



**Comments to U.S. Department of Education Request for Information on Strategies for Improving Outcomes for Disconnected Youth: Docket ID: 2012–OVAE–0014  
July 27, 2012**

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On behalf of the Campaign for Youth, a coalition of national youth policy and advocacy organizations focusing on low-income youth who are out of school and/or out of work, we applaud the Obama Administration and the U.S. Department of Education for its leadership in bringing attention to the unique challenges facing youth and for its thoughtfulness in gathering input from a broad range of stakeholders to inform its work around disconnected youth. Youth employment rates are at historic lows – fewer than one in five black and Latino youth is employed, and nearly half of all low-income youth of color will not graduate high school on time. While we are encouraged by the Administration’s efforts, we are also hopeful these comments and others will seed a greater vision for cross-agency policy that strengthens service to disconnected youth that is comparable to the challenges facing them in urban, suburban and rural communities across the nation.

Ensuring all young people have access to the tools and resources that will lead to full participation in our democracy is both a moral and economic issue. **There are an estimated 6.7 million young people ages 16 to 24 that are unattached to school or work, of which 3.4 million are defined as being “chronic” having no attachment to school or the labor market since the age of 16. The taxpayer and social burden of a disconnected 16 year old young person over his or her lifetime is over \$1,014,140 million.<sup>i</sup>** There is a clear need to examine the policy and practice strategies that need to be in place to ensure all young people are afforded opportunities for social and economic mobility – a strong secondary and post-secondary experience that leads to credentials and the ability to work and earn wages sufficient to support their families.

The Request for Information (RFI) requests information for a broad group of disadvantaged and disconnected young people ages 14 to 24, all of whom undoubtedly would benefit from improved strategic policy thinking that would influence better life outcomes for them. However, the focus of the Campaign for Youth’s comments are intended to ensure that those young people that we believe are most vulnerable within this definition receive ample and increased attention to their needs – including those young people who have dropped out of high school; are within the age for compulsory school attendance but are over-age and under-credited; have been subject to the juvenile or adult justice system or ordered by a court to an alternative school; are homeless/runaway or under the care of the child welfare system; are low-income pregnant or parenting and are not attending any school. While the RFI addresses some of

these populations of youth, we believe that a focus on the populations mentioned above would further improve outcomes for the most vulnerable youth.

Strategies that are specifically targeted to this youth population are essential. This particular youth population is often overlooked, as they may require interventions that are more intense and longer in nature. In 2008, the Campaign for Youth issued a call to action and developed recommendations for a [national investment strategy](#)<sup>ii</sup> to help reclaim the talent and potential of these young people. The Investment Strategy called for five broad approaches to reclaim the nation's young people that were falling through the cracks:

1. *Invest in building the youth service delivery capacity in communities of high youth distress* – Federal resources must be directed to support communities -- urban and rural – in most need – characterized by high poverty, high unemployment, and high dropout rates.
2. *Recognize best practices and invest in scaling them up to meet the need for high-quality programming* – Best practices in working with marginalized youth populations do exist. For the better part of two decades innovative communities have employed research-driven interventions and [deliberate cross-systems efforts](#) that have demonstrated positive outcomes for youth. At the same time, national programs have demonstrated how best practices can be integrated into comprehensive interventions and such national program should be scaled up to meet the demand.
3. *Create “on ramps” and pipelines connecting youth to high-skill, high-wage career opportunities* – Young people of all skill levels ranging from those that are reading below a 6<sup>th</sup> grade level to those that are just shy of earning a high school diploma or GED need to be connected to employment pathways that allow them to move up and through a career trajectory – with clear policy and practice linkages to post-secondary institutions, the business sector, and local workforce systems.
4. *Create a policy and research infrastructure to identify innovations, assess progress, and provide technical support* - As communities tackle this issue and begin to rethink the way they do business – out of silos and into a broader community-wide approach -- they will need technical assistance and other supports to identify, document, and evaluate outcomes. They may also need assistance in leadership and quality management skills and tools to assess program quality and support continuous program and systems improvement.
5. *Involve young people in finding solutions for their own generation* – Young people must be a central stakeholder not just in programs that directly serve them but also in the federal policy decisions that govern their service implementation. There are a range of approaches to include authentic youth voice from enacting a [Presidential Youth Council](#) to supporting existing state and local youth-led councils and youth-participatory research designs.

Our investment strategy is a roadmap for federal policy and how it should facilitate the strengthening and development of local comprehensive, cross-systems youth recovery and re-engagement systems. We recommend policies that involve all systems and sectors, including efforts to bring community providers, the business community, and private foundations together with public youth-serving systems; and provide communities with incentives and assistance to integrate new and existing services and funding streams to support youth programming. It is against this framework that the Campaign for Youth respectfully submits these comments. Thank you for your consideration of our recommendations. If you have any questions or need further information, please contact Kisha Bird, Project Director, Campaign for Youth at [kbird@clasp.org](mailto:kbird@clasp.org).

## **I. Leveraging Resources Across Systems**

Federal, state, and local funds must be leveraged to establish and effectively implement comprehensive services for disconnected youth. And a comprehensive approach to service delivery recognizes that an effective community strategy must not only prioritize work and education, but it must also prioritize addressing issues that can impede youth progress – such as housing, child care, mental health issues.<sup>iii</sup> In this context, it is possible to imagine an array of federal resources, in conjunction with state and local public and private resources, being amassed to support multiple pathways for disconnected youth to get on track and stay on track. Such federal funding streams that many of the progressive communities have leveraged -- to support their community strategies, despite multiple reporting requirements and disincentives facilitated by cumbersome eligibility requirements, and we have continued to advocate for – include, but are not limited to, Workforce Investment Act-Youth Activities Formula Funds, Workforce Investment Act- Adult Formula Funds, Adult Education, Federal Student Aid, Temporary Assistance for Needy Families, Community and Development Block Grant, Social Services Block Grant, Community Services Block Grant, and AmeriCorps.

Additionally, dropout recovery and recuperative strategies for this population should be a fundamental part of successful high school reform. Therefore, in tandem with federal funding – Title I and other discretionary education funding (including Investing in Innovation, Race to the Top, and the High School Graduation Initiative) -- state and local education agencies should play a pivotal role in strategically thinking across systems and incent positive behavior for increased education options (such as average daily attendance funding following students and specific schools designed for this population). Several states have already begun to implement progressive education policies that allow for a more flexible administration of education funding supporting state and local dropout recovery strategies. For example, Indiana, Massachusetts and Wisconsin have established programs to provide additional funding beyond the standards per pupil amount for alternative education programs. And Oregon and Wisconsin also have mechanisms that ease the flow of funding to non-traditional programs.

Over the past two decades, we have learned what it takes to engage disconnected youth and get them on pathways toward success in postsecondary education and the workforce. During this time federal funding investments for Youth Fair Chance, Youth Opportunity Unlimited, and Youth Opportunity Grants catalyzed and supported promising practices at the local level that provide a roadmap to help shape current and future youth and education policy. Though its funding was short lived, the [Youth Opportunity Grant program](#), which provided communities with federal funding to create comprehensive cross-system approaches for their vulnerable youth population, [had a tremendous impact](#), helping many communities to realign their delivery systems. It had considerable success in engaging youth and connecting them to work experiences, postsecondary options, training, and employment.<sup>iv</sup>

## **II. Effective or Promising Practices and Strategies**

As this RFI suggests, there is no one system responsible for meeting the diverse needs of the most vulnerable disconnected youth. And the magnitude of the challenges – unprecedented low levels of youth employment, low graduation rates – particularly among youth of color -- requires an immense response that goes beyond the qualities of a singular program model. Based on the learning from the field, we've found that key programmatic features of a comprehensive community intervention for this population should include three primary intersecting components in which youth are engaged:

1. *Work and Career Preparation* – Includes a wide array of strategies such as job training, youth entrepreneurship, career and technical skill building, internship and apprenticeship opportunities, and employment opportunities, including summer and year-round employment, national and community service, service-learning, and work experience that expose youth to the world of work, including careers in high-growth, high-demand industries. In addition, workforce preparation activities that promote the development of applied skills, including oral and written communication, teamwork, leadership, critical thinking, and a commitment to social and civic responsibility. National networks of programs for disconnected youth, including service and conservation corps, YouthBuild, and transitional jobs programs, provide work experience to tens of thousands youth every year. These approaches provide youth with a blend of high quality work experience, education, and the opportunity to engage in service and give back to their communities. There are limited opportunities for disadvantaged youth to develop these skills. However, when given the opportunity, young people excel. In a comprehensive study of national youth corps programs, researchers found that young people who join a Corps experience significant employment and earnings gains and reduction in arrests and out-of-wedlock pregnancies.<sup>v</sup>
2. *Education Supports* – Offered in partnership with secondary and postsecondary education institutions that re-engage dropouts and/or provide alternatives for other high risk youth and include a menu of well-supported, clear educational pathways and options that lead to secondary credentials and postsecondary preparedness. Such options should include in-district and community based organization-run, high-quality alternative programs or schools; accelerated learning models (e.g. credits earned based on demonstrated competency via multiple forms of evidence instead of seat time); twilight academies; concurrent enrollment in high school and community college; GED Plus/Diploma Plus models; career and technical education; postsecondary education and training opportunities; and integrated education and skills training.
3. *Youth Supports* – The role of case management in connecting youth to essential education and work activities is significant -- but even more so this function provides young people who often overlap in various youth systems with essential navigation assistance. The most vulnerable youth often need help to access health and mental health services, drug treatment services, housing, transportation, childcare or family support services. They also often need help navigating postsecondary and training institutions, including federal financial aid opportunities. Case managers, in some cases referred to as youth advocates or graduation coaches, are caring adults that walk with the young people on a path toward success – their role is vital to both recruitment and retention strategies.

A strong youth delivery system must offer young people a broad range of options, have considerable depth in support services, and be flexible enough to connect individual youth to appropriate services. Much like the essential function of case management, the existence of youth centers and/or reengagement centers have also been seen an effective approach to deliver youth services. For example, as part of the Department of Labor's Youth Opportunity Grants program, communities established Youth Opportunity Community Centers to provide safe and accessible places where youth could benefit from multiple community-based services -- education and employment skills as well as receive long-term supportive services, such as life skills training and mentoring. Similarly, communities large and small have established re-engagement centers – which is a critical element in a community-wide dropout recovery system, providing multiple pathways for young people to get reconnected to education through a “one-stop” model. In addition, some national programs integrate a

comprehensive set of supports into their local program, creating a healthy mini-community that include partnerships with a variety of providers.

### ***Youth Involvement in Planning and Implementation Programming***

Too often we talk about young people as a problem. But young people deserve respect, and we should include them in finding solutions. First, federal policy should emulate the positive development of [Youth Councils in several states and localities](#) that give young people a voice in co-developing interventions and advising high-level government officials, and form a Presidential Youth Council, comprised of young people from across the country, to work with the Interagency Youth Working Group, bringing young people's unique perspective to bear on the critical decisions which affect their lives, especially young people in non-traditional learning settings and those that are reconnected. Second, local areas must support constructive engagement of youth involvement on state and local youth councils, as well as on youth advisory boards, such as state and local children's cabinets. Finally, every local program should include a youth policy council as part of its program structure. While these are important structures that deserve to be supported and integrated into community-wide intervention systems, they are often limited to a handful of youth representatives. Other creative ways to engage youth include participatory research efforts – involving the youth participants served in a given program in its design and evaluation.

### **III. Setting a vision and establishing outcomes**

While it may seem like a daunting undertaking for communities, the long-term outcomes must be supported by a fundamental belief system of getting all youth to and through a quality post-secondary experience – in which they earn a credential that allows them to participate in the labor market with a path towards upward mobility. The systemic effort should ultimately be held accountable for ensuring youth *(a) attain a secondary school diploma or its equivalent; (b) attain a 2-year or 4-year credential from an institution of higher education, an industry recognized credential, or certification from a registered apprenticeship program; and (c) secure and succeed in a family-supporting career.*

This will not happen overnight, and communities should be afforded the ability to track progress towards this vision over time allowing for intensity of services so that youth can succeed. Suggested *interim indicators* may include: youth participation; youth progress towards the attainment of a secondary school diploma or its recognized equivalent; job readiness; and youth attainment of secondary school diploma or its recognized equivalent. Suggested *transitional indicators* may include: youth attainment of a secondary school diploma or equivalent, and entrance into postsecondary education or employment; or youth attainment of a recognized post-secondary credentials, which may include a certificate, a license, a journey-status card, or an associate degree or baccalaureate degree. *Long-term indicators* may include the employment and initial wage level of youth participants that attained a secondary school credential, and attained recognized post-secondary credentials, which may include a certificate, license, journey-status card, or associate degree or baccalaureate degree.

### ***Precautions and Protecting the Most Vulnerable***

While the above section includes recommendations for outcomes that should be considered, it does not specify levels of performance. Instead, we recommend that the levels of performance shall take into account the

economic conditions of the area served, the characteristics of young people in the area, secondary school graduation rates, and the activities or services provided in the community served under the partnership. Local communities that have a track record in implementing cross-system strategies are best suited to determine and set strong but achievable levels of performance for hard to serve youth.

### ***Evaluation***

In order to effectively evaluate interventions that by their nature have complicated moving parts, such as those that may result within the partnership pilots, we support evaluation approaches that do not require random assignment, but that instead will provide a foundational framework that will maximize the knowledge that will be gained from the pilots- that seek to answer questions about the level, intensity, duration and types of services/activities required to bring vulnerable disconnected youth to positive education and labor market outcomes. We suggest that consideration be given to customizing the evaluation approach to each of the pilots which documents the baseline practices, policies, systems connections, and numbers served, captures the changes that accrue as a result of the pilots, and extracts the lessons learned that have broader applicability.

## **IV. Recommendations for Performance Partnership Pilot Structure and Design**

The Campaign for Youth recommends that local communities be considered for the Performance Partnership Pilots utilizing *Combined Formula/Competitive Approach*. Requiring applicants to blend formula funds helps ensure that the pilots are doing deep integration work, and sets the stage for wider adoption of this flexible approach in more communities. The competitive funding would be a welcome addition if that funding supports pilot sites in planning and implementing innovative ways to work across agency lines and costs associated with the coordinating and overseeing of this work at the local level. It is important to emphasize that non-profit partners and community-based organizations should be essential players in any Performance Partnership Pilot application. Applicants should be prioritized by the following criteria:

- *Targeting Communities in Most Need* – priority to local areas — (1) that serve areas with disproportionately high numbers or percentages of young people who have left secondary school without obtaining a secondary school diploma or its recognized equivalent; (2) that serve areas with high concentrations of young people in families whose family income is not more than 200 percent of the poverty line (as determined under section 673(2) of the Community Services Block Grant Act (42 U.S.C. 9902(2))); and (3) that serve areas with high numbers or percentages of young people who are unemployed or underemployed.
- *Direct Resources to Experienced Communities* - support existing community efforts with demonstrated track record of working with this unique population across multiple funding streams in an integrating approach; and that has at minimum representation from the local workforce, local education agency, local post-secondary institution(s), child welfare and juvenile justice systems, in partnership, with a strong community-based provider network. Many of the communities that have the most experience in implementing integrated approaches are the communities that are most in need. The experience of Youth Opportunity Grants as well as the American Recovery and Reinvestment Act demonstrated this point well – where geographically diverse communities including Seattle, Portland, Denver, Los Angeles, Boston, Philadelphia, Hartford and Baltimore were able to successfully provide education and employment for disconnected and high-risk youth.



- *Preference for Pilots which Integrate Not Just Federal Funds, but State and Local Funds as well* - Preference should be given to pilots proposing efforts which align federal, state and local (city/county). For a pilot to be fully successful, they will need flexibility from not just federal regulations, but from state and local regulations as well. Projects demonstrating buy-in and commitments to participate from state and local governments working together should get preference in selecting which sites become pilots.
- *Increased Accountability for Program Outcomes* - A demonstrated effort to include an accountability structure that enable partnerships to use a common set of evaluation methods and procedures to assess program implementation, academic achievement, and the successful transition of these youth into educational institutions or employment.
- *Creating and Improving Transition Services* - A demonstrated effort to create and/or improve the continuum of services by focusing on transitions for this population that provide participants with the knowledge and skills needed to make a successful transition to secondary school completion, vocational or technical training, further education or employment.

The above criteria does not reference emerging state and local areas that are seeking to develop strategies for this population, with limited resources it prioritizes those local areas that have amassed the leadership and have gained ability to understand the challenges associated with employing cross-systems efforts as well as how to overcome them over time. Given the magnitude of these issues, it is important that the Interagency Work Group on Disconnected Youth, led by the Office of Vocational and Adult Education at the U.S. Department of Education, leverage resources from across its member departments to provide technical assistance and incentive funds to those more seasoned applicants for the Performance Partnership Pilots and planning and learning exchange opportunities for those emerging communities that are just beginning to grapple with developing strategies for their disconnected youth population.

In addition, we have identified the following considerations that would strengthen the ability of the Performance Partnership Pilots to reach and serve the eligible disconnected youth population in communities:

- *DOJ, HUD, ONDCP Policies should be Waivable* - It is important for the Department of Justice, Department of Housing and Urban Development, and the Office of National Drug Control Policy to be at the table. Many disconnected youth are court-involved, live in housing projects, or are homeless. For a pilot to fully succeed they will need the ability to apply for waivers from those two departments in addition to Education, Labor, and Health and Human Services.
- *Remove Cap on Funds within the Waivers* - The imposition of an arbitrary limit on how many federal dollars may be used in the pilots will limit their effectiveness. If, for example, a community applies for a waiver to pool funding from 3 federal programs, and if the community received a total of \$30M from those federal programs, and if the federal government only grants them waivers on \$20M of the funds, then the community will have to account for \$10M of the funding streams one way, and \$20M the other way. This will increase rather than decrease the bureaucratic burden on the community. Limiting the number of pilot sites – rather than the total amount of the funds for which waivers can be granted – seems a better way to approach these pilots.

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i Clive R. Belfield, Henry M. Levin, and Rachel Rosen, *The Economic Value of Opportunity Youth*, Civic Enterprises, 2012,

[http://www.civicerprises.net/MediaLibrary/Docs/econ\\_value\\_opportunity\\_youth.pdf](http://www.civicerprises.net/MediaLibrary/Docs/econ_value_opportunity_youth.pdf)

ii Campaign for Youth, *Our Youth, Our Economy, Our Future*, 2008, <http://www.campaignforyouth.org/admin/documents/files/CFYInvestmentStrategy.0910.pdf>.

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- iii National League of Cities *Institute for Youth, Education, and Families*, “Reengaging Disconnected Youth”, Action Kit #7, <http://www.nlc.org/find-city-solutions/iyef/at-risk-youth/municipal-network-on-disconnected-youth>.
- iv Community Collaborating to Reconnect Youth, “Fact Sheet: Youth Opportunity Grant Evaluation,” 2008 <http://www.clasp.org/admin/site/publications/files/FACT-SHEET-FROM-the-YOUTH-OPPORTUNITY-GRANT-EVALUATION.web.pdf>.
- v JoAnn Jastrzab, John Blomquist, Julie Masker, and Larry Orr, Youth Corps: Promising Strategies for Young People and Their Communities, Abt Associates, Inc. Studies in Workforce Development and Income Security, 1997, 16-21, <http://www.nascc.org/images/pdfs/abtreport.pdf>.