



Workforce Investment Act Title I Youth Activities Reauthorization Recommendations

NATIONAL YOUTH EMPLOYMENT COALITION

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Workforce Investment Act (WIA) Title I Youth Activities Reauthorization Recommendations

The National Youth Employment Coalition (NYEC), a 250+ national membership network in 40 states and the District of Columbia, strives to improve the effectiveness of organizations that seek to help youth, particularly disadvantaged youth, to become productive citizens. Toward this end, NYEC:

- Tracks, crafts, and influences policy;
- Sets and promotes quality standards;
- Provides and supports professional development; and
- Builds and increases the capacity of organizations and programs.

NYEC works at the intersection of three fields of practice: youth development, workforce development and education and reflects a blending of principles, standards, and practices that have emerged from these fields. Building from this foundation, NYEC introduces and orients youth-serving delivery systems to the principles and practices that make a difference in the life and career trajectories of vulnerable and disconnected youth.

NYEC's work is predicated upon the recognition that programs and systems targeting or serving youth in the midst of transition from adolescence to adulthood require developmental learning opportunities, supports, and services that reflect lessons from youth development, workforce development, and education. For more information about NYEC visit www.nyec.org.

NYEC supported many of the significant changes to the federal youth employment and training program that were incorporated in the Workforce Investment Act (WIA) of 1998. Most significantly, the Act:

- promotes what both research and practice tell us are the elements of an effective youth employment program;
- requires the establishment of local Youth Councils to ensure that youth programming is given appropriate prominence, and informed by key community stakeholders;
- targets resources at out-of-school youth and the hardest-to-serve youth populations.

Since 1998, there have been some successes, many challenges and many questions regarding implementation and service delivery. In 2009, young people are facing a labor market with limited prospects. NYEC recommends that statutory changes are needed to improve implementation of the program and the career trajectories of the young people served by the program.

NYEC proposes the enclosed recommendations for WIA Reauthorization. We look forward to working with the Administration, Congress, our members and other key stakeholders in the reauthorization process.

WIA Title I Youth Activities Reauthorization Recommendations – Summary

Eligibility

- **Age & Income Eligibility Requirements** - Allow youth ages 14-24 to be eligible for WIA youth programs, streamline the eligibility determination process, and expand income and group eligibility.

Performance Measures & Program Elements

- **Performance Measures** - Support a Performance Measurement System that takes into account the challenges associated with serving the hardest to serve populations.
- **Program Elements** - Maintain the ten required youth program elements.

Funding & Formula

- **Increase Funding** - Increase WIA Youth Activities funding to \$3 billion, allowing programs to leverage the successful expansion of summer and year-round services through ARRA.
- **Maintain Separate Youth Formula** - The WIA Youth Formula funding stream should be kept separate and any proposed additional grants should be supported with new funds.
- **Improve the Youth Formula** - Replace the one-third of the funding formula based on relative adult “excess” unemployment with a measure of relative youth unemployment
- **Unemployment vs. Joblessness** - Use measures which include all joblessness, including “marginally attached” and “discouraged” workers.
- **Innovation Fund for Youth** - Establish a competitive innovation fund focused on areas of high youth unemployment and poverty. Use and build upon effective practice, successful approaches and lessons learned from the Youth Opportunity program.
- **Reallocation of Funds** - Maintain the existing WIA language regarding the reallocation between states and within states of “unobligated” funding.
- **Out-of-School/In-School Funding Requirements** - Establish the requirement that, *at minimum*, 50 percent of youth formula funds should be spent on out-of-school youth. Provide the opportunity for waivers to local workforce boards that can demonstrate the need to serve more than 50 percent in-school youth.
- **Summer Employment, Work Experience and Service** – Allow up to 30% of formula funds to be used to for paid work experience opportunities, summer employment opportunities, and/or service activities.

Innovation and Capacity Building

- **Local Flexibility** - Retain local flexibility and promote cross-sector collaboration between workforce investment boards, businesses, youth service providers, school districts, and state institutions
- **Build Data Infrastructure** - Build the infrastructure and capacity needed to collect, report, and use data on youth participation and outcomes across youth-serving systems.
- **Build Organizational and Professional Capacity**. Identify, disseminate and recognize effective practices across youth serving systems. Provide support, training and technical assistance to build the capacity of youth service professionals and youth-serving organizations.
- **Offer Multiple Pathways to Secondary & Postsecondary Credentials**. Promote innovation and expand upon what works to offer and expand pathways to secondary and postsecondary credentials and employment.

Youth Councils and One-Stops

- **Youth Councils** - Maintain Youth Councils or an analogous community entity (alternative entity) focusing on youth that facilitates cross-system collaboration.
- **One-Stops** – Improve One-Stops so they are more responsive to youth needs.

Eligibility

Age of Eligibility

Recommendation:

Allow youth ages 14-24 to be eligible for WIA youth programs.

Discussion:

As WIA services are provided to in-school and out-of-school youth and seek to connect youth to employment, an expanded age range would provide more flexibility, continuity, and additional options across systems for youth.

For disconnected youth, there currently exist very few systems which focus specifically on the difficulties of transitioning to independent adulthood. This transition period, where the goal is self-sufficiency and workforce productivity, is a unique period, and therefore needs a unique commitment. School and child welfare programs end their services at age 18. Post-secondary education and adult basic education programs focus on providing education skills, but do not teach how to live as an independent and self-sufficient adult. It is estimated that by the age of 25, five percent of youth remain disconnected.¹ For those five percent, it is crucial that programs exist to provide the services they need to become connected.

Streamlining and Expanding Income Eligibility

Recommendation:

NYEC supports streamlining the eligibility determination process and expanding income and group eligibility requirements. Youth 14-24 who are out-of-school and without a diploma or equivalent should be eligible for WIA services regardless of income level. Youth in high risk categories such as foster care youth, youth in the juvenile justice system, youth with disabilities, homeless and runaway youth, and young parents should also be eligible for WIA services regardless of income level. The burden of income documentation serves as a barrier to service.

Discussion:

According to a 2002 U.S. Government Accountability Office (GAO) survey of state and local workforce boards, documenting eligibility has been “difficult to accomplish and resource-intensive.” State and local officials have asserted that, “many at-risk youth were unable or unwilling to provide pertinent documentation of their income eligibility, such as their parents’ paycheck stub or tax return.”² In addition, obtaining all of the necessary documentation is time consuming and diverts financial and staff resources away from direct service delivery. Older youth, in particular, who may not live with their families, and may be homeless and transitory, find it very difficult to produce the documents required to determine their eligibility. As a result, countless eligible youth, discouraged by the cumbersome process, never complete the registration process, and hence, many WIA youth programs are not fully subscribed.

¹ “Connected by 25: Improving the Life Chances of the Country’s Most Vulnerable 14-24 Year Olds”, Michael Wald and Tia Martinez, Stanford University, p. 3.

² GAO Report to Congressional Requesters, “Workforce Investment Act: Youth Provisions Promote New Service Strategies, but Additional Guidance Would Enhance Development”, April 2002, p. 29.

Furthermore, many economically disadvantaged young people, who have one of the enumerated barriers to employment required for WIA eligibility, are determined to be ineligible because they are not sufficiently poor. The WIA income eligibility guideline (70 percent of the lower living standard) excludes many youth in need who come from poor or working-poor families and reside in disadvantaged communities.

NYEC recommends the following changes to streamline and expand WIA youth program eligibility:

- Allow cross system eligibility for young people and families who have been determined eligible for other means-tested federal programs that require families or individuals to be low-income. At minimum, restore the Job Training Partnership Act (JTPA) provision that allowed students who are determined eligible for free or reduced lunch under the National School Lunch Program to be automatically determined income eligible.
- Where it is not possible to identify individuals enrolled in the free or reduced lunch program due to privacy concerns, allow local workforce areas to include youth that live in a high-poverty area or who live in a school district with high percentages of free and reduced lunch (see below) as WIA eligible. For the purposes of this recommendation, we define high-poverty as any area where 40 percent or more of the households fall below 50 percent of the median regional income.³
- Youth who are out of school and have not received a high school diploma or fall into any of the specified target groups (youth in foster care, youth in the juvenile justice system, youth with disabilities, homeless and runaway youth, young parents) should be eligible for WIA services without regard to income.
- Amend other federal program statutes to enable federally-funded programs to share select case information with other human/youth service agencies when authorized in writing by a parent or youth age 18 or above.
- Clarify that self-certification methods, such as sampling and other methods that reduce the documentation burden, are acceptable alternatives to individual documentation.
- Increase the WIA youth program poverty guidelines to 200 percent of the lower living standard.
- Allow for district-wide eligibility (school-wide projects) for students enrolled in schools in which 40 percent or more of the students are eligible for free or reduced lunch under the National School Lunch Program.

³ This definition is taken from the report “Measuring Concentrated Poverty: The Federal Standard vs. a Relative Standard” by Todd Swanstrom, Rob Ryan and Katherine Stigers, *Housing Policy Debate*, Volume 19 Issue 2 © 2008, p.303

Performance Measures & Program Elements

Performance Measures

Recommendation:

- Support adoption of common reporting measures for all mandatory partners.
- Allow both Literacy/Numeracy Common Measures to be used to measure progress of both in-school and out-of-school youth
- Support interim performance measures which allow for reporting educational gains for both in-school and out-of-school youth over time. Interim and progress measures should lead/be connected to employment, credential attainment or at a minimum to pathways leading to employment and credentials (industry recognized credential; 2 year/4 year credentials/degrees from community colleges, 4 year university program)
- Allow a variance in performance measures depending on the poverty-level of the local workforce area and the functional grade-level equivalent of the entering WIA youth participant. For the purposes of this recommendation, we define high-poverty as any area where 40 percent or more of the households fall below 50 percent of the median regional income.⁴

Discussion:

Many states have adopted the US Department of Labor (USDOL) Common Measures. The only interim youth measure available is the Literacy and Numeracy Gains measure. This measure, however, excludes in-school youth. The USDOL's rationale behind this exclusion is that "in-school youth already undergo a number of assessments within the school system in order to comply with state standards of learning and, in many states, graduation exams."⁵ However, this rationale simply the fact that WIA youth service programs often work with eligible in-school youth and currently have no way to show the interim progress of these youth in their programs. An assessment that aligns with NCLB (to be renamed) or state standards must be available to allow WIA youth service providers to measure the interim performance of their in-school youth.

Excluding Literacy & Numeracy Gains measures for in-school youth may serve to encourage youth service providers to only provide services to out-of-school youth. Though many providers are focused on out-of-school youth, providers must have the flexibility of serving eligible in-school youth in their programs. Many of the programs funded by WIA provide services which simply are not available in the traditional educational setting, integrating reading, writing, and math with career and life-skills training. Some of our members report that these integrated youth services, in many areas offered **exclusively** by WIA funded programs, can reach the at-risk and disconnected students who are not succeeding in traditional educational settings.

Common Measures currently require that all youth must improve by one literacy/numeracy grade-level in one year's time, regardless of the participant's entering circumstances. We recommend that performance

⁴ This definition is take from the report "Measuring Concentrated Poverty: The Federal Standard vs. a Relative Standard" by Todd Swanstrom, Rob Ryan and Katherine Stigers, *Housing Policy Debate*, Volume 19 Issue 2 © 2008, p.303

⁵ U.S. Department of Labor, Employment & Training Administration, Training and Employment Guidance Letter (TEGL) No. 17-05, p. 14.

measures be flexible enough to measure progress in smaller increments or over a longer period of time. A 2008 GAO report stated that “the need to achieve outcome measures often based on only 12 months of service provided a disincentive to serve those youth with the greatest challenges.”⁶

Examples of flexible performance measures are outlined below:

- A. For youth who are not in school and lack a high school diploma and have literacy levels **above** the eighth grade:
 - Return to high school for one year, or
 - Attain an industry-recognized credential, or
 - Attain a GED diploma during enrollment or for up to one year after exit from the program, or
 - Increase literacy and numeracy skills by at least .75 grade levels within one year.

- B. For youth who are not in school and lack a high school diploma and have reading or math levels **below** the eighth grade:
 - Increase of one year in academic level in one or both areas within 15 months of registration in the program and
 - Participate for at least 3 months in an internship or part-time job, or
 - Prepare a portfolio for use with employers in job attainment, or
 - Incentive for these youth - contractor may add .25 participant for each youth who has achieved this gain and can verify the entry level through a Department of Education certified record.
 - Attain an industry-recognized credential

- C. For youth who are not in school, but have a diploma
 - Retention in paid employment of at least 6 months, or
 - Retention in post secondary education for at least two full semesters

- D. For youth who are 14-15 and/or in school and have literacy and numeracy levels below eighth grade
 - Include literacy and numeracy gains measure currently used for out of school youth in common measures, and
 - Improve school attendance rate over a 3 month period and
 - Participate for at least 3 months in internship/community service

Program Elements

Recommendation:

NYEC supports maintaining each of the ten youth program elements and the requirement that the elements be made available to each WIA-registered youth based on his/her individual service plan.

Discussion:

The ten elements represent one of the most significant provisions of the youth chapter of WIA, and embody the programmatic principles that research, practice, and NYEC’s Promising and Effective Practices Network (PEPNet) have demonstrated are key to program success. These principles reflect the near consensus that effective youth programs should incorporate youth development elements, such as

⁶ GAO Report to Congressional Requesters. “Disconnected Youth: Federal Action Could Address Some of the Challenges Faced by Local Programs That Reconnect Youth to Education and Employment”. February 2008.

adult mentors, opportunities to serve the community, leadership development, positive peer interaction, and long-term follow-up and support, as well as sound workforce development activities. Altering this requirement would be a significant step backwards and would be counter to all that has been learned over the past ten years about positive youth development. The only change to this provision that NYEC supports would be to codify in WIA an existing regulation that requires that every youth participant is provided 12 months of follow-up services.

The ten elements are:

1. tutoring, study skills training, and instruction leading to completion of secondary school, including dropout prevention strategies;
2. alternative secondary school services;
3. summer employment opportunities that are directly linked to academic and occupational learning;
4. paid and unpaid work experiences, including internships and job shadowing;
5. occupational skill training, as appropriate;
6. leadership development activities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours;
7. supportive services;
8. adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months;
9. follow-up services for not less than 12 months after the completion of participation, as appropriate; and
10. comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.

A comprehensive guide to using the ten program elements can be found in NYEC's Promising and Effective Practices Network (PEPNet) "Guide to Quality Standards."

Funding & Formula

Increase Funding

Recommendation:

- Funding for the WIA Youth Formula should be increased to \$3 billion. With an increase to the WIA Youth Formula, organizations that have expanded their youth employment and training programs with American Recovery & Reinvestment Act (ARRA) funds will be able to build upon their successes and continue offering expanded summer and year-round services in the future.
- Any proposed additional grants should be supported with new funds.

Discussion:

At existing funding levels (\$924 million in the Administration's FY 2010 budget) and not including ARRA funds, WIA Youth Activities funding has been cut by more than two-thirds since FY 2001. Adjusted for inflation, cuts to Youth Activities funding since 2001 would be approximately \$774 million.⁷ Data from localities and states shows that youth employment programs enrolled thousands in the summer of 2009, and still had long waiting lists for services. Youth in the United States are facing a virtually unprecedented crisis in employment. In October of 2009, youth unemployment (16-19) reached **27.6 percent, the highest rate since the government began keeping track of such statistics in 1948**. The Center for Labor Market Studies (CLMS) at Northeastern University estimated that in 2008 the employment rate for teens was at the lowest rate in more than 60 years – 32.8% for all teens and 22.7% for black teens. The Center also estimates that individuals under the age of 25 represented 60% of the 1.2 million jobs lost last year. New, increased investments in youth employment and training programs are needed now more than ever.

Maintain Separate Youth Formula

Recommendation:

The Youth Activities Formula funding stream should be kept separate and any proposed additional grants should be supported with new funds.

Discussion:

Suggestions have been made to include WIA Youth Activities within Adult funding streams. NYEC recommends that WIA Youth Activities be maintained as a separate formula independent of other programs. This allows for a continue focus on youth, greater flexibility and program effectiveness.

⁷ Calculated using the U.S. Department of Labor, Bureau of Labor Statistics Consumer Price Index Inflation Calculator

Improve the Youth Formula

Recommendation:

Replace the one-third of the funding formula based on relative adult “excess” unemployment with a measure of relative youth unemployment and use measures of unemployment which include “marginally attached” and “discouraged” workers.

Discussion:

Currently, funds are allocated to local workforce investment areas with one-third allocated on the basis of local workforce area relative numbers of unemployed individuals (adults & youth), one-third allocated on the basis of the relative numbers of unemployed individuals (adults & youth) in excess of 4.5 percent of the civilian labor force in each local workforce area, and one-third allocated on the basis of relative numbers of disadvantaged youth in each local workforce area. Employment statistics illustrate that youth unemployment is often several times the rate of adult unemployment. Traditional unemployment numbers do not include unemployed individuals who have stopped looking for work and dropped off the unemployment rolls, and thus are not reflective of total unemployment. It is our concern that the present formula will not direct funds to youth in the areas most in need.

Unemployment vs. Joblessness

Recommendation: Use measures of unemployment that include “marginally attached” and “discouraged” workers.

Discussion:

Traditional unemployment numbers do not include unemployed individuals who have stopped looking for work and dropped off the unemployment rolls, underemployed and part-time workers, and thus are not reflective of total unemployment. It is our concern that the present formula will not direct funds to areas most in need.

Innovation Fund for Youth

Recommendation:

Establish a competitive innovation fund focused on areas of high youth unemployment and poverty. Use and build upon effective practice, successful approaches and lessons learned from the Youth Opportunity program.

Discussion:

Both the Center for Law and Social Policy (CLASP) and GAO evaluations of the original Youth Opportunity grants have shown them to be a very effective means of targeting disconnected rural and urban youth populations and to result in increased youth employment and enrollment in post-secondary education. We believe that the focus on the neediest youth should be maintained in the any new grant program and reauthorization should recognize and consider existing Youth Opportunity Grant programs in the selection and award process.

Reallocation of Funds

Recommendation:

Retain the language in WIA (29 U.S.C. 2852 et al) stating that the amount available for reallocation between states and within states is equal to the unobligated balance that “exceeds 20 percent...for the prior program year.” We oppose use of the term “unspent balances” in place of “unobligated balance.” We further recommend that language be added to explicitly define “obligations” and “expenditures” and clarify explicitly how the USDOL will calculate and classify WIA spending.

Discussion:

According to a November 2002 GAO report, “States are spending their WIA funds much faster than required under the law...By the end of program year 2001, states had spent virtually all funds allocated in 1999 as well as 90 percent of 2000 funds and 56 percent of 2001 funds.” It is unrealistic and inefficient to expect WIA funds to be zeroed out every year when by law, the programs funded must be sustained over multiple years and require a funding commitment which allows for obligated funds to be carried over from year to year. In his June 28th testimony before the House Education and Labor Subcommittee on Higher Education, Lifelong Learning, and Competitiveness, Sigurd Nilsen of the GAO stated that USDOL’s “focus on expenditures without including obligations overestimates the amount of funds available to provide services at the local level.” He also stated that USDOL’s “Office of the Inspector General (OIG) recently concurred, noting that obligations provide a more useful measure for assessing states’ WIA funding status if obligations reflect legally committed funds, and are consistently reported.” Still, the USDOL continues to use this incorrect method of calculating unspent funds, resulting in the belief that there are large sums of money not being spent and providing erroneous justification for those who would like to rescind obligated “carryover” funds.

Out-of-School/In-School Funding Requirements

Recommendation:

Establish the requirement that, *at minimum*, 50 percent of youth formula funds should be spent on out-of-school youth who are 16-24 without a secondary credential, and other high risk categories. Provide the opportunity for waivers to local workforce boards that can demonstrate the need to serve more than 50 percent in-school youth.

Discussion:

This recommendation allows for areas with greater numbers of out-of-school youth to allocate accordingly.

A 2008 GAO report stated that “programs receiving WIA funds preferred to focus on in-school youth because serving out-of-school youth was much more difficult and expensive, and less effective.”⁸ In addition, a 2002 GAO survey reported that many local officials asserted that recruiting and retaining sufficient numbers of out-of-school youth was a challenge and hindered implementation efforts.

⁸ GAO Report to Congressional Requesters. “Disconnected Youth: Federal Action Could Address Some of the Challenges Faced by Local Programs That Reconnect Youth to Education and Employment”. February 2008, p.31

Furthermore, local officials asserted that locating and following up with this “hidden population” is more difficult than with in-school youth, who can be tracked through the education system.

Summer Employment, Work Experience and Service

Recommendation: Allow up to 30 percent of formula funds received by each local workforce board to be used to for paid work experience opportunities, summer employment opportunities, and/or service activities. Require that summer employment opportunities for youth are connected to a comprehensive year-round employment program. (“**Summer Plus**”)

Discussion:

Summer jobs can be a critical component of a year-round youth employment program. However, traditional summer jobs programs are often not an appropriate intervention for older out of school youth. To better serve the needs of traditionally disconnected youth populations we propose a summer plus (+) program option that can lead to longer term engagement in employment, skill development and secondary and postsecondary education pathways. This notion is similar to other extended approaches leading to positive outcomes for older youth, such as the GED Plus (+) concept.

In August 2009, the National Youth Employment NYEC conducted research and a survey of members’ experiences implementing Workforce Investment Act (WIA) youth activities funding authorized by the American Recovery and Reinvestment Act (ARRA). Most organizations expanded existing programs or developed new programs to serve large numbers of youth, in many cases doubling or tripling the numbers of youth served. The Minnesota Office of Youth Development indicated that by enrolling 6,000 youth, programs were able to nearly triple the total number of youth served as compared to previous years. Arizona Call-A-Teen Youth Resources stated that ARRA funds allowed the program to reach out and serve rural youth in Maricopa County Arizona that previously had not been served. Survey results indicate that despite greatly increasing the numbers served, the demand for these services continued to exceed the supply. A sample of six different organizations providing full data in their implementation survey responses show that of 40,700 youth applying for summer employment spots, 7,312 applicants or 18 percent of all applicants were enrolled.

The ARRA funding allowed many programs to serve significantly more youth than in previous summers or build programs from scratch where none had before existed. The implementation of ARRA programs lead to partnerships with public and private entities which programs hope to build upon and sustain for many years to come. And many programs were able to use ARRA funds to innovate, to go beyond the traditional summer jobs programs, and especially in the case of older youth, provide opportunities and connections to year-round services and even full-time employment. To view the survey summary and report, visit www.nyec.org/content/documents/NYECARRAImplementationReportSept2009.pdf.

Innovation & Capacity Building

Organizational and Professional Capacity

Recommendation: Build Organizational and Professional Capacity. Identify, disseminate and recognize effective practices across youth serving systems. Provide support, training and technical assistance to build the capacity of youth service professionals and youth-serving organizations.

Discussion:

A critical factor in helping youth succeed, particularly disconnected youth, is the ability to maintain and build the capacity of youth serving systems, organizations and youth service professionals. Often, such systems and organizations operate only within their local communities, with little opportunity to learn from relevant research or from others in the field. They need access to effective practices, tools and systems that can help them make their operations more effective as well as meet the requirements of federal legislation.

Identifying, disseminating and recognizing effective practices across youth serving systems and organizations can assist in building their capacity. Using guidance from established resources such as NYEC’s Promising and Effective Practices Network (PEPNet) quality standards and tools can assist in these efforts. There are many successful youth programs that may not conform to any single model yet have been recognized as meeting the criteria of effective practice rooted in research and practice.

Additionally, youth programs are continuously challenged by the need to recruit, train, retain and develop quality staff. This challenge is aggravated by poor pay and a lack of clear-cut career ladders. The youth employment and development fields need to find ways to expand the pool of workers in the field, retain them and provide career growth opportunities for them. In addition, staff at all levels of youth programs must be knowledgeable of relevant practice and policy, familiar with the issues confronting the field and process the management skills needed to lead their organizations. In addition, there is a lack of “youth-centered” policy infrastructure at the local and state level. While youth programs in local and state agencies exist, they are scattered across multiple agencies, often narrow in mission and scope. The decrease in WIA Youth funding over the past several years has caused a significant drop in the rolls of youth service professionals, leaving a huge vacuum of experienced staff.

Youth service professionals, including intake workers, case managers, job developers, and independent living specialists, are often the first contact or “face” of youth-serving systems and must gain specific knowledge, skills, and abilities (KSAs) to work with this emerging workforce. There is currently no national system of professional development that identifies, builds, and certifies the KSAs of practitioners. Yet professional development has been linked to professionalization of a field, increased job satisfaction, better youth programs, and improved youth outcomes.

Multiple Pathways to Secondary and Postsecondary Credentials

Recommendation: Offer Multiple Pathways to Secondary & Postsecondary Credentials. Promote innovation and expand upon what works to offer and expand pathways to secondary and postsecondary credentials and employment.

Discussion:

Secondary and postsecondary credentials are critical to employment at a living wage in the 21st century. Youth workforce development programs tied to secondary and postsecondary pathways can provide a valuable bridge to success for youth and young adults. Postsecondary credentials may include industry recognized credentials; 2 year/4 year credentials/degrees from community colleges, and 4 year university degrees. All youth need comprehensive and consistent support, services, and opportunities to help them enter, persist and complete postsecondary education. While postsecondary institutions often offer outreach, access and support service programs to students from low-income backgrounds through some federally funded TRIO programs, these programs typically target high academic achievers. There is no equivalent for youth who are not high academic achievers

When program funding and staff capacity allows it, some out-of-school and disadvantaged youth receive critical postsecondary transition support, services, and opportunities from the same community-based youth service organizations that are helping them complete their high school diploma or equivalent. There is a need to increase their academic skills and help them obtain job training and employment.

Retain Local Flexibility

Recommendation: Retain local flexibility and promote cross-sector collaboration between workforce investment boards, businesses, youth service providers, school districts, and state institutions (Departments of Human Services, Juvenile Justice, Health, etc.)

Discussion:

Significant pluralities of disconnected youth populate public care systems. Large majorities of these young people eventually drop out, thus exacerbating the stresses on various public systems. Therefore, it is in the individual and collective interest of these systems to work together to reduce the number of dropouts.

In addition, NYEC supports the continuation of local flexibility provided by WIA, yet recognizes that states are key to enabling local workforce development systems that are effective and accountable. Specifically, 1) coordination; 2) cross program integration; and 3) delivery of technical assistance, are critical.

- **Coordination.** States should facilitate coordination in at least four areas:
 - **With other Youth Serving Systems** – States should incentivize greater coordination and linkages between the various systems and programs that target and serve vulnerable youth. In particular, states should promote linkages between youth workforce development and education systems, juvenile justice/youth correction and child welfare systems, and programs that target pregnant and parenting teens and runaway and homeless youth.
 - **With TANF** – Some states or localities have developed a separate workforce system for welfare participants. In these cases, the welfare centers serve welfare customers and are not linked to WIA programs. NYEC recommends, at a minimum, requiring states to develop policies and procedures to deliver workforce services through one-stop systems and centers, and provide social service department personnel at these centers.

- **With Economic Development** – NYEC recommends adding strong language about the workforce systems’ role in economic development. State and local economic development initiatives must be linked with workforce development systems. For instance, if a state is looking to attract a major company to the state, then developing one-stop centers in local areas as a key partner and service center should be automatic. Creating a new or different way to serve that business customer would be counterproductive and costly.
- **Among all the state and local agencies** with any responsibility for workforce development.
- **Cross Program Integration and Collaboration.** States must provide clear direction, guidance, and leadership to state agencies on their role in integrating their workforce and youth service delivery systems. State agency barriers to service integration – such as technology access, personnel job duties and assignments, client information sharing, and differing outcome measures – should be removed. Local areas should not depend upon whether state agencies and local leaders are willing to maneuver among systemic obstacles.
- **Delivery of Technical Assistance.** States should be directed to provide technical assistance on a statewide basis, and provide funds to the local WIBs and Youth Councils to obtain technical assistance.

Build Data Infrastructure

Recommendation: Build the infrastructure and capacity needed to collect, report, and use data on youth participation and outcomes across youth-serving systems. The many systems serving youth need the ability to share information to gain a full sense of system performance and ensure effective transition services.

Discussion:

According to the Data Quality Campaign initiative, “Multiple agencies, including child welfare, juvenile justice, higher education and employment services, seek to improve child outcomes, but they often pursue these goals in isolation, with little information and few data systems bridging these supportive service systems.” You may find more information about the Data Quality Campaign initiative at http://www.dataqualitycampaign.org/files/meetings-dqc_quarterly_issue_brief_091807.pdf.

The Data Quality Campaign initiative also identifies ten essential elements of a comprehensive longitudinal data system. The initiative report then continues by identifying many of the barriers to creating these data systems and some of the strategies that might be used to overcome these barriers.

Federal agencies and grantees serving disconnected youth should publicly report their demographics, service levels, expenditures and outcomes. This would enable local communities to assess the magnitude of the problem, system performance, who is—and is not—effectively served, and monitor improvement over time. NYEC suggests the following:

- Develop a uniform definition for measuring graduation and dropout rates for local high schools, alternative schools, charter schools, school districts, and states. Establish accountability measures related to graduation rates and hold states and local systems accountable for making progress towards those benchmarks for **all** youth, not just youth who stay in school.
- Require states to monitor policies and practice that result in youth being “pushed out” or

disproportionately tracked to inappropriate educational alternatives

- Incorporate and potentially expand upon the data collection requirements established by the Foster Care Independence Act of 1999, which established the Chafee Foster Care Independence Program and mandated by the implementation of a National Youth in Transition Database (NYTD).
- Provide both incentives and sanctions to state and local child welfare and juvenile justice systems to ensure effective transitional services, including the requirement that at key risk points and before a youth is discharged, there are explicit transition plans to connect youth to key education, training, housing, and support services⁹

⁹ Wagner, Judith O.; Wonacott, Michael E., *Serving Youth in One Stops, Focused Futures: Youth Development System Builder*, p. 14

Youth Councils & One-Stops

Youth Councils

Recommendation:

Maintain Youth Councils or an alternative entity focusing on youth that facilitates cross-system collaboration. Expand the role and membership of Youth Councils to promote system building rather than their current focus on contracting, procurement and compliance.

Discussion:

Youth Councils are often strong and influential in cases when WIBs and staff have empowered the Youth Council with full authority and accountability for youth program development and oversight. In many of the areas, Youth Council chairs are members of their WIBs and/or their WIBs Executive Committee, and therefore, are well positioned to make recommendations in behalf of their Youth Councils. These WIBs often ratify most of the Youth Councils' work and direction. These are WIBs that have strong committee structures and work with most of their committees in this way. However, some Youth Councils experience difficulty developing beyond being advisory bodies to their WIBs.

According to the 2002 GAO survey, building a comprehensive youth development system, as envisioned by WIA, requires "strong working relationships between the workforce development and education systems at all levels of government." The report acknowledges, however, that "while forging strong linkages between these two systems is critical in preparing youth not only for success in the classroom, but also for their future careers, some local educators remain hesitant to participate in WIA youth programs." The GAO found that "workforce and education officials acknowledge the need for more assistance to help strengthen the partnership between these two systems."¹⁰

NYEC believes that maintaining the direct connection between Youth Councils and WIBs is vital to ensuring that Youth Council recommendations are supported by their WIBs. Furthermore, appointing WIB members to Youth Councils – particularly business members of WIBs – would strengthen Youth Councils' position with WIB members.

NYEC recommends new language that:

- more explicitly describes the legislative intent of Youth Councils (some of the current regulatory language should become statutory language);
- facilitates stronger linkages between the education and workforce systems by mandating the inclusion of education representatives on Youth Councils;
- encourages WIB chairs to appoint youth to Youth Councils;
- encourages WIB chairs to appoint business members to the Youth Council; and
- encourages Youth Councils to engage community members representing various youth populations, such as young ex-offenders, runaway and homeless youth, and youth with disabilities.

¹⁰ GAO Report to Congressional Requesters, "Workforce Investment Act: Youth Provisions Promote New Service Strategies, but Additional Guidance Would Enhance Development", April 2002, p. 34.

NYEC also recommends increasing the availability of technical assistance to help WIBs develop stronger Youth Councils/community entities.

One-Stops

Recommendation:

Make One-Stops More Responsive to Youth Needs. As part of the planning process, require that all One-Stops include how they will deliver services to youth. All One-Stop staff should be provided opportunities to receive professional development and training related to youth service delivery.

Discussion:

Many youth service providers report that local one-stops are unable to adequately respond the needs of young people attempting to access services. Under current law, the only options available to youth at One stops are either identical to services that are provided to adults or a referral to an off-site youth provider. This strategy is often not effective for a young person who is making his/her first attempt to engage in employment or reengage in education.

One-Stops have the potential to provide an additional set of resources for youth to prepare and obtain employment and/or a credential. Programs and specialists who can go beyond core services to address the specific needs and concerns of youth should be available.

One-Stops should consider the following elements in the planning process:

- Understand youth's needs, situations, problems, challenges and how they can help
- Recognize the need for intervention and take appropriate action
- Know about youth programming and development
- Advocate for youth, motivate youth, recruit youth and engage youth.
- Be familiar with the community and its youth resources
- Be sensitive to adolescents' concerns
- Be aware of assumptions and stereotypes about young people.
- Communicate effectively with all youth including those with disabilities.
- Understand how reengage youth who have often left secondary school before attaining a diploma in a pathway that leads to both education attainment and work experience.

References and Resources

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