can use the initial petition period to help ensure that programs will continue to be eligible for the upcoming year.
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High Priority Occupation (HPO) Petition Form

1. Workforce Development Area(s):

2. Occupation Code(s) (SOC or O*Net):
   Occupation Title(s):

   If applicable, list any CIP codes related to this petition:

3. Petition Type:  □ Regular  □ Emergency

4. Petition Justification: (Select all that apply)
   □ Unmet Employer Demand – Hiring activity by local employers that is not captured in traditional data sets. Justification must include letters from at least three businesses that when combined have a total number of job openings (specific to the occupation petitioned) that meets your local openings threshold for each of the next three years. Employer letters must also document wages paid at or above the local self-sufficiency level. Attach all supporting letters to this petition form.
   
   Number of Letters Attached: __________________
   Total Number of Job Openings/Year: __________________

   □ Career Pathway – Occupation represents an entry point into career pathways leading to other HPOs. Justification must include letters from at least three businesses that when combined have a total number of job openings (specific to the occupation petitioned) that meets your local openings threshold for each of the next three years. Employer letters should also include data on wages paid to these positions. In addition to employer letters, an explanation of the career progression from the petitioned occupation to other HPOs must be included with specific mention of any job experience and/or education requirements needed to advance in the career pathway. Attach all supporting documentation to this petition form.

   □ Local Workforce Initiatives/Sector Partnerships – Local efforts by an established group of workforce development partners have determined a need for the occupation(s). Documentation should include a description of the local efforts, including the name or description of the partnership, and details on why the occupation was chosen, why it is difficult to fill positions, and why this is a great career within the area. The summary of the occupational need should include total job openings and self-sustaining wages that exceed the local thresholds. While letters from specific employers are not necessary, the documentation should list a few examples of area employers that support the occupation. Attach all supporting documentation to this petition form.

5. Submitting on behalf of: (Select all that apply)
   □ Workforce Development Board
   □ Community Colleges (list)
   □ Career & Technical Centers (list)
   □ Other Training & Educational Institution(s) (list)

   ☑

   Workforce Development Board Authorization
   (This section to be completed by appropriate Workforce Development Board staff only)

   By submitting this application, I, as a representative of the Workforce Development Board, affirm that the facts set forth in it are true and complete.

   Date
   Name (printed)
   Signature

   This application can be e-mailed to workforceinfo@pa.gov with the subject High Priority Occupations or mailed to the Center for Workforce Information & Analysis, Attn: High Priority Occupations, 651 Boas St., Room 220, Harrisburg, PA 17121

2017 HPO Petition Form
Sample Unmet Employer Demand Letter: APPENDIX C

Below is a sample letter that can be used to document employer demand. All bolded items should be changed to fit with the occupation and region as appropriate.

June 1, 2017

Center for Workforce Information & Analysis
Attn: High Priority Occupations
651 Boas Street, Room 220
Harrisburg, PA 17121-0001

Dear CWIA Director:

As one of the many companies successfully doing business in the (INSERT) Workforce Development Area, we want to express our support to add the following occupations to the local WDA High Priority Occupation List:

Dental Assistants (31-9091)
Dental Hygienists (29-2021)

We verify that we will have at least XX openings for qualified Dental Assistants, as well as XX openings for Dental Hygienists, for each of the next three years. The average annual wage we pay our Dental Assistants is $XX,XXX, and the average annual wage we pay our Dental Hygienists is $XX,XXX.

The demand for trained workers continues to grow in the Workforce Development Area and a pipeline of skilled workers needs to be established to address the changing workforce. We strongly support the addition of this occupation to our local High Priority Occupation list so state and federal funds can be expended in this occupation allowing schools to receive funds to support this program and to be eligible for grant funding opportunities.

If you have any questions, you may contact me at:
Sample Career Pathways Letter: APPENDIX D

Below is a sample letter that can be used to document career pathways between occupations. All bolded items should be changed to fit with the occupation and region as appropriate.

June 1, 2017

Center for Workforce Information & Analysis
Attn: High Priority Occupations
651 Boas Street, Room 220
Harrisburg, PA 17121-0001

Dear CWIA Director:

As one of the many companies successfully doing business in the (INSERT) Workforce Development Area, we want to express our support to add the following occupations to the local WDA High Priority Occupations List:

**Nursing Aides (31-1013)**
**Orderlies (31-1015)**

We verify that we will have at least XX openings for qualified Nursing Aides, as well as XX openings for Orderlies, for each of the next three years. The average annual wage we pay our Nursing Aides is $XX,XXX, and the average annual wage we pay our Orderlies is $XX,XXX. While these wages may fall below the self-sufficiency level, these are entry-level occupations that many people use to start their nursing career. With additional training such as (INSERT) we will promote or re-hire these workers as Licensed Practical & Licensed Vocational Nurses (29-2061), which we pay an average annual wage of $XX,XXX. From there they can continue their training and education to become a Registered Nurse (29-1141), which we pay an average annual wage of $XX,XXX. These latter two occupations are already designated as High Priority Occupations in my area.

The demand for trained workers continues to grow in the Workforce Development Area and a pipeline of skilled workers needs to be established to address the changing workforce. We strongly support the addition of this occupation to our local High Priority Occupation list so state and federal funds can be expended in this occupation allowing schools to receive funds to support this program and to be eligible for grant funding opportunities.

If you have any questions, you may contact me at:
Sample Local Workforce Initiatives/Sector Partnership Letter: APPENDIX E

Below is a sample letter to be used to document a local workforce initiative or sector partnership. All bolded items should be changed to fit with the occupation and region as appropriate.

June 1, 2017

Center for Workforce Information & Analysis
Attn: High Priority Occupations
651 Boas Street, Room 220
Harrisburg, PA 17121-0001

Dear CWIA Director:

I am writing on behalf of the (INSERT) Partnership to request that the addition of the following SOC codes to the local WDA High Priority Occupation list:

Dietitians & Nutritionists (29-1031)
Medical Assistants (31-9092)
Speech-Language Pathologists (29-1127)

(INSERT description of the partnership, its mission, goals, and examples of active employers)

The (INSERT) Partnership has specifically identified challenges in finding qualified candidates for each of the three occupations to meet their current business needs. These jobs are not entry-level positions; they pay a family sustaining wage, and require significant educational requirements that are lacking in candidates within the region.

We verify that the employers within our partnership will have at least XX openings for qualified Dietitians & Nutritionists for each of the next three years, and pay an average annual wage between $XX,XXX and $XX,XXX. They will also have at least XX openings for qualified Medical Assistants for each of the next three years, and pay an average annual wage between $XX,XXX and $XX,XXX. Lastly, they will have at least XX openings for qualified Speech-Language Pathologists for each of the next three years, and pay an average annual wage between $XX,XXX and $XX,XXX.

The demand for trained workers continues to grow in the (INSERT) Workforce Development Area and a pipeline of skilled workers needs to be established to address the changing workforce. We strongly support the addition of this occupation to our local High Priority Occupation list so state and federal funds can be expended in this occupation allowing schools to receive funds to support this program and to be eligible for grant funding opportunities.

If you have any questions, you may contact me at:
Scoring Rubric for Petitions: APPENDIX F

Below is a summary of the number of points available for each section of the petition. The maximum number of points that can be awarded to any petition is 20.

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<th>Career Pathway</th>
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