



November 12, 2022

U.S. Department of Commerce
CHIPS Program Office, National Institute of Standards and Technology
1401 Constitution Ave. NW
Washington, DC 20230

Dear Ms. Chambers,

We are writing in response to the National Institute of Standards and Technology (NIST) CHIPS Program Office (CPO) on October 12, 2022, notice and request for information (RFI) on the “Implementation of the CHIPS Incentives Program.” Our organization, America Forward, leads a Coalition of more than 100 social innovation organizations working together to advance equitable, innovative, and effective public policies in education, early childhood, workforce development, youth development, and poverty alleviation. We are writing in collaboration with members of the America Forward Coalition that have demonstrated strong outcomes in serving BIPOC participants and the America Forward-led peer learning and action community (PLAC) of predominantly BIPOC workforce entrepreneurs from 14 social enterprises who operate equitable, cutting-edge workforce development programs. We were excited to see the significant public investment into the semiconductor industry with the passage of the CHIPS Act of 2022 and the specific requirement that Section 9902 incentive applicants submit a plan demonstrating worker and community investment commitments.

By way of background, each of the signatories below is an organization with deep experience in workforce development and training programs for BIPOC and other underserved populations (see attached appendix for brief descriptions of each). Many of our organizations also work to support and expand inclusion and economic opportunities for economically disadvantaged individuals, women, people of color, veterans, disabled individuals, people without college degrees, and people in rural communities. And some are deeply involved with working directly with corporate partners to influence and support program and practice change designed to lead to greater inclusion and equity outcomes at these companies.

We write to share our recommendations for how CPO can structure its Section 9902 application requirements to most effectively support the scale-up of proven models and programs inclusive of populations traditionally underrepresented in the industry through the Section 9902 incentive program. We were thrilled to see CPO’s *CHIPS for America: A Strategy for the CHIPS for America Fund* highlight these approaches for forthcoming application materials and offer our support to help the Department fully leverage this opportunity. Specifically, we write in response to the RFI’s questions regarding opportunity and inclusion, 21, 22, 23, and 25.

We offer the following suggestions for inclusion in the application forms and guidance provided by the CPO to prospective applicants for CHIPS incentives. First, concerning incorporating programs inclusive of populations traditionally underrepresented in the industry:

- **Expand mentorship.** The Small Business Administration’s (SBA) Mentor-Protégé program is a robust model for helping BIPOC enterprises gain capacity and win

government contracts through partnerships with more experienced companies. We strongly recommend that CPO consult with SBA about how this model can support Section 9902 applicants' partnerships with workforce development organizations.

- **Improve early and active outreach to BIPOC-led and BIPOC-serving organizations.** For the CHIPS program to encourage new ecosystem collaborations and facilitate such investments, we recommend more targeted and intentional outreach to underserved populations to draw in new participants. This shift involves promoting a "marketing mindset," in which an agency's success is defined as much by an increase in the number of applicants from such enterprises and their degree of success in receiving grants and contracts as it is by getting the money out of the door and timely reporting. For example, marketing and communication can be made more streamlined and easily digestible, including providing supportive services for smaller organizations to guide them through the grant finding and application process to better understand and apply for applications. To date, many federal grant applications are communicated through existing networks and connections, limiting smaller, less established organizations.
- **Early engagement to facilitate effective and equitable partnerships.** As soon as practicable, we encourage CPOs to engage with proven workforce development organizations and thought leaders to assist potential grantees in developing their strategy and implementation plan to engage with diverse organizations. We stand ready to help identify workforce development organizations led by and serving BIPOC individuals.

We make the following recommendations regarding the scale-up of proven models:

- **Prioritize evidence-based models.** A growing body of compelling evidence shows that certain types of workforce development programs, such as sectoral training programs and employment social enterprises, can provide a pathway to economic mobility while advancing labor market needs.¹ Many programs are delivered in settings relevant to Section 9902, such as IT and manufacturing. We recommend that the CPO partner with the Department of Labor to leverage DOL's Clearinghouse for Labor Evaluation and Research (CLEAR) to lift the most effective models for applicants. We also strongly recommend that CPO's application materials include a priority for those applicants partnering with workforce development organizations that meet the highest levels of evidence under DOL's evidence framework.
- **Support scale-up and technical assistance.** Alongside support for earlier-stage organizations, we call on CPOs to prioritize applicants that will support their workforce development partners with significant financial and technical support as they engage in continuous improvement, evaluation, planning, and expansion activities necessary to scale up effectively. We suggest, for example, encouraging applicants to partner with intermediary nonprofit organizations with significant expertise and experience in providing capacity-building assistance to support scale-up. We also recommend encouraging applicants to partner with organizations that can give evaluative/research support, including assistance with data tracking, performance management, and rigorous evaluation, to support smaller organizations and employments that may not have the capacity to measure outcomes themselves. We recommend that the application package

¹ See U.S. Department of Labor (2022), "What Works to Improve Employment and Earnings for People with Low Incomes?," <https://www.acf.hhs.gov/sites/default/files/documents/opre/pathways-meta-analysis-feb-2022.pdf>.

recognize the extent of prior and planned future support that applicants will provide their partners as a critical component.

We appreciate the opportunity to respond to this RFI and welcome a meeting to discuss our recommendations further. We look forward to continuing to support the Department's critical work in this area.

Thank you,

America Forward

ArtsEmerson

i.c.stars

nXu Education

Per Scholas

Project QUEST

REDF (Roberts Enterprise Development Fund)

The Alliance for Media Arts + Culture

Year Up Inc.

YouthBuild USA

APPENDIX - OVERVIEW OF ORGANIZATIONS

America Forward

America Forward is the Washington, D.C.-based nonpartisan policy initiative of New Profit, a pioneering national venture philanthropy organization that invests in a portfolio of breakthrough social entrepreneurs and systems-change initiatives, catalyzes and builds their impact, and transforms how government and philanthropy pursue social change to ensure that all people can thrive.

America Forward unites social innovators with policymakers to advance a public policy agenda that strengthens equity, fosters innovation, rewards results, catalyzes cross-sector partnerships, and transforms local impact into national change. The America Forward Coalition comprises a network of over 100 social innovation organizations that champion innovative, effective, and efficient solutions to our country's most pressing social problems while working in more than 15,000 communities nationwide. Since 2007, our America Forward Coalition organizations have successfully advocated for lasting policy change in education, workforce development, and evidence-based policy, leveraged \$1.7 billion for social innovation, and driven millions of federal resources toward programs that are achieving measurable results for those who need them most.

i.c.stars

i.c.stars works to activate a technology community of change agents to power social and economic freedom. Working with low-income young adults, providing them with employment opportunities, and preparing them for community-based advocacy allow us to achieve our social purpose.

Since 1999, i.c.stars has been identifying, training, and jump-starting technology careers for low-income young adults who, although lacking access to education and employment, demonstrate extraordinary potential for success in the business world and impact their communities.

We believe that when young adults focus their talent on technology services and community impact, their success in both increases significantly.

ArtsEmerson

ArtsEmerson is the professional presenting and producing organization at Emerson College, based in the heart of downtown Boston. Founded in 2010—the year the U.S. Census confirmed no single cultural majority in Boston—we set out to foster positive change in this historically segregated city. We did not see this change as a byproduct of the work but as the primary purpose. ArtsEmerson aims to tear down traditional cultural divisions and invest in a vibrant, connected Boston.

Our initial seasons focused on building a world-class cultural institution, raising awareness of our existence and work, and forging a reputation for artistic excellence. In 2013 we expanded our focus through various civic engagement activities, setting out to become an effective partner in Boston's efforts to foster social cohesion.

ArtsEmerson was first named “Boston’s Best Theater” by Boston Magazine following its 2012/13 season. When naming ArtsEmerson “Boston’s Best Theater” again in 2015, Boston Magazine wrote, “Most impressive, ArtsEmerson realizes its global vision while remaining audience-focused and community-centric.” In 2019 WBUR recognized ArtsEmerson as an “A Model For Equity In The Arts,” stating, “From its inception, ArtsEmerson has instituted programs at the intersection of civic dialogue and artistic exploration that have expanded its audience and engaged communities that arts organizations have historically ignored.”

Since then, we have worked to build diverse audiences that reflect Boston. While borders, intolerance, and isolation may try to separate, art and conversation connect people over differences. Through the lens of contemporary works from around the globe, audiences throughout the city are inspired to reflect on what’s happening here at home and in the larger world. In this way, we all step into someone else’s shoes and engage with questions of equity and justice.

Our globe-spanning theatrical performances, films, and public dialogues invite us to be part of a more creative, equitable and connected Boston.

nXu Education

[nXu](#) is a national non-profit initiative that supports youth to explore their identities, develop a sense of purpose, cultivate social capital, and foster social-emotional (SEL) wellness to succeed in life after high school and pursue compelling careers. Since its inception, nXu has intentionally served BIPOC students and students from historically marginalized communities—and the educators and schools serving them—for whom career exploration opportunities integrating purpose and identity development have been sorely lacking.

Few schools are designed to intentionally foster a youth’s sense of purpose, identity, social capital, and SEL skills needed to navigate our changing world. And few provide space for youth to explore their purpose & identity deeply and to engage in career exploration through these lenses. In response, nXu has developed a middle and high school curriculum—and an associated assessment system—that strategically integrates purpose, SEL, identity, and social capital development and career exploration.

To support the effective implementation of its curriculum, nXu has established a curriculum implementation support model named [Purpose Opportunity Program](#) (POP), through which they partner with schools and youth-serving organizations across 20+ states. nXu’s long-term aspiration is to become the country’s outstanding, high-quality, purpose, SEL, and career development solution.

Per Scholas

Per Scholas is a national organization advancing economic mobility for 25 years. Through rigorous training, professional development, and robust employer connections, Per Scholas prepares individuals traditionally underrepresented in technology for high-growth careers in the industry. Per Scholas partners with leading employers to build more diverse talent pools, directly connecting our graduates to new career opportunities with leading employers. Per Scholas has

trained more than 17,000 individuals, helping them build lasting, life-changing skills and careers in technology. With operations in 19 cities across the nation, historically, 85% of Per Scholas learners graduate, and 80% of graduates gain employment within one year of program completion. Per Scholas' outcomes have twice been proven in randomized and controlled research trials conducted in MDRC's Work Advance study, which concluded that for every \$1 spent on Per Scholas training, \$8 is returned to the local economy through the reduction of public benefits, increased taxes, and increased spending.

Project QUEST

Project QUEST (QUEST) is a workforce intermediary enabling individuals to receive education and training to prepare them for career readiness, job placement, and job retention. QUEST's mission is to strengthen the economy and transform lives by preparing individuals for in-demand, living-wage careers. Individuals receive access to training in Healthcare, Information Technology/Cybersecurity, and Trades/Advanced Manufacturing that lead to post-secondary degrees or industry-recognized certifications. QUEST serves young adults (18+) throughout San Antonio (and Bexar County) who are unemployed (no job), underemployed (low-paying jobs below their education or skill level), or under-skilled (do not possess the skills required to compete for living-wage jobs). Generally, these individuals represent the underserved community where limited resource availability creates barriers to economic mobility.

From its inception, one of Project QUEST's driving principles has been equity by working with the underserved. QUEST is a nationally recognized workforce model that has been researched and tested to be effective by the Aspen Institute, Ford Foundation and was part of a gold-standard independent study conducted by the Economic Mobility Corporation. QUEST delivers a participant-centric approach to assist in meeting their career goals.

REDF (Roberts Enterprise Development Fund)

REDF invests in employment social enterprises (ESEs) — businesses that provide jobs, training, and support to people breaking through barriers to employment. REDF partners with these businesses and the entrepreneurs who lead them — providing capital, capacity, and community — to amplify their transformative impact. Since 1997, REDF has invested in more than 238 ESEs in 33 states and DC. Collectively these partnerships have helped 86,000 people enter the workforce and generate more than \$1.6 billion in revenue that is reinvested in employee success—creating a ripple effect that strengthens families and communities and helps build an economy that works for everyone.

The Alliance for Media Arts + Culture

The Alliance envisions and believes in a world where artists, storytellers, and community media organizations are valued as leaders and catalysts of economic and cultural revitalization. Through a suite of forward-thinking and inclusive programs, we serve a dynamic network of artists and organizations committed to powerful creative storytelling as an engine for transformation and the collective imagination. We work to preserve and celebrate diverse cultures and champion free expression as the common language of a democratic society.

Year Up Inc.

Year Up is a national 501(c)3 workforce development organization committed to ensuring equitable access to economic opportunity, education, and justice for all young adults—no matter their background, income, or zip code. Year Up utilizes a high-expectations, high-support model where students learn in-demand technical and professional skills and apply them during a corporate internship. Year Up has served more than 34,000 young adults across 35 campuses since its founding in 2000 and has been voted one of the "Best Non-Profits to Work For" by The NonProfit Times.

YouthBuild USA

Within the opportunity youth population — young adults between the ages of 16 and 24 who are neither in school nor employed — the YouthBuild movement primarily serves young people who lack a high school diploma and financial resources. These young people are in greatest need of our support and are our greatest source of untapped potential. Across hundreds of YouthBuild programs in the United States and around the globe, these young people work together to reclaim their education, gain job skills and become leaders in their communities.

YouthBuild USA – the support center for the YouthBuild movement – strengthens YouthBuild programs through technical assistance, leadership development, innovative program enhancements, and advocacy. YouthBuild programs outside of the United States are supported by YouthBuild USA’s international division, YouthBuild International.