

CLASP

Policy solutions that work for low-income people

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Kimberly Vitelli
Deputy Administrator
U.S. Department of Labor
Employment and Training Administration
200 Constitution Avenue NW
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Jennifer N. Kemp
Chief, Division of Youth Services
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Dear Deputy Administrator Vitelli and Chief Kemp,

During the current emergency caused by COVID-19, it is vital to identify the most effective ways to support physical and economic health for everyone. When the nation faces a crisis of this scale, existing disparities in income, employment, and other social determinants of health become exacerbated. We know that those who are already marginalized in society face the greatest risk of unemployment, reduced wages, and loss of other basic needs.

History demonstrates the precarious position of young workers in a volatile economy: a decade after the Great Recession, [employment rates for youth and young adults still have not fully recovered, especially among young Black and Native American workers](#). With this understanding, the Center for Law and Social Policy (CLASP), in partnership with the National Youth Employment Coalition (NYEC), gathered **input from workforce development boards, city agencies, community-based organizations, and other youth workforce partners nationwide**. **This letter shares their insights and recommendations** for the U.S. Department of Labor's response to the multi-layered crises resulting from COVID-19.

Our partners' most common requests are (1) timely guidance from DOL; (2) prioritizing direct relief funds to serve youth and young adults, especially Opportunity Youth (16- to 24-year-olds who are not working or in school); (3) flexibility to quickly modify use of existing federal funds to adjust to virtual operations; (4) removal of technical and administrative requirements that hamper remote services; and (5) release from negotiated performance measures.

Meeting immediate needs

Youth and young adults who participate in education, training, and work experiences rely on stipends, incentives, or subsidized wages to meet basic needs for themselves and often for their families. Local agencies are working to maintain youth services through calls, texts, online classes, cell phone apps, and other virtual means. They need guidance and flexibility from DOL to help them adjust and meet young people's needs.

Recommendation: Issue explicit guidance to state and local workforce boards that clarifies their ability to authorize stipends and incentives for enrolled youth, regardless of current participation. Many workforce boards have expressed uncertainty about the extent to which they can distribute federal dollars directly to youth who cannot currently participate in typical WIOA activities.

Recommendation: Instruct States that supportive services can include emergency cash assistance; food; purchase of laptops, tablets, or internet hotspots; voice and data service for cell phones; recurring car-sharing or taxi costs (since public transit is reduced in much of the country); and other emergency needs during the pandemic and recovery efforts.

Recommendation: Strongly encourage use of self-attestation to the maximal extent allowable under WIOA. For eligibility requirements that require documentation, encourage use of electronic verification (including but not limited to emailed documents and virtual signatures) so workforce agencies can continue to enroll youth during and after this crisis.

Maintaining services through the emergency

Youth-serving agencies are reconfiguring operations to protect the health of staff and participants and comply with stay-at-home orders. They are working to meet emergency needs, identify ways to keep participants engaged remotely, and prepare for a surge in demand as the job market contracts. Unemployment claims already stand at record levels, and jobs in fields such as hospitality with low barriers to entry are in short supply, leaving workforce agencies concerned about availability of jobs during the peak summer months.

Recommendation: Direct new funding toward programs serving youth and young adults. Without explicit prioritization, young people – especially Opportunity Youth– are likely to be left behind. In line with WIOA requirements and DOL’s commitments to serving youth with low incomes and Opportunity Youth, these funds must explicitly prioritize youth with the most tenuous connections to the labor market.

Recommendation: Clarify that Sec. 3515(a) of the CARES Act applies to youth service providers, allowing them to spend up to 20 percent of WIOA Youth funding on administrative costs to facilitate the transition to remote services.

Recommendation: Suspend the requirement that 20 percent of WIOA Youth funding be spent on work experience so programs can use funds as needed to provide effective services during this time of high unemployment.

Recommendation: Accept alternative forms of verification of services, such as self-attestation, electronic signatures, call logs, or other systems proposed by youth-serving agencies.

Recommendation: Issue guidance with the broadest possible interpretation of allowable costs for outreach, such as radio and social media ads that can reach youth during stay-at-home orders, when important outreach strategies such as partner referrals or other personal interactions are impractical.

Sustaining youth workforce systems beyond the immediate crisis

With budgets stretched by unexpected expenses, city and state agencies and community-based organizations face extraordinary financial challenges. At the same time, young people who rely on their services have even greater need for education and training that prepares them for sustainable careers.

Recommendation: Assure state and local agencies that they will not be penalized for failure to meet negotiated WIOA performance measures due to the COVID-19 emergency. State and local area funding must be held harmless during the pandemic. Rather than focusing on outcomes or numbers served, DOL’s oversight of states, and states’ oversight of local areas, should be used to [ensure equity](#) in access to services and use of funds.

Recommendation: Suspend requirements to exit youth for inactivity during the emergency period so they can easily resume participation when they are able.

Recommendation: Maintain the requirement that 75 percent of WIOA Youth dollars be spent on out-of-school youth so agencies can target their efforts toward the 4.5 Million Opportunity Youth in our communities – a number we expect to grow due to the disruptions to the economy. The Secretary should exercise caution regarding equity concerns when considering waiver requests.

Recommendation: Encourage investment in long-term career development through stipends and other supports for students enrolled in post-secondary education.

Recommendation: Give automatic no-cost extensions for discretionary grants so programs have time to recruit and reengage participants.

The youth workforce system is finding ways to adapt to unprecedented challenges that affect demand for services, available program modalities, administrative and infrastructure capacity, and opportunities to meet job placement and retention outcomes measures. Sector leaders are actively learning from their peers across the country through professional networks such as the Aspen Institute's Opportunity Youth Forum, Communities Collaborating to Reconnect Youth Network (CCRY), National League of Cities Reengagement Network, NYEC, Reconnecting Youth Campaign, and other local, state, and national groups.

Creative solutions have included adjusting requirements for receiving stipends and subsidized wages, instituting app-based payment systems (e.g., Cash App), moving GED courses online, offering daily mini-lessons on Facebook Live, providing case management through text messaging, and working more closely with partner organizations to ensure youth have food and other necessities. Some programs are using this crisis as an opportunity to deepen relationships with youth and families, contacting youth primarily to check on their personal needs and emotional wellbeing rather than focusing on program compliance, with the hope that strengthening these connections with caring adults will improve long-term program retention, compliance, and performance. Others are responding to uncertainty about summer jobs (particularly given predictions that stay-at-home orders in some jurisdictions may last into June), by exploring the feasibility of remote work experiences replacing some traditional summer jobs.

Over the last few weeks, thousands of youth have already experienced disruption to education, training, and work experience. Although the CARES Act provides relief to some sectors of the economy, it does little to address the concerns outlined in this letter. CLASP urges the U.S. Department of Labor to help workforce agencies respond nimbly to changing needs and circumstances by providing timely guidance and maximum flexibility, including but not limited to adoption of the recommendations outlined above. Our nation cannot afford to leave our young people behind again.

Thank you for the opportunity to share the insights we have gathered from the field. Please direct any questions to me at 202-906-8020 or kbird@clasp.org.

Sincerely,

Kisha Bird, Director
Youth Policy

cc: Sara Hastings, U.S. Department of Labor, Employment and Training Administration