



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

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Linda Harris and Kisha Bird

CLASP applauds the Obama Administration and the leadership of the Office of Management and Budget and the U.S. Department of Education in spearheading the Interagency Work Group on Disconnected Youth. We welcome the role the workgroup can play in providing visibility to the situation of this often forgotten segment of the youth population and in advancing policies that support dropout recovery and the reengagement of youth in high-risk situations. We hope this group can be a catalyst in exploring how federal funding streams—including and beyond those included in the Performance Pilot Partnerships—can be assembled to create robust interventions to put these youth on track to education, career, and life success.

This Request for Information on Strategies for Improving Outcomes for Disconnected Youth is timely and necessary. The context in which too many young Americans live is severe: 6.4 million youth ages 16 to 24 are disconnected from education, the workforce, and opportunity.¹ America's youth are experiencing Depression-era levels of employment, and we are losing significant ground with segments of our minority youth population. In particular, low-income young men of color are disproportionately affected by the current labor market—fewer than one in five African-American and Latino young men had a job last month.²

The social fabric in poor communities across this country is unraveling, and the odds of making a successful transition to adult economic self-sufficiency are stacked against young people in these communities. CLASP's youth policy agenda has long been aimed at advancing both policy and practice to dramatically improve the education, employment, and life outcomes for youth in communities of high youth distress. Youth who live in communities of high youth distress are particularly at risk of disconnecting from the mainstream: they often live in low-income, minority communities where high school dropout rates exceed 50 percent, youth unemployment is extremely high, youth violence is a persistent issue, and too large a portion are connected to the criminal justice system. We believe that solutions to the disconnected youth problem rest at the community level, leveraging the resources of the public systems, the secondary and postsecondary education systems, business and industry, community providers, parents, youth, and philanthropy to put in place a comprehensive, community-wide approach to helping these youth get back on-track. Youth recovery requires leadership, innovation, and strategic planning targeted to building capacity on the ground, and it is imperative that these approaches be supported with sufficient federal resources, guidance, and policy intervention.

Our comments here draw upon CLASP's decade of policy work at the national, state, and local levels related to disconnected youth. We believe our comments in response to the U.S. Department of Education Request for Information on Strategies for Improving Outcomes for Disconnected Youth will serve to inform the development of the Performance Partnership Pilots as well as federal cross-agency policy development and funding decisions that can address our current challenges, develop the human capital needed to fuel our economy, and unleash the untapped potential and talent of the millions of young people who have fallen through the cracks. Thank you for considering our recommendations.

If you have any questions or need further information, please contact Linda Harris, Director of Youth Policy, at lharris@clasp.org or Kisha Bird, Senior Policy Analyst, at kbird@clasp.org.

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I. Lessons from Public and Private Partnerships

It is very encouraging to see the federal interagency team exploring ways to promote comprehensive, cross-system interventions to address the complicated issues associated with putting disconnected youth back on track and bringing multiple federal resource streams to bear in creating solutions. It is worth taking into consideration the lessons of previous federal efforts, as well as the capacity building in the field that was seeded by those efforts. Over the years, the federal government has made significant investments in demonstration programs designed to build the capacity of high-poverty communities to work across systems to create a stronger infrastructure for serving the needs of disadvantaged and disconnected youth. Much of this work occurred in the late nineties and the early two thousands. It included: Youth Opportunities Unlimited, Youth Fair Chance, Out of School Youth Demonstration Grants, Opportunity Areas Pilot Grants, and Youth Development Practitioner Apprenticeship Grants, culminating with Youth Opportunity Grants in 2000.

Much of this funding was through the Department of Labor, and millions of dollars have been invested in documenting lessons from the various initiatives. What was clear is that during this period the Administration and the Department of Labor advanced a vision for improving the education of and labor market outcomes for high-risk youth in high-poverty communities and consistently used discretionary funding vehicles to reinforce key themes about comprehensive and holistic service delivery, community partnerships, education innovation, and systems integration.

Throughout the decade, federal youth funding moved the country in the direction of longer, more strategic interventions and resulted in over 150 communities engaging in aggressive planning to land coveted Youth Opportunity Grants in 2000. Authorized under the Workforce Investment Act of 1998, Youth Opportunity Grants were to be the vehicles for transforming youth programming in distressed communities, but they were short lived. The Administration and Congress greatly reduced federal youth funding and redirected what remained toward more programmatic and population-focused interventions. At least until the reductions in funding, the theory of change governing the federal demonstration programs was that programs would have an impact on communities as a whole, not just a small number of participating youth by: focusing resources on targeted, high-poverty neighborhoods; encouraging comprehensive strategies that link education, employment, social services, juvenile justice, as well as recreation programs and other community-based activities; and establishing new, community-based governance strategies. These efforts attempted to integrate research and policy on effective practice into the program requirements, thus promoting continuous improvement in the field of youth practice.

Key features of each of these efforts included:

- ***Comprehensive community-wide strategy:*** The grants required that multiple stakeholders come together to strategically assemble academic, employment, and personal support to build pathways to labor market success for youth in areas of concentrated poverty. They recognized the importance of community input into design and oversight processes.
- ***Saturation strategy:*** The grants recognized the importance of scale in promoting behavioral and attitudinal change on the part of a large segment of the youth population and on improving community-level outcomes.
- ***Integrating the most recent research and policy developments:*** The Youth Opportunity Grants identified specific elements and program models with proven track records and required that grantees build on the lessons from previous demonstrations and research.

Many of the communities that currently have the strongest cross-system interventions and strategic approaches in addressing the needs of disconnected youth are those that benefited from the above federal initiatives. The Communities Collaborating to Reconnect Youth Network (CCRY) grew out of the Youth Opportunity movement in which the U.S. Department of Labor awarded grants to 36 high-poverty urban, rural, and Native-American

communities to provide programs and supports at scale to change the education and labor market outcomes for 14- to 21-year-old youth.

At the conclusion of Youth Opportunity Grants in 2006, several communities formed the CCRY Network to: 1) serve as a collective learning environment, promoting peer-to-peer exchange and hands-on assistance in implementing and expanding best practice, especially in communities with high levels of youth distress; 2) act as a communications vehicle to bring attention to the work and to innovative practice in communities across the country; and 3) have a collective voice on and provide input into state and federal policy on issues affecting disconnected youth in distressed communities. These communities—including Baltimore, Boston, Brockton, Hartford, Houston, Los Angeles, Kansas City, Portland, Philadelphia, Rural Arkansas, San Diego, and Seattle—not only know what it takes to amass federal, state, and local resources to implement a comprehensive community-based strategy for disconnected youth, but they also have seen what a comprehensive strategy can achieve. As noted in the appendix, many of the communities continued their collaborations with community partners, leveraging resources from multiple systems, state and local revenue streams, and foundations to sustain their efforts, albeit at much reduced scale. Many of the communities have stayed connected through the CCRY Network, National Youth Employment Coalition Forums, Conference of Mayors, and National League of Cities activities to advance the policy-to-practice efforts and expand innovation through peer-to-peer exchange.

Federally funded evaluations and reports, along with research and analyses conducted by numerous policy and research organizations, have contributed to a substantial body of knowledge on effective practice related to moving disconnected youth along supported pathways to education and the labor market. Below are findings that are relevant to the work of the federal interagency workgroup on disconnected youth and to Performance Partnership Pilots.

Findings from research and demonstration

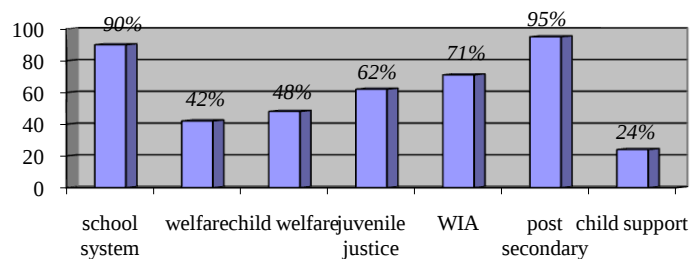
Youth Fair Chance and Youth Opportunity Unlimited were analyzed and evaluated by Mathematica Policy Research and the Academy for Educational Development. Their findings and lessons were incorporated in structuring the federal Youth Opportunity Grants, which were subjected to much more rigorous process and impact evaluations by Decision Information Resources, Inc. The findings include:

- Implementing Youth Fair Chance dramatically increased the level of services provided to out-of-school youth and changed the nature of those services and service delivery.
- When targeted to high-poverty communities, universal eligibility helped with recruitment, eliminated stigma associated with categorical eligibility, eased implementation, and generated increased community support.³
- Youth Opportunity Unlimited reduced the incidence of juvenile arrests and reduced dropout rates among high school youth.⁴
- Youth Opportunity Grants enrolled over 90,000 mostly minority youth in service programs. The Department of Labor estimated that 62 percent of eligible out-of-school youth in the program catchment areas participated. Decision Information Resources, Inc., which conducted process and impact evaluations, found that Youth Opportunity Grants:⁵
 - Reduced the number of out-of-school and out-of-work youth and reduced the number of high-school dropouts;
 - Increased the receipt of Pell Grants in urban sites and increased postsecondary enrollment for foreign-born youth;

- Increased the labor force participation rate overall and increased the employment rate for blacks, teens, and out-of-school youth and had a positive effect on hourly wages for women and teens;
- Provided a safe space for youth, high-quality youth and adult relationships, enhanced training and education services, and opportunities to be productive.

An analysis by the Center for Law and Social Policy of the activities of twenty-two of the thirty-six Youth Opportunity Grantees further documented an impressive level of leveraging of multiple systems.⁶ More than half of the communities leveraged resources or engaged in formal relationships with four or more youth-serving systems to structure comprehensive interventions.

Percent of Youth Opportunity Communities with Formal Relationships with Selected Systems



There are other “takeaways” from the earlier federal initiatives. Key elements of the federal solicitation process (especially regarding the [Youth Opportunity Grant solicitation](#)⁷) contributed greatly to catalyzing leadership and innovation in rethinking the youth delivery system at the state and local levels. The solicitation:

- Encouraged an inclusive community engagement process; suggested the major systems, sectors, and stakeholders that were to be included; and allowed ample time for developing responsive proposals;
- Required submissions to be specific about the design elements of the comprehensive community approach based on what was known about effective practice, with a specific focus on community-based centers and case management;
- Gave considerable weight to management, accountability, and leveraging of partnerships and complementary resources, with 35 out of 100 rating points awarded based on the quality of management and partnerships;
- Required the applicants to detail the specific interventions to be put in place to reduce the dropout rates and increase college enrollment and provided specific practices that had proven effective to serve as a basis for planning.

The support and stewardship given by the Department of Labor to these initiatives were instrumental in strengthening youth service delivery, including investments in technical assistance, peer learning exchange, data systems, professional development of the youth practitioner field, and the setting of standards for quality practice.

II. Effective or Promising Practices and Strategies

While federal funding for much of this activity has been reduced significantly, many of the communities continue to engage in the important strategic work of pulling resources together across systems and sectors to get disconnected youth off the corners and on pathways to labor market success. In documenting effective local practice, CLASP found that no one program model or intervention can meet the scale of the challenge or the diverse needs of young people in distressed communities. However, among the most effective approaches to youth service delivery, commonalities have been documented in practice and in research that result in positive outcomes.

MDRC surveyed the many youth programs it had evaluated and identified some key components of successful program interventions.⁸ These components are the same ones that CLASP identified and documented in “Building a Comprehensive Youth Delivery System – Learning from Effective Practice.”⁹ They are essential if a program is to address the range of needs—employment, academic, social, personal, family, life skills—encountered when working with groups with significant barriers to employment. The components include:

- **Caring adult support and mentorship**

A caring adult advocacy and support system helps youth navigate a complex maze of programs, services, and educational options, and it guides them in choosing the set of services that best suits their individual needs. Such a system creates a personal relationship of respect and support between the young people and well-trained, caring adult advocates. This relationship should continue until the young people achieve stability in the labor market.

- **Multiple pathways integrating academic skills and occupational preparation**

The education/competency levels of disconnected and disconnecting youth span a broad range. Students whose basic skills and English literacy are at low levels need substantial amounts of education in order to achieve a secondary school credential; students who have sufficient skills to earn a high school diploma or GED quickly may be nearly ready for college. Given these differences, a system that allows for multiple entry and exit points along an educational continuum is most useful in meeting the diverse educational needs of the dropout population. If communities are to reengage these young people, it is essential to provide multiple pathways in order to maximize the number of them who obtain education and training leading to decent-paying jobs matching their interests and aspirations. Designing entry points to multiple pathways requires leveraging the multitude of federal, state, and local resources available to serve this population, improving the performance of education and workforce systems, and aligning programming across the systems serving this population.

- **Rich work experiences and workplace connections**

Work skills and protocols cannot be effectively imparted in classroom and workshop settings. This requires exposure to work and to people who work as role models. Especially in communities of high unemployment, a range of work-related experiences is essential to exposing youth to a variety of work environments and career options and to fostering the development of appropriate workplace skills and a work ethic. Often, the ability to sustain participation in education and training over a longer term depends directly on earning income. The array of work-related options should include subsidized employment, work experience, internships, paid or stipended community service, on-the-job training, tryout employment, part-time and full-time employment, and college work-study. These offerings should be arranged along a continuum that enables young people to progress from the most sheltered experiences to unsubsidized private-sector workplaces, depending on their level of work preparedness and comfort.

- **Personal development/leadership and civic responsibility**

Preparing youth for success in postsecondary endeavors and for advancement in the workplace requires not only developing their critical academic and occupational skills but also honing their personal, communication, social, and life-management skills. Activities that expose young people to new environments, engage them in civic projects, allow them to volunteer, and provide them with opportunities to lead and to function as part of a team all contribute to the development of their skill sets. Helping youth mature into responsible adults who possess integrity, a strong work ethic, and a sense of personal, civic, and family responsibility should be a key objective of program intervention.

- **Connections to resources and support**

Even young people with the best intentions of pursuing an education can be sidetracked by the weight of financial burdens, family responsibilities, and personal crises. A Government Accountability Office review of programs for disconnected youth in 39 communities noted that access to HIV testing, child care, housing, food, and health, mental health, and substance-abuse services were important supports accessible at the program site or through formal partnerships.¹⁰ We also found that in the most successful cross-system partnerships, a respected entity plays an intermediary role bringing the various stakeholders to the table. This entity maximizes resource sharing, holds engaged partners and systems accountable for establishing a shared vision and assures that the vision is effectively implemented.¹¹ The appendix provides examples of cross-system community interventions that couple the above components. While each community example assembles resources and relationships in its own way, they all have in common the goal of ensuring that all youth attain a secondary school credential, are exposed to valuable work experience, and are increasingly connected to postsecondary opportunities.

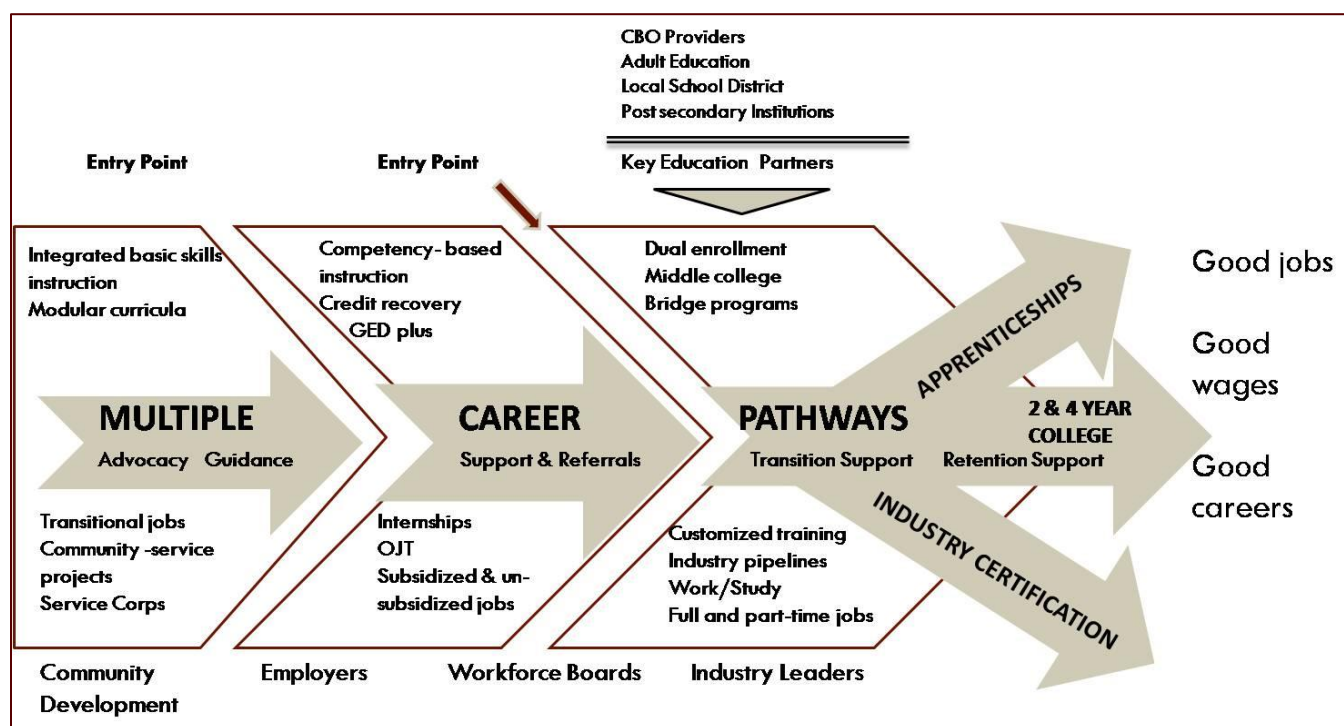
There has also been considerable innovation over the past decade in educational interventions that accelerate learning and the earning of secondary and postsecondary credentials. The following educational interventions are often included in career pathways program approaches, which are fundamental in a recovery and reengagement system for disconnected youth:

- *Credit recovery programs* enable a student who previously did not complete a particular course to recover credit for that course by demonstrating competency on its content standards rather than spending a particular amount of time in a course. Credit recovery programs are particularly effective in helping over-age students earn their high school diplomas.
- *Competency-based approaches* award a high school diploma based on attainment of the skill proficiency equivalent of a high school graduate. This approach is even more flexible than the credit-based approach.
- *Dual enrollment programs* enable students to work toward a high school diploma while accruing postsecondary credit. Also called concurrent enrollment and dual credit programs, these approaches expose students to postsecondary-level work, add rigor and intensity to the educational experience, and help students achieve their goals faster.
- *Early and Middle College programs* are secondary schools that collaborate with local postsecondary institutions to offer students the opportunity to earn college credit while attending high school. They serve students who have dropped out and those who are at risk of dropping out, as well as higher-skilled students. The schools graduate students with a high school diploma and some postsecondary credit. The secondary and postsecondary institutions develop an integrated academic program so that students earn transferrable college credits.
- *Career pathway bridge programs* typically cover soft skills, precollege academic skills, and specific job skills, ideally as part of a career pathway. Career pathway bridges tailor and contextualize the basic skills and English language content to general workplace needs and to knowledge and skills needed in a specific occupation. The creation of a good bridge program requires rewriting or creating curricula. Ideally, technical job content is integrated with basic skills and English language content, which increases skill acquisition and shortens the time to completion.

- *Integrating remediation with occupational instruction* is a strategy to reduce the time to credentials by integrating remediation with occupational training, rather than requiring students to complete remediation before starting for-credit occupational coursework. It accelerates learning by customizing the basic skills and remedial coursework to the student's occupational objectives and provides for an easier transition to higher-level study or certification.

Several systemic efforts around the country employ these approaches—creatively blending education, work, and service supports to create multiple pathways to credentials for disconnected youth. The schematic below depicts visually how multiple supports can be positioned along a continuum to postsecondary engagement and success.

Solution: Create Multiple Pathways to Credentials



III. Leveraging Public Systems for Disconnected Youth

As the examples we've highlighted demonstrate, no single funding stream is robust enough to solve the multifaceted needs facing disconnected youth. We asked the members of the CCRY Network which federal funding streams/systems they felt were important to leverage in addressing the needs of disconnected youth with education deficits. They cited:

- Workforce Investment Act (WIA)-Title I, Youth Activities Formula Funding and Adult Formula Funding, and Title II Adult Education and Family Literacy Act (AEFLA)
- Temporary Assistance to Needy Families (TANF)
- Community Development Block Grant (CDBG) and Community Services Block Grant (CSBG)
- Education funding streams: Title I-Elementary and Secondary Education Act (ESEA), Carl D. Perkins Career and Technical Education Act

- Juvenile Justice Delinquency Prevention Act Funding
- TRIO Programs and a menu of higher education supports, under the Higher Education Act (HEA), such as Pell Grants and work-study.

Accessing discretionary funding from across federal agencies has also played a significant role in strengthening community capacity to develop new pathways for youth—for example, funding from the Department of Education (High School Graduation Initiative, Investing in Innovation Fund, Race to the Top, Promise Neighborhoods), the Department of Labor (Workforce Innovation Fund and Pathways Out of Poverty), the Corporation for National and Community Service (AmeriCorps and Social Innovation Fund), and other Health and Human Services and Housing and Urban Development grants. In addition, CLASP has summarized a number of relevant federal programs that can be leveraged to support a comprehensive systems approach for disconnected youth in “Funding Career Pathways and Career Pathway Bridges: A Federal Policy Toolkit for States.”¹²

The ability of a community to establish a shared set of criteria across a set of the aforementioned funding streams in a Performance Partnership Pilot will be particularly constructive. While many barriers can emerge in braiding and blending multiple federal funding streams, four primary areas make it difficult to do so:

- *Eligibility criteria:* The variation in eligibility criteria across funding streams for the same population makes blending those streams and seamless transitions from one program to the next extremely challenging. For example, a 20-year-old high school dropout with multiple barriers can be served without regard to income using adult education and WIA adult funds but may not be able to be supported with WIA youth funds because of the very restrictive income requirements. Even if eligible, many youth from dysfunctional home situations have found it challenging to produce the required documentation and local programs have been vocal about the challenge of eligibility determination and certification. Allowing universal eligibility across funding streams for certain vulnerable populations and allowing other less burdensome means of documenting income status could contribute greatly to the alignment of these funding streams in support of vulnerable youth.
- *Performance measures:* Such measures across major youth funding streams that serve the same or similar youth populations differ greatly, and they often do not share long- and short-term outcomes. It is difficult to establish a community-wide system, which includes a broad set of programmatic services, if the ultimate goals of federal, state, and local funding resources are not aligned. What’s more, many federal funding streams offer too little flexibility to provide the required intensity of services to the youth populations in most need.
- *Reporting requirements:* Having multiple reporting requirements—with the associated infrastructure costs for databases and other essential technology—can be duplicative for communities working across public systems to deliver multiple services for the same youth population. A more streamlined process would maximize efficiency.
- *Use of funds:* It is important to establish parameters around the use of overlapping funding streams to assure that the original intent of each funding stream is being met and the intended populations served. However, it is often difficult to manage blended or braided funding when some activities are allowed and others disallowed by the various sources of funding. The waiver process should consider allowing all activities allowable in one funding stream to be acceptable uses for all federal streams engaged in the pilot, thus avoiding the potential audit exceptions and disallowed costs that could accompany such an ambitious endeavor.

The Performance Partnership Pilots present an opportunity to establish new and relevant eligibility criteria for disconnected youth, including deeming out-of-school youth in certain target groups—dropouts, youth who are in foster care, homeless, runaways, and offenders—eligible for service without regard to income; allowing youth who reside in high-poverty communities to be eligible for service; and using other means-tested programs, such as free and reduced lunch, to establish eligibility. Establishing shared performance measures will incent cross-system

behavior by uniting public systems in establishing uniform outcomes for the same target population. Coordinating a unified reporting mechanism would also reduce the current administrative burden.

The following table highlights some of the challenges, opportunities, and considerations of six major federal funding streams. These should be considered when developing the Performance Partnership Pilots and other federal policy efforts focused on moving disconnected youth forward.

Federal Funding Stream	Opportunities/Challenges
WIA – Title I Youth Activities Formula	Opportunity: This funding stream should be serving disconnected youth in much higher numbers. WIA statute requires that at least 30 percent of the formula funding allocated to local areas be spent on out-of-school youth; however, there is no reporting requirement to assess local expenditures via this requirement. Currently, an estimated 25 percent of youth served through this funding stream are dropouts,¹³ hardly reaching the estimated 3.4 million eligible “chronically” disconnected youth.¹⁴ Nationally, just 11,266 of the 129,505 youth who exited service in PY 2010 were offenders.¹⁵ Youth Councils authorized under WIA can and should play a strategic role in bringing systems and resources together. These pilots can allow the waivers to address impediments to serving this population. Challenges: WIA statute includes onerous eligibility certification requirements, which can stigmatize youth and deter service to hard-to-serve young people who may not be able to produce income verification documentation. Performance measures do not allow for adjustments that would take into account the time and intensity needed to deliver youth to interim benchmarks and ultimate outcome measures.
WIA – Title I Adult Formula	Opportunity: Youth 18 and over can be served, and WIA can be a good source of access to occupational training, individual training accounts, and on-the-job training. While eligible without regard to income, youth without a high school diploma are relatively underserved in WIA. In PY 2010, 293,119 individuals served through WIA-Adult funding streams were ages 19-24, representing 17 percent of all WIA-Adult participants.¹⁶ And just 15 percent of the participants ages 19-21 received any training. Challenges: Primary access to WIA adult service is through One Stop Centers, which are not necessarily conducive to serving youth and where it is hard for youth to compete for service with a more skilled adult population, given performance requirements. In addition, training services that would most likely benefit youth are primarily provided through individual training accounts, which allow participants to select training of choice from a state-approved provider list. Participants typically move through a sequence of services, and training is not immediate in most cases. The procurement process can inhibit the blending of these funds with others to customize appropriate and comprehensive interventions.
WIA – Title II (AEFLA)	Opportunity: The federal adult education system serves a substantial number of youth ages 16-24. For PY 2009-2010, 46 percent of participants in adult basic education and 58 percent of participants in adult secondary education were in this age category.¹⁷ Collaborative partnerships can provide the opportunity to increase the intensity of education intervention beyond the current average of 30 to 80 participation hours and to connect to more supportive workforce preparation activities in keeping with the program’s new performance measures, which are more aligned with employment and credential attainment. Challenges: There are significant funding limitations at the federal and state levels. The program serves only 2.3 million students annually of a potential 93 million who may be eligible for services. Challenges exist in blending policy, protocols, and procurement for adult education systems with more locally administered programs and systems. AEFLA is a state-administered program, and the agency responsible for administering the program varies across states. For example, in some cases the responsible agency may be the state department of labor; in others, it may be the community college

	system. While WIA Title I primarily operates at the local level, there is no local role in the administration of the Title II program.
TANF	Opportunity: A substantial portion of the heads of TANF households fit the definition of disconnected youth. Federal and state policy, coupled with local programming, should target these individuals with the same supports and interventions that are deemed necessary and appropriate for other segments of the youth at-risk population related to postsecondary and labor market success. TANF allows for a fairly flexible use of funds for work and training activities that could be a boost to any partnership subject to state policy. While not included in the authorization for the Performance Partnership Pilots, federal policy leaders can incentivize system behavior at the state and local levels by issuing cross-agency guidance, providing joint technical assistance sessions, and encouraging the intentional use of discretionary funding to reinforce the importance of including TANF youth in recovery and postsecondary strategies. Challenges: TANF administration and policies vary widely across states. The following are just a few of the issues that may arise when utilizing TANF in a cross-system strategy for youth: — Most TANF programs focus on custodial parents of minor children. While there are opportunities to use TANF funds to serve older youth and noncustodial parents, the rules are complicated and poorly understood. — TANF funding goes to the states, which vary greatly regarding the local role in TANF implementation. — States are under great pressure to assign recipients to activities that can count toward the federal work participation rate. While teens can meet the work requirement through education, older youth are treated as adults and subject to “work first” policies that often discourage education and training. Short time limits also pressure participants to focus on employment rather than on developing human capital. — Minor parents are subject to additional requirements regarding school attendance and living with their parents or an adult. Minor parents who do not meet these requirements on application may be told they are ineligible for services rather than assisted in meeting the requirements.
ESEA	Opportunity: With many states now using four-year and extended cohort graduation rates as part of their education accountability systems, there should be increased incentive for state and local education agencies and schools to implement dropout recovery efforts in collaboration with community that can dramatically improve the educational outcomes for the cohort. These dropout recovery efforts must include wraparound support services to address factors that may impede educational success. To facilitate the role of education leaders as community partners, states and LEAs should be required in Title I plans to specifically outline dropout recovery strategies, and to specify how states and districts will partner across systems and with community resources to reengage youth in education. Challenges: After students drop out of school, local education agencies have no incentive to seek out students and reengage them in education. Current policies are a disincentive because unsuccessful students negatively affect school and district aggregate test scores. As a result, there is little outreach to dropouts, and many are encouraged to pursue opportunities outside the education system, where schools and local education agencies bear no responsibility.
HEA	Opportunity: The federal TRIO programs, which are designed to provide outreach and student services to individuals from disadvantaged backgrounds, are certainly a resource to be included in the mix of services to be leveraged to support disconnected youth who are matriculating via alternative pathways to postsecondary credentials. In particular, Education Opportunity Centers, Student Support Services, Talent Search, and Upward Bound can greatly enhance outcomes if included as part of intentional strategies to support these youth. In addition, coordinating access to Pell Grants and work-study would offer significant financial supports to low-income youth seeking postsecondary opportunities, including the “Ability to Benefit” provision authorized under HEA. This provision

	allows students without a high school diploma or GED to access federal student aid, including Pell Grants, by showing they have the ability to benefit from postsecondary education by passing a federally approved test or completing six credits toward a certificate or degree and receiving a “C” or higher. The Department of Education’s student aid website and financial aid Shopping Sheet model that helps to provide more clear and consistent information about college costs and student aid are two tools that can be utilized to help disconnected youth and staff assisting them understand and access student aid, including Pell Grants and work study. Challenges: Newly enrolled college students without a high school diploma or equivalent will no longer be eligible for federal student aid—including Pell Grants, work-study, and loans—due to Congress’s elimination of the Ability to Benefit provision in December 2011. This is problematic for establishing concurrent enrollment and blended education and career pathways for out-of-school youth seeking postsecondary credentials to improve their job prospects.¹⁸ In addition, eligibility requirements for other higher education supports—such as those through the TRIO programs—do not necessarily target disconnected youth broadly, let alone those without a high school diploma. The Department of Education’s recently revised regulations on what is required for students to show that they are making “Satisfactory Academic Progress” through college appear to pose significant challenges for lower-skilled students such as disconnected youth who may need more support and time to reach their academic stride.
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Ensuring pilots “do no harm” and do not have adverse effects on the most vulnerable populations

It is easy to envision the power and promise associated with aligning multiple funding streams in a way that provides seamless services and supports to vulnerable populations and sustains them along longer pathways to postsecondary labor market success. It is also just as easy to envision how blending funding streams and relaxing eligibility and reporting requirements could lead to the most vulnerable populations losing ground as collaborations rethink delivery of service to youth. This RFI defines the target populations as 14- to 24-year-olds who are in foster care, juvenile offenders, or not employed or educationally attached. This latter category covers a broad range of youth, including those with high school diplomas and even some college if they are not succeeding in the labor market. Thus, without safeguards, it is easy to envision how employer-postsecondary-workforce partnerships could evolve to serve youth at the higher end of the skills spectrum to the detriment of those in high-risk categories. In fact, when preparing for a forum on expanding employer engagement in youth programming three years ago, CLASP explored select sector and employer initiatives designed to create pathways for underserved individuals; we found very few that engaged youth who were high school dropouts or in other high-risk categories.

It is essential that collaborations that seek waivers do not direct funding away from those target populations or jurisdictions where the dropout challenge is the greatest. Often, this redirection of funding is an unintentional byproduct of inappropriate attention to outreach, program design, community input, and connectivity to community organizations or supports with a history of success with more difficult youth populations.

Here are some considerations to ensure that Performance Partnership Pilots do not adversely affect the most vulnerable populations:

- Target communities of high youth distress¹⁹ and applicants that are explicit about the intent to reach out to youth in high-risk categories.

- Assure that those seeking waivers through Performance Partnership Grants identify the vulnerable populations currently served by the funding streams being blended and how the proposed partnership will enhance programming and outcomes to those populations.
- Require those seeking waivers to specify the mechanisms they will deploy to assure the participation of youth in high-risk categories in the programs of service designed under the pilot.
- Require that pilots collect data and report on youth enrollment and outcomes in ways that allow appropriate monitoring of which populations benefit.
- In state and regional collaborations, provide assurances that resources are not redistributed from jurisdictions of high youth distress to areas of lesser vulnerability.
- Require applicants to: obtain formal concurrence from appropriate administrators of the affected funding streams; identify how the process engaged key stakeholders in the various systems; and identify the mechanisms used to gain community input and comment.

IV. Establishing Benchmarks and Outcomes

The RFI is explicit that the intent of the pilots is to implement strategies that: 1) reengage disconnected youth; 2) connect them to pathways with academic and other supports; and 3) achieve outcomes that prepare them to be college and career ready. While the ultimate outcome objective should be college and career readiness for all youth, the strategies, pathways, supports, and interim benchmarks will vary greatly depending on how priorities are set for different segments of the population to be served in the pilot. The data to be collected and the outcomes to be measured must be specific to what the pilot area seeks to achieve through a waiver. It will be important to understand the interplay among populations served, interventions, progress on interim benchmarks, and impact on ultimate outcomes. For youth with greater academic deficits and more barriers, the achievement of postsecondary benchmarks may occur far outside of the three-year pilot window. Thus, it is important for pilots to document progress along a series of interim benchmarks.

Ideally, the funded pilots will create robust community-based interventions that serve the multiplicity of needs of youth in various risk categories, and connect them to the appropriate intensity of service through effective case management and multiple pathways, rather than pilots focused on specific subgroups or program models. However, the challenge with systemic, comprehensive interventions is their complexity, which also means they are less amenable to a singular evaluation format.

One way to maximize the learning from these pilots is to use several lenses to evaluate progress and measure success, including:

- **Process Measures** that look at aspects of implementation and delivery to gauge positive change and efficiencies in how resources are organized and services delivered across systems. For example:
 - An articulation of a strategic vision related to recovering and reengaging disconnected youth that is adopted by multiple systems
 - Number and nature of changes in policy and practice across systems to facilitate access to comprehensive services
 - Formal agreements across systems and with community providers related to referral, transition support, resource access, data sharing, etc.
 - Number of new pathways that blend education, work preparation, and support and the number of funding streams blended to create those pathways
 - Number of innovative ways deployed to award credit or reduce time to credential at the secondary and postsecondary levels

- Number of employer relationships activated to provide access to career exposure, internships, work/study, work experience, tryout employment, and job placement
- Effectiveness in outreach to and the recruitment of disconnected youth
- Effectiveness in enhancing the skills of youth-serving professionals across systems to collaborate and to better address the needs of high-risk youth
- **Interim Benchmarks of Progress** that chart the progress of the program interventions in moving cohorts of youth toward achieving the ultimate outcomes. For example:
 - Retention at 6 months, 12 months, 18 months, and 24 months and the achievement of academic progress and labor market objectives at each of those points
 - For youth engaged with the foster care or justice systems, homeless/runaways, or other high-risk youth, improvement in independent living skills, personal development, civic development, and recidivism
 - Academic progress:
 - For those who are deficient in basic skills, skills gains commensurate with the time and intensity of the program intervention and in keeping with goal of college and career readiness
 - For those without a high school diploma, reenrollment in school or an alternative education pathway that leads to a high school diploma or equivalent
 - For all youth, achievement of an academic skill set that prepares them for postsecondary success in college, training, apprenticeship, or employment
 - Employment benchmarks:
 - Continuous engagement in work-related activities—community service, transitional jobs, work experience, apprenticeships, internships, on-the-job training, work-study, subsidized and unsubsidized employment— along a continuum of progress toward living-wage employment
 - The achievement of employment competencies and occupational credentials with value in the labor market
- **Outcome Measures:** Ultimately, outcome measures should relate to the attainment of secondary and postsecondary credentials, employment, employment retention, and earnings. The WIA common measures can serve as a start by providing a point of reference for comparison.

V. Data Collection, Data Sharing, and Reporting

Many communities have data systems in place to track enrollments and outcomes for the youth they serve. In fact, most communities have multiple systems and complicated protocols. Some local areas, including Baltimore, Hartford, Indianapolis, and Los Angeles, have invested in case management systems that collect demographics, can track service and outcomes, and make it possible for providers to share data. These systems help with grant reporting and managing the progress of youth being served, but rarely are they connected to UI wage records, school system data, or data on postsecondary credentials. Waivers that would allow “real time” access to participant information would greatly enhance the ability of partnerships to provide timely and seamless service to youth. However, it is important that not all safeguards are waived in the interest of efficiency. We suggest that in granting waivers to allow data sharing, grantees be required to adhere to certain guidelines, including:

- Implementing protocols to assure that data are securely maintained when sharing data across systems;
- Assuring that data are accessible only to approved partners and only to those authorized within the partnership organizations;
- Identifying the sanctions for infractions of the protocols;

- Requiring informed consent on the sharing of personal data (e.g., criminal background, health, mental health) outside of those engaged in case management.

Another common concern in communities that attract multiple funding streams is that varying definitions, reporting requirements, and reporting systems are not only onerous but also costly in terms of administrative resources. However, if these experiments in waivers and blending funding streams are to have value, there must be robust vehicles for data collection and reporting. The ability of the pilot site to collect, report, and share data across systems should be a consideration in the selection. Some suggested considerations:

- Allow partners to be concurrently enrolled in all funding streams participating in the pilot. Provide funding to the pilots to adapt their data systems and reporting systems to accomplish this electronically and efficiently.
- Exempt partners in the pilot from inclusion in the calculation of performance for the individual funding streams (Incompatible performance expectations is often the biggest deterrent to collaboration).
- Require pilots to identify the benchmarks and outcomes that will be achieved and the data system that will be adapted to support the project, as well as the protocols for data sharing across systems.
- Where definitions and allowable activities differ, require applicants to specify which waivers being requested are designed to create uniformity and seamless services.
- Require pilots to collect data on the full range of demographics, interim benchmarks, and outcomes for all youth enrolled in the pilot.

VI. Considerations for Evaluation Design

Too few youth strategies have rigorously evaluated. Of those that have been evaluated, with random assignment experimental design as the predominant method, very few have yielded robust positive findings. This is not necessarily because the program interventions do not have merit; rather, it might reflect the challenges inherent in effectively evaluating interventions with many moving parts in very complex environments. Also, the more youth-serving programs and systems a community has, the more likely it is that a control group can access training and services outside of the demonstration, thus minimizing the findings on impact.

Key evaluation questions include:

- Did waivers make a difference in the effectiveness, efficiency, and quality of service delivery for disconnected youth? For which youth?
- If taken to scale, which segments of the youth population would be better served; which segments might see lesser service? Is this as intended? Is this an acceptable tradeoff?
- Did more comprehensive, effective, and efficient delivery of services to youth result in better education and labor market outcomes?

For the above reasons, we urge exploring evaluation approaches that do not require random assignment but do frame the approach to the above questions in ways that maximize the knowledge development from these experiments in waivers and the integration of funding. We suggest giving consideration to customizing each pilot's evaluation approach in order to document the baseline practices, policies, systems connections, and numbers served; capture changes that accrue as a result of the pilots; and extract lessons that have broader applicability.

VII. Recommendations for Performance Partnership Pilot Structure and Design

CLASP recommends utilizing *Combined Formula/Competitive Approach*. The integration of existing formula funds at the point of service delivery in local communities can be an effective method of achieving systems reforms, transforming programmatic behavior, and seeding knowledge development for other communities seeking to adopt flexible approaches to better serve disconnected youth. Competitive funds should be directed towards supporting pilot sites in the planning and implementing of innovative ways to work across agency lines and covering related costs associated with the coordinating and overseeing of this work at the local level. Thus, we propose the Administration do the following:

- Charge local community applicants to identify specific formula funds that will be leveraged to support the pilot and to describe how those decisions were made.
- Provide incentive funding to local areas to support costs associated with coordination, adapting data and reporting systems, etc., from a funding pot of cross-agency Federal competitive discretionary funding streams. We recommend a set-aside be made available to support pilot grantees.
- Leverage resources from across member departments of the Interagency Work Group on Disconnected Youth to provide technical assistance more seasoned applicants for the Performance Partnership Pilots and learning exchange opportunities for those emerging communities that are just beginning to grapple with developing strategies for their disconnected youth population.

Further, we recommend the Administration prioritize applicants 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* - Of great concern to communities that have working cross-system partnerships or strategic youth initiatives in place is that new Performance Partnership Pilots will be launched in their communities without regard or connection to work that is already ongoing. CLASP recommends that these pilots should not be new or fledgling initiatives. They should be built on or anchored to existing collaborations where cross-system relationships have matured and the leadership is in place in the public and private sectors to venture more strategically and aggressively to align systems or blend funding streams. There are several examples of such ventures in the attached appendix.
- *Preference for Pilots which Integrate Federal Funds, State and Local Funds*- 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.

Appendix: Examples of Local Innovation in Cross-system Solutions

In each example, various stakeholders have come together to strategically design interventions to change the education and labor market landscape for high-risk youth. More information and contacts for these communities can be found at: <http://ccrynetwork.articulatedman.com/member>

Local Area	Key Features
Baltimore Mayor's Office of Employment Development Baltimore Youth Opportunity System	• The Baltimore Youth Opportunity System serves 7,000 young people during the summer and nearly 2,400 in a multitude of year-round programs. Youth Opportunity centers are the gateway to services and provide caring adult support and navigation, assessment, goal setting, mental health services, and access to the most appropriate education options. • YO! Baltimore, the Youth Opportunity Academy, and the Career Academy are part of the range of alternative education sites that offer GED Plus, credit recovery options, accelerated learning, career and college readiness training, and early college exposure. • The Baltimore Youth Opportunity System is the evening reporting center for youth who would otherwise be in juvenile detention. Programming includes intensive exercise, self-expression through writing, performing arts and music, problem solving, and peer rap sessions. BYOS works with youth, their families, and justice staff to develop plans that put youth back on track. BYOS also provides transition support for youth leaving the foster care system. • The YO! Civic Justice Corps, coordinated by the City's Youth Cabinet and operated by the Mayor's Office of Employment Development, serves 18-24 year olds who have had a connection to the juvenile justice system. It is an innovative partnership among community-based organizations in West Baltimore. • The Baltimore Youth Council convenes stakeholders to work strategically on behalf of disconnected and disadvantaged youth.
Boston Office of Community Services and Jobs Youth Options Unlimited	• The Boston Public Schools Re-Engagement Center is supported by community partners, including the Private Industry Council, the Boston Public Health Commission, Youth Options Unlimited, Boston After-School & Beyond, and others. It is an expansion of Project Reconnect. • In the Boston Youth Service Network, a group of community-based organizations collaborate to provide alternative education and employment pathways for at-risk youth. • The Boston Private Industry Council leads the Youth Transitions Taskforce and actively engages with other advocates on key youth legislative issues and dropout prevention and recovery legislation. This advocacy has generated state funding to expand interventions for high-risk youth. A comprehensive bill to address dropout prevention and recovery has been introduced in the state legislature. • Youth Options Unlimited focuses on the hardest-to-serve youth, in particular offenders. The program provides intensive case management that begins before release, prepares youth for education reentry, and connects them to a nationally recognized Transitional Employment Services Program model. • Pathways to College/Year 13, Boston's "Year 13" initiative, combines the Private Industry Council's school-based services with those of the career centers, community colleges, and community-based organizations to provide an integrated network of support, beginning in high schools for students who will not yet be eligible for a Boston Public Schools diploma.
Hartford	• Hartford's Office of Youth Services led an integrated strategy that included Hartford Public Schools, United Way, Capital Workforce Partners, the Hartford Foundation for

Capital Workforce Partners Hartford Office of Youth Services	Public Giving, the judicial branch of the state government, the Hartford Police Department, the Department of Children and Families, and local nonprofits. This resulted in a Landscape Report on Hartford Youth, with recommendations for action. • The strategic work resulted in an overhaul of Hartford Public Schools to create smaller, career-themed learning environments and a variety of options for out-of-school and other high-needs youth. The Our Piece of the Pie® OPPortunity High School was created to provide individualized attention and support to over-age and under-credited youth. It serves youth who are age 18 or younger and have completed at least one and half years of high school but not enough credits to go on to the tenth grade. • The Future Workforce Committee of Capital Workforce Partners implemented the Career Competency System, a comprehensive “work and learn” framework that is embraced by business and embedded in all youth programming. The system assures that both in-school and out-of-school youth gain the workplace credentials and career exposure that prepare them for labor market success. • Capital Workforce Partners worked strategically with the state and regional literacy providers to create a coordinated, accountable adult literacy system across the adult education, community college, and workforce investment systems. • Capital Workforce Partners in partnership with Connecticut Workforce Development Council and the State Commission on Children got a bill introduced in the state legislature to develop a comprehensive youth employment system for coordinating and enhancing public and private resources and create employment opportunities and career pathways for youth.
Kansas City, MO Full Employment Council	• Kansas City is one of a very few communities that use individual training accounts for youth through the workforce system. ITAs are a strategy typically used primarily for adults. The ITAs help move youth beyond the boundaries of a GED/high school diploma and into postsecondary education. • Working jointly with city government, the local Workforce Investment Board, and community colleges, the Full Employment Council has utilized Integrated Basic Education and Skills Training (I-BEST), primarily an adult basic education tool, to improve reading and math skills among older youth who are dropouts, disconnected, and economically disadvantaged. • Kansas City established the Young Adult Career Connection Center, “The Cube,” to serve as a career and education hub for a variety of youth programs. The Cube houses Central Missouri University’s outreach center and satellite campus, where youth coming to the Career Connection Center can access classes, courses, certifications, internships, and training. • The Full Employment Council and Catholic Charities of Kansas City-St. Joseph Project Rise are lead partners in Project Rise through the Social Innovation Fund. The model is designed to improve long-term economic opportunities for young adults who are out of school, out of work, and lack a high school diploma or GED and who read between the sixth-grade and eighth-grade levels. MDRC is conducting an evaluation.
Los Angeles Back on Track Community Development Department	• The workforce system, the Los Angeles Unified School District, the Los Angeles Community College District, the Conservation Corps, the chamber of commerce, and a host of community partners are collaborating. • The city launched a large-scale, city-wide effort to reconnect dropouts with appropriate education options and supports. • Through a network of 13 Dropout Recovery Centers, young people can get training and engage with counselors about reenrolling in education. The centers are staffed by the school and workforce systems. • The city will draw upon a network of over 30 education partners to provide a broad array of options, including technical high schools, charter schools, alternative schools, community-based programs, vocational skills centers, the Conservation Corps, GED-to-college programs, and the Health Career Advancement Academy, which prepares dropouts for postsecondary training in health careers. • The workforce system has received a \$12 million federal Workforce Innovation Grant

	and increased its targeted expenditure for out-of-school youth to 80 percent of its WIA youth allocation to support this effort. Blended funding across multiple streams covers the cost of education, training, and support services for youth.
Philadelphia Project U-Turn Philadelphia Youth Network	• The Philadelphia Youth Network works with the city, United Way, the Greater Philadelphia Chamber of Commerce, local institutions of higher education, employers, schools, community-based organizations, and other stakeholders—including youth themselves—to connect resources, practices, programs, and strategies around community-wide agendas for youth. • Project U-Turn is a citywide campaign to focus public attention on the dropout crisis and to design strategies and leverage investments to resolve it. • Key community stakeholders engaged in an extensive data-driven process and worked with the district to better shape programs and policies to meet the needs of struggling students and out-of-school youth. • The city expanded multiple pathways to graduation, with the school district’s support, for over-age and under-credited young people. These pathways recently have provided 3,550 former or near-dropouts with high-quality educational programming and options. • The city added GED Plus to the menu of education options. This is a GED-to-college model that provides: rigorous academic preparation for the GED and college-level academics; postsecondary bridging, leading to successful attachment to a postsecondary institution; and postsecondary transition and follow-up support through the first year of the postsecondary placement. • Five E3 (Education, Employment, and Empowerment) Centers are located throughout the city. They provide educational services, employment readiness and placement services, and occupational and life skills training for disconnected youth, including those returning from juvenile placement centers.
San Diego San Diego Workforce Partnership	• Collaboration among San Diego stakeholders resulted in the creation of the Office of Youth Development and a youth “czar” position to facilitate continued strategic work across systems. These will be housed at the San Diego Workforce Partnership, the county’s chief workforce development organization. • A network of One Stop Youth Career Centers serves the transition needs of youth who are expelled, delinquent, gang affiliated, homeless, parenting, or are in foster care or on probation. • The workforce system partners with child welfare services to provide independent living skills and workforce development skills to youth transitioning from foster care. • In keeping with the city’s strategic youth plan, the San Diego Workforce Partnership dramatically increased the share of WIA youth funds to be spent on out-of-school youth. It issued an RFP for youth programs to reflect this change in priority and to require that all respondents wishing to serve older youth partner with a postsecondary training entity to assure youth receive training and a labor market credential. • The San Diego Workforce Partnership developed the Career Pathways for After School Staff (CPASS) and the Urban Teachers Fellowship Program to put interested disconnected youth on a pathway to the teaching profession; the pathway is connected with Mesa College and San Diego State University.
Seattle Workforce Development Council of Seattle-King County	• The Workforce Development Council provides leadership and helps set strategic vision on the delivery of youth employment and education programming in the region. In partnership with community-based organizations, local community colleges, school districts, businesses, and training providers, the WDC targets comprehensive programs for disadvantaged and disconnected youth. • YouthSource, a youth-focused, multiservice agency, is an education, employment, and development center for at-risk youth ages 14-21. Co-located with a full-service one-stop site, yet targeting the unique needs of youth with multiple barriers, YouthSource offers a learning center through a community-college partnership. It also offers project-based learning through innovative programs focused on computers, construction and manufacturing; mental health and chemical dependency counseling and treatment; links to employment; and intensive case management.

- SODO Inc., winner of a 2011 Governor’s Best Practice Award, is a public-private partnership among a youth-services provider (King County Work Training Program/YouthSource), industry (the Manufacturing Industrial Council), and a community college (South Seattle Community College). SODO Inc. prepares disadvantaged youth and young adults for family-wage careers. It serves youth and young adults ages 18-24, with a focus on those previously involved in the justice system. It offers college training, industrial credentials, private-sector internships, individualized case management, and job placement assistance.
- The King County Out-of-School Youth Consortium, another collaborative partnership, offers a variety of pathways for out-of-school youth. The consortium is a WIA-funded network of 13 partner agencies.

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