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Comments to United States Department of Health and Human Services Notice of Request for Public Comments: Document Number: 2010-31975 Input for a Strategic Plan for Federal Youth Policy January 20, 2011

On behalf of the Campaign for Youth, thank you for the opportunity to inform the vision and *Strategic Plan for Federal Youth Policy*. We applaud the initial efforts of the *Interagency Working Group* to gather input from a diverse set of stakeholders around the country, including youth, non-profit organizations, and state and local leaders. We also commend Congress and the Administration for recognizing the importance of establishing such a workgroup to improve youth service delivery at all levels of government through effective information dissemination, system and programmatic coordination, and braiding and blending of critical resources. In particular, we support the broad [*Framework*](#) developed by the *Interagency Working Group* thus far, specifically:

- **Outcomes:** The three outcomes- *Health, Safety, and Wellness; School, Family, and Community Engagement and Connections; Education, Training, Employment, Transitions; and Readiness for Jobs, Careers and Adulthood* established for all youth, including those youth in highly disadvantaged situations, signals a commitment to addressing the interlocking systems and multiple domains in which youth exist rather than a single focus on one particular set of youth outcomes.
- **Transitions:** The *Working Group's* youth development approach to framing youth policy and its recognition of critical age and developmental transitions that extend beyond age 18 or 21. Research learned from the youth development and brain research field reveals that late adolescence and early adulthood are critical stages in the growth of young people and federal programming must adequately address the unique needs of youth during these transitions.
- **All Youth:** The focus on all youth, including special populations and those involved in systems, points to a universal approach in which policy will address the needs of all youth, with a caveat and appropriate acknowledgement that some young people require additional supports, skills, and resources to reach adulthood with success.

While we are pleased to see the inclusion of the above components in the initial *Framework*, we believe there are particular elements that should be included in a Strategic Plan to more effectively support the outcomes of youth living in communities of high youth distress, youth of color, and those disconnected from the mainstream. Our comments and recommendations relate specifically to ensuring the needs of disconnected and high needs youth¹ are adequately addressed. If you have any questions or need further information, please contact Kisha Bird at the Campaign for Youth (202-906-8020 or campaignforyouth@clasp.org).

Addressing the Youth Challenge

The odds of successful transition to adulthood for young people living in high-poverty communities-urban and rural - are sadly, stacked against them. Lack of opportunity saturates their daily existence and far too many are idle, detached from civic life, education, and employment. Every year, approximately 1.2 million students do not graduate from high school on time. And nearly 500,000 fail to graduate.ⁱ

Black males in the United States are 31 percent less likely to graduate from high school than their white males peers. In places like Washington, D.C. and New York State the black male /white male graduation gap jumps to 43 percent.ⁱⁱ **Rates of idleness among racial-ethnic minorities in rural areas are particularly high**-16.5 percent of rural blacks, 19.3 percent of rural Hispanics, and 22.6 percent of rural “other” racial-ethnic groups (such as American Indians) are idle.ⁱⁱⁱ Still, in the face of these inequitable circumstances, youth continue to have high hopes for their futures and possess talents unique to them.² At our own peril, we risk the loss of the talent and promise these young people hold if they are denied equal access to realize their full potential.

Reversing the Trend: Federally Funded Youth Recovery and Re-Engagement System

A Youth Recovery and Reengagement System is not just a moral and civil rights issue but its existence or lack thereof has a direct impact on the economy and national security of our nation. For over 20 years, economists and labor market analysts have been sounding the alarm. The American way of life “*our economy, national security, and social cohesion*” is at alarming risk if serious attention is not devoted to the development of comprehensive policies and programs that address the needs of all youth, especially minorities and the most disadvantaged.^{iv}

We have an opportunity deficit in our nation. An estimated 5.2 million youth ages 16-24 are out of school and out of work.^v Without purposeful efforts to connect disconnected youth to jobs, paid work experience, education, and training to prepare them for openings in the new economy, those youth will

¹ Young people in disadvantaged situations, age 16-24, including those who left secondary school without receiving a high school diploma, those at risk of not graduating with a diploma on time, youth detached from the labor market, runaway and homeless youth, youth in foster care and those aging out of care, formerly incarcerated and court involved youth and young people with disabilities.

²CLASP surveyed nearly 200 youth from across 13 communities to gain better insight into the unique experiences of young people who have dropped out of high school and reconnected to career and education supports.

<http://www.clasp.org/issues/pages?type=youth&id=0029>

most likely spend the better part of a decade with few opportunities to work, gain skills, or earn family sustaining wages.

What is needed is a ***Federally Funded Youth Recovery and Re-Engagement System*** funded at scale that:

- ***Targets Funding*** to communities of high youth distress and to serve disconnected & high needs youth
- ***Builds Community Capacity*** to create a comprehensive delivery system, leverage community & public resources
- ***Creates Multiple Pathways*** that blends education, training, and support to lead to secondary and post-secondary credentials
- ***Greatly Expands Work Experience*** including subsidized work, internships, pre-apprenticeships and apprenticeships, on-the-job training, summer jobs, transitional jobs, and service and youth corps

This is not the responsibility of just one federal department or function of a single piece of legislation. Thus, the federal government, through the *Interagency Working Group* and the *Strategic Plan for Federal Youth Policy*, has an opportunity to demonstrate leadership by fostering a new sense of federal responsibility on behalf of high needs and out-of-school youth. The following responses refer to specific questions referenced in the *Notice of Request for Public Comments: Input for a Strategic Plan for Federal Youth Policy* and include further recommendations to improve the *coordination, effectiveness, and efficiency of federal programs affecting youth*:

I. What programs really make a difference in the lives of youth? How do you know this?

The Campaign for Youth takes the approach that there is no one single “program” that provides a magic remedy for youth living on the margins. The solution lies beyond a group of independently operated programs each doing its own thing for youth. Rather, we’ve found that the most effective communities employ a comprehensive youth service delivery approach to dropout recovery and re-engagement. They weave resources and funding streams – public, private, and foundation – in a strategic way that draws on the strengths of public systems and community providers to create multiple, supported pathways that provide youth with the education, skills, and access to good jobs and careers they need to be successful.^{vi}

A body of knowledge developed over the past two decades points to key elements of successful practice working with youth in high risk situations and supporting struggling students and out-of-school youth and get them on pathways toward success in postsecondary education and the workforce.³ Innovative

³ 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.

approaches to serving high needs and out-of-school youth that most often incorporate the following components:

- **A strong education component**, offered in partnership with secondary and postsecondary education institutions that re-engages dropouts and/or provides alternatives for over-aged and under-credited, in-school students.
- **A work experience or career exposure component**, providing hands-on exposure to the workplace, education about appropriate work behaviors and ethics, leadership and personal development activities, and exploration of career options with strategic linkages to postsecondary education.
- **Extensive support services**, providing the health and social welfare supports necessary so young people can concentrate on their educational needs.
- **A well-trained case management arm**, responsible for engaging youth by identifying and meeting needs in the areas of education, employment, basic skills, and wrap-around supports.^{vii}

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. In short, such a system must offer a menu of well-supported educational pathways and options for high school students and dropouts 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 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, skills training, and work experience programs leading to secondary and/or occupational credentials. Programs also incorporate personal and leadership development activities that support civic engagement and community connections.

Services are more effective and resources are better used when all systems and sectors work together. Effective coordinating efforts are underway at the state and local levels. Twenty-four states have established cross-agency coordinating bodies for children and youth, and across the country cities are creating “youth master plans” to facilitate the development of sustained and coordinated strategies that yield large and lasting dividends and ensure that opportunities to improve outcomes for children and youth are not squandered.”^{viii} However, coordination alone cannot resolve glaring gaps in service and opportunity in high poverty communities. The scale of the interventions must be commensurate with the magnitude of the dropout challenge. While coordination is a central charge of the *Interagency Working Group*, we earnestly caution federal agencies to not diminish the scarce financial resources already dedicated to youth and this population.

II. What are the barriers to collaborating to improving youth outcomes and how can these barriers be removed?

Cornerstone pieces of youth legislation – including the Elementary and Secondary Education (ESEA), Workforce Investment Act (WIA), Temporary Assistance to Needy Families (TANF), and Perkins, as well as departmental programs and initiatives –can provide a pivotal launching point for seeding and establishing an exhaustive set of youth policies that will build on the existing youth service delivery and education infrastructure in local areas. We must leverage opportunities through reauthorization of these policies to restructure federal approaches to meet serious youth challenges, address the demands of a 21st Century economy, and better align funding streams to support programming for off-track students and dropout recovery. Built into the various pieces of legislation should be consistent targeting, definitions, accountability measures, and requirements for strategic coordination of efforts to address the needs of these youth. We believe the youth service program design/delivery must be based on the following core principles:

- All systems must work in concert- the workforce, child welfare, justice, education, including adult education, and other youth serving systems – to prioritize vulnerable youth for service and coordinate transition support for them;
- Reach out to youth who have disengaged from education and labor market pursuits and help them reconnect to education, training, and employment supports;
- Work in tandem with the secondary system – in particular with school reform efforts –to keep youth who are in high-risk situations attached to school; and
- Convene workforce, public education, labor, employers, higher education and community-based organizations to craft pathways to postsecondary and labor market success.

There are various barriers within individual pieces of legislation and departmental policies that make it difficult for state and local communities to operate under the above mentioned principles. For example, misaligned performance measures across various statutes make it less appealing to work with “hard to reach youth” and those with limited education and skills, lack of federal, state, and local strategic vision and planning for youth, a dearth of needed support and wrap around services, and various impediments related to income eligibility and verification make it difficult for local areas to serve high needs youth in disadvantaged situations.

Fixes to some of these issues must be addressed within individual pieces of legislation; however, an *Interagency Working Group* can set forth principles/goals that signal elements to be addressed within reauthorizations and implemented within department discretionary grant programs, such as:

- Establishing a youth council (or other appropriately designated entity) function in all federal funding streams, including discretionary grants that target funding to local areas that serve high needs youth. The youth council function would support the intentional integration of federal programming across agencies and systems and facilitate the development of sustained and coordinated strategies at the state and local level. The coordinating body would be responsible for the development youth plans in which they conduct data analysis and strategically assess programs to address the needs of youth in these specific high needs categories and how funding from various federal sources will be appropriated to support these needs.
- Addressing eligibility and income issues that would allow for high needs youth and high school drop outs to be automatically eligible for a battery of services and interventions, expanding eligibility, where appropriate to age 24, and increasing the baseline for income eligibility.
- Supporting innovations that improve the use of data to inform planning and programming for dropout recovery and build the capacity local leaders to use data to improve quality and system management at the local level.
- Utilizing existing federal departmental technical assistance resources to support: cross-sector collaboration, the development and staff capacity to implement multiple education options, use of and integration of education technologies, and accelerated and applied learning techniques with this population of students; evaluation, knowledge development, and dissemination; and to document practices appropriate to older youth and non-traditional learning environments.

III. What can federal agencies do to assist? What are your ideas for federal policy to improve the coordination, effectiveness, and efficiency of programs affecting youth?

In addition to careful consideration of the above recommendations, federal agencies and its leadership can also use their “bully pulpit” and budget authority over discretionary resources to:

- Make reconnecting our youth a national priority: reconnect them to education, employment, service, and citizenship

An elevated priority on this youth population will raise the profile and importance of these young people in the minds of state and local community leaders. It will propel local systems administrators, elected officials and nonprofit organizations responsible for appropriating and delivering youth services and working towards increasing graduation rates to not just focus on preventative strategies but also on recuperative and recovery efforts across funding streams. A *Federal Work Plan* that explicitly includes this population will drive states and communities (where implementation occurs) to develop strategies that work for disconnected youth.

- Invest in building the youth service delivery capacity in communities of high youth distress

Nobody is currently accountable for youth who leave school prematurely or fall between the cracks as they transition between systems. Leadership at the local and state levels needs to be supported to create a locus of responsibility for out-of-school, unemployed young people. We recommend policies to support community efforts to build a robust youth service delivery infrastructure that involves 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.

In cities such as Hartford, Boston, Philadelphia, Portland (Oregon), local leaders (community-based nonprofit partners and other youth serving systems-such as workforce, child welfare, and juvenile justice) are working in partnership and creating promising strategies to re-engage youth who are slipping off-track to graduation and to recover those that have already left school. These communities have found that targeting resources to “map student needs against actionable solutions” will increase the likelihood that students at risk of not graduating on time and those already out-of-school can attain secondary school diploma through recuperation and recovery efforts that link education, training, and work.^{ix}

IV. How can youth be engaged in these efforts?

Too often we talk about young people as a problem. But young people deserve respect, and we should include them in finding solutions. Young people can and should work hand in hand with adults to craft solutions to the challenges their communities face^x. We recommend policies to:

- Call for constructive engagement of youth involvement on state and local youth councils⁴ as well as on youth advisory boards, such as state and local children’s cabinets, to give young people a voice in co-developing interventions and advising high-level government officials.
- Form a National Youth Council, comprised of young people from across the country, to work with the *Interagency 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.
- Encourage the development of state and local youth councils to bring perspective into local youth programming and to provide input on the work of the *Interagency Working Group* and the National Youth Council.
- Annually hold *National Youth Listening Summit* to hear the concerns and solutions of all youth, including those that have dropped out of high school and youth in disadvantaged situations.

⁴ As defined by the [Workforce Investment Act of 1998](#)

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- ⁱ Education Week, *Diplomas Count 2008: Diplomas Count 2008. School to College: Can State P-16 Councils Ease the Transition?* <http://www.edweek.org/ew/toc/2008/06/05/index.html>
- ⁱⁱ *Given Half a Chance: The Schott 50 State Report on Public Education and Black Males*, Schott Foundation, 2008, <http://www.blackboysreport.org>
- ⁱⁱⁱ Anastasia Snyder and Diane McLaughlin, Fact Sheet- No. 11: "Rural Youth are More Likely to be Idle", Winter 2008, Carsey Institute at the University of New Hampshire, http://www.carseyinstitute.unh.edu/publications/FS_RuralYouth_08.pdf
- ^{iv} William T. Grant Foundation Commission on Work, Family and Citizenship. (1988). *Citizenship through service*. Washington, DC: Author.
- ^v Andrew Sum et al., *Left Behind in the Labor Market: Labor Market Problems of the Nation's Out-of-School, Young Adult Populations*, Northeastern University: Center for Labor Market Studies, 2003
- ^{vi} Sara Hastings, et al., *Building a Comprehensive Youth. Employment Delivery System: Examples of Effective Practice*, Center for Law and Social Policy, February 2010, <http://www.clasp.org/admin/site/publications/files/Youth-Employment-Systems.pdf>
- ^{vii} Ibid.
- ^{viii} Action Kit for Municipal Leaders, Issue# 10, "Youth Master Plan", National League of Cities, Institute for Youth, Education, and Families, <http://www.nlc.org/assets/fe8fc40157954b35aa6bc9c0c450d330/>
- ^{ix} MetisNet. *Closing the Graduation Gap: A Superintendent's Guide for Planning Multiple Pathways to Graduation*, Youth Transition Funders Group, 2009, 5-6
- ^x *Our Youth, Our Economy, Our Future: A National Strategy for Reconnecting America's Youth*, Campaign for Youth, 2008. <http://campaignforyouth.articulatedman.com/admin/documents/files/CFYInvestmentStrategy.final.11.09.pdf>