



**Recommendations for WIA Reauthorization Legislation:  
Title I Youth Provisions**

by Linda Harris

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Reauthorization of the Workforce Investment Act (WIA) is happening at a particularly important time for state and local youth delivery systems. During the past few years, increased attention has been given to the unacceptably high dropout rates in districts across the country. The revelation that nearly one in three youth—one in two minority youth—who start public high school fail to graduate four years later has brought visibility to the issue of disconnected youth in this country.<sup>1</sup> The No Child Left Behind accountability lens will aim to increase the focus on high schools, forcing school districts and communities to pay attention to cohorts of students as they enter ninth grade, to ensure graduation four years later. In many districts, accomplishing this will require communities to come together around preventive strategies and around connecting high-risk youth to supportive education alternatives that lead to credentials.

As local communities seek to put these interventions in place, WIA can and should play a pivotal role. In fact, in many jurisdictions the youth system under WIA has made some important advances and has provided key lessons, lessons that should be built upon in the reauthorization process. Many local areas have found ways to use their WIA resources and their youth councils to leverage resources of other systems in a more coordinated and strategic way.

A Government Accountability Office (GAO) study on early implementation reports that nationally, 50 percent of local areas leverage non-WIA funding to support their youth programming. It cites active involvement of youth councils in communities across the country, such as Sonoma County and San Jose, California; Cheyenne, Wyoming; Madison and Milwaukee, Wisconsin; South Florida; and Middlesex, New Jersey. In local areas that received Youth Opportunity (YO) grant funding—such as Boston; Baltimore; San Diego; Houston; Philadelphia; Molokai, Hawaii; Kansas City; Los Angeles; Hartford, Connecticut; rural Arkansas and Louisiana; Lumber River, South Carolina; and Tucson—formal alliances have formed among multiple systems, alliances that have continued after grant funding ceased.<sup>2</sup>

The reforms in service delivery that were envisioned with the passage of WIA are taking hold in many jurisdictions across the country. It is important that the reauthorization incorporate the past five years' experiences and lessons learned related to youth delivery,

especially in economically distressed areas. Reauthorization of the youth provisions of WIA should consider the following:

1. Preserve youth councils, or an appropriately designated alternate entity, to serve as the focal point for strategic coordination of youth service activity.
2. Require a greater focus in the formula funding on dropouts and youth in high-risk categories.
3. Remove the bureaucratic eligibility certification requirements, which deter youth from accessing service and make coordination across systems and funding streams more difficult.
4. Ensure that YO grants are retained in the legislation and are targeted to economically distressed communities, require the collaboration of multiple systems, and focus on building a comprehensive and integrated youth delivery system.
5. Restore the formula funding to at least the 2000 levels, and trigger the funding for the YO program.
6. Increase access to paid work experience opportunities, including summer jobs for 14- to 16-year-old youth, transitional jobs for vulnerable populations such as re-entering offenders, and year-round work experience and service programs for out-of-school youth in high-risk categories.
7. Adjust the performance-measurement system to take into account risk factors in setting standards and identifying interim benchmarks.

**1. Preserve youth councils, or an appropriately designated alternate entity, to serve as the focal point for strategic coordination of youth service activity.**

The establishment of youth councils under WIA was designed to bring focus and strategic action around youth programming to local areas around the country. This is important, as this role of focusing priority and coordinating services on behalf of youth—in particular, disadvantaged youth—does not by statute rest with any other body. It is too soon to abandon this provision in WIA. Youth councils should continue to be mandated, and the reauthorizing legislation should support their role as the focal point for blending funding streams and systems' supports in the delivery of comprehensive youth services. Youth councils have been hampered in playing this role, because the current WIA statute is overly prescriptive about youth council membership, responsibilities, and authority. Reauthorized legislation should allow local areas the flexibility to configure these items as appropriate in their areas.

**Recommendations:** Maintain mandatory youth councils; but refocus their role on strategic planning, oversight, and coordination.

- Provide for the establishment of a youth council—or a committee of the local workforce investment board, or an alternative entity designated by the local elected official(s) in consultation with the board—that consists of experts and stakeholders in youth programs, *including youth*, to advise the local board on youth activities.

- Eliminate the overly prescriptive definition of youth council responsibilities, and allow flexibility for local areas to determine the configuration of partners and priorities that works best for their local area. Require, however, the participation of business and education on the council.
- Require states to identify in the state plans specific actions that will be undertaken to facilitate the work of the local youth councils and to foster greater coordination with state-administered youth systems and programs.
- Require local youth councils to develop a comprehensive youth plan that identifies priorities, strategies to be employed, and funding streams.
- Require local youth councils to detail how they will link with the justice system to provide support and service to those youth under the juvenile justice system's jurisdiction.

**2. Require a greater focus in the formula funding on dropouts and youth in high-risk categories.**

For the most part, youth programming under WIA is carried out via funds driven by formula to local areas or via competitive funding through the YO grant provision of the law. Current law mandates that a minimum of 30 percent of the formula funds be spent locally on out-of-school youth. Given the high level of youth distress in communities with high poverty rates and dropout rates and the tremendous challenges that youth in high-risk categories present, a case can be made for driving the local system to serve a more difficult population.

**Recommendation:** Require that 40 percent of those served with formula funding be in the high-risk category, to include dropouts along with homeless youth, young offenders, and youth in the foster care system, regardless of their school status.

**3. Remove the bureaucratic eligibility certification requirements, which deter youth from accessing service and make coordination across systems and funding streams more difficult.**

A GAO report to Congress indicates that overly restrictive income requirements and burdensome certification processes have served as barriers to receipt of services for many youth.<sup>3</sup> Many out-of-school youth are in tenuous living situations without easy access to parent or guardian income information. For many out-of-school youth, it is difficult to assemble the necessary papers to document income, residency, welfare status, and the like. For in-school youth, the process can be stigmatizing. Competing eligibility requirements are a daunting challenge to efforts to integrate services across systems, and the process is burdensome for service providers.

**Recommendation:** Make 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.

**4. Continue targeted funding to economically distressed communities via YO grants, require the collaboration of multiple systems, and focus on building a comprehensive and integrated youth delivery system.**

Competitive YO grants to high-poverty urban, rural, and Native American communities are authorized under current legislation. The grants were introduced in the legislation as the vehicle to get the resources to high-poverty communities, to build the delivery system capacity to address the issue at a scale that would ultimately make a difference in the education and labor market outcomes for the community's youth as a whole. They were meant to be comprehensive, intensive, and cross system. More than 150 communities applied for grants, with 36 being selected in the initial and only round of awards. These grants were highly successful in building delivery capacity in these communities. More than 90,000 mostly minority youth were enrolled in programs, 48 percent of whom were out of school.

The programs had tremendous drawing power. The Department of Labor estimated that 42 percent of eligible youth—62 percent of out-of-school youth in the 36 communities—were enrolled.<sup>4</sup> The YO communities were particularly successful in making educational connections, post-secondary connections, and short- and long-term placements for these youth. A table highlighting some of the local-programming innovations that resulted from YO funding can be found in the appendix of the CLASP publication *Learning from the Youth Opportunity Experience: Building Delivery Capacity in Distressed Communities*.<sup>5</sup> The lessons from the initial grantees were to be used in the rollout of additional communities, thus changing the landscape of youth delivery in distressed communities. However, appropriations to allow the continuance of the grants did not materialize.

Current law targets YO grants to empowerment-zone and enterprise-zone communities. This targeting to distressed urban and rural areas should be maintained, using criteria such as poverty and dropout rates. Given the heightened attention to the unacceptably low graduation rates and the need to focus more attention and resources on keeping youth—in particular, high-risk youth—connected to school or appropriate alternatives, there should be some effort to ensure that the discretionary YO grants are directed to communities that serve these youth.

**Recommendations:**

- Specify that YO grants are to be targeted to areas of high youth-poverty or dropout rates and equitably distributed among urban, rural, and Native American communities.
- Require the Secretary of Labor to consider factors reflecting youth distress when awarding YO grants. These include such factors as youth economic distress, dropout rates, youth unemployment, youth poverty, post-secondary attendance rates, and other need-related factors.
- Require that applicants identify how the various youth-serving systems will coordinate in the planning and implementation of services under this grant—in

particular, the local WIA system, education (including post-secondary), juvenile justice, and foster care.

- Require applicants to be explicit about their support strategy for re-entering young offenders.
- Require applicants to put in place a case management/youth advocacy system that will help youth navigate the systems and resources and help keep them on track to successful outcomes. Well-trained, caring youth advocacy staff has been cited repeatedly as key to successful outcomes.
- Require that applicants identify the specific role that business will play in the planning and oversight process and in providing access to work experience, internships, apprenticeships, training, and placement in growing sectors of the regional economy.

**5. Restore the formula funding to at least the 2000 levels, and trigger the funding for the YO program.**

Since its authorization in 2000, funding for the youth title of WIA has been reduced considerably. If the system was funded at the same level as 2000, the federal investment would be approximately \$1.5 billion, adjusting for inflation. However, the Fiscal Year 2008 budget mark is \$940 million. This money is only for the formula program, since the legislation requires at least \$1 billion formula funding before the YO grants are triggered. This provision was placed in the legislation to prevent YO grants from being funded at the expense of local programs. However, formula funding has been less than \$1 billion dollars since 2003.

**Recommendations:**

- Restore the formula program to at least the 2000 level of \$1.5 billion (in 2007 dollars).
- Reauthorize YO grants as an essential vehicle for building the capacity of high-poverty communities to build the infrastructure to connect high-risk youth to the education, training, work, and supports needed to ensure their labor market success. Authorize YO grants at the level intended when the legislation was implemented—\$300,000, adjusted for inflation.

**6. Increase access to paid work experience opportunities, including summer jobs for 14- to 16-year-old youth, transitional jobs for vulnerable populations such as re-entering offenders, and year-round work experience and service programs for out-of-school youth in high-risk categories.**

In areas of high unemployment and during times of economic recession, youth suffer tremendously in the job market. Studies from Northeastern University's Center for Labor Market Studies (CLMS) document the ongoing tremendous decline in labor market opportunities for youth. A 2004 CLMS study concluded that the employment rate for black male teens had declined to slightly less than 20 percent, the lowest in 50 years.<sup>6</sup> Early work experience is critical to the development of work ethic and appropriate

workplace skills, and it correlates with higher earnings in later years. A 2006 CLASP report found supported work experience to be a critical component in most of the successful programs for youth returning from confinement.<sup>7</sup> An Abt evaluation of service corps found higher rates of employment and higher wages for corps participants, especially for minority male participants.<sup>8</sup>

It is important to re-introduce actual hands-on work experience as a tool for imparting workplace skills that can't be taught in a classroom or workshop setting.

**Recommendation:** Restore the summer jobs program. Require that the program include the enrichments that were built into it prior to its elimination with the implementation of WIA. These included augmenting the youth's summer experience with individual assessments, opportunities for contextual learning and career exploration, structured academic support, activities and workshops tied to the development of competencies for workplace success, and mechanisms for documenting that youth are in fact learning and developing skills.

#### **7. Adjust the performance-measurement system to take into account risk factors in setting standards and identifying interim benchmarks.**

Currently, the performance-standard system within WIA and the proposed system of common measures do not allow adjustments to reflect the relative difficulty of the populations enrolled. Thus, a community serving mostly high school graduates has the same performance expectations as another serving higher-risk groups in much more challenging environments. Without proper adjustments to the setting of performance levels, states and local areas that serve a higher proportion of dropouts and harder-to-serve youth will be at a disadvantage in meeting performance standards. We propose that reauthorized legislation require that the performance levels be adjusted, taking into account economic and demographic characteristics of the population to be served, and that states and local areas choosing to serve a more difficult youth population have their performance levels adjusted accordingly.

#### **Recommendations:**

- State and local youth standards should be adjusted to take into account the proportion of dropouts and other youth risk categories—such as offenders, homeless youth, and youth in foster care—that are being served.
- Local areas serving high-risk out-of-school populations should be allowed to negotiate interim performance benchmarks—such as recidivism reduction; accumulation of credits; and re-enrollment, retention, and progress in structured education programs.
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<sup>1</sup> Gary Orfield, Daniel Losen, Joanna Wald, and Christopher Swanson, *Losing Our Future: How Minority Youths are Being Left Behind by the Graduation Rate Crisis*, The Civil Rights Project at Harvard University, 2004.

<sup>2</sup> U.S. General Accounting Office, *Workforce Investment Act: Youth Provisions Promote New Service Strategy, but Additional Guidance Would Enhance Program Development*, April 2002.

<sup>3</sup> U.S. General Accounting Office, *Workforce Investment Act*.

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<sup>4</sup> Department of Labor, *Youth Opportunity Monthly Progress Report*, June 2005.

<sup>5</sup> Linda Harris, *Learning From the Youth Opportunity Experience: Building Delivery Capacity in Distressed Communities*, Center for Law and Social Policy, 2006, [http://clasp.org/publications/youthopportunity\\_report.pdf](http://clasp.org/publications/youthopportunity_report.pdf). This report also includes a fuller description of accomplishments.

<sup>6</sup> Andrew Sum, Ishwar Khatiwada, Frimpomaa Ampaw, and Paulo Tobar, with Sheila Palma, *Trends in Black Male Joblessness and Year-Round Idleness: An Employment Crisis Ignored*, Center for Labor Market Studies, Northeastern University, Boston, 2004.

<sup>7</sup> Linda Harris with Charles Modiano, *Making the Workforce – Juvenile Justice Connection for Re-entering Young Offenders: A Guidebook for Local Practice*, Center for Law and Social Policy, 2006.

<sup>8</sup> JoAnn Jastrzab, Julie Masker, John Blomquist, and Larry Orr, *Final Report on the Evaluation of the American Conservations and Youth Service Corps*, Abt Associates, 1996, [http://www.abtassociates.com/reports/ccc\\_youth\\_0596.pdf](http://www.abtassociates.com/reports/ccc_youth_0596.pdf).