

*Implementation Study of the Workforce Innovation and Opportunity Act (WIOA)
Regarding Title I and Title III Core Programs*

Operationalizing Changes to the Title I Youth Program Under WIOA

Based on Findings from 14 States and 28 Local Areas

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- Operationalizing Changes to the Title I Youth Program Under WIOA
- State and Local Efforts to Strengthen Workforce System Governance and Planning Under WIOA
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Executive summary

The Workforce Innovation and Opportunity Act (WIOA) of 2014 included multiple provisions to strengthen service quality, access, accountability, and alignment across many programs (see Exhibit ES.1). This report focuses on **implementation of WIOA’s changes to the Title I youth program**, administered at the Federal level by the Employment and Training Administration (ETA) of the U.S. Department of Labor (USDOL). The report covers changes regarding funding, service delivery approaches, performance accountability, and program elements.

The report is one in a series of five reports, developed as part of a study of WIOA implementation commissioned by USDOL and conducted by Mathematica and Social Policy Research Associates. The other reports address changes in the following:

- Governance and planning;
- American Job Center (AJC) systems;
- Services for adults, dislocated workers, and employers; and
- Performance accountability and reporting, eligible training providers, labor market information, and evaluation requirements.

Data for this report are drawn primarily from site visit interviews, conducted in early 2019, with administrators, board chairs and members, employer and agency partners, and frontline staff in 14 states and 28 local areas (see Exhibit ES.2). Other sources of information include administrative data and relevant state and local documents. The site visit locations were purposively selected to assure diversity geographically and in size, among other criteria. The findings here, based on those interviews, should therefore be viewed as suggestive of common experiences and not assumed to be nationally representative. Also, it should be noted that, subsequent to the site visits, ETA provided additional guidance and technical assistance that covered some of the issues and concerns identified by study respondents.

The Workforce Innovation and Opportunity Act

Signed into law on July 22, 2014, WIOA retained many provisions from the prior law, the Workforce Investment Act of 1998 (WIA), which created a system of service delivery at the local level through American Job Centers (AJCs), with guidance and oversight from local workforce development boards, all under the policy and oversight from state workforce agencies and boards. As did the prior law, WIOA authorized multiple workforce programs as well as two related programs administered by the U.S. Department of Education. Overall there are six “core” programs under the law for which coordination and integration were required to be strengthened at the state and local levels, along with multiple other programs required to be included in local partnerships.

Exhibit ES.1. WIOA's six core programs and other required partner programs**WIOA Core Programs****U.S. Department of Labor (USDOL):**

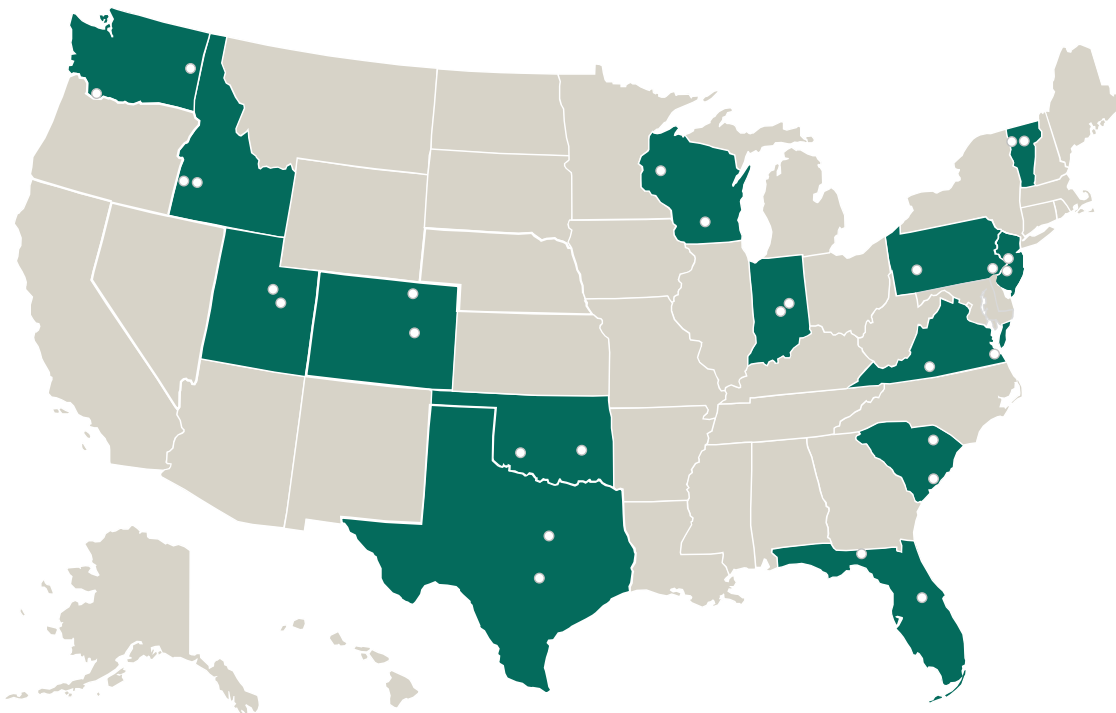
- Title I - 3 Programs: a) Adult, b) Dislocated Worker, and c) Youth Programs
- Title III - Wagner-Peyser Act - Employment Service (ES)

U.S. Department of Education

- Title II - Adult Education and Family Literacy Act (AEFLA)
- Title IV – State Vocational Rehabilitation (VR) programs under the Rehabilitation Act of 1973

Other Required One-Stop Partner Programs

- U.S. Department of Labor: Job Corps, YouthBuild, Indian and Native American programs, National Farmworker Jobs Program, Migrant and Seasonal Farmworker Programs, Senior Community Service Employment Program, Trade Adjustment Assistance, Unemployment Compensation programs, Jobs for Veterans State Grants, and Reentry Employment Opportunities
- U.S. Department of Education: Carl D. Perkins Career and Technical Education Act programs
- U.S. Department of Housing and Urban Development: Employment and Training programs
- U.S. Department of Health and Human Services: Community Services Block Grant employment and training programs and Temporary Assistance for Needy Families (TANF)

Exhibit ES.2. Site visit locations in 2019 (14 states and 28 local areas)

Note: White dots are local areas visited for the study. See Appendix B for a list of states and local sites included in the study. The list, along with other information on the site visits, is also found in the Technical Appendix for the entire evaluation.

A. WIOA Title I youth program requirements

The WIOA Title I youth program is a comprehensive employment program for eligible youth, ages 14–24, who face barriers to education, training, and employment. Services are delivered either by competitively selected service providers or by state or local youth program grant recipients. WIOA youth services are required to be accessible via AJCs. The program is national in scope, with each state receiving a formula allotment out of the total amount allocated for youth program activities, which in program year (PY) 2019 was \$903,416,000.¹

WIOA made a number of significant changes to the Title I youth program, including:

- Increasing the amount of program funds required to be spent on out-of-school youth to 75 percent, up from the 30 percent required under WIA;
- Adding a requirement to spend 20 percent of youth program funds on work experience activities;
- Making changes to the program's accountability system;
- Increasing the emphasis on partnerships with other WIOA core programs;
- Adding five new program elements, including:
 - Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
 - Financial literacy education;
 - Entrepreneurial skills training;
 - Services that provide local labor market and employment information about in-demand industry sectors or occupations, such as career awareness, career counseling, and career exploration services; and
 - Activities that help youth prepare for, and transition to, post-secondary education and training; and
- Eliminating WIA's requirement that local workforce development boards (WDBs) have a youth council.

B. Key findings on the Title I youth program

Drawing on information collected through site visits and analysis of administrative data, this section describes key findings related to changes in the Title I youth program under WIOA. First, it describes the perspectives of study respondents to those changes and then identifies key findings from an analysis of administrative data. Based on site visit responses, the remainder of this section describes key challenges encountered and strategies to address them.

1. Perspectives on changes to the Title I youth program

As noted above, WIOA included a number of changes to the Title I youth program, such as shifting the program's focus to out-of-school youth, adding program elements, and eliminating WIA's requirement for youth councils. State and local respondents' views regarding these changes are as follows:

¹ Source: <https://www.federalregister.gov/documents/2019/04/19/2019-07729/program-year-py-2019-workforce-innovation-and-opportunity-act-wioa-allotments-py-2019-wagner-peyser>

Shift from serving in-school youth to serving older, out-of-school youth. The most noteworthy change, from the respondents' perspective, was WIOA's requirement that states and local workforce areas spend at least 75 percent of youth

“I initially was traumatized ... it happened so fast and there wasn't a lot of information ... but I actually like it [WIOA] better.... I feel like it's more flexible.”

–Youth provider

program funds on out-of-school youth² in order to serve individuals with greater barriers to employment. This is more than double the 30 percent required under WIA. Although respondents from all of the state and local areas visited reported that they had successfully met or were on track to meet this requirement, respondents from 11 of these states and 9 local areas noted that they had faced substantial challenges, at least initially, to implementing this change. Some program respondents asserted that the 75 percent requirement had resulted in the program serving older youth, since out-of-school youth tended to be older than those in-school, and also because WIOA increased the upper end of the age range for this group to 24 (from 21), while the age range for in-school youth was unchanged (at 14 to 21).

Concerns regarding in-school youth. Many respondents were concerned that spending 75 percent of program funds on out-of-school youth created a gap in services for in-school youth,³ who were in danger of dropping out of school, and also harmed workforce partnerships with schools and colleges. Some local boards in the study reported serving no in-school youth, while others reported serving only in-school youth with the most barriers. To meet some of the needs of in-school youth who they were no longer able to serve with youth program funding, states and local workforce boards reported relying on partnerships and other funding sources. However, some respondents noted that helping youth with barriers stay in school would be more efficient and less costly than waiting until after they dropped out, which could also create additional trauma for this population.

Greater focus on work experience. WIOA's requirement that local WDBs spend 20 percent of their non-administrative youth program funds on paid or unpaid work experience was noted by youth program respondents from 8 states and 16 local areas as leading to a number of changes to the youth program. Chief among those was that work experience had become a more common service, especially for out-of-school youth. Youth program respondents from four local areas also indicated that this requirement had contributed to a decrease in the length of time most youth participants spent in the program. Findings from analysis of administrative data also show that a majority of youth program exiters from program years 2013 to 2017 participated in a work experience offering, but service duration became shorter.

² As outlined in WIOA section 129(a)(1)(B), at program enrollment, in addition to being 16–24 and not attending any school, OSY must meet one or more of the following criteria: a school dropout; a youth who is within the age of compulsory school attendance, but has not attended school for at least the most recent complete school year calendar quarter; a recipient of a secondary school diploma or its recognized equivalent who is a low-income individual and either basic skills deficient or an English-language learner; an individual who is subject to the juvenile or adult justice system; a homeless individual, a runaway, an individual who is in foster care or has aged out of the foster care system, a child eligible for assistance under section 477 of the Social Security Act, or an individual who is in an out-of-home placement; an individual who is pregnant or parenting; an individual with a disability; a low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment.

³ In Section 129(a)(1)(C). WIOA defines an ISY as an individual who, at program enrollment, is: attending school (as defined by state law), age 14-21 (unless an individual with a disability who is attending school under State law), and low income; and is one or more of the following: basic skills deficient, an English language learner, an offender, a homeless individual, a runaway, in foster care or has aged out of the foster care system, eligible for assistance under section 477 of the Social Security Act, in an out-of-home placement, pregnant or parenting, disabled, requires additional assistance to complete an educational program or to secure or hold employment.

Addition of five new program elements. Youth program respondents reported that the addition of five new program elements—education offered concurrently with workforce preparation and training for a specific occupation; financial literacy education; entrepreneurial skills training; services that provide labor market information; and post-secondary preparation and transition activities⁴—had a modest influence on approaches to providing youth services and the range of service offerings.

Provision of youth services by local boards. All 16 local boards included in the site visits that had competitively procured youth service providers under WIA continued to do so under WIOA. They chose not to take advantage of flexibility under the WIOA Final Rule that allowed them to directly provide the program services. However, the three single workforce area states and the other six local boards all directly provided youth services.

Access to youth services at AJCs. Most but not all youth staff continued to be housed in AJCs, as they were under the prior law. Consequently, youth programs had no difficulty meeting WIOA’s strengthened requirement that all one-stop partner programs provide access to their services at AJCs. However, respondents from nine local areas complained that AJCs are often not “youth friendly” because they are too “institutional,” have dress codes, and prohibit food and drink; which may be of greater importance given the challenges programs continue to face in effectively recruiting and serving out-of-school youth.

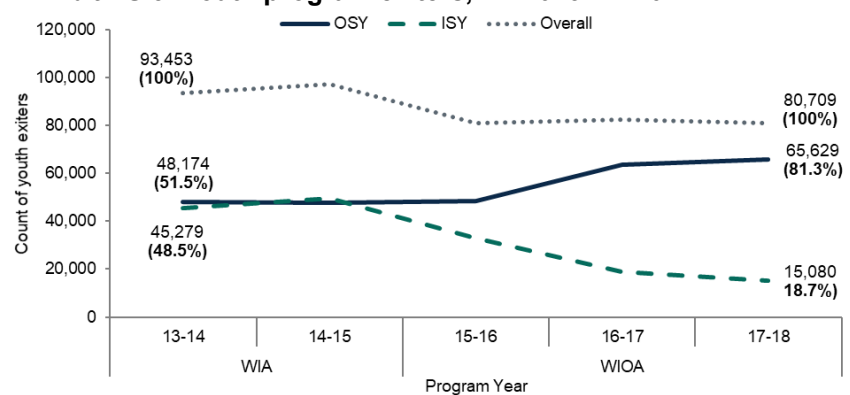
Retention of youth councils. Although WIOA did not require local boards to maintain youth councils most of the local boards visited continued to have youth-focused standing committees. Six of these local boards reported doing so because their states required it; respondents from eight other local boards reported that a youth standing committee allowed for a diverse array of youth stakeholders to provide policy and programmatic input on their youth programs.

2. Changes in the characteristics of youth participants, the duration of programs, and the number of youth served

Participant characteristics.

Administrative data on the youth program for PY 2013 through PY 2017 showed that, across all states, implementing the requirement corresponded to a significant increase in the number and percentage of out-of-school youth exiters, and a parallel decline over the same time period (PY 2013 – PY 2017) in the number and percentage who were in-school youth (see Exhibit ES.3). By PY 2017, more than 80 percent of youth served were out-of-school youth.

Exhibit ES.3. Youth program exiters, PY 2013-PY 2017



Source: WIASRD/PIRL data

⁴ These new elements outlined in WIOA section 129(c)(2) included education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster; financial literacy education; entrepreneurial skills training; services that provide labor market and employment information about in demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and activities that help youth prepare for and transition to post-secondary education and training.

The data also showed that more youth participants were reported to be high school graduates and were age 18 or older. Fewer youth participants had documented low income status. Youth program respondents from five local areas related this latter trend to WIOA's changes to eligibility requirements, which allowed age-eligible youth with specific barriers to meet the definition without documenting low income status. Respondents from two of these local areas asserted that most of these youth participants were still low income. Respondents asserted that the lack of a low income documentation requirement simply made it easier for low income youth to access services.

Program duration and enrollment. The median duration of participation in the program declined from ten to seven months overall from PY 2013 to PY 2017. Respondents connected this decline to the high cost of work experience activities as well as an unwillingness among out-of-school youth to participate in long-term activities. These respondents asserted that many out-of-school youth preferred to get a job as soon as possible rather than participate in training—in part because they often had to support themselves and needed income, but also because they had typically been less successful in school settings. There was also decline of 12,744 youth exiters (a drop of 13.6 percent) from to PY 2013 to PY 2017 (see Exhibit ES.3.). Some program administrators and staff thought that this decline was due to the greater expense of serving out-of-school youth, since they require more intensive case management, and greater use of incentives and support services to keep them engaged and successful in the program. It should be noted that overall youth program funding declined nationally by 1.3 percent over this same time period.⁵

3. Common challenges and strategies for implementation

Site visit respondents highlighted common challenges encountered when implementing WIOA's Youth program changes, as well as strategies that supported successful implementation and helped address those challenges.

a. Recruiting out-of-school youth

To meet the 75 percent requirement, Title I youth programs needed to recruit many more out-of-school youth than they had under WIA. Workforce board and youth provider respondents from nine local areas stated that it was much more difficult to find and enroll these youth due to their transience; compared to in-school youth, out-of-school youth are not found in specific locations such as a high school or college. Youth staff also noted the tight labor market had made it easier for some out-of-school youth to find jobs without receiving services. Respondents from multiple states reported that rural areas presented greater recruitment challenges for several reasons: few organizations serving youth and providing referrals, weak or absent broadband limiting internet access,⁶ fewer staff available for recruitment due to smaller funding allocations, and lack of transportation options for youth to travel to program offices or AJCs.

Respondents also described a number of strategies that supported recruitment of out-of-school youth:

- ***Use of new referral partners***, such as probation and parole offices, courts, police and sheriff's departments; organizations serving youth in or aging out of foster care; homeless resource centers;

⁵ According to DOL data cited by the Government Accountability Office (GAO), youth program funding declined from \$709.7 million in PY 13 to \$700 million in PY 17 ("Workforce Innovation and Opportunity Act. States and Local Areas Report Progress in Meeting Youth Program Requirements," GAO-18-475, p.10).

⁶ According to the Federal Communication Commission's 2018 Broadband Deployment Report, as of 2018, more than 30 percent of rural residents lacked access to basic fixed broadband services, compared with just 2 percent of residents in non-rural areas. See <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/2018-broadband-deployment-report>.

housing agencies; drop-out and adult education programs (both in and outside of schools); organizations providing assistance to pregnant and parenting youth, Supplemental Nutrition Assistance Program (SNAP) and SNAP Employment and Training (E&T) programs; health programs; and TANF agencies.

- **Intensive community outreach** in churches, laundromats, barbershops and other locations where out-of-school youth tend to congregate, and going door-to-door in low-income apartment complexes or other target neighborhoods.
- **Reduced outreach to in-school youth**, including less time spent communicating with high school or community college partners.
- **Use of social and traditional media**, such as LinkedIn and Facebook, as well as apps, such as Instagram and Snapchat. In one case, a local Spanish-language radio station was used to recruit migrant and seasonal farmworker youth.
- **Other approaches**, such as shifting outreach to later in the day or in the evenings, altering enrollment processes, such as by providing one-on-one support to complete the process.

b. Retaining out-of-school youth in WIOA services

Respondents from five states and nine local areas cited problems retaining out-of-school youth in their programs as challenging, particularly when many of these recruited youth did not complete intake processes so they could receive services beyond assessment and development of an individual service strategy. Respondents noted difficulties in getting youth to participate in comprehensive assessments, including those that used a lengthier version of the Test of Adult Basic Education (TABE). Even among out-of-school youth who completed intake, many reportedly did not complete subsequent program activities due to serious barriers such as mental health and substance abuse.

“... That out-of-school youth population is very transient and there are a lot of out-of-school youth that are homeless.... Once you enroll them, you lose them.”
–Youth provider

Respondents described a number of strategies that supported retention of out-of-school youth:

- “Hands-on” intensive case management,
- Provision of supportive services such as child care and transportation assistance,
- Use of social media to communicate rather than phoning or texting, and
- Providing incentives to achieve various milestones, such as completing a resume and attaining a GED or unsubsidized employment.

“... What I can offer is being that personal cheerleader, because I really want my kids to have a person that they can depend on. There have been sometimes where ... you ask for an emergency contact. And I’ve had someone say, “It’s just me. I don’t really have anyone.”
–Youth staff person

c. Providing work experience activities

WIOA instituted a new requirement that local boards spend a minimum of 20 percent of their youth program funds⁷ on work experience activities. Local level respondents reported successfully

⁷ The allocation of funds at the local level covers both program activities and administrative costs, with funding for the latter capped at 10 percent.

implementing this requirement despite what they perceived as significant challenges. These challenges included:

- The amount of time staff needed to spend engaging with employers to develop work experience opportunities;
- Employer unwillingness to provide work experience opportunities, particularly on-the job training (OJT), apprenticeships, and pre-apprenticeships for youth participants⁸; and
- A lack of understanding of what costs could be counted toward the 20 percent requirement, including whether staff time spent developing work experience opportunities could be counted.
- Respondents also described strategies for providing work experience activities. These included more effective engagement with employers by creating new youth program positions that focused entirely on working with employers, and by developing stronger linkages between youth programs and their local areas' existing business services teams. In addition, respondents developed work experience opportunities better suited for youth with significant barriers, so that such youth could successfully participate and complete these activities.

d. Reporting on program expenditures and performance

Tracking expenditures. WIOA's mandate to spend 75 percent of youth funds on out-of-school youth and 20 percent on work experience activities presented some challenges related to tracking expenditures. Respondents from two states and two local areas noted that some providers found the 75 percent expenditure requirement difficult to understand and track, with confusion regarding the application of the percentage to expenditures rather than to enrollments. Some local board respondents reported their youth providers had so much difficulty separately tracking out-of-school and in school youth expenditures that the boards revised the providers' contracts so they served only out-of-school youth. Similarly, youth program respondents did not understand what costs could count toward meeting the 20 percent work experience requirement, nor did they have financial systems set up to capture those charges.

One major strategy states used to assist local WDBs with tracking these expenditures was to provide training on the specific types of costs that could be counted and how to track them. Another strategy was to provide local boards with tools for tracking these expenditures.

Performance accountability changes. Under WIOA, the youth program became subject to the same six primary indicators of performance as the other five core programs.⁹ Youth program respondents reported struggling with the new measurable skill gains and credential attainment indicators and questioned the appropriateness of these indicators for out-of-school youth.

Site visit respondents also highlighted their satisfaction with DOL-issued youth program guidance. In particular, some found the electronically available material quite helpful.

C. Looking ahead

WIOA included provisions that have profoundly changed the Title I youth program in multiple ways. While not necessarily reflective of the experiences of all states and local areas, the findings described above suggest key considerations for workforce system stakeholders as they continue their efforts to

⁸ The most common work experience activity was subsidized work experience, just as it was under WIA.

⁹ Two of the indicators have slightly different parameters for the Title I youth program, though, to reflect its greater focus on postsecondary education and training.

implement WIOA's vision and requirements, as well as directions for future youth-focused research efforts. These include:

1. Developing a stronger understanding of how to recruit and serve out-of-school youth, especially practices related to serving youth with significant barriers.

WIOA's emphasis on serving primarily out-of-school youth, a majority of whom are young adults (18 and over), and away from serving in-school youth represents a large shift for many states and local areas. Serving out-of-school youth may require states and local areas to adjust their referral sources and programming, as some respondents in this study described doing. Building on existing guidance, technical assistance and peer sharing, states and local areas could benefit from developing a stronger understanding of approaches for recruiting and serving out-of-school youth. Further, key stakeholders may benefit from learning about approaches that could help them connect in-school youth with services beyond those funded by WIOA's Title I.

2. Accessing waivers that allow states and their local areas to spend less than 75 percent of youth funds on out-of-school youth.

Respondents from state and local areas expressed some concerns regarding funding for and the availability of services for in-school youth, and particularly for dropout prevention services. Waivers currently allow states and local WDBs to allocate more funding to meet the needs of in-school youth with barriers. Continued access to such waivers could provide flexibility to state and local areas to allocate funding to focus on particularly at-risk in-school youth including those likely to drop out of school or those facing other serious barriers, such as homelessness.

3. Improving understanding of the credential attainment measure and allowable credentials.

Title I youth program respondents at both the state and local levels reported numerous challenges and concerns related to the implementation of WIOA's credential attainment indicator (as have respondents from across WIOA's other five core programs). In particular, states and local areas could benefit from better understanding what credentials can be counted toward achievement of the credential attainment measure and how states and local areas should make that determination.¹⁰

4. Leveraging effective strategies and best practices for collaboration between Title I youth programs and TANF agencies.

WIOA's youth program changes helped spur the formation of new partnerships and strengthened existing partnerships. Respondents noted that in response to WIOA's emphasis on core program partnerships and the Temporary Assistance to Needy Families (TANF) program's new status as a required partner, many new partnerships had been developed and strengthened, including partnerships with TANF, AEFLA, VR, and other programs. In particular, these partnerships supported successful recruitment of and services for out-of-school youth according to respondents.

States and local areas could benefit by learning about their peers' efforts to cultivate these partnerships, and particularly how to navigate different requirements across programs for shared participants.

¹⁰ Since the completion of the study's site visits, DOL has provided states and local areas with technical assistance on this indicator, including organization of a peer learning cohort and a decision tree tool. Continuation of these and other TA efforts, as well as continued guidance, may help states and local areas develop a stronger understanding of this indicator and how to implement it.

5. Supporting continued research on the WIOA Title I youth program.

Additional research may be helpful to better understand several key aspects of the youth program under WIOA, such as exploring:

- **How changes to the definition of out-of-school youth have affected the characteristics of youth served under WIOA, and whether the intent of WIOA's changes is being met.** Such an analysis would allow for a comparison of the characteristics of in-school youth to out-of-school youth served under WIA. Due to the complexity of WIOA's out-of-school youth definition, which requires youth to meet multiple requirements in different combinations to be determined eligible, it is difficult to clearly identify whether the program is serving more youth with barriers under WIOA than it did under WIA. Additional quantitative analyses of administrative data may be warranted, to determine whether the data reported on low income status reflects an actual shift in the percentage of low-income youth served or is instead a by-product of the other changes in eligibility.
- **What types of services or combinations of services are most effective** in achieving program goals, possibly through structured efforts to test different approaches at the local level, for different subgroups of youth. It could also be useful to analyze expenditure data to determine the extent to which WIOA requirements, such as the 20 percent work experience expenditure requirement, are being met.

I. Introduction

The Workforce Innovation and Opportunity Act (WIOA) of 2014 included multiple provisions to strengthen service quality, access, accountability, and coordination across many programs (Exhibit I.1). This report focuses on implementation of WIOA’s changes to various aspects of the WIOA Title I youth program administered by the U.S. Department of Labor (USDOL); these include changes to funding, service delivery approaches, performance accountability, and program elements.

A. Study overview

The report is one in a series of five papers developed as part of a study of WIOA implementation, commissioned by USDOL and conducted by Mathematica and Social Policy Research Associates. Data for this report are drawn primarily from site visit interviews, conducted in early 2019, with state and local administrators, board chairs and members, employer and agency partners, and frontline staff, in 14 states and 28 local areas. The site visits included visits to three states with single workforce areas. To learn about local implementation in these states, visits included interviews from staff located at two American Job Centers. Their responses are included with those from local area respondents in the other 11 states. This report also includes analysis of administrative data and draws on information from relevant documents provided by states and local areas.

Exhibit I.1. WIOA’s six core programs and other required partner programs

WIOA Core Programs

U.S. Department of Labor (USDOL):

- Title I - 3 Programs: a) Adult, b) Dislocated Worker, and c) Youth Programs
- Title III - Wagner-Peyser Act - Employment Service (ES)

U.S. Department of Education:

- Title II - Adult Education and Family Literacy Act (AEFLA)
- Title IV – State Vocational Rehabilitation (VR) programs under the Rehabilitation Act of 1973

Other Required One-Stop Partner Programs

- U.S. Department of Labor: Job Corps, YouthBuild, Indian and Native American programs, National Farmworker Jobs Program, Migrant and Seasonal Farmworker Programs, Senior Community Service Employment Program, Trade Adjustment Assistance, Unemployment Compensation programs, Jobs for Veterans State Grants, and Reentry Employment Opportunities
- U.S. Department of Education: Carl D. Perkins Career and Technical Education Act programs
- U.S. Department of Housing and Urban Development: Employment and Training programs
- U.S. Department of Health and Human Services: Community Services Block Grant employment and training programs and Temporary Assistance for Needy Families (TANF)

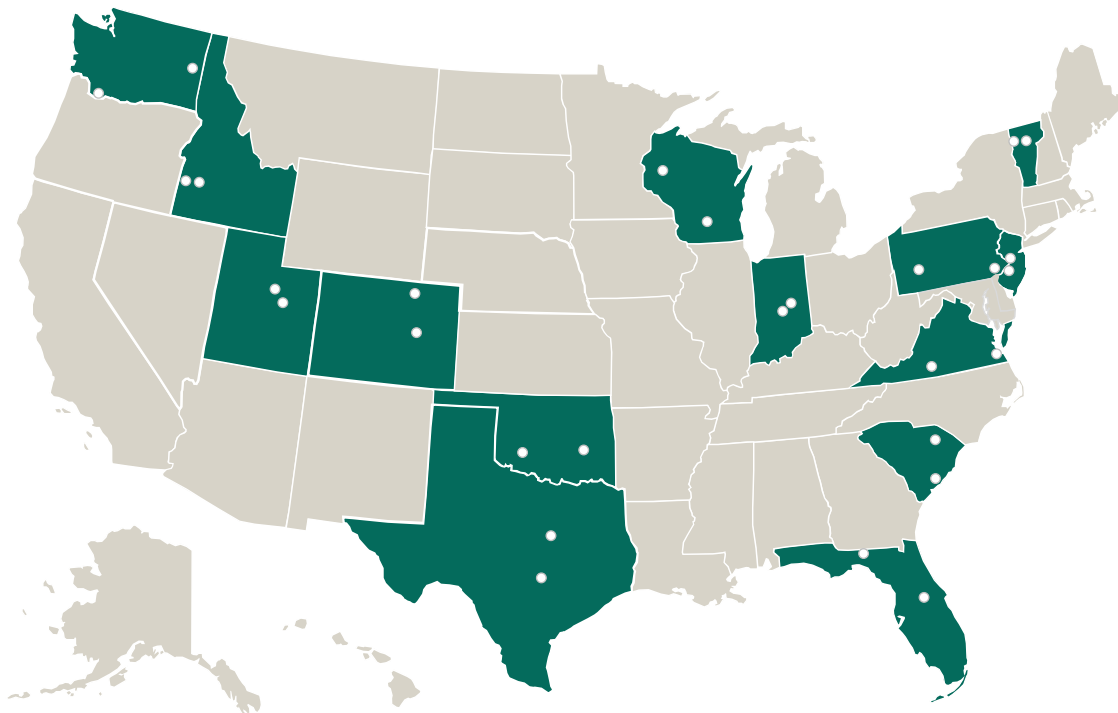
All locations were purposefully selected to assure diversity geographically and in size, among other criteria. Exhibit I.2 identifies the states and local areas visited; Exhibit I.3¹¹ identifies types of site visit respondents. More information about the site visits, site visit respondents, and other components of the WIOA Implementation Study is provided in the technical appendix. The findings here, based on those

¹¹ Three of the 14 states were single-workforce area states, and the team visited two AJCs in each of those states. The report includes these AJCs when it refers to “local areas”. The study team also conducted four site visits in late 2017 to capture WIOA implementation at an earlier stage. Technical information about the site visits can be found in the technical appendix.

interviews, should therefore be viewed as suggestive of common experiences and not assumed to be nationally representative. The study overall also used information from other sources, including state plans and program data, to provide additional context for insights from site visit interviews.

It should be noted that, at the time of the site visits in winter and spring of 2019, the Employment and Training Administration (ETA), the US Department of Labor (DOL) agency responsible for administering WIOA Title I and Title III programs, had not yet provided relevant technical assistance (TA) on several key aspects of the youth program changes. This report indicates where subsequent TA may have covered some of the issues and concerns identified by respondents during the site visits.

Exhibit I.2. States and local areas visited in 2019



Note: White dots are local areas visited for the study. See Appendix B for a list of states and local sites included in the study. The list, along with more detailed information on the visits, is also included in the Technical Appendix for the overall evaluation.

Exhibit I.3. WIOA Implementation Study: Types of site visit respondents at the state and local levels

Types of state-level respondents	Types of local-level respondents
State workforce board chair	Local workforce board chair
State workforce board staff	Local workforce board staff
State workforce agency director	AJC manager
State WIOA policy staff	AJC operator
Title I adult and dislocated worker program and performance staff	Title I adult and dislocated worker program manager
Title I youth program staff	Title I adult and dislocated worker frontline staff
Title III Employment Services program staff	Title I youth provider or program manager
Unemployment Insurance administrator	Title III Employment Services program manager
Title II Adult Education and Family Literacy Act administrator	Title III Employment Services frontline staff
Community college, career technical education, or K–12 partner staff	Title II Adult Education and Family Literacy Act program manager
Title IV vocational rehabilitation administrator (including services for the blind if separate)	Community college, career technical education, or K–12 partner manager
TANF staff	Title IV vocational rehabilitation program manager
	TANF area manager
	Other partner manager (YouthBuild, Senior Community Service Employment Program, National Farmworker Jobs Program, etc.), if applicable

B. Changes to the Title I youth program

WIOA introduced significant changes to the Title I youth program. More specifically, WIOA:

- Increased the amount of program funds required to be spent on out-of-school youth to 75 percent, up from the 30 percent required under WIA;
- Added a requirement to spend 20 percent of youth program funds on work experience activities;
- Made changes to the program's accountability system;
- Increased the emphasis on partnerships with other WIOA core programs;
- Added five new program elements, including:
 - Education offered concurrently with and in the same context as workforce preparation activities and training for a specific occupation or occupational cluster;
 - Financial literacy education;
 - Entrepreneurial skills training;
 - Services that provide labor market and employment information about in-demand industry sectors or occupations available in the local area, such as career awareness, career counseling, and career exploration services; and
 - Activities that help youth prepare for and transition to post-secondary education and training; and
- Eliminated WIA's requirement that local boards have a youth council.

C. Road map to the report

In the remainder of this report, we describe how states and local WDBs operationalized WIOA's changes to the Title I youth program and how these changes appear to have affected the program. Chapter II describes the shift to serving older out-of-school youth and the 75 percent spending requirement, while Chapter III focuses on WIOA's requirement to spend 20 percent of program funds on work experience. Chapter IV discusses the new required program elements and direct access to youth services at AJCs. Chapter V discusses changes in state and local boards' youth committees and changes in WDBs' provision of youth services. Chapter VI describes changes in partnerships and Chapter VII focuses on WIOA's requirements for youth program performance indicators. The report concludes with considerations for workforce system stakeholders as they look ahead at WIOA implementation.

II. Shifting the focus to out-of-school youth

One of WIOA's major changes to the youth program was an increased focus on out-of-school youth (OSY), as part of the Act's greater focus on serving more individuals with significant barriers to employment. This new emphasis was expressed via the requirement to spend a minimum of 75 percent of program funds (referred to as the "75 percent requirement" below),¹² on OSY compared to 30 percent required under prior law.¹³ At the time of the 2019 site visits, all states and local areas reported they had either met or were close to meeting this requirement.¹⁴ (By contrast, during early pilot visits to four states in 2017, respondents from those four states reported many of their local WDBs still had to make substantial changes to meet this requirement.)

Implementing the 75 percent requirement for OSY expenditures was reported by respondents to have created a number of challenges at both the state and local levels. Respondents also described a number of strategies they used to successfully implement this new requirement.

A. Challenges in meeting the 75 percent spending requirement

Respondents presented a mixed picture as to how difficult it had been to implement the new spending priority. Forty percent of the boards visited reported that the 75 percent requirement had been easy to accommodate. They attributed this to their shift in focus to OSY before WIOA became law, whether because they had seen early drafts of the legislation and realized that the change was likely or because OSY were already a priority for their states.

However, a similar percent of boards reported that, despite meeting the 75 percent requirement, they had experienced challenges in doing so. Also, 11 of 14 states reported this transition had been challenging for at least some of their local WDBs or offices. One of the most common challenges cited by these respondents was that, until WIOA's passage, their youth programs focused heavily on serving in-school youth (ISY)¹⁵ and it took substantial effort to completely revamp their programs for OSY.

Recruitment. WDB and provider respondents from nine local areas stated it was much more difficult to find and enroll OSY than ISY. They attributed this to the transience of OSY and the fact that these youth are less likely to congregate in a single location such as a high school or college. As a result, a number of local programs reported spending much more staff time to find enough OSY to meet the 75 percent requirement. Youth staff also noted the tight labor market had made it easier for OSY to find jobs without receiving services, especially in rural areas where employers may hire OSY for manual labor jobs.

"It makes it tough to find them and get them involved because most of the out-of-school youth that we deal with are very mobile.... Sometimes they disappear for a while, they go somewhere else and they come back. They usually have multiple issues."

—State youth staff person

¹² The three states visited (Indiana, Texas, and Virginia) that had waivers from DOL related to this requirement had to spend only 50 percent of their youth program funds on OSY.

¹³ The 75 percent requirement only applies to non-administrative funds (states and local areas can spend up to 10 percent of the funding allocated for youth program activities on administrative activities), and, at the state level, only to funding spent on direct services to youth.

¹⁴ Although the study team did not have access to expenditure data to independently verify these results, expenditure data included in a June 2018 Government Accountability Office (GAO) report indicate that most states were meeting the 75 percent requirement. <https://www.gao.gov/assets/700/693019.pdf>.

¹⁵ In-school youth were defined by WIA as youth ages 14 to 21 who are attending any school.

In states such as Vermont, with very low drop-out rates, or Wisconsin, where state law legally prohibits youth younger than age 18 from dropping out of school, finding OSY to enroll was reported to be even tougher.¹⁶ Several youth program respondents noted the definition of OSY—which excludes youth who have registered but are not yet attending college—had also made it harder for them to recruit and enroll OSY.

“... It is a challenge for our rural areas, because number one, you don't have as many employers there.... Even just with transportation, that's a big issue for a lot of our out-of-school youth in those rural areas.”

—State youth staff person

Respondents from multiple states reported that rural areas presented greater OSY recruitment challenges than urban areas. Rural areas typically have fewer organizations that specialize in working with OSY that could serve as a referral source for WIOA youth programs. In addition, technology—typically an effective way to reach

youth—does not work as well in rural areas due to Internet bandwidth issues.¹⁷ Respondents from two states and three local areas also noted rural areas have a harder time conducting outreach because their typically smaller allocations of youth funding do not allow them to employ enough youth staff to easily reach widely dispersed OSY. This is compounded by the fact that many of these youth lack means of transportation to travel to youth program offices or AJCs.

Retention. Respondents cited problems with retaining OSY in their programs as another challenge to meeting the 75 percent requirement. Local area respondents explained that it was difficult to spend enough on OSY to meet the

“... That out-of-school youth population is very transient and there are a lot of out-of-school youth that are homeless.... Once you enroll them, you lose them.”

—Youth provider

requirement when many of the OSY they recruited did not even complete their programs' intake processes so they could receive program services beyond assessment and development of an individual service strategy. Respondents had trouble getting OSY to complete comprehensive assessments, especially those assessing basic skills. Four local areas commented that the newest version of the Test of Adult Basic Education (TABE), which increased the time required to complete the test, exacerbated this problem. Even among OSY who completed intake, many reportedly did not complete subsequent program activities due to serious barriers including mental health and substance abuse.

¹⁶ According to the U.S. Department of Education's National Center for Education Statistics, Vermont's high school dropout rate in 2017 was 11 percent, one of the lowest in the nation. In Wisconsin, state law does not permit individuals to drop out of school until they turn 18, and even then they must wait until the end of the school term to do so.

¹⁷ According to the Federal Communication Commission's 2018 Broadband Deployment Report, as of 2018, more than 30 percent of rural residents lacked access to basic fixed broadband services, compared with just 2 percent of residents in nonrural areas. See <https://www.fcc.gov/reports-research/reports/broadband-progress-reports/2018-broadband-deployment-report>.

Shifting from ISY to OSY. Respondents from 11 states and 16 local areas—including those from states and local areas that did not struggle with meeting the 75 percent requirement—indicated that WIOA’s 75 percent requirement kept them from focusing sufficiently on ISY. This sentiment—supported by their state WDBs and governors—was behind two study states’ requests for waivers to spend less than 75 percent on OSY. Generally, youth program respondents wanted to focus more on ISY with barriers. They felt those

“...There is a gap in services ... under this new 75 percent requirement [for]...vulnerable and at-risk in-school [youth] ... that struggle, whether they come from families that are in poverty or they’re dealing with domestic violence and trauma in their home.... There’s not a ton of resources [for those youth]. You’ve got school counselors that have 400 kids they are responsible for. Who [can] care about that one kid who is struggling and is going to fall out of school?...”

—State workforce manager

youth were not being served due to a lack of resources beyond the Title I youth program. These youth staff also asserted that the gap in services for ISY created a bigger problem down the line because, without help, many of these at-risk ISY would drop out of school and it would be much more difficult to assist them after they did so. During the 2017 visits, some respondents also expressed concern about shifting resources away from serving ISY, as they still saw a need to serve this population.¹⁸

Respondents from 12 states and 14 local areas also reported that their inability to serve many ISY had damaged their partnerships with secondary schools and technical or community colleges; respondents from three local programs specifically cited challenges getting out of commitments with school partners. These partnerships were hurt because the WIA program had been an important part of dropout prevention efforts at their schools and they now had to struggle to find other resources or partners to serve at-risk students.

For the eight WDBs that faced challenges in implementing the 75 percent requirement and competitively procured youth service providers, ensuring that providers made the needed changes to focus on OSY instead of ISY required rewriting providers’ contracts or rewriting request for proposal (RFP) documents to conduct new procurements. The one WDB in the study with an ISY-focused program that provided services directly had to completely shift its programs, including recruitment processes and, in some cases, its customer flow.

Tracking expenditures. Respondents from two states and two local areas noted that some youth providers found the 75 percent expenditure requirement difficult to understand and track. One youth provider thought its contract with the local WDB required that 75 percent of its participants had to be OSY, but the WDB’s youth program manager stated the provider was required to spend 75 percent of its funds on OSY. In another local area, WDB youth respondents reported their youth providers had so much difficulty separately tracking OSY and ISY expenditures that the WDB revised the providers’ contracts so they served only OSY.

B. Changes in participants and services with the focus on OSY

Overall, respondents asserted that WIOA’s 75 percent OSY expenditure requirement affected the youth program in important and numerous ways. These included a substantial increase in the number and percentage of OSY served, an overall decrease in the number of youth served, and an increase in the average age of youth participants.

¹⁸ Please see the study’s insights brief for a summary of findings from early visits to four states.

1. The youth program is serving far more OSY, but fewer youth overall

Although the 75 percent OSY expenditure requirement does not require states and local WDBs to serve more OSY, respondents from all states (even those with waivers) and 22 local areas stated that the requirement had resulted in a major increase in the percentage of program participants who are OSY. This assertion is consistent with the results of an analysis of youth program administrative data presented in Exhibit II.1 which shows that, nationwide, the percentage of youth program exiters who were OSY increased from slightly more than 50 percent of youth who exited in PY 2013 (the second to last year of WIA) to more than 80 percent of youth exiters in PY 2017, the most recent year for which data were available. Even among states that had received a waiver¹⁹ to allow them to spend less than 75 percent of their funding on OSY, 79.5 percent of youth exiters in PY 2017 were OSY, just slightly below the percentage for the nation as a whole.²⁰

Youth program staff from four states and two local areas also asserted that the 75 percent requirement—along with the fact that they found OSY generally cost more to serve than ISY, as well as a slight decrease in funding²¹—had resulted in a decline in the total number of youth they could serve. This assertion is consistent with the analysis in Exhibit II.1: the number of youth program exiters nationwide declined by 13.6 percent (12,744 youth), dropping from 93,453 in PY 2013 to 80,709 in PY 2017. Youth program funding declined nationally by 1.3 percent over this time period.²²

“The cost per participant, we found, is significantly higher in an out-of-school youth program because they require more [services such as] child care assistance. And if we want to get them to school, and then also help them get work experience, we’re going to have to figure out what’s going to happen to their kids while they’re doing those things. And child care is expensive....”

–Local WDB youth program staff

Youth staff reported that one reason OSY cost more to serve was they need more services. For example, several program staff stated that to keep OSY successfully engaged, staff had to provide them with extensive supportive services and intensive case management—both of which are costly. Further, as will be discussed in more detail later, finding and enrolling OSY is an intensive process requiring a significant amount of staff time, which also adds to the cost of services.

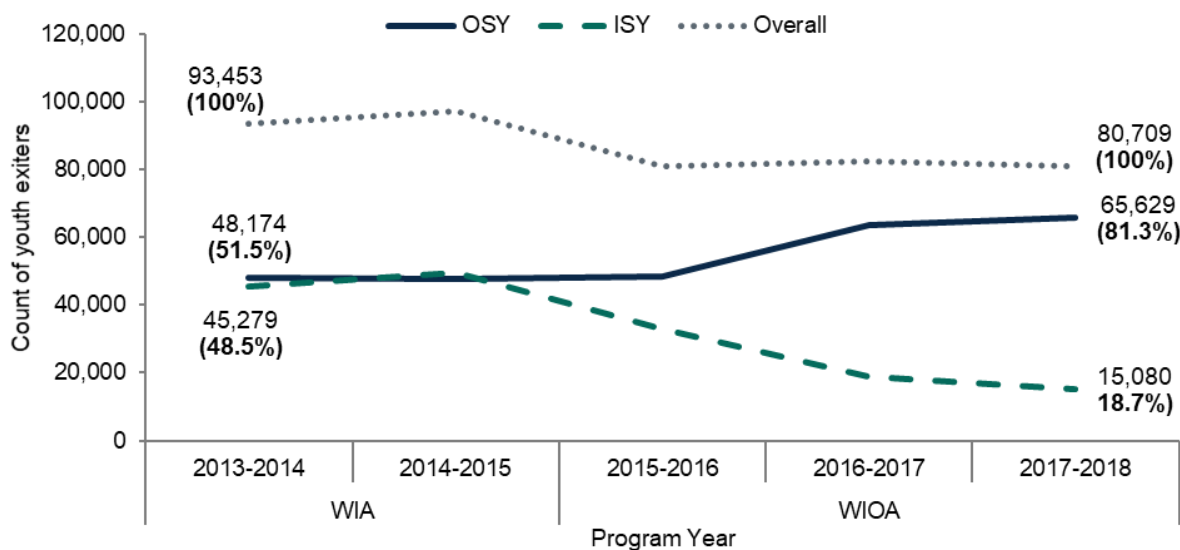
¹⁹ Under WIOA, the Secretary of Labor has the authority to issue waivers to states that request them related to certain aspects of the Act, if those requested waivers will improve job seeker or employer outcomes. The list of states that have been granted waivers of the 75 percent requirement as of July 2020 are listed here: https://www.dol.gov/sites/dolgov/files/ETA/wioa/pdfs/Waivers_Granted_as_of_July_24_2020.pdf.

²⁰ The small difference between the 15 waiver states and the other 35 (plus the District of Columbia) is likely because these waivers were issued only for PY 2018; as of PY 2017, the waiver states including 3 of the study states (Indiana, Texas, and Virginia) had not yet begun to implement their waivers.

²¹ According to DOL data cited by the Government Accountability Office (GAO), youth program funding declined from \$709.7 million in PY 13 to \$700 million in PY 17 (“Workforce Innovation and Opportunity Act. States and Local Areas Report Progress in Meeting Youth Program Requirements,” GAO-18-475, p.10).

²² According to DOL data cited by the Government Accountability Office (GAO), youth program funding declined from \$709.7 million in PY 13 to \$700 million in PY 17 (“Workforce Innovation and Opportunity Act. States and Local Areas Report Progress in Meeting Youth Program Requirements,” GAO-18-475, p.10).

Exhibit II.1. Number and percentage of youth exiters, overall and by school status



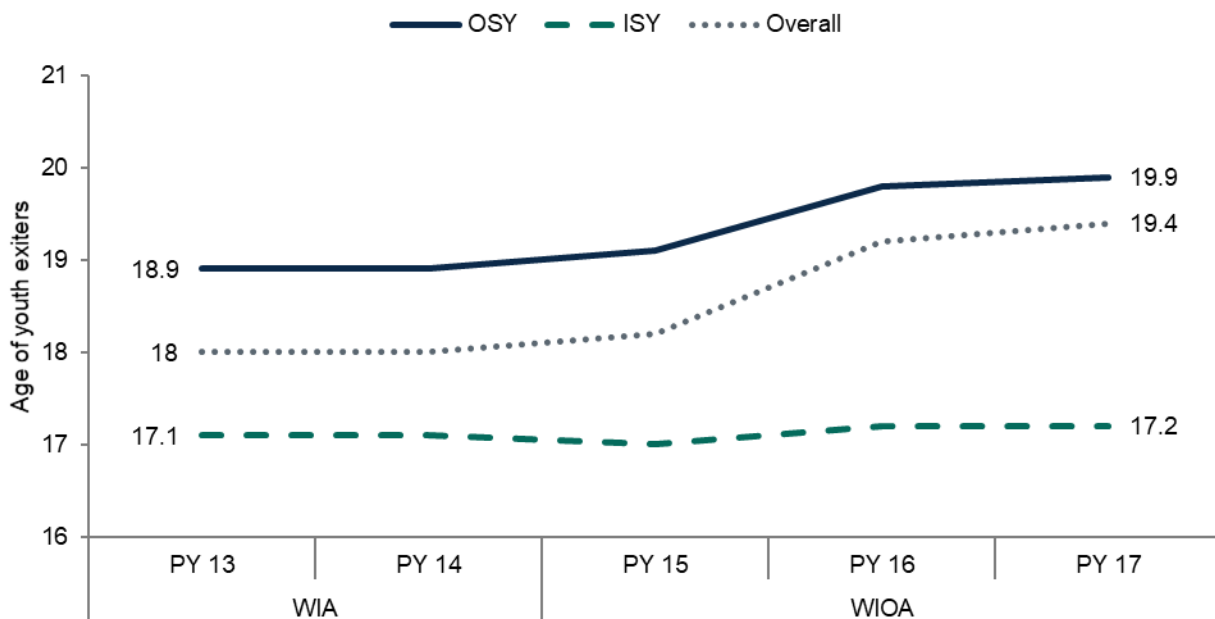
Sources: For PYs 13 to 15, Workforce Investment Act Standardized Record Data (WIASRD); for PYs 16 and 17, PIRL.

Note: During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

2. Youth program participants are older

Some youth program respondents asserted that the 75 percent requirement had resulted in the program serving older youth. They explained that OSY tended to be older than ISY, at least partly because WIOA increased the upper end of the age range for OSY from 21 to 24,²³ but left the age range for ISY unchanged at 14 to 21. The study states’ experience is consistent with Title I youth program data showing that the average age for all youth exiters nationally increased from 18.0 to 19.4 years of age (Exhibit II.2), mirroring the increase in the average age of OSY from 18.9 in PY 2013 to 19.9 in PY 2017. During that same period, the average age of ISY shifted from 17.1 to 17.2 years of age.

²³ WIOA also clarified that 16 is the lower end of the age range for OSY.

Exhibit II.2. Age of youth exiters, overall and by school status

Sources: For PYs 13 to 15, WIASRD; for PYs 16 and 17, PIRL.

Note: During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

C. Youth program strategies for meeting the 75 percent requirement

States and local WDBs reported using several strategies to successfully implement WIOA's 75 percent requirement and to overcome the challenges described earlier. These strategies included revamping outreach, recruitment, and enrollment; changing service delivery to retain OSY; changing ISY services; and changing OSY eligibility criteria.

To place the efforts of study states and local areas to recruit and serve OSY in broader context, we examined nationwide youth program administrative data on youth exiters' barriers to employment from PY 2013 (just before WIOA's passage) to PY 2017. Appendix A, Exhibit A.1 shows that, as under WIA, the most common barriers for youth exiters during the first three years of WIOA were basic skills deficiencies, needing additional assistance to enter and complete an education program or retain employment, receiving other public assistance including SNAP, and being pregnant or parenting.

1. Revamping outreach, recruitment, and enrollment

According to respondents, the shift from serving ISY to OSY led many local youth programs to revamp their outreach and recruitment activities, typically by developing new referral partnerships with agencies that work extensively with OSY, conducting intensive community outreach, decreasing the amount of outreach to ISY, and increasing use of social and traditional media.

New referral partners. Respondents from 10 states and from 14 local areas reported that a key strategy they used to increase OSY recruitment was to develop new referral partnerships. Most commonly, local areas forged new OSY referral partnerships with justice system agencies such as probation and parole offices, courts, and police and sheriff’s departments; respondents from six states and eight local boards and offices reported these types of partnerships. For example, one local office’s youth program staff leveraged a connection with a county judge by meeting with the judge and describing the program’s services. Eventually, based on that connection, information about the youth program reached the probation and parole agencies. Those agencies became the source of many of that youth program’s OSY referrals.

A contracted youth provider for Virginia’s South West Workforce Development Board collaborated with state attorneys who referred youth ages 16 to 24 who were charged with a misdemeanor or nondrug-related felony and were likely to be eligible for the youth program. These youth—if they chose to participate—would then be eligible to have their charges reduced or dismissed.

Other reported partnerships that netted new OSY referrals included organizations serving youth in or aging out of foster care; homeless resource centers; housing agencies; drop-out and adult education programs (both in and outside of schools); organizations providing assistance to pregnant and parenting youth, including child care assistance; SNAP and SNAP Employment and Training (E&T) programs; health programs; and TANF agencies. One local area youth program had a contract with the housing authority to conduct recruitment and provide services. This made it “...super easy...to reach their disconnected youth because they’re embedded ... in the public housing community.”

In two local areas, youth program staff stated that they developed new partnerships for recruiting OSY by cold calling and setting up meetings with agencies, or spending time in places where these youth might be. In six local areas, youth programs reported that they built new partnerships based on existing but undeveloped relationships. Some youth staff devoted a significant amount of time to maintaining these partnerships, including regularly meeting with partners in person and trying to “stay on the radar” with partners that have high staff turnover. As a result, these programs reported adding new or dedicated outreach staff who could serve as a single point of contact to streamline the process.

Even with dedicated outreach staff focused almost entirely on OSY, respondents from two local youth programs noted that to be successful, they had to focus their OSY referral partnership efforts on only the activities that netted the most referrals. A state staff person noted that local WDBs in that state had begun thinking more strategically about youth recruitment, looking for ways to efficiently recruit significant numbers of OSY, including from the SNAP E&T program.

Intensive community outreach. In other cases, state and local respondents reported that program staff simply had to get out into the community to churches, laundromats, barbershops and other locations where OSY tended to congregate. This could include going door-to-door in low-income apartment complexes or other target neighborhoods, a strategy that enabled some program staff to connect not only with youth but their families as well.

“We go out and we target the communities with the most need ... and we go door-to-door. We meet with moms, grandmoms, dads, uncles, the whole gamut, and we say, ‘This is what we’re offering. If you have a family member, or if you yourself are interested in it, this is what we have to offer.’ We started going out and doing that, and we’ve had great success.”

–Youth provider

Reduced outreach to ISY. To focus on their partnerships and outreach activities related to OSY, 18 local WDBs and their youth providers reported that they had to decrease the time spent recruiting and serving ISY. They also reported spending less time communicating with high school or community college partners and visiting those locations.

Social and traditional media. Youth program respondents from four local areas noted that social media was an effective way to recruit OSY, especially if youth can access the messages from their phones. These respondents cited websites, including LinkedIn and Facebook, as well as apps, such as Instagram and Snapchat. One office had great success using a local Spanish-language radio station to recruit migrant and seasonal farmworker youth.

Other approaches. Another OSY recruitment strategy used by several local youth providers was to shift their program hours so they could conduct outreach later in the day or in the evenings when

“I found that I needed to be right there with the kid to get the application done.”

–Youth program outreach staff

they were more likely to locate OSY. Staff from two local programs reported changing their enrollment processes to enable more of the OSY they recruited to receive program services. They found that many OSY, because of the many barriers they face, needed much more one-on-one support to complete the enrollment process.

2. Changes to service delivery to retain OSY in the youth program

Hands on case management. Youth programs often modified their service delivery design in an effort to improve retention among OSY. They used strategies similar to those employed to recruit and enroll more OSY. One of the most common adjustments (reported by respondents from 12

“There’s so much mental health and addiction issues [with OSY]. It’s tough for us. You can’t get your arms wrapped around that in the time that we have with them and try to keep them engaged and connected with us.”

–Youth program staff person

local areas) was to make case management services much more hands-on. These respondents cited the need for intensive case management to help OSY overcome major barriers such as addiction, trauma, and needing to support themselves. They noted that these youth often have no one else to support them and need a sense that someone cares about them and their successes; they need more than regular contact with their case manager but are extremely mobile and hard to reach. To provide their case managers with strategies to work effectively with OSY, two local programs noted they had trained their case managers on trauma-informed approaches to case management. Youth staff from four local areas also shifted their communication strategies by focusing more on social media rather than phones and texting.

“... What I can offer is being that personal cheerleader, because I really want my kids to have a person that they can depend on. There have been sometimes where ... you ask for an emergency contact. And I’ve had someone say, “It’s just me. I don’t really have anyone.”

–Youth staff person

Incentives. Respondents from two states and four local programs increased their use of incentives to keep OSY engaged. Some youth programs added incentives for achieving modest milestones, such as completing a resume, in addition to incentives for obtaining their GED or unsubsidized employment. As one noted: “[OSY] have a new phone number every month, a new email every other day. [So] we were looking at revamping [the youth program], looking at how do we celebrate the little milestones to keep them engaged.”

Supportive services. Respondents from one state and five local areas reported that their programs provided OSY with more supportive services to help OSY stay in the program. A number of youth programs were serving more participants with children and had to provide child care support to enable those youth to participate in program activities. Respondents from three of these local areas reported increasing funding for transportation assistance because, unlike ISY who could be served on site in the schools, OSY needed help getting to youth program offices or AJCs.

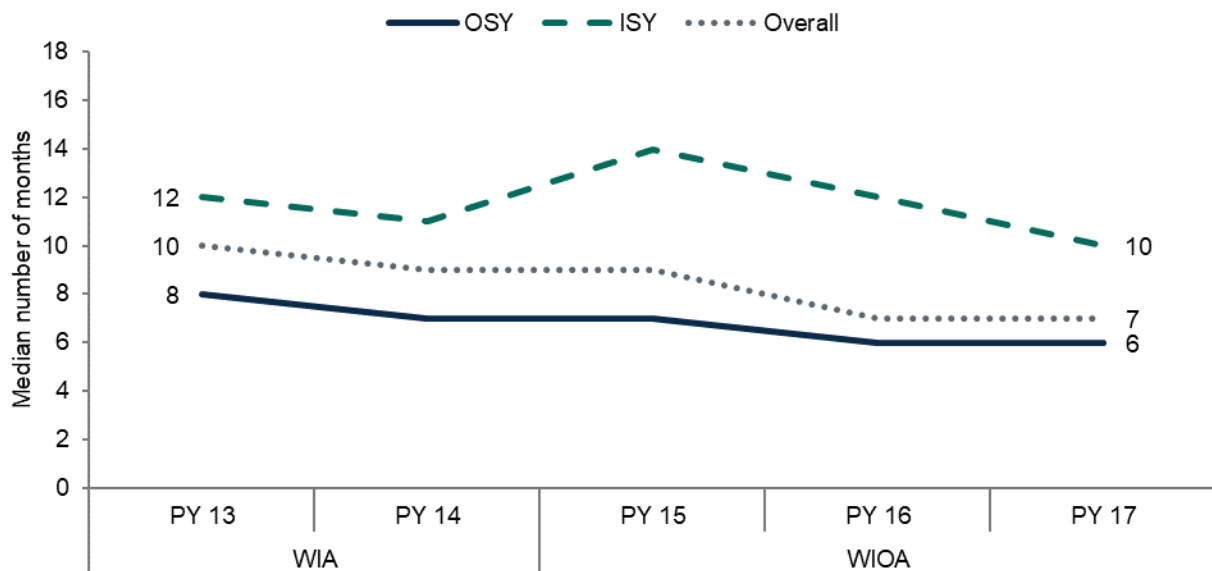
Staff from four states and four local areas noted that, to be successful with OSY and to mitigate the extra expense of serving them, they developed or strengthened their relationships with certain partners to ensure that OSY received the services they needed. These partners included adult education programs, foster care agencies, pregnancy centers, and mental health and substance abuse agencies. In addition to providing youth with more services, these agencies could

The CareerSource Central Florida WDB, which directly operates the youth program, contracted with organizations serving various populations of OSY, such as foster and justice-involved youth, to have a staff person serve as a navigator. The navigator connects those populations of OSY with needed services and connects Title I staff with other partners who can assist that youth.

also help program staff better understand the specific mental health, parenting, and addiction issues faced by these youth. Noted one respondent: “So where [the youth program’s] main focus is just education and employment, we bring in these [mental health] agencies and organizations to help us understand that [OSY] youth population.” A number of respondents noted that many youth programs braided funds with other programs to cover the costs of these more intensive and specialized services for OSY; state and local youth staff reported braiding Title I funding with TANF, VR, SNAP E&T, and reentry programs.

Program duration. Respondents from two local areas reported shortening the time OSY spent in the program. They reported doing so because they asserted that OSY were more interested in immediately getting a job than participating in long-term training—partly because they often have to support themselves and need income, but also because they have typically been less successful in school settings. This is consistent with nationwide youth program administrative data that show the median number of months OSY stayed in the program declined from eight to six months from PY 2013, the penultimate year of WIA, to PY 2017, the third year of WIOA (Exhibit II.3).²⁴

²⁴ This exhibit presents the median number of months youth exiters participated in the youth program rather than the average number of months because the latter shows the same general trend, but is skewed higher by about three months due to a small number of youth who participated many months longer than most other participants.

Exhibit II.3. Median number of months exiters participated in the youth program

Sources: For PYs 13 to 15, WIASRD; for PYs 16 and 17, PIRL data.

Note: During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

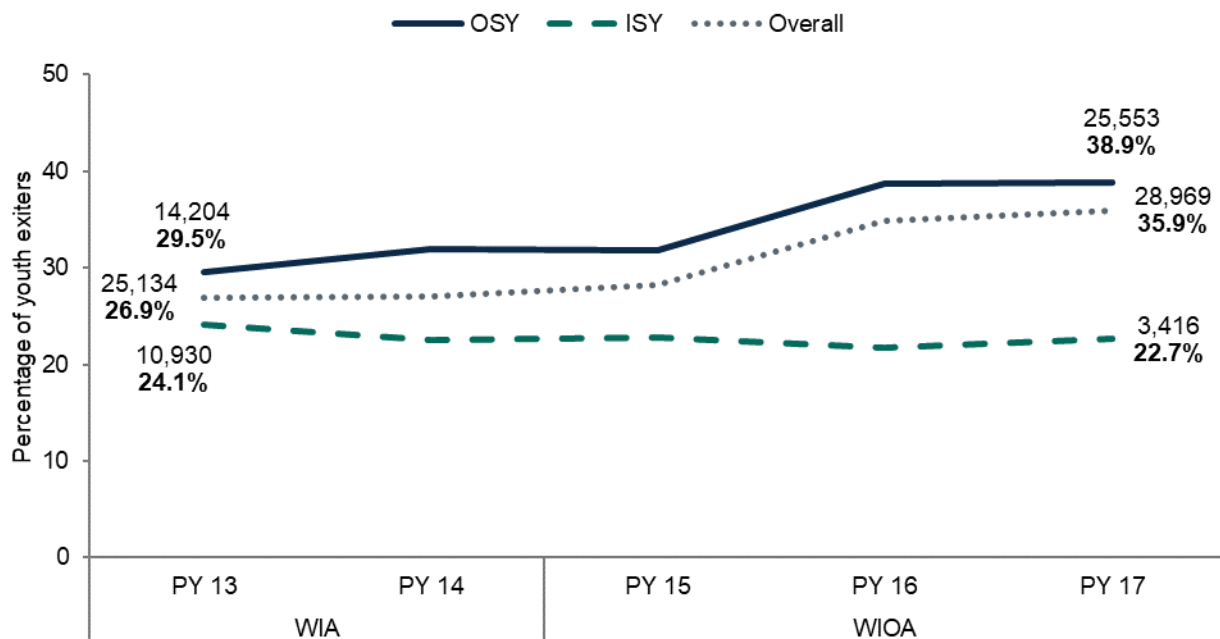
3. Changes to ISY services

Youth program respondents stated that the 75 percent requirement had resulted in several changes to ISY services. The first and most obvious change was that six local WDBs simply stopped serving ISY, whether to ensure their programs could meet the 75 percent requirement or because they felt they could not work effectively with ISY using just 25 percent or less of their youth funds. One WDB youth program manager stated: “The reason we switched to 100 percent [OSY] is because we have 11 high schools to serve scattered over 10 counties, so the 25 percent of the funds that we were using was mostly spent on travel for the case managers. By the time they traveled to all these high schools [there was nothing left]. The funding piece is the reason.”

Respondents from two states and four local areas made their ISY youth services less intensive by no longer offering ISY access to lengthy or expensive services such as work experience or occupational skills training, especially long-term training such as associates degrees. An analysis of nationwide youth program administrative data is consistent with study respondents’ assertions that ISY were less likely and OSY were more likely under WIOA to receive occupational skills training (Exhibit II.4).

“[Before WIOA] if we had some in-school youth who would be great for work-based learning [we would have found placements for them], but for our targeted funding to keep it 75 percent, we don’t go that direction.”

—Local youth manager

Exhibit II.4. Occupational skills training, overall and by school status

Sources: For PYs 13 to 15, WIASRD; for PYs 16 and 17, PIRL.

Note: During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

Staff from two youth programs reported shifting their ISY services to focus only on older ISY and those facing the most barriers as a way to ensure the programs spent their limited funds on the ISY who needed the most assistance and were less likely to be served by schools. In focusing on older youth, one program reasoned that education agencies have wraparound services for 14- and 15-year-olds, and their 25 percent of funding for ISY can support those youth with barriers who are not connected with an Individualized Education Program (IEP) or a 504 plan.²⁵

As noted earlier, youth programs faced pushback from their in-school partners—and sometimes their WDB members—from cutting back on ISY spending to meet the OSY expenditure requirement. In response, local WDBs and their youth programs worked hard to identify other resources that could fund ISY services, especially summer employment programs. In some cases they co-enrolled ISY with other programs to conserve Title I youth funding for OSY. For example, some WDBs used TANF dollars to fund summer work experience for co-enrolled ISY. Some states and local areas served ISY through other programs but did not enroll them in Title I. Instead, they used TANF, Wagner-Peyser, and SNAP E&T funding to serve ISY.

4. Changes to OSY eligibility that were reported to contribute to meeting the 75 percent requirement

Respondents from five local areas noted that several of WIOA's changes to the definition of an OSY helped them meet the 75 percent requirement. The most helpful of these changes is that many OSY no

²⁵ 504 Plans are for students with physical or mental impairments but who do not qualify for an IEP. They are authorized under Section 504 of the U.S. Rehabilitation Act of 1973. Like IEPs, 504 Plans are designed to help such students receive needed supports and accommodations to succeed in school.

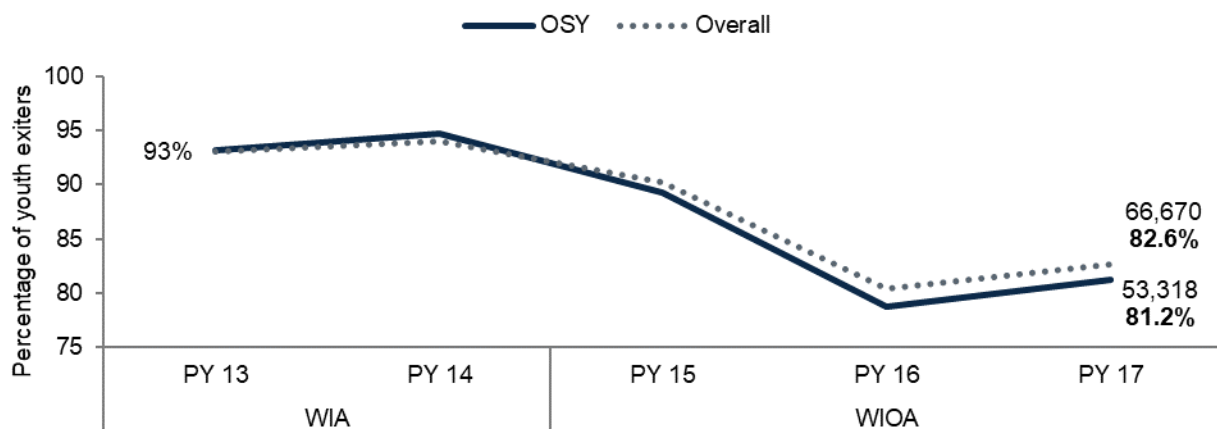
longer have to be low income to be eligible for the program. Unlike under WIA²⁶, in which 95 percent of youth participants—whether OSY or ISY—had to be low income to be eligible, any youth—regardless of income—is eligible under WIOA if they are ages 16 to 24, not attending school, and fall into one or more barrier-related categories (for example, they are a school dropout, involved with the justice system, homeless, pregnant or parenting, or disabled).²⁷

Youth program respondents from two local areas explained that this flexibility on income determination had been significant to their success in recruiting OSY. Under WIA they had lost many potentially eligible participants who had one or more barriers but either did not have a sufficiently low income or did not provide the documentation required to show that they or their families fit in that category. This is consistent with an analysis of nationwide youth program administrative data showing that the percentage of OSY exiters who were identified as low income declined from 93 percent of OSY exiters in PY 2013 to 81.2 percent in PY 2017, the third program year of WIOA (Exhibit II.5).

“Under WIA, it was pretty regimented, they [youth] had to meet certain things. With WIOA they’re able to just be a dropout and be eligible. They’re able to just have children and be eligible. Because a lot of the young adults that we work with still live with their parents, so when you have to figure in [their parents’] income [for eligibility], it makes them uncomfortable.”

—Youth staff person

Exhibit II.5. Youth exiters reported to be low income, overall and among OSY



Sources: For PYs 13 to 15, WIASRD; for PYs 16 and 17, PIRL.

Note: During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

WIOA’s changes to allow youth to be OSY-eligible, even with a high school diploma or equivalent, also helped programs enroll more OSY and thus meet the 75 percent requirement (box at right). Consequently,

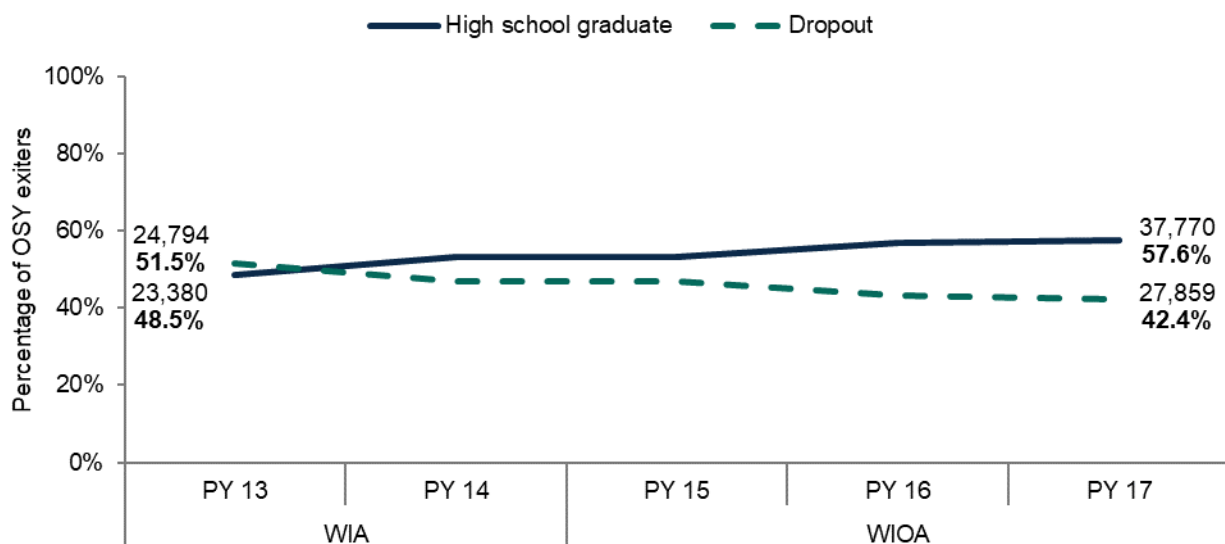
²⁶ Under WIA, all but 5 percent of youth participants had to be low income. WIA section 129(a)(1)(B).

²⁷ The full list of categories that exempt an OSY from needing to be low income at enrollment includes: school dropout; youth who are within the age of compulsory school attendance, but have not attended school for at least the most recent complete school year calendar quarter; individuals subject to the juvenile or adult justice system; homeless individuals, runaways, individuals who are in foster care or have aged out of the foster care system, youth eligible for assistance under Section 477 of the Social Security Act, or individuals who are in an out-of-home placement; individuals who are pregnant or parenting; disabled individuals. WIOA section 129(a)(1)(B)

youth programs could target more high school graduates with significant barriers to employment; respondents from five local areas noted that was a positive change.

These changes to the definition of OSY, along with youth program recruiting practices, are consistent with an analysis of nationwide youth program administrative data. The results of this analysis, presented in Exhibit II.6, show that although there were nearly equal numbers of high school graduates and dropouts among OSY exiters in PY 2013, nearly 60 percent of OSY exiters were high school graduates in PY 2017 (Exhibit II.6). Due to the overall increase in OSY served under WIOA, the absolute number of high school dropouts served under WIOA also increased from 24,794 in PY 2013 to 27,859 in PY 2017.

Exhibit II.6. Percentage and number of OSY exiters who were dropouts and high school graduates



Sources: For PYs 13 to 15, WIASRD; for PYs 16 and 17, PIRL.

Note: During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

WIOA's changes to the methods youth programs can use to determine whether a youth is low income were also reported to have helped with OSY recruitment.²⁸ One of these changes is that youth can be verified as being low income if they live in a designated high-poverty area.²⁹ Respondents viewed this change as beneficial because such youth only had to provide proof of their address, rather than documentation of their or their parents' incomes.

Respondents from one state and two local areas reported that WIOA's increase in the maximum age for eligible OSY from 21 to 24 had helped them to meet the OSY expenditure requirement because it

²⁸ Two groups of OSY must still be low income to be eligible for the youth program under WIOA: (1) recipients of a secondary school diploma or its recognized equivalent (these youth must also be basic skills deficient or an English language learner); (2) youth whose qualifying barrier is that they require additional assistance to enter or complete an educational program or to secure or hold employment. Note that both of these groups of youth must also be ages 16 to 24 and not attending any school. WIOA section 129(a)(1)(B).

²⁹ Section 129(a)(2) of WIOA defines a youth as low income if he or she lives in a high-poverty area, defined in 20 CFR § 681.260 as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area (defined by the U.S. Census Bureau), Alaska Native Village Statistical Area or Alaska Native Regional Corporation Area, Native Hawaiian Homeland Area, or other tribal land as defined by the Secretary in guidance or county that has a poverty rate of at least 25 percent as set every five years using American Community Survey 5-Year data.

increased the pool of eligible youth. In addition, these respondents asserted that OSY on the older end of that range were more likely to be receptive to the youth program's offerings.

Despite praise from these respondents for how WIOA's eligibility changes had helped them reach the 75 percent requirement, youth staff in one state reported that those changes were too confusing and still too narrow. They would instead prefer a complete exemption from all eligibility requirements for 10 percent of all youth participants; they proposed enrolling these youth simply based on staff judgement.

Chapter II described implementation of WIOA's shift to OSY through its requirement to spend a minimum of 75 percent of non-administrative funds on this population. Next, we examine WIOA's focus on work experience through its requirement that local WDBs spend 20 percent of their non-administrative youth program funds on paid or unpaid work experience.

III. Emphasizing work experience and the 20 percent spending requirement

WIOA’s requirement that local WDBs spend 20 percent of their non-administrative youth program funds on paid or unpaid work experience represents a second major change to the youth program.³⁰ Although WIA included work experience among the 10 program elements youth participants were required to be offered, there was no expenditure requirement related to the provision of work experience opportunities. Study states and local areas had mixed experiences meeting the new requirement, with five states and seven local areas reporting initial difficulty and three local areas reporting that they were still struggling.

The requirement did not present challenges for those that already had strong work experience components in place prior to WIOA.³¹

This chapter describes changes to the youth program in the study states and nationwide related to the 20 percent work experience expenditure requirement (hereinafter referred to as the 20 percent requirement), the challenges states and local youth programs reported facing in implementing the requirement, and how they mitigated those challenges.

“We have found that work experience is a critical component of working with youth.... You give them an avenue to work and earn an income, then you’ve got their attention, you’ve got a hook [and] you can do some of the other things ... that they need but they don’t really want to learn about.”

–Local youth provider

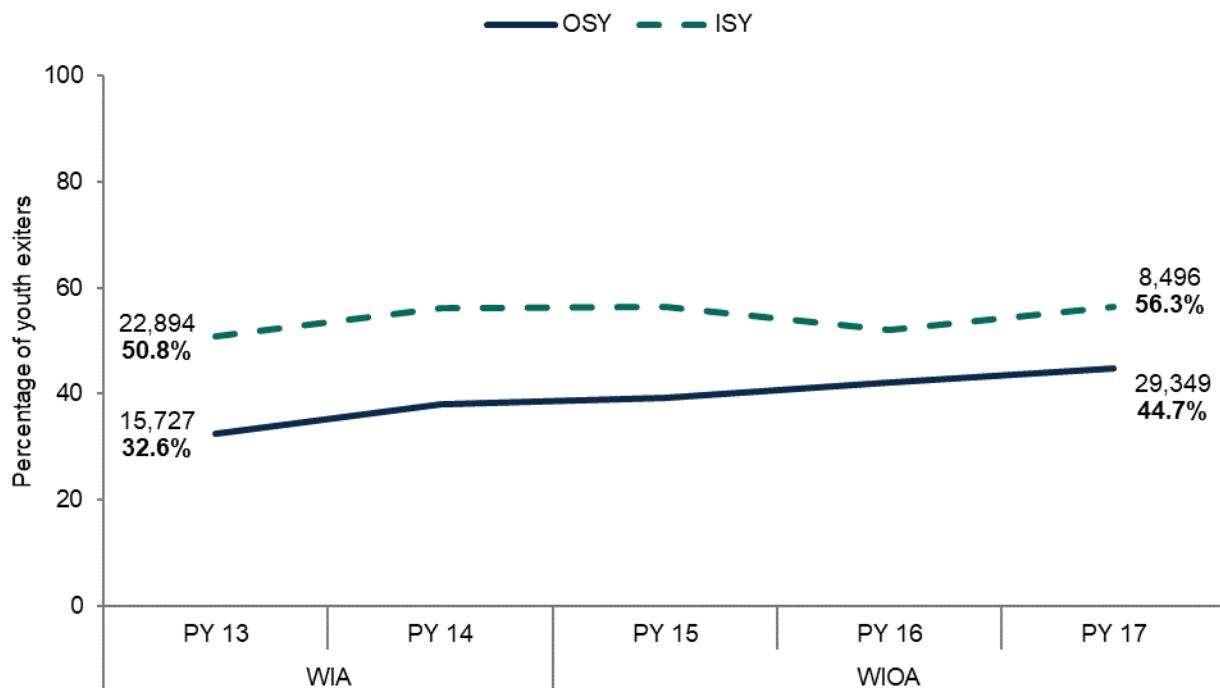
A. How the 20 percent requirement has changed the youth program

Youth program respondents from 8 states and 16 local areas asserted that the 20 percent requirement had resulted in a number of changes to the youth program. Chief among those was that work experience had become a more common service, especially for OSY. This viewpoint is consistent with our analysis of nationwide administrative data³² that shows that both the percentage and the absolute number of all OSY who received work experience increased substantially between the last years of WIA (PY 2013–2014) and the third year of WIOA (PY 2017) (see Exhibit III.1). The percent of all ISY receiving work experience also increased from PY 2013 to PY 2017, but more modestly, while the absolute number of all ISY receiving work experience actually dropped by 13,622 (due to the overall drop in ISY in the program).

³⁰ States are not held to this requirement.

³¹ The study did not have access to local WDB expenditure data to independently verify these results, but they match the trends found by GAO via a survey of 130 WDBs conducted from November 2017 through January 2018, where most local areas reported that they were either meeting the requirement or were on track to do so in the future. (“Workforce Innovation and Opportunity Act: States and Local Areas Report Progress in Meeting Youth Program Requirements,” GAO-18-475).

³² The study collected and analyzed public-use data sets that contain the administrative data states submitted to DOL, documenting WIOA participants’ service receipt and outcomes for Title I youth program.

Exhibit III.1. Percentage of OSY and ISY exiters who received work experience

Source: For PY 13–15, WIASRD; for PY16–17, PIRL.

Note: During these time periods there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

Youth program respondents from four local areas also indicated that WIOA’s 20 percent requirement had contributed to the decrease in the length of time most youth participants spent in the program. As shown in Exhibit II.3, the median number of months that exiters participated in the youth program declined from 10 to 7 months between PY 13 and PY 17. These respondents connected the decline in participation duration to the 20 percent requirement primarily because, to meet the requirement, many local youth programs had to increase the proportion of their budgets spent on work experience. Thus, they asserted that they had less funding available for other services. Some of these youth program managers noted that one way they cut costs was by decreasing the length of the occupational skills training programs they funded. Since occupational skills training programs are among the longest lasting of the youth program elements, these respondents asserted that shorter skills-training programs contributed to the decline in the length of program participation.

B. Challenges local boards faced in meeting WIOA’s 20 percent requirement

About one-third of the WDBs and one of the single state offices visited reported that they had struggled or were still struggling to meet the 20 percent requirement.³³

³³ Among the six single-state offices we visited, four reported that meeting this requirement for their office’s service delivery area was easy, one reported that it was challenging, and one reported that it was unclear on how they were doing related to this requirement.

Expanding work experience opportunities. The biggest challenge noted by respondents was how to substantially increase the number of work experience opportunities so that more youth could participate. These efforts required staff members to spend time developing new employer partnerships so that employers would agree to host work experience opportunities. These WDBs' youth programs also had to ensure that new work experience opportunities were accessible to a broader range of youth, particularly OSY and youth with significant barriers like homelessness or involvement in the justice system. They reported that in many cases employers were unwilling—or legally unable—to provide placements for such youth.

“[T]he biggest barrier is ... finding work experiences for some of our youth that have some felonies.”

–Youth program staff

Retention in work experience activities. Respondents from two areas explained that when youth dropped out of their work experience placements, less funding was spent on paying youth wages. When too many youth dropped out of these placements, these youth staff reported that employers became dissatisfied and it became harder to maintain employer partnerships. And, as noted earlier, youth staff from one rural area noted that their tight rural labor market resulted in youth being hired before they could be placed in work experience.

Allowable costs. Five states reported that many of their WDBs did not understand what costs could count toward meeting the 20 percent requirement, nor were the WDBs' financial systems set up to capture those charges.³⁴ The states reported that these challenges persisted despite several rounds of DOL guidance on the topic, as well as extensive technical assistance provided by state staff. State and local youth staff described other challenges related to understanding what costs could be used to meet the requirement. Staff members from one state were initially unclear about whether apprenticeship-related costs could be counted, and they were therefore unable to provide guidance to their local WDBs about this. Youth staff from one local workforce area also reported confusion about whether apprenticeships and pre-apprenticeships could count as work experience activities, and thus they were not sure whether staff time spent on developing and managing those activities could be counted.³⁵

“When we first implemented, there were some local areas that didn't fully understand what types of costing to charge to that [work experience] line. So if you thought that only wages...could go to that line and you had not set up a process by which to apply staff time, then you were going to be missing out on a lot of the costs...to get you to that 20 percent.”

–State youth administrator

Even though many youth need assistance with child care and transportation to participate in work experience, supportive services may not be counted as work experience costs.³⁶ Respondents indicated that to increase their work experience expenditures to 20 percent they had to cut back on other costs, including supportive services, which meant that youth needing those services could not participate in work experience. In one of these

³⁴ Training and Employment Guidance Letters 23–14, 8–15, and 21–16 state that activities whose costs can be counted toward meeting the required 20 percent work experience expenditure include wages/stipends for youth; staff time spent setting up, managing, and evaluating work experience placements; participant and employer orientations for work experience; job readiness employability skills training; classroom training directly related to the work experience; and incentives tied to completion of the placement.

³⁵ DOL specifically included pre-apprenticeship as an example of an acceptable work experience in TEGL 21-16, p. 16.

³⁶ Training and Employment Guidance Letter 21–16 clarifies that “Supportive services are a separate program element and cannot be counted toward the work experience expenditure requirement even if supportive services assist youth in participating in work experience” (p. 15).

cases, program staff tried to find work experience placements within walking distance of where youth lived but that was often impossible.

Respondents also reported that their inability to count leveraged funding for work experience toward the 20 percent requirement was challenging. Even though they had funding from other sources specifically for work experience-related costs, they still had to spend 20 percent of their Title I youth funds on work experience and could not use those funds for other important program services, such as intensive case management to support OSY.

One state reported that some of its local WDBs initially thought they were required to provide 20 percent of their participants with work experience. Once the state clarified the requirement, these WDBs had to shift their approaches to meeting the requirement.

C. Local board strategies for meeting the 20 percent requirement

Local WDBs used a variety of strategies to meet WIOA’s 20 percent requirement and mitigate the challenges described previously.

Employer engagement. Respondents in four local areas and one state noted that their strategy for meeting the 20 percent requirement was to engage more effectively with businesses, whether by creating new youth program positions that focused entirely on working with employers or by developing stronger linkages with their local areas’ existing business services teams. To work effectively with the youth program, business services staff reported that they often had to adjust their approaches to finding employers. For example, one of these business services staff explained that he would pitch youth placements as a way for employers to make a difference in the life of youth, and this approach would make the employers more willing to handle the challenges of a less mature worker. However, once they made these adjustments, youth staff reported that business services staff were then able to identify placements for even youth with multiple barriers to employment, including those with criminal records. In two local areas, business services staff also worked with youth to help them become job ready.

“[I] let them [employers] know, it’s really a mentorship. A lot of these youth have never had employment before, and some of them were going to be rough around the edges. And it took somebody willing to give them an opportunity and really mentor them, to make a difference.”

–Business services staff

Increasing youth participation and retention. Youth programs developed strategies to enable more youth, including those with significant barriers, to participate in work experience. For example, in the Capital local workforce area in Texas, the youth program created a two-tiered work experience program (see box for more information on this approach). Another local youth program creatively paired occupational skills training with work experience placements in different fields to help youth gain transferable labor market skills. For example, for youth who wanted to work in welding but had not completed their welding training, the program would try to find those youth a subsidized work experience placement in an industrial setting.

Capital's two-tiered work experience approach

The Title I youth program in the Capital area in Texas created a two-tiered work experience program. The first tier was for youth to whom private sector employers were reluctant to offer a work experience placement opportunity because they lacked a work history. To help build a resume-ready work experience, the program placed these youth in internships with nonprofit partners, such as Goodwill, where they received lower wages but more support. The second tier, which involved placement at a higher wage with a private sector employer, was for youth who had more skills or labor market experience. Youth in the second tier also had to complete certain career advancement classes to further demonstrate their readiness for a private sector placement.

"I'm being very transparent. We weren't meeting the work experience number, and we were putting these young adults into these great opportunities and they were 'flaming out' as we called it, right? And so, we put together this work readiness series and I mean, it did exactly what we had identified we need to do ... and we turned around from not meeting the 20 percent."

–Youth program manager

Local youth programs also reported developing strategies that they thought would increase the likelihood that youth would complete their work experience placements. One local youth program added a two and a half-day work readiness component and used coaches to help youth participants maintain their placements.

These coaches modeled appropriate workplace

behavior and helped youth deal with any challenges that arose, such as issues in communicating with their supervisors.

State guidance. Four states reported playing a major role in helping their local WDBs meet the 20 percent requirement by providing guidance and training on what costs could be classified as work experience expenditures. Through TEGL 8-15, DOL also provided guidance on allowable expenditures that could be counted toward the

work experience expenditure requirement. These states also assisted their local WDBs with tracking what they were spending on work experience. Staff in one state assisted local WDBs with adjusting their financial systems to effectively track those costs. In another, state staff sent expenditure reports to local boards on a regular basis. A third state was in the process of developing an expenditure tracking sheet that local boards could use to keep track of their progress on meeting the 20 percent requirement. States also shared what they perceived as promising practices related to effective work experience with their WDBs. Respondents from two local WDBs reported that as a result of assistance from their states, they were able to increase what they counted as work experience costs. One youth program respondent noted that her program now counted the costs of work readiness and other types of the training youth receive prior to participating in work experience as well as the costs of job shadowing.

"We've gotten a better handle on it [what costs count as work experience]. Some of our youth that go through a work experience will go to a training. [Now we know] we can pay for the training out of the work experience funds."

--Youth program manager

Some states assisted local WDBs with developing employer partnerships, particularly with larger, statewide employers. As one state workforce manager explained: "The only way that you can meet that minimum [of 20 percent] is by having partnership engagement, business services, not just at the local level, but also at [the state] level to continue to build the number of employers."

D. Efforts to expand work experience by developing OJT and apprenticeship opportunities for youth

While respondents said that most of the work experience they provided is the traditional fully subsidized employment (consistent with the national analysis presented in Exhibit III.2), in about half of the states and local WDBs or offices, youth programs also aimed to expand the types of work experience opportunities available to youth by developing OJT, apprenticeship, or pre-apprenticeship opportunities. For example, six states and about one-third of local youth programs reported trying to place youth into apprenticeships and pre-apprenticeships as a way to meet the 20 percent requirement. Another two states and four local WDBs reported that they were trying to develop more OJT placements.

“OJTs [are] helpful for the participants because they’re guaranteed that job, they’re working for that company.”

–Local youth program manager

These states and local WDBs reported that they were focusing on these types of placements because they are better for youth. For example, with OJT, the employer is expected to continue to employ youth after completion of the training,

while apprenticeships not only provide work experience but also lead to a professional certification. Respondents from two of these states also noted that both OJT and apprenticeships are more appropriate for older youth participants, so the increase in the age range at the top end had made these kinds of work experience placements more feasible.

Respondents from these states noted, however, that their efforts had yet to generate large numbers of OJT, apprenticeship, or pre-apprenticeship placements. Most of these efforts had begun only in the last two or three years, and respondents reported facing a number of challenges in developing these kinds of work experience opportunities. Some respondents noted that few youth program participants can meet testing and other requirements for an apprenticeship, and apprenticeships typically last too long—two to four years—to be feasible for some participants.

Employer opposition. Youth program respondents from four local areas also thought that employers were not open to offering OJT slots or apprenticeships because of the amount of paperwork required and also because they were not ready to directly hire participants, pay a portion of their wages, provide worker’s compensation, and continue to employ them after completion of the work experience. Some of these respondents also noted that some employers in industries outside of construction were resistant because they assumed apprenticeships are only suitable for the building trades.

“[Its] just the paperwork of being an established apprenticeship... they’re [employers] just like, ‘Okay, just forget all the stuff for registered apprenticeship ... OJT, why would you bother? Registered apprenticeship ... why would you bother?’”

–Youth program staff

Exhibit III.2 presents an analysis of nationwide youth program administrative data that is generally consistent with the experiences reported by state and WDB study respondents. As noted by study respondents, most of the work experience provided to youth is subsidized or unpaid employment. Despite some states and local WDBs’ emphasis on OJT, apprenticeships, and pre-apprenticeships, the numbers and percentages of youth exiters who were reported to have received these types of work experience activities in PY 2016 and 2017 were very small.

Exhibit III.2. Types of work experience received by youth exiters under WIOA

	WIOA					
	PY 16			PY 17		
	All # %	OSY # %	ISY # %	All # %	OSY # %	ISY # %
Paid (subsidized by youth program) or unpaid employment/internships (summer and year-round)	24,442 67.0	17,742 66.4	6,700 68.7	26,284 69.5	19,794 67.4	6,490 76.4
Job shadowing and other work experience activities (not included in other categories)	7,256 19.9	5,515 20.6	1,741 17.8	7,838 20.7	6,255 21.3	1,583 18.6
On-the-job training	850 2.3	809 3.0	41 0.4	935 2.5	885 3.0	50 0.6
Apprenticeships	238 0.7	209 0.8	29 0.3	240 0.6	217 0.7	23 0.3
Pre-apprenticeship programs	64 0.2	61 0.2	3 0.0	92 0.2	73 0.2	19 0.2
Transitional jobs	3 0.0	3 0.0	0 0.0	18 0.0	18 0.1	0 0.0
Not specified	3,902 10.7	2,644 9.9	1,258 12.9	2,735 7.2	2,380 8.1	355 4.2

Source: U.S. Department of Labor's PIRL data.

Note: Because individuals can receive more than one type of work experience, the sum of exiters across the categories in Exhibit III.2 is greater than the count of exiters who received any work experience.

During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY. These data were not captured in the WIASRD; they are available only for youth program exiters since the PIRL was instituted in PY 16.

IV. WIOA'S youth program elements and American Job Center access requirements

In addition to the 20 percent work experience expenditure requirement, WIOA included two other service delivery-related changes that affect the youth program: (1) the expansion of required program elements and (2) a strengthened requirement that youth must be able to access youth program services from AJCs. This chapter describes how the 14 states and 28 local WDBs in this study implemented these WIOA requirements.

A. WIOA's new program elements

WIOA expanded the number of program elements that must be offered to youth to 14, compared to 10 under WIA, by adding 5 new elements and combining 2 existing elements (summer employment and paid/unpaid employment). The five new elements are:

- Education offered concurrently with workforce preparation and training for a specific occupation (element 5)
- Financial literacy education (element 11)
- Entrepreneurial skills training (element 12)
- Services that provide labor market information (LMI) (element 13)
- Postsecondary preparation and transition activities (element 14)³⁷

Exhibit IV.1 presents an analysis of national PIRL data showing youth participation in each of these new elements. Provision of LMI was most common, with more than one-third of youth served receiving that program element in PY 2017.

Exhibit IV.1. Youth program exiters who received new program elements

New program element	WIOA					
	PY 16			PY 17		
	All # %	OSY # %	ISY # %	All # %	OSY # %	ISY # %
Education concurrent with workforce preparation	4,201 5.1	3,315 5.2	886 4.7	4,535 5.6	3,629 5.5	906 5.0
Financial literacy education	9,061 11.0	7,726 12.2	1,335 7.1	12,268 15.2	10,455 15.9	1,813 12.0
Entrepreneurial skills training	2,739 3.3	1,950 3.1	789 4.2	2,541 3.1	1,883 2.9	658 4.4
Labor market information services	23,056 28.0	18,451 29.2	4,515 24.1	28,996 35.9	24,502 37.3	4,494 29.8
Postsecondary preparation and transition activities	7,931 9.6	4,767 7.5	3,164 16.9	7,985 9.9	5,555 8.5	2,430 16.1

Source: U.S. Department of Labor's PIRL data.

Note: During these time periods, there were 2,812 youth exiters for whom we do not have information about whether they were OSY or ISY.

³⁷ Workforce Innovation and Opportunity Act, section 129(c)(2); Training and Employment Guidance Letter 21–16.

Respondents from 12 states and 23 local programs indicated that they already provided these program elements under WIA. Therefore, they perceived WIOA's new requirement as a minor change. It was still viewed as a positive change, however, because it reinforced the importance of these services and allowed youth program respondents to report their receipt separately.

"I actually loved that [reporting the five new elements separately]. There were things we were already doing that we couldn't count, since there was no service [element] for those. So that opened up [our ability to measure and emphasize them ... like LMI for] job search."

—Local youth program manager

Staff members from two states noted, however, that adding these new elements to their administrative data systems and training youth staff on how to correctly report on them was challenging. In addition, respondents from about a third of local programs faced challenges in offering entrepreneurial skills training and financial literacy education, with some expressing interest in receiving additional guidance on these two elements.

None of the respondents reported making changes to their ongoing service offerings related to education, labor market information, or postsecondary preparation, so these elements are not discussed in this chapter.

1. Entrepreneurial skills training

Of the five new program elements, only a very small share—about 3 percent—of youth program participants received entrepreneurial skills training nationwide (see Exhibit IV.1). Youth program respondents from about a third of local areas described challenges to offering entrepreneurial skills training that may shed light on the nationally low rates of participation in this type of training:

- **Difficulty in finding providers or appropriate materials.** Respondents from three local programs noted a lack of suitable providers to offer these services in their local areas or faced a challenge finding appropriate materials so that they could offer this service themselves. One program was not able to find a provider whose materials were suitable for use by youth with low literacy skills and requested assistance in locating or developing more appropriate entrepreneurial skills training materials.
- **Lack of interest among youth.** While one state youth administrator thought that entrepreneurial skills training was a critical way to create high-quality jobs in areas where such jobs were limited, staff from two local areas asserted that youth were not interested in entrepreneurial skills training because it was not relevant to their lives. They noted that their participants were often struggling to meet their immediate financial needs and just wanted to find jobs that could cover basic expenses. One youth provider stated that “these kids oftentimes don’t even have a regular bed, so entrepreneurship is a nice thing to offer that we can build that into occupational foundation classes, but is [it] really relevant to their situation right now?”

2. Financial literacy education

About two-thirds of youth programs were already providing financial literacy services. A third of youth programs saw the addition of financial literacy as a separate program element as an opportunity to strengthen their existing offerings by developing new partnerships with banks or other organizations that specialize in financial literacy. One local program noted that the Federal Deposit Insurance Corporation provided an entire financial literacy curriculum for free; another developed a partnership with a debt-reduction services nonprofit.

The Hampton, Virginia, program integrated incentives with its financial literacy component by giving youth checks for certain amounts of money for achieving their goals. The program then helped participants decide what to do with those incentive checks through its financial literacy component.

Six local youth programs reported facing challenges implementing the financial literacy element. One program that had to create this element from scratch, reported difficulty doing so. Three other local areas noted that their youth participants were not interested in financial literacy; they just wanted to get a job or receive training and have someone else handle their finances. Another local area thought financial literacy should be provided as part of broader training on work readiness skills, but that made it hard for them and their youth career counselors to track the service. These respondents were interested in receiving technical assistance for this element.

B. Youth program connections to AJCs

WIOA requires that all one-stop delivery system partners (including the Title I youth program) provide access to their programs at comprehensive AJCs. Under WIA, partners could meet this requirement by co-locating their program staff at AJCs or simply by ensuring that information about their programs—even just a printed brochure, website, or contact information—was available at the AJCs. WIOA strengthened this requirement by clarifying that providing access means providing all customers contact with a staff person who can provide program information or services either in-person, by phone, or via the Internet.³⁸ During the 2017 visits, all four states were working to improve access for youth.

Co-locating youth staff members in AJCs is the clearest way to meet the AJC access requirement. This was the most common method reported by the youth programs: in 22 of 28 local areas and AJCs visited, at least some staff funded by the youth program were housed at one or more AJCs (see Exhibit IV.2). Similarly, most of the states that discussed where youth programs were typically located reported that youth staff were primarily located in AJCs. All of these respondents reported that co-location of youth staff at AJCs was also the most common method of providing access under WIA.

³⁸ 20 CFR 678.305 requires that comprehensive AJC customers must be able to access required partner programs and services in one of the following ways: by having a program staff member physically present at the AJC; by having a staff member from another program who has been appropriately trained to provide information on the program physically present at the AJC; or by having a technological, real-time “direct linkage” to program staff, beyond simply providing a phone number, website, or printed information.

Exhibit IV.2. Methods used to provide access to youth program services at AJCs

Methods of providing access	Number of local areas/offices
Co-locating youth staff members at AJCs	22
Training other programs' staff members who are co-located at AJCs or providing a technological, real-time "direct linkage"	6

Source: Study site visits to 28 comprehensive AJCs: one per local area or single-area state region visited.

In contrast, six local WDBs' youth programs had no staff co-located at comprehensive AJCs. These WDBs reported that they met WIOA's AJC access requirement by ensuring that staff at the AJCs were trained on Title I youth program services. In three local areas, this training was facilitated by the youth program offices or centers' close proximity to an AJC, either in the same office complex or in a building next door.

Beyond meeting WIOA's access requirement, youth program respondents provided other reasons for co-locating their program staff in AJCs:

Better coordination and shared staffing with the Title I adult and dislocated worker programs. As Title I adult and dislocated worker staff members were always co-located at comprehensive AJCs, housing youth staff at these centers made it easier for staff from all three Title I programs to work together. This common strategy facilitated co-enrollment of youth participants in the adult program, as well as shared case management of co-enrolled participants. It also allowed the three programs to jointly fund staff members, allowing youth programs to increase their staff capacity without covering all the costs of those staff on their own.

More exposure for youth to workplace expectations. Since most AJCs had dress codes and standards of conduct that were similar to those of many workplaces, having youth participants meet with their youth program counselors at AJCs provided those participants with more experience in a professional environment.

"I think it's good to have the environment that we have in most of the centers [AJCs] to kind of expose them [youth] to a professional environment, to the world of work."

–Youth program manager

Greater access to local business services teams and employers. Being in the AJCs, where most business services staff were located, gave youth staff and participants more contact with business services staff. In addition, because most AJCs host employer hiring events, co-location at AJCs gave youth participants more access to those events and employers more exposure to youth; respondents hoped that this would lead more employers to host youth work experience placements or hire youth outright.

Greater awareness of youth services among parents. Respondents reported that co-location made it more likely that parents visiting an AJC could learn about youth program services and recommend them to their potentially eligible children.

More welcoming environment for youth. Co-location was reported to help make AJCs more welcoming because they advocated for youth-friendly rules and processes and trained other programs' staff on working effectively with youth.

However, respondents from nine local youth programs felt that AJCs are often not effective locations for youth to access services, primarily because they were not youth-friendly environments. The atmosphere of most AJCs, which, as noted above, often included dress codes and prohibitions on food and drinks, was too institutional especially for youth with barriers who were not yet job-ready; some youth program managers thought it was too institutional for their youth counselors as well. These respondents indicated that this atmosphere made youth less willing to connect and share their challenges with staff. Some youth staff also noted that many AJCs are not equipped to deal with small children, and some do not allow small children on their premises. They noted that many OSY participants are pregnant or parenting and lack the resources to cover child care, so they need to bring their children with them.

“Why don’t they go to the AJC? Because it feels too institutional? It’s cold ... it’s just cold. There’re no signs or windows in the building. Honestly ... it feels very much like you’re going to the DMV....”

–Youth staff person

Seven of these youth programs addressed this issue by having staff regularly travel to locations that were friendlier to youth, including libraries, the mall, cafes, homeless shelters, or their homes. A number of these respondents, as well as respondents from three other programs, said this approach was also critical because many youth lack access to transportation—particularly in rural areas—and have difficulty traveling to any location, whether youth-friendly or not. Youth staff from two local areas also expressed interest in having separate, more relaxed areas for youth in their AJCs. One would like “a place where they [youth] can come in and sit and watch TV and meet and talk.” Unfortunately, neither of these AJCs had room for such a separate youth “space.”

Some programs housed youth staff not only at AJCs but also at other locations. For example, in Indiana’s Region 12, which has multiple contracted youth providers, some youth-funded staff were located at the comprehensive AJC, but others were located at the contracted providers’ offices. Some youth staff were also located at what the local WDB called the Pivot Re-Engagement Center, a space specifically targeted toward youth dropouts that the local WDB was piloting with philanthropic funding (see box for more details).

Six local areas housed all youth staff outside of AJCs, in either the contracted youth provider’s offices, a youth career center, or in both types of locations. As noted above, in three of these local areas, youth staff were located very close to AJCs—so close that respondents described these locations as being part of the AJC’s “campus” and youth staff as “essentially co-located” at those AJCs.

WDB staff in two of the locations that created separate youth job centers described doing so after consulting with youth, youth provider staff members, and community members—in at least one case using the principles of human-centered design—who all agreed that having a separate employment-focused space for youth was critical. As one youth program manager stated: “We did tons of focus groups with kids, with our staff and then also with community members. It was really clear to us from all of those that we needed to have a space that was specific for youth.” These centers—which have multiple youth-focused partners on-site in addition to Title I-funded youth staff—are aimed at being true “one-stop” centers where youth can access “education, career skills training, and community and employment resources, in order to set them [youth] up for success in achieving their life and career goals.” (See the accompanying box for more information on the Southwest Washington WDB’s Next Career Center.)

Southwest Washington's Next Career Center

The Southwest Washington WDB's Next Career Center serves youth ages 16–24. The center provides youth with access to education, training, and employment-related services, including assistance with obtaining a high school diploma or GED, registering for an apprenticeship or college, connecting with Job Corps, work readiness training, and placement in an internship. According to staff, the center also serves as a safe space where youth can connect and socialize with each other and center staff, get something to eat, access health services, and even take a shower. <https://nextsuccess.org/>

V. Changes in youth program governance and structure

WIOA gave local WDBs greater flexibility in selecting youth program providers and overseeing the youth program more generally than WIA had accorded them. WIOA provided oversight flexibility to local WDBs by eliminating the requirement that local WDBs have a youth council³⁹. To provide local WDBs flexibility on youth program services, WIOA now allows Title I youth program grant recipients or fiscal agents—usually the same entities that staff local WDBs—to directly provide some or all youth program services. This chapter describes whether and how local WDBs took advantage of this increased flexibility, beginning with a discussion of the elimination of WIA’s youth council requirement.

A. Eliminating WIA’s youth council requirement

Although WIOA eliminated WIA’s requirement that local WDBs must have youth councils to help them oversee the Title I youth program, WIOA does allow local WDBs to establish standing committees focused on youth services. WIOA requires only that a member of the local WDB chair those standing committees and that they must include other individuals with relevant experience appointed by the board. WIOA also allowed WDBs to transition their WIA youth councils into youth standing committees. DOL guidance has encouraged local boards to institute such committees. The role of youth standing committees, should a local WDB choose to constitute one or if it transitioned the WIA youth council into a youth standing committee, is to assist with planning, operational, and other issues related to providing services to youth, including identifying or recommending eligible providers of youth workforce investment activities.^{40,41}

About two-thirds of the study’s local WDBs in multi-area states had instituted a youth standing committee. Six WDBs did so because their state required it. Other multi-area states left this decision to local WDBs, reasoning that local WDBs knew best how to oversee their local youth programs. As one state administrator stated: “If the boards thought there was great value in them [standing youth committees], they would have retained them.”

Half of the 16 local WDBs that were given the option by their state WDB to retain a youth standing committee chose to do so. These local WDBs said that a youth standing committee allowed for a diverse array of youth stakeholders to provide policy and programmatic input on their youth programs. These stakeholders varied by local WDB, but often included youth program staff, AJC frontline staff (who were not funded by the youth program), high school staff, foster home staff, technical school staff, employers, and youth. These

“Under WIA, youth councils were very prescriptive. The law said you must have this, this, this, this. ... Although that was not necessarily bad, ... WIOA gives you more latitude to bring to the table people who can benefit the program and the youth the best.”

–Local WDB youth staff

³⁹ Under WIA, Youth Councils were a required subgroup under each local workforce board with a prescribed membership that included, at a minimum, members of the local board; representatives of youth-serving agencies, Job Corps, and public housing authorities; parents of eligible youth seeking assistance from the Title I youth program; and other individuals, including former youth program participants, with experience related to youth activities. WIA assigned Youth Councils several responsibilities, including coordinating youth activities in the local area; developing portions of the local plan related to eligible youth; recommending eligible youth service providers to the local workforce board; overseeing those providers; and carrying out other duties as authorized by the chair of the local workforce board. WIA Section 117(h).

⁴⁰ TEGL 23-14, p.6.

⁴¹ WIOA Section 107(d)(10)(B)(i).

respondents were quite happy about the elimination of WIA’s stringent youth council requirements, which they felt did not allow such diverse representation.

“We’re trying to look at it [youth issues] from the pipeline approach, and [take] a more holistic view ... of youth, rather than just the Title I [youth] program piece.”

–WDB Youth manager

The other half of the 16 WDBs that had a choice opted not to have a youth standing committee. Their primary rationale was that their WIA youth council had been ineffective or underused and there were more effective ways to oversee their Title I youth program. In some local areas, this

meant other, more broadly focused existing committees handled youth issues. For example, one local WDB reported that the board’s standing career services and marketing diversity committees handled youth issues. Another local WDB opted to create a new, more broadly focused committee to handle youth issues. In this area, the local WDB created what it called an emerging workforce committee that focused on adults and young adults. To ensure this committee covered youth issues adequately, the local WDB was also in the process of developing a youth-run advisory council to advise the committee. Another approach taken by some of these local WDBs was to convene ad hoc youth-focused committees as needed. For example, one WDB determined it needed a youth committee to provide input only during the local planning process; upon completion of the local plan the committee disbanded.

In local areas that chose to maintain or create a youth standing committee, those committees generally focused more on policy, planning, and connecting to larger community efforts than they had under WIA. In several cases, local youth standing committees also connected to other local or state-related youth committees, enabling them to play a broader role than just overseeing the Title I youth program. For example, one local area elected to align its youth standing committee with the work of a larger local collective impact group focused on youth. In another area, the youth standing committee coordinated closely with the state’s career and technical education advisory committees.

State standing youth committees. Although not required by WIOA, 10 of the 14 states visited still had a state-level youth standing committee that had been established under WIA. States did not report many changes associated with these youth committees under WIOA, although two reported recruiting youth for positions on that committee. One state indicated that the structure and membership of its youth committee had changed about the time of WIOA’s passage, but for unrelated reasons. One of the four states that had eliminated its youth standing committee decided to form ad hoc youth committees as needed, but had not yet done so. Another had initially moved away from having a youth committee as part of a general reorganization of committees after WIOA’s passage, but later reconstituted it after determining that younger ISY warranted greater attention and priority. Three other states also reported increased focus on meeting the needs of ISY with barriers in their youth standing committees once the effect of the 75 percent requirement on ISY services (discussed in Chapter II) became evident in their states.

B. Direct provision of youth services by WDBs

WIOA allows state and local grant recipients or fiscal agents—usually the same entities that staff WDBs—to directly provide some or all youth services without going through a competitive selection process.⁴² By contrast, under WIA, the law required youth services to be competitively procured unless there were no available providers, in which case the local board could apply for a waiver to directly

⁴² 20 CFR 681.400 (a) specifically states that “the grant recipient/fiscal agent [for Youth funds] has the option to provide directly some or all of the youth workforce investment activities.”

provide youth services.⁴³ However, despite this new flexibility the 22 local WDBs and three single-state areas visited in early 2019 reported that they did not change their approaches to youth program service delivery from WIA to WIOA. In 6 of the 22 local areas and in all single-area states, the Title I grant recipient or fiscal agent (in each case the same entity that administered the WDB) served as the youth provider. All of these arrangements were in place under WIA due to allowable exemptions or waivers.

In four of the study's multi-area states, though, state staff reported that some of their other local WDBs had taken advantage of this flexibility and directly provided some or all youth services. In many cases—as with the local WDBs visited for the study—these boards simply continued youth service delivery arrangements that began under WIA. However, in two other multi-area states, local WDBs had to competitively procure youth services by state policy (a third was in the process of implementing such a requirement as of early PY 2019).

The states and local WDBs that chose to provide services directly did so primarily to maintain control over service delivery, save limited youth funding for service delivery, and avoid the costs of a procurement process and of hiring WDB staff whose only role would be monitoring service providers.

⁴³ TEGL 21-16 p. 11 and referencing 20 CFR § 681.400.

VI. Partnerships with core and other programs

WIOA emphasized the importance of partnerships across programs as part of its aim of creating a more coordinated and streamlined workforce system. As discussed above, WIOA also established six core programs, among them the Title I youth, Title II AEFLA (or adult education); and Title IV VR programs, and emphasized

“I think the relationships [with adult education and VR], even though they’ve been there, haven’t been as coordinated as they could’ve been. WIOA mandating all of those partnerships has really brought it to the forefront.”

–State youth program administrator

partnerships among those programs. In addition, WIOA made TANF a required one-stop system partner.⁴⁴ At least partly due to WIOA’s changes, Title I youth programs reported an increase in partnerships with adult education and VR. Partnerships with TANF also increased, though not to the same extent and more so due to a shared client base as the youth program has shifted to serving older youth, some of whom are also TANF participants. These partnerships were reflected in new referral processes and increases in referrals, co-enrollment, and co-location or visiting one another’s service locations.⁴⁵ The rest of this chapter describes these partnerships.

A. Partnerships between adult education and the youth program

Adult education is an umbrella term generally referring to adult basic education, adult secondary education, and English language acquisition programs.⁴⁶ The primary federal investment in adult education is the AEFLA program. Funding for AEFLA is distributed through each state’s designated agency (typically the state department of education or labor) and then re-granted to a wide variety of entities, such as school districts, community colleges, nonprofit community-based organizations, or other eligible adult education providers.⁴⁷

In almost half of states and local areas visited, respondents reported that WIOA has influenced and strengthened partnerships between Title I youth and adult education programs. The primary reason cited for these stronger partnerships was that adult education was a key source of potential OSY participants for the youth program. These states and local areas also noted that the referrals were reciprocal—from adult education to the youth program and vice versa.

Youth program respondents from these states and local areas noted that referrals from the youth program to adult education programs were beneficial because the adult education programs provided several key services to youth program participants, including assessment and testing (for example, TABE), GED preparation and testing, and tutoring. In some areas, adult education was the primary provider of basic skills testing for the youth program. Two local areas and one state described a reciprocal referral process enhanced by sharing intake information and TABE results. The box describes how one of these local areas managed the process.

⁴⁴ Except in states where the governor decides not to include TANF.

⁴⁵ The four states visited in 2017 had also reported increased integration with partner programs.

⁴⁶ Most respondents used the term *adult education* rather than *AEFLA* when describing these partnerships. We have also used this term, except in cases specifically referring to the AEFLA program or WIOA Title II.

⁴⁷ Bergson-Shilcock, Amanda. “Better Together: How Adult Education/CTE Collaborations Benefit Workers and Business.” National Skills Coalition, January 2019.

Referrals between adult education and the Title I youth programs were reported to sometimes lead to co-enrollment of youth in both programs. In one local area, there was a clear, intentional co-enrollment process for a subset of youth identified by both the youth program and the adult education partner. Respondents reported that the adult education program identified motivated students and partnered with the youth program to co-enroll them. Those youth were then enrolled in an occupational training program simultaneous with completing their GED, and the partners split the cost of tuition.

As a result of increased co-enrollment, respondents asserted that shared service planning also became more common between youth and adult education program providers in one state, in which portions of the learning plans developed for youth by adult education providers were carried out by enrolling those youth in the youth program to participate in work experience. In another local area, sequential enrollment was more common than co-enrollment; youth were enrolled in an adult education program to complete their GED and then enrolled in the youth program to participate in occupational skills training.

State and local youth program and adult education respondents highlighted other aspects of strengthened partnerships with adult education, such as co-location of adult education staff with Title I youth staff members, or increased coordination if program staff were in different locations. One local area noted that because an adult education program had co-located at an AJC that also housed youth staff and started to offer GED testing on site—which had occurred after WIOA passed—the youth program had seen a considerable rise in the number of OSY enrollments from youth participating in on-site GED instruction. Even when adult education programs were not co-located at AJCs, respondents reported that the relationship between the two partners was often strengthened because space was made available to each at either partner’s location. For example, one adult education respondent noted that youth program staff regularly visit the adult education-run career resource center to meet with and enroll eligible students into the youth program.

Respondents in three local areas reported that partnerships between the Title I youth program and adult education were also strengthened when the same organizations served as both adult education and youth program providers. This occurred in three local areas. In another region, the adult education provider was contracted to provide a six-week summer skills training to disconnected youth, funded by the Title I youth program.

Another marker of stronger partnerships, according to respondents, was the presence of adult education on state and local workforce boards or youth committees, and adult education contributions to the WIOA state, regional, or local plans. Many states and local areas mentioned these activities, but often noted that they had predated WIOA. In other cases, larger state efforts coincided with WIOA to support the goal of

Local partnerships in Pennsylvania’s Southern Alleghenies WDB

In the Southern Alleghenies region of Pennsylvania, the adult education provider developed a reciprocal referral process with Title I youth staff located at the comprehensive AJC. Both programs had a point person who took each other’s referrals and oversaw delivery of those referrals to the appropriate staff at their respective agencies. Both partners used a referral form that helped track the referrals. When an age-appropriate youth came to the adult education location (not the AJC), staff provided information about the youth program. If the youth expressed interest in enrolling in the youth program, the point person asked him or her to sign a third-party release of information allowing the adult education program to send intake information and the youth’s TABE scores to the youth program at the AJC.

strengthened partnerships—including, in one state, youth initiatives that used WIOA Title I state set-aside funds to support multi-partner collaborative efforts to serve youth.

Adult education partners in eight states shared the view that WIOA had led to a stronger workforce system. They noted that adult education and Title I programs (including the Title I youth program) had become more aware of one another as partners and spent more time learning about one another under WIOA through formal cross-training, informal information-sharing, attending shared meetings, conducting shared client staffing sessions, and through shared referral processes.

Respondents asserted that one motivator for the increased coordination and collaboration was that under WIOA, AEFLA is also held accountable to the same performance indicators as Title I, including employment measures that adult education providers had not previously adhered to closely. Similarly, under WIOA, youth program participants have to achieve a measurable skill gain (discussed in Chapter VII), which is sometimes measured through one of the basic skills assessments that are part of adult education’s standard scope of services. Given that, referrals to or co-enrollment in the youth program, which focuses explicitly on employment, can also help AEFLA-funded adult education programs meet their performance standards.

One state adult education respondent provided an overview of the many ways that WIOA had influenced its relationship with Title I programs.

“I think a lot of it [the relationship between adult education and Title I programs] depends on the local board staff and the value that they see in adult education, and who they’ve worked with in the past.”

–State adult education manager

In that state, adult education was represented on the state youth committee and on a standing committee of the state board focused on adult

education and family literacy issues. There was also broad representation by adult education programs on local WDBs and a strong working relationship between adult education and Title I programs at the local level. This respondent suggested that WIOA had given adult education a greater voice in the public workforce system, specifically as it relates to serving youth.

In three local areas, respondents reported the relationship between the youth and adult education programs was still siloed, or the partners had not taken full advantage of the overlap in population. In other cases, respondents attested that the relationship had always been strong and WIOA did not change that. One state respondent suggested the strength of local relationships between the youth program and adult education in the WIOA era depended on the strength of those relationships under WIA.

B. Vocational rehabilitation and the youth program

WIOA now requires VR to spend a significant portion of its funding on disabled youth—a population that is also a focus for the Title I youth program. Under this new WIOA requirement, VR agencies must set aside at least 15 percent of their funding to provide pre-employment transition services (pre-ETS) to youth with disabilities who are eligible or potentially eligible for VR services. As a result of this change to the VR program, as well as VR’s designation, along with the Title I youth program, as core programs, both VR and Title I respondents noted that VR agencies had begun to play a more active role in youth conversations on WDBs and their youth standing committees, as well as among youth providers. For example, one state reported a broad partnership effort that led both VR and the state workforce agency to organize a youth-led youth council focused on and including the participation of youth with disabilities. This group had gone to the state capital and met with the governor to advocate for youth with disabilities and was in the process of planning its first youth summit.

There were other examples of partnership building through efforts to increase cross-system awareness and communication between VR and the youth program. In one state, VR staff brought youth participants from a special statewide VR workforce program to AJCs, AJC staff then met with the youth, gave them a tour of the building, and showed them how to register with the state's labor exchange system. This program predated WIOA, but WIOA's emphasis on VR as a core partner reinforced the relationship.

However, respondents reported that partnerships between VR and the Title I youth program have faced challenges because the two programs are focused on different sub-populations of youth. Most of the disabled youth served by VR under pre-ETS are ISY, whereas (as discussed above) the Title I youth program has shifted to serving mostly OSY. Respondents directly cited this difference in which subpopulation of disabled youth each program aims to serve—ISY versus OSY—as impeding partnerships between the two programs.

Despite these reported challenges, coordination through referrals and co-enrollment of VR youth in the Title I youth program and vice versa was evident in some states and local areas—for example, to pay for work experience (especially summer employment programs) for disabled youth. This, in itself, was not entirely new, as in the past some VR and WIA youth programs coordinated to supplement WIA-funded summer youth employment programs with VR funding. However, this type of coordination was newly practiced by VR and WIOA youth in some states and local areas visited. Two of the states visited during the early site visits also mentioned making strong efforts to partner with VR related to serving youth.

C. TANF and the Youth Program

The TANF program was reported to be an important partner for the Title I youth program in six of the states visited because of the overlap in populations of focus (young TANF participants who are parenting or youth who are parented by a TANF participant). Respondents from these states acknowledged that these partnerships in at least some cases were partly due to WIOA, and partly due to the willingness of TANF partners to connect with the workforce system to provide a more comprehensive set of services to youth TANF participants.

Co-enrollment in TANF and the youth program was reported by four local area to be a popular strategy for braiding funding—for example, using TANF funding to support work experience or WIOA dollars to pay for an individual training account. One local area described starting monthly partner program “client staffing” meetings, in which staff would discuss youth served by the youth program and TANF (or adult education or VR, as mentioned earlier) to coordinate service delivery.

Several local youth program respondents noted that youth providers now routinely visit TANF offices and TANF staff visit AJCs and other youth service locations in an effort to enroll eligible youth in the respective partner programs. However, state youth and TANF program respondents from two states indicated that many times those examples of coordination are “relationship-dependent” (for example, some TANF case managers happen to know youth program case managers and vice versa) rather than systematic. Local respondents from one area agreed that collaboration with TANF happens but is not systematic. Other local areas described more strategic, systematic efforts to increase collaboration with TANF. For example, in one case, the youth provider was also the TANF E&T and SNAP E&T provider, and the approach to serving youth was through coordinated sequential enrollment (rather than co-enrollment), first enrolling youth into TANF or SNAP E&T while the youth are still in-school and then enrolling them into the Title I youth program when they are no longer in school.

To more closely align TANF with the Title I youth program, one state required contractors applying for TANF funding to demonstrate how they provide the 14 required youth program elements. However, in this state, it seems that TANF serves ISY and the Title I youth program serves OSY. As discussed in Chapter II, the requirement to spend 75 percent of youth funds on OSY led, in other areas, to a similar division of labor between TANF and the youth program in which TANF funds (and other state resources) were used to serve ISY who would previously have been served by the Title I youth program.

States and local areas offered other examples of initiatives that involved a stronger working relationship between TANF and the Title I youth program. For example, in one local area, a youth-supporting initiative focused on SNAP and TANF households was being designed at the time of the site visit to offer a full range of services (including Title I youth services) to families (including young people). The state planned to run a competitive process to identify three or four pilots, first awarding planning grants and then program funds. The goal was to accelerate partnerships that enabled intentional integrated service delivery and case-coaching at the family level. Another local area had connected to adult education, VR, TANF, and the youth program in a career pathways partnership to coordinate efforts to attract local businesses to hire and provide work experience to program-enrolled youth.

Coordination through co-enrollment and mutual referrals was common in some states and local areas, but respondents from two states noted that the relationship between the programs could use strengthening given overlapping populations. One state youth respondent said, “We could improve our partnership between TANF ... we refer youth to TANF if we can see that there’s a need for it and that they would likely be eligible. But I think we could do better.”

VII. Changes in performance indicators for the youth program

WIOA revised the Title I youth program’s performance indicators by instituting new primary indicators of performance.⁴⁸ Three of these new indicators (the employment and earnings indicators) are quite similar to WIA’s statutory performance measures and the common measures that many states reported on by the end of WIA; state and local youth program respondents reported the indicators had not been difficult to implement. However, youth program staff from nearly every state and local area reported challenges or concerns related to the new Measurable Skill Gains (MSG) indicator and the Credential Attainment indicator, as did the four states visited in 2017.⁴⁹ Respondents from 10 states and 21 local areas noted more general challenges or concerns about WIOA’s performance indicators and their negotiated performance targets, particularly related to their suitability for measuring youth programs’ success in serving OSY. The rest of this chapter describes the challenges and concerns reported by respondents.

A. General challenges and concerns

Respondents from three states and four local areas reported great difficulty in meeting their negotiated performance targets because they served all or mostly OSY, who faced many barriers to success and—as discussed

“... It goes back to the metrics. It’s hard to serve those populations that you care about because they tend not to be successful.”

—State youth manager

previously—were difficult to engage for the long term. For example, one staff person noted that many of the OSY his program serves are homeless, and it is very difficult for them to stay engaged in the program and achieve successes on the performance indicators when they lack a stable place to live.

Further, respondents from two local areas reported that many OSY are reluctant to participate in training because of the challenges they faced in school. But without training, they asserted that many lack the skills that will enable them to find and keep jobs at living wages, resulting in poor performance outcomes. And when OSY do agree to participate in education or training activities, many drop out before completing the program, which these respondents asserted also typically leads to poor performance results. As one youth staff person stated, “For out-of-school youth, mostly dropouts ... it’s hard to get them into a rhythm that can move those performance metrics.” Due to the challenges OSY face in earning educational credentials such as diplomas and GEDs, state-level administrators from three states emphasized the importance of having performance indicators that adequately capture youth’s small-scale, incremental successes and expressed concern that the WIOA indicators do not do so.

Respondents from two local areas noted that OSY need more time to reach the goals of WIOA’s primary indicators, but that the time frames for OSY to achieve those results are too short. “Because you’re serving the hardest to serve and it takes more of a concerted effort to serve that population. You can’t just

⁴⁸ These six indicators include the Title I Youth Education and Employment Rate—2nd Quarter After Exit; Title I Youth Education and Employment Rate—4th Quarter After Exit; Median Earnings—2nd Quarter After Exit; Credential Attainment; Measurable Skill Gains; and Effectiveness in Serving Employers. TEGL 10-16, Change 1. Note that we do not discuss the Effectiveness in Serving Employers indicator in this chapter. Because it was still being piloted at the time of the site visits, youth program respondents—particularly those at the local level—had little knowledge of it and could not comment on its implementation.

⁴⁹ These concerns were raised by respondents from all four of the other affected WIOA core programs, as discussed in this study’s report on implementation of WIOA’s performance accountability and reporting requirements.

turn around and get them a job right away. You’ve got to get them all these interventions before you can even get them job-ready.”

Overall, respondents from three local areas asserted that ISY have a much easier time achieving success on the performance indicators and questioned whether the performance indicators were appropriate for OSY. As a result, respondents from these three local areas and two others expressed concern that the WIOA performance indicators and their associated targets might therefore push local areas and service providers to serve fewer OSY. Respondents from two other local areas wondered why Title I youth programs should be expected to achieve results with OSY who have repeatedly failed in the education system. “I don’t want to say the education system has failed them [OSY], but it hasn’t been successful for them and now we’re held accountable for ... them and have a year to meet that credential attainment GED. Yeah. And all those years prior to that, that didn’t happen.” A state respondent asserted that one reason most programs continue to serve at least a few ISY is because doing so makes it easier for local WDBs to achieve their negotiated performance standards. One local WDB that had served only OSY planned to start serving at least some ISY again for similar reasons.

B. Measurable Skill Gains (MSG)

The MSG, which all six core programs require, measures “the percentage of program participants who, during a program year, are in an education or training program that leads to a recognized postsecondary credential or employment and who are achieving documented academic, technical, occupational, or other forms of progress, towards such a credential or employment.”⁵⁰ The intent of this indicator is to “measure interim progress of participants who are enrolled in education or training services”. Consequently, unlike all of the other participant-focused indicators, MSG is measured before participants have exited the program.⁵¹

1. Challenges related to implementing the measurable skill gains indicator

A commonly reported challenge with the MSG indicator among youth program respondents was confusion about the five ways that programs can document a skill gain.

Although youth staff were generally pleased to have multiple methods for capturing a skill gain—and Exhibit VII.1 shows youth staff nationwide used all five methods fairly evenly—respondents also stated that some of the methods were quite confusing. One youth staff person described relying on transcripts because they are straightforward, but not relying on the other methods cited in TEGL 10-16, Change 1 which were less familiar. Some youth program respondents found it confusing that some work experience activities such as apprenticeship triggered a youth participant’s inclusion in the MSG indicator, but others such as job shadowing, pre-apprenticeship, and subsidized employment did not. Other respondents were frustrated that they could not count the learning that youth achieve in subsidized employment placements, especially because the 20 percent work experience expenditure requirement made these activities central to their youth programs.

“[The problem] about work experience is it’s not a measurable skill gain. And so, that stinks that we’re putting funding, 250 to 500 hours into a kiddo, and ... although they’re gaining skill from it, it may be their first job and they learn tons, there’s no ... MSG [recorded] from it.”

–Local youth program manager

⁵⁰ 20 CFR sec. 677.155(a)(1)(v); TEGL 10.16, Change 1.

⁵¹ 20 CFR sec. 677.155(a)(1)(v); TEGL 10.16, Change 1.

Exhibit VII.1. Types of measurable skill gains reported for youth exiters

	PY16		PY17	
	Number	Percentage	Number	Percentage
Educational functioning level gains	11,313	26.6	12,873	27.2
Secondary school diploma/equivalent gains	13,386	31.5	14,529	30.7
Secondary or postsecondary transcript or report card school gains	6,831	16.1	10,527	22.2
Training milestone gains	3,709	8.7	5,664	12.0
Technical or occupational skills progression gains*	9,928	23.3	14,840	31.3

Source: WIASRD/PIRL data.

* Passage of an exam required for an occupation or progress attaining technical or occupation skills as evidenced by trade-related benchmarks, such as knowledge-based exams. See TEGL 10-16 Change 1 for more information on each of these types of gains.

Another commonly reported challenge was the requirement that for a skill gain to count, it has to be realized within the program year—no matter when the youth enters the program or whether something occurs that slows the youth’s progress. Explained one youth counselor, “you do your best to try to actively engage a youth ... to get to that point where they hit a measurable skill gain [but you have] to strategically do it at a certain point so you can get them in the beginning of the year and then try to close them [the goal] out before the year is over.”

A state youth staff person noted that it had been quite a challenge to ensure that the state’s workforce management information system correctly captured all the information needed to accurately calculate the MSG indicator. Another state respondent highlighted the challenge of developing clear operational definitions for some MSG-related components, such as “achieving the State unit’s academic standards.”⁵²

2. Usefulness of the measurable skill gains indicator

Beyond these reported challenges, youth program respondents from three local areas questioned the utility of the MSG indicator, primarily because they thought that achieving a skill gain did not demonstrate anything that would help a youth become employed. They also argued that when a skills gain documented for the MSG indicator was something that would help a youth with employment, it was likely to be a credential that could also count for the credential attainment indicator—which was duplicative.

“I don’t think it [MSG] makes sense ... let’s say a person is taking a CNA [Certified Nursing Assistant] course. They may pass their first aid certification as part of that course. Boom, we’ve hit the measurable skill gain. Then they drop out of their program. What is that measurable skill gain going to get them? Nothing. So why are we measuring that?”

–Local youth manager

However, other youth program administrators thought that the MSG indicator was a good supplement to the Credential Attainment indicator because it rewarded both youth and programs for either obtaining a credential or making good progress toward one.

“We do push measurable skills gains because we think that it gives a youth, specifically ... those incremental accomplishments to get them to that credential.”

–State youth program administrator

⁵² As described in TEGL 10-16, Change 1.

C. Credential Attainment indicator

Although the Title I youth program under WIA was held to various performance indicators related to credential attainment,⁵³ WIOA's credential attainment indicator differs substantially from its predecessors. Perhaps the most notable difference is in WIOA's definition of a qualifying credential and the requirement that attainment of a high school diploma or its equivalent must be accompanied by employment or enrollment in a training program leading to a postsecondary credential.⁵⁴

1. Challenges Related to Implementing the credential attainment indicator

"In part, some credentials that were recognized under WIA aren't recognized under WIOA, for good reason. But also, sometimes there are things that industry does say, 'This is really, really good,' but we can't count it as an industry-recognized credential because WIOA doesn't see it that way."

—Local youth program manager

Youth program respondents from five states and seven local areas found the Credential Attainment indicator challenging to implement, primarily due to their concerns about the specific credentials that could be counted as a success for the indicator.

One issue was that respondents were unhappy that certain entry-level credentials, such as

Occupational Safety and Health Administration 10

or 20-hour, ServSafe,⁵⁵ and cardiopulmonary resuscitation certifications, could not be counted under the Credential Attainment indicator. Respondents emphasized that these credentials were industry-recognized and they helped youth gain entry-level employment; the respondents did not understand why the credentials were not counted as a success in the credential indicator.

Respondents from two states and two local areas and also reported confusion about how to determine which specific credentials could and could not count for the Credential Attainment indicator. These respondents stated that this was in part because such decisions are made at the state and local WDB levels, so some credentials counted in certain states and local areas but not in others. Even within states, differences among state agencies about what credentials counted filtered down to the local level, and were reported to cause confusion. Said one state administrator, "We've seen a lot of separation there between our local staff saying, well, we go by what's on the state education [agency's] list and we're on the workforce side questioning whether those should be considered [countable] for workforce purposes for youth." Another state youth manager staff member struggled under both WIA and WIOA to identify acceptable credentials. To mitigate this kind of confusion, Vermont created a state-level committee to approve credentials (see box for further details).

Vermont's state WDB credential committee

To iron out disagreements and confusion related to countable credentials among state agencies, Vermont created a state-level committee to approve credentials for different purposes. "We created this committee of the state board for training and credentials, gave them [the committee] the authority to endorse credentials and create a state list of what the credentials are [that count] and which categories they fall into."

⁵³ These included two credential-related measures included in the WIA statute (the Younger Youth Diploma/Equivalent Attainment and Older Youth Employment and Credential Rate) as well as a youth common measure (Attainment of a Degree or Certificate).

⁵⁴ TEGL 10.16, Change 1.

⁵⁵ ServSafe is a food and beverage safety training and certificate program administered by the National Restaurant Association and many restaurants require it for entry-level positions.

2. Appropriateness of the Credential Attainment indicator

In contrast to the MSG indicator, youth staff from all but one local area viewed the Credential Attainment indicator as an appropriate goal for youth participants because they asserted that having a credential clearly helps youth to find and retain employment. However, respondents from three local areas took issue with the requirement that, for a high school diploma or GED to count as a qualifying credential, a participant also has to be employed or enrolled in a postsecondary education program leading to a recognized credential within a year after exit. WIA did not have this requirement. These staff maintained they have many OSY in their programs for whom attainment of just a high school diploma would be a major accomplishment, and that should be enough for them to be deemed successful on this indicator as it was under WIA. A respondent noted that if the youth is just interested in a GED, "...now we really have to talk them into employment and postsecondary afterwards when just the GED would have been enough in WIA."

Respondents from two areas also thought that it was problematic for Title I youth programs to lose credit for performance when their participants—most of whom have had such a hard time succeeding in school—decide to focus more on employment instead of education and do not follow through on getting a credential. One youth staff person explained that helping an OSY complete basic skills remediation and engage in work life "are wins", but if they don't also complete their GED, they don't receive the credential. The staff person reflected "I know we want to get young people with a high school diploma because it's a basis for everything. At the same time life happens. And so how do you balance that?"

VIII. Looking ahead

WIOA included provisions that have profoundly changed the Title I youth program in multiple ways. While not necessarily reflective of the experiences of all states and local areas, the findings described above suggest key considerations for workforce system stakeholders as they continue their efforts to implement WIOA's vision and requirements, as well as directions for future youth-focused research efforts. These include:

1. Developing a stronger understanding of how to recruit and serve out-of-school youth, especially practices related to serving youth with significant barriers.

WIOA's emphasis on serving primarily out-of-school youth, a majority of whom are young adults (18 and over), and away from serving in-school youth represents a large shift for many states and local areas. Serving out-of-school youth may require states and local areas to adjust their referral sources and programming, as some respondents in this study described doing. Building on existing guidance, technical assistance and peer sharing, states and local areas could benefit from developing a stronger understanding of approaches for recruiting and serving out-of-school youth, including the use of technological tools such as social media and texting applications. Further, key stakeholders may benefit from learning about approaches that could help them connect in-school youth with services beyond those funded by WIOA's Title I.

2. Accessing waivers that allow states and their local areas to spend less than 75 percent of youth funds on out-of-school youth.

Respondents from state and local areas expressed some concerns regarding funding for and the availability of services for in-school youth, and particularly for dropout prevention services. Waivers currently allow states and local WDBs to allocate more funding to meet the needs of in-school youth with barriers. Continued access to such waivers could provide flexibility to state and local areas to allocate funding to focus on particularly at-risk in-school youth including those likely to drop out of school or those facing other serious barriers, such as homelessness.

3. Improving understanding of the credential attainment measure and allowable credentials.

Title I youth program respondents at both the state and local levels reported numerous challenges and concerns related to the implementation of WIOA's credential attainment indicator (as have respondents from across WIOA's other five core programs). In particular, states and locals could benefit from better understanding what credentials can be counted toward achievement of the credential attainment measure and how states and local areas should make that determination.

Since the completion of the study's site visits, DOL has provided states and local areas with technical assistance on this indicator, including organization of a peer learning cohort and a decision tree tool. Continuation of these and other TA efforts, as well as continued guidance, may help states and local areas develop a stronger understanding of this indicator and how to implement it.

4. Leveraging effective strategies and best practices for collaboration between Title I youth programs and TANF agencies.

WIOA's youth program changes helped spur the formation of new partnerships and strengthened existing partnerships. Respondents noted that in response to WIOA's emphasis on core program partnerships and

the Temporary Assistance to Needy Families (TANF) program's new status as a required partner, many new partnerships had been developed and strengthened, including partnerships with TANF, AEFLA, VR, and other programs. In particular, these partnerships supported successful recruitment of and services for out-of-school youth according to respondents.

States and local areas could benefit by learning about their peers' efforts to cultivate these partnerships, and particularly how to navigate different requirements across programs for shared participants.

5. Supporting continued research on the WIOA Title I youth program.

Additional research may be helpful to better understand several key aspects of the youth program under WIOA, such as exploring:

- **How changes to the definition of out-of-school youth have affected the characteristics of youth served under WIOA, and whether the intent of WIOA's changes is being met.** Such an analysis would allow for a comparison of the characteristics of in-school youth to out-of-school youth served under WIA. Due to the complexity of WIOA's out-of-school youth definition, which requires youth to meet multiple requirements in different combinations to be determined eligible, it is difficult to clearly identify whether the program is serving more youth with barriers under WIOA than it did under WIA. Additional quantitative analyses of administrative data may be warranted, to determine whether the data reported on low income status reflects an actual shift in the percentage of low-income youth served or is instead a by-product of the other changes in eligibility.
- **What types of services or combinations of services are most effective in achieving program goals, possibly through structured efforts to test different approaches at the local level, for different subgroups of youth.** For example, it might be useful to examine the effectiveness of intensive case management and coaching on the achievement of educational and labor market outcomes by OSY.
- **Whether the 75 percent OSY and 20 percent work experience expenditure requirements are being met, through an analysis of program expenditure data.** An analysis of Youth Program expenditure data could also examine whether and to what extent participant program costs have increased due to the change in program focus.
- **What types of incentives are most effective in helping youth program participants, especially OSY, to achieve program goals.** This research could involve testing different types and uses of incentives with different sub-populations of youth, possibly applying learning from behavioral insights research and theories around gamification of public services.

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Appendix A:

**Number of Title I Youth by Selected Barriers to Employment
for PY 2013 to PY 2017**

Exhibit A.1. Number of youth exiters with selected barriers PY 2013 to PY 2017

	WIA						WIOA						Change PY 13 – PY 17					
	PY 13			PY 14			PY 15			PY 16			PY 17					
	All	School status OSY ISY		All	School status OSY ISY		All	School status OSY ISY		All	School status OSY ISY		All	School status OSY ISY		All	School status OSY ISY	
All youth participants	93,453	48,174	45,279	97,167	47,634	49,533	81,056	48,242	32,814	82,254	63,541	18,713	80,709	65,629	15,080	-12,744	17,455	-30,199
Basic skills deficient or low levels of literacy	57,039	33,534	23,505	60,907	33,607	27,300	52,338	33,352	18,986	46,116	35,365	10,751	44,961	35,206	9,755	-12,078	1,672	-13,750
Youth who need additional assistance to enter or complete an educational program or to secure or hold employment	56,730	27,090	29,640	56,824	25,123	31,701	37,018	19,124	17,894	30,942	22,813	8,129	25,544	20,709	4,835	-31,186	-6,381	-24,805
Receives other public assistance (including SNAP)	41,987	21,822	20,165	42,226	20,292	21,934	31,908	18,291	13,617	23,072	18,000	5,072	21,780	18,210	3,570	-20,207	-3,612	-16,595
Pregnant or parenting youth	14,100	10,792	3,308	13,086	9,898	3,188	11,854	9,948	1,906	16,426	15,396	1,030	17,144	16,280	864	3,044	5,488	-2,444
Individual with a disability	13,654	4,423	9,231	14,730	4,588	10,142	11,831	5,102	6,729	10,713	7,094	3,619	11,842	8,672	3,170	-1,812	4,249	-6,061
Single parent	8,931	6,914	2,017	8,357	6,383	1,974	7,142	5,995	1,147	10,020	9,397	623	10,652	10,113	539	1,721	3,199	-1,478
Ex-offender	7,841	5,420	2,421	7,025	4,613	2,412	6,122	4,711	1,411	7,735	6,843	892	8,434	7,648	786	593	2,228	-1,635
Receives Temporary Assistance to Needy Families	5,443	2,750	2,693	5,400	2,638	2,762	4,106	2,340	1,766	4,029	3,304	725	3,723	2,985	738	-1,720	235	-1,955
Homeless individual	4,485	3,189	1,296	4,701	3,224	1,477	4,244	3,396	848	5,072	4,539	533	5,128	4,645	483	643	1,456	-813
Receives SSI/SSDI	4,319	1,784	2,535	4,049	1,452	2,597	2,944	1,357	1,587	1,716	1,069	647	1,863	1,296	567	-2,456	-488	-1,968
Foster care youth	3,292	1,445	1,847	3,472	1,484	1,988	2,564	1,476	1,088	2,558	1,848	710	2,738	2,052	686	-554	607	-1,161
English language learner	1,947	767	1,180	2,493	932	1,561	1,576	696	880	2,195	1,305	890	2,403	1,688	715	456	921	-465

SSDI = Social Security Disability Income; SSI = Supplemental Security Income.

Source: WIASRD/PIRL data.

Appendix B:

WIOA Implementation Study Sites

Exhibit B.1. WIOA Implementation Study: Site visit states, regions, and local areas

	State/Region	1	2	3	4	5	6	State workforce agency	Local workforce area	Local workforce board	American Job Center
1	New Jersey	✓						NJ Department of Labor and Workforce Development	Gloucester County	Gloucester County Workforce Development Board	Gloucester One-Stop Career Center
									Middlesex County	Middlesex County Workforce Development Board	New Brunswick One-Stop Career Center
2	Vermont		✓					Vermont Department of Labor	Single workforce area	Single workforce area	Burlington Career Resource Center
											Morrisville Career Resource Center
3	Pennsylvania		✓					Pennsylvania Department of Labor & Industry	Chester County	Chester County Workforce Development Board	PA CareerLink® Chester County
									Southern Alleghenies	Southern Alleghenies Workforce Development Board	PA CareerLink® Cambria County
4	Virginia			✓				Virginia Employment Commission	Hampton Roads	Hampton Roads Workforce Development Board	Virginia Career Works—Norfolk Center
									South Central	South Central Workforce Development Board	Virginia Career Works—South Boston
5	Florida			✓				Florida Department of Economic Opportunity	North Florida	CareerSource North Florida	Madison office
									Central Florida	CareerSource Central Florida	Orlando office
6	South Carolina				✓			South Carolina Department of Employment and Workforce	Pee Dee	Pee Dee Workforce Development Board	SC Works Pee Dee
									South Coast	Trident Workforce Development Board	SC Works Trident
7	Colorado			✓				Colorado Department of Labor & Employment	Weld County	Weld County Workforce Development Board	Employment Services of Weld County
									Pikes Peak	Pikes Peak Workforce Development Board	Pikes Peak Workforce Center
8	Oklahoma				✓			Oklahoma Office of Workforce Development	South Central	South Central Oklahoma Workforce Board	Lawton Workforce Center
									Southern	Southern Workforce Board	McAlester Workforce Center

Exhibit B.1 (continued)

	State/Region	1	2	3	4	5	6	State workforce agency	Local workforce area	Local workforce board	American Job Center
9	Texas				✓			Texas Workforce Commission	Heart of Texas	Workforce Solutions for the Heart of Texas	McLennan County Workforce Solutions Center
									Capital Area	Workforce Solutions Capital Area	North Center
10	Utah					✓		Utah Department of Workforce Services	Single workforce area	Single workforce area	Price Center
											Provo Center
11	Indiana					✓		Indiana Department of Workforce Development	Central	Region 5 Workforce Development Board	WorkOne Greenfield
									Marion County	Employ Indy	WorkOne Indy
12	Wisconsin						✓	Wisconsin Department of Workforce Development	South Central	Workforce Development Board of South Central Wisconsin	Dane County Job Center (Madison)
									West Central	Workforce Development Board of West Central Wisconsin	Eau Claire County Job Center
13	Idaho						✓	Idaho Department of Labor	Single workforce area	Single workforce area	Boise
											Caldwell
14	Washington						✓	Washington State Employment Security Department	Vancouver	WorkSource Southwest Washington	WorkSource Vancouver
									Spokane	Spokane Workforce Council	WorkSource Spokane
15	Massachusetts (pilot)	✓						Department of Career Services	North Shore	MassHire-North Shore Workforce Board	MassHire North Shore Career Center—Salem
									Lowell	MassHire-Greater Lowell Workforce Board	MassHire Lowell Career Center
16	Mississippi (pilot)		✓					Department of Employment Security	Twin Districts	Twin Districts Local Workforce Development Board	Hattiesburg Job Center
									Southcentral Mississippi Works	Southcentral Mississippi Works Local Workforce Development Board	Madison Job Center
17	Ohio (pilot)					✓		Department of Jobs and Family Services	Area 20	South Central Ohio Workforce Partnership	OhioMeansJobs Fairfield County
									Area 11	Workforce Development Board of Central Ohio	OhioMeansJobs Columbus—Franklin County
18	California (pilot)						✓	Employment Development Department	San Joaquin County	San Joaquin County WorkNet	Stockton WorkNet Center
									Contra Costa County	Workforce Development Board of Contra Costa County	Concord American Job Center

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