



# WIOA TITLE I PARTNERSHIP DEVELOPMENT FOR VOCATIONAL REHABILITATION PROFESSIONALS A CURRICULUM GUIDE

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**Vocational Rehabilitation Youth Technical Assistance Center  
Institute for Educational Leadership**

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# Introduction

## ABOUT Y-TAC

The Vocational Rehabilitation Youth Technical Assistance Center (Y-TAC) provides support and assistance to the nation's Vocational Rehabilitation (VR) system to strengthen transition services for youth, based on a cooperative agreement with the Rehabilitation Services Administration (RSA). Housed at the Institute for Educational Leadership (IEL), Y-TAC is designed to provide state VR programs and related rehabilitation professionals with training and assistance in providing effective services to youth with disabilities, including youth who are potentially eligible for VR services (as described in the Workforce Innovation and Opportunity Act [WIOA, 2014]).

## ABOUT THE CURRICULUM GUIDE

This guide is one of a series of resources developed by Y-TAC to help VR professionals expand and strengthen transition services available to eligible youth, ages 16-to-24. Prepared for Y-TAC by the National Youth Employment Coalition (NYEC) and the K. Lisa Yang and Hock E. Tan Institute on Employment and Disability at Cornell University's School of Industrial and Labor Relations (ILR), this document is informed by 23 in-depth conversations with VR and workforce officials in 14 states, who graciously offered their time and insights. The programs and practices described throughout this guide as well as quotes and success stories were gathered through interviews.

The document contains three distinct sections.

- Part I: An overview of Title I of WIOA, with emphasis on youth activities and potential connections to Title IV VR services.
- Part II: A detailed look at the characteristics of the 16-to-24 year old out-of-school youth (OSY) population, including effective strategies for recruitment, engagement, and training.
- Part III: A primer on partnership formation, including research-based practices and numerous examples from the field.

While discrete, the three parts in this Guide are mutually reinforcing. They can be used together as a set, or individually, based on the interests and needs of VR professionals. They also contain numerous links and references to practical tools, such as memoranda of understanding, planning guidance, and interagency agreements, utilized by many of the individuals interviewed, as well as appendices with detailed information on WIOA-related statutory and regulatory issues, other federal programs serving youth, and research regarding effective practices.

It is important to note that this guide was written prior to the onset of the COVID-19 pandemic. While the strategies and lessons described are still valid, the ongoing pandemic has exacerbated many of the challenges facing the workforce development system as economic conditions and employment trends have been impacted nationwide.

# Part I: WIOA 101 for VR Professionals

## INTRODUCTION

Part I is designed to help VR professionals gain a fuller understanding of Title I of WIOA, with particular emphasis on portions relating to youth activities. This content was influenced by conversations with individuals in a number of local and state VR offices and attempts to provide information to help professionals better understand and collaborate with Title I partners. It also includes recommendations on building stronger partnerships with workforce boards and identifying providers of WIOA Youth activities.

## OVERVIEW OF PART I

### Part I covers:

1. Basics of WIOA with a focus on WIOA Title I Youth (WIOA Youth) program;
2. How WIOA benefits youth with disabilities, particularly the WIOA Youth program; and
3. Ways the WIOA Youth program can help the VR system achieve its goals for youth with disabilities.

### Part I prepares VR practitioners to...

**Leverage WIOA programs to benefit youth with disabilities.** This curriculum guide describes each of the major sections, or titles, of WIOA, with a particular emphasis on the core programs that make up the backbone of the job training system in the United States. Major formula programs in Title I include WIOA services for adults and dislocated workers, as well as for youth (WIOA Youth). Title I also includes national programs such as Job Corps and YouthBuild. Title II supports adult education programs. Title III supports the infrastructure of the workforce system. Title IV contains amendments to the Rehabilitation Act of 1973, which authorizes the VR system. Performance

for all WIOA core programs are measured against a set of common performance measures, including the percentage of participants who enter employment and the wages of those who do.

**Tap into WIOA Youth resources to serve youth with disabilities.** This curriculum guide describes eligibility requirements for WIOA Youth programs. While almost all youth with disabilities are eligible for WIOA Youth services, Appendix A of this document provides a three-step guide to determine eligibility for out-of-school youth and a four-step guide to determine eligibility for in-school youth. WIOA Title I requires that service providers develop an Individual Service Strategy (ISS) for each youth served with WIOA Youth funds; this guide provides examples of these forms. The ISS is similar in purpose to the Individualized Plan for Employment (IPE), which is utilized to guide the VR process.

**Connect youth with disabilities to new services.** This curriculum guide describes the 14 types of services, such as tutoring, training programs, and financial literacy, which WIOA requires each local area to offer to eligible youth. This guide shows how these services align with and build upon Pre-Employment Transition Services (Pre-ETS) and traditional VR services (see Table 1). In addition, the description of the workforce system's structure and governance will provide VR counselors with an awareness of the variety of services provided in their area.

## THE BASICS OF WIOA

### What is WIOA?

President Obama signed WIOA on July 22, 2014. It is the most recent version of a decades-old law that describes federal job training programs—what they are, how they work, and whom they are meant to serve. It replaced the Workforce Investment Act (WIA) of 1998.

WIOA contains five major sections, or titles, four of which authorize different programs (WIOA, 2014).

Title I authorizes the Workforce Development System and describes how it should be governed. In addition, Title I:

- contains several national formula-funding streams targeted to broad populations: adults, dislocated workers, and youth (hereafter referred to as WIOA Youth);
- authorizes a “one-stop delivery system,” a network of centers where jobseekers and employers may receive services; and
- authorizes Job Corps, YouthBuild, and programs focusing on populations like migrant and seasonal farmworkers and Native Americans.

Title II authorizes adult basic education (ABE) programs, including those ABE programs targeted to individuals who are at least 16 years of age; are neither enrolled nor required to be enrolled in school based on state law; and are either basic skills deficient, without a high school diploma or its equivalent, or English language learners.

Title III authorizes the Employment Service, whose staff and services must be co-located with the “one-stop” centers authorized under Title I.

Title IV contains the Rehabilitation Act (Rehab Act) that authorizes the VR system. The Rehab Act was originally passed in 1973, but amend-

ments have been made through the reauthorization process of WIA to WIOA.

Title IV of WIOA:

- made the amendment to the Rehab Act requiring the provision of Pre-ETS.
- authorizes the National Council on Disability, centers for independent living, services for older individuals who are blind, and other disability-related programs.

Title V includes general provisions for WIOA, such as those relating to privacy and the transition from WIA to WIOA.

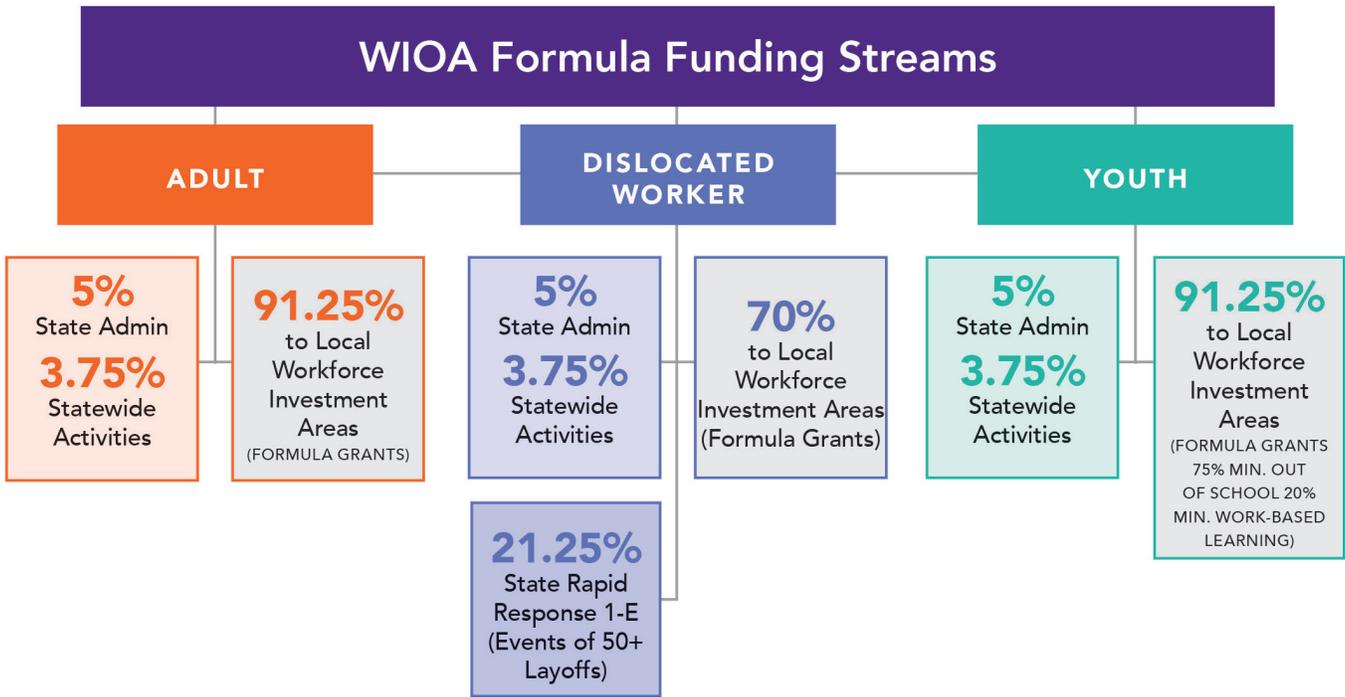
WIOA defines a group of six “core programs” which form the backbone of the federal job-training system (Figure 1):

- Title I authorizes three formula programs – one for adults, one for dislocated workers, and one for youth;
- Title II authorizes adult basic education state grants;
- Title III authorizes the Employment Service; and
- Title IV authorizes the VR program.

WIOA names other programs as optional one-stop system partners, such as career and technical education programs funded under the Perkins Act, services provided under Temporary Assistance for Needy Families, employment and training activities funded by the Supplemental Nutrition Assistance Program, and Trade Adjustment Assistance programs. For example, Figure 1 illustrates how Illinois allocates its WIOA Title I dollars. While the WIOA statute provides some parameters, each state makes final determinations, many of which are laid out in state plans.

**FIGURE 1**

## Title 1 Funding Flow Example (Illinois)



Source: Adapted from WIOA Works Illinois, WIOA Training Funds (2016).

### WIOA Title I Core Programs: Funding, Governance, and Planning

#### Funding

In its Committee on Appropriations report (Report 116-000) in September 2019, the Departments of Labor, Health and Human Services, and Education, and Related Agencies report that in fiscal year (FY) 2020, WIOA Title I state grant funding levels for the three programs totaled approximately \$2.7 billion (which is significantly lower than previous funding): \$845 million for adult employment and training, \$903 million for youth activities (WIOA Youth), and \$1.041 billion for dislocated worker employment and training. By comparison, state grants for VR services were about \$3.6 billion.

Funding for WIOA Title I programs, as described in the preceding section, flows from the U.S. Department of Labor (DOL): first to

states, and then to local workforce areas. In a Training and Employment Guidance Letter No. 16-19 (2020), the Employment and Training Administration Advisory System of the U.S. Department of Labor included a formula that determines how WIOA Youth funding flows to states. The formula equally weights substantial unemployment (areas with unemployment rates over 6.5%), number of excess unemployed individuals statewide (the number of individuals in excess of 4.5% of the labor force), and the number of disadvantaged youth.

Thus, only one third of this formula is based on factors directly related to youth. Including factors affected by adult unemployment rates tends to broaden the distribution of funding across all regions of the nation and states rather than concentrating them on areas with significant concentrations of disadvantaged youth. In Program Year 2019, the smallest state

allotments under WIOA Youth were approximately \$2.2 million, while California received \$119 million (Employment and Training Administration Advisory System, 2020).

Each governor may reserve up to 15% of the state's allotment for each of the three major programs to support statewide employment and training activities. These include required activities, such as monitoring and oversight, managing the performance accountability system, and assisting local areas. Allowable activities, such as conducting research and demonstration projects and supporting alternative, evidence-based strategies that promote education and workplace success, are also included.

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**RECOMMENDATION:** Utilizing the governor's reserve, VR agencies should work with state workforce officials and the State Workforce Development Board (SWDB) to collaborate on the development and funding of innovative approaches, which can enhance employment success for youth with disabilities.

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DOL recalculates core program formulas annually, which can help to address economic downturns in states and localities. However, despite statutory limits on sizes of changes in allotments and small-state minimum allotments, this annual recalculation can result in states and local areas experiencing significant swings in funding from year to year. This, in turn, can result in program expansion or contraction. States typically receive notification of funding levels for the upcoming program year (July 1 – June 30) in the spring; however, when completion of the federal appropriations process is delayed, as it has been in recent years, states may not learn about their allocations until closer to the beginning of the program year (i.e., October 1).

## Governance

WIOA authorizes governors to appoint SWDBs, which are responsible for a variety of activities, including but not limited to:

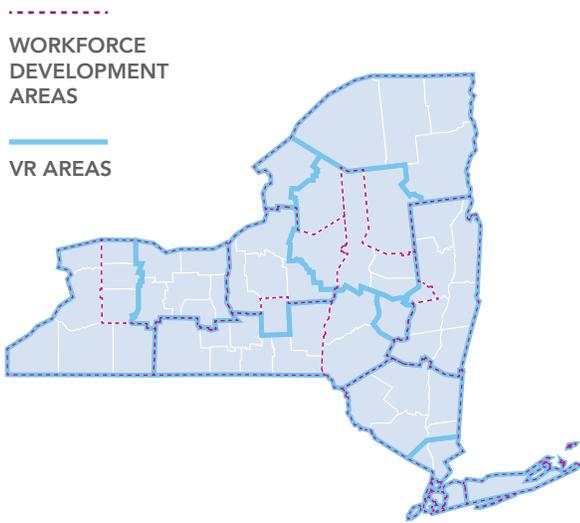
- developing WIOA state plans;
- reviewing workforce policies and programs and recommending actions which promote an aligned and streamlined statewide system;
- developing accountability measures, including performance levels;
- establishing local workforce areas; and
- developing policies for the statewide one-stop delivery system.

The majority of SWDB members must be representatives of businesses in the state, with another 20% representing workforce organizations (e.g., labor organizations, apprenticeship programs, community-based organizations, and others with demonstrated experience). Other members include lead state officials with responsibility for each core program, including VR, members of the legislature, and the governor.

Each SWDB establishes local workforce areas, based on factors such as population, location, and commonality of labor markets. In some states, VR offices or units may be contiguous with local workforce areas. In these instances, VR office regions might overlap with more than one workforce area, and, in others, more than one VR office could nest within a single area. The figures below represent service areas for VR and Workforce Development offices as analyzed by the National Youth Employment Coalition (NYEC) (2018). For example, in New York (Figure 2) there are 16 VR areas versus the 10 Workforce Development areas. However, in California (Figure 3) there are 47 Workforce Development areas but only 13 VR areas. Florida (Figure 4) has 23 Workforce Development areas compared to only nine VR areas. Arizona (Figure 5) is the most closely aligned state with

**FIGURE 2**

### New York VR and Workforce Development Areas



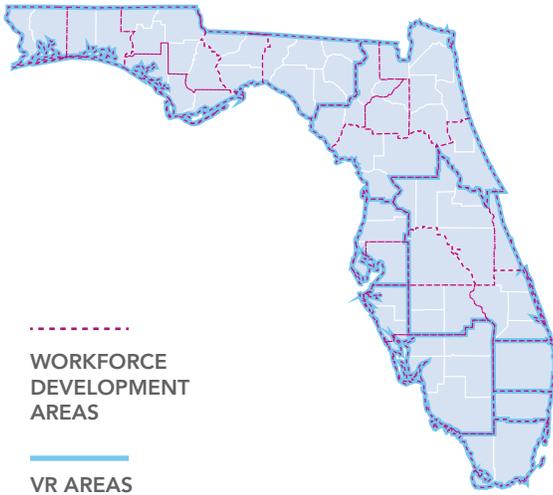
**FIGURE 3**

### California VR and Workforce Development Areas



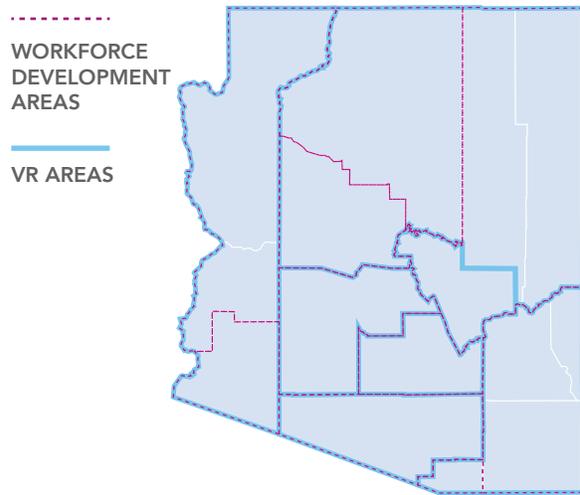
**FIGURE 4**

### Florida VR and Workforce Development Areas



**FIGURE 5**

### Arizona VR and Workforce Development Areas



10 Workforce Development areas and seven VR regions.

As indicated in each of the state figures, it is important to understand what communities are covered by the Workforce Boards as compared to the VR service areas (and that these configurations may change over time) to facilitate service coordination and collaboration. In most states, Local Workforce Development Boards (LWDB) oversee workforce programming in local workforce areas. In states with small or sparse populations, the governor may establish a single workforce area to cover the entire state, in which case the SWDB and LWDB are the same entity. The chief elected official(s) in each area appoint the LWDB. Once again, the majority of the LWDB must be comprised of business representatives. Other members include workforce representatives, education and training organizations, and economic development and government representatives, including a representative from VR.

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**RECOMMENDATION:** Support the VR representative(s) on the LWDBs in your region by providing information and data underscoring the importance of VR programming and its benefits to the overall workforce system.

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The administrative arm of the LWDB is often housed within local government offices. Some boards have formed separate nonprofit organizations, which can allow additional flexibility and facilitate leveraging and partnership development. LWDBs receive WIOA allocations to support workforce activity in their areas, based on the three-part formula previously discussed. The LWDB uses these funds to support activities, such as:

- developing a local plan for workforce development, consistent with WIOA requirements;

- analyzing the local/regional labor market;
- engaging area employers;
- developing career pathways;
- negotiating levels of local performance; and
- supporting and overseeing the core programs within the local workforce area, including the selection of workforce programs and service providers.

Most LWDBs competitively procure youth workforce services through requests for proposals and contracts with community-based providers (WIOA's final regulations allow LWDBs to directly deliver services as well [WIOA, 2016]). Successful bidders then develop and manage programs consistent with WIOA requirements (see Appendix B for descriptions of required elements and individual service strategy).

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**RECOMMENDATION:** Identify the providers of WIOA Youth activities in your region and look for opportunities to partner.

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WIOA also authorizes, but does not require, local boards to establish standing committees to assist with carrying out its responsibilities. Examples in the statute include a standing committee to assist with issues relating to the provision of services to youth and a standing committee on issues relating to the provision of services for individuals with disabilities.

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**RECOMMENDATION:** Encourage your LWDB to establish standing committees on youth and individuals with disabilities, and work with board staff to ensure their success. If these standing committees already exist, offer to join and actively support their work.

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## Planning

As noted above, one of the most important responsibilities of the SWDB and LWDBs is

developing and submitting plans that describe workforce goals and strategies which will be used to achieve them. States must prepare and submit four-year plans to the DOL describing goals and strategies for each of the six core programs (described above), including strategic approaches (e.g., labor market analyses, performance goals, and alignment strategies) and operational elements (i.e., how the work will be accomplished).

States may submit Unified Plans, which include only the six core programs, as described in the preceding section, or they may take a broader approach by developing Combined Plans, which include at least one partner in the one-stop system (e.g., postsecondary, career and technical education, and Temporary Assistance to Needy Families).

LWDBs also develop and submit four-year plans to the state agency responsible for WIOA administration. These plans include descriptions of how the LWDB will align and provide training in the local area, manage the one-stop system, develop career pathways, negotiate performance levels, and other related functions.

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**RECOMMENDATION:** In addition to active participation in the planning process, continue to meet and work with core program partners on a regular basis after plans have been submitted to maintain collaborative approaches and pursue common goals.

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## **HOW CAN WIOA TITLE I BENEFIT YOUTH WITH DISABILITIES?**

### **Who is Eligible for WIOA Youth Services?**

WIOA Youth services focus on two categories of youth: in-school youth (ISY), who are ages

14-to-21; and out-of-school youth (OSY), who are ages 16-to-24. There are several different criteria and conditions for participation, but most youth with disabilities are eligible for WIOA Youth services in one of these categories. For example, a youth with a disability who is 16-to-24 years old and not attending any school (as defined by state law) is automatically eligible for WIOA Youth services without regard to income or other eligibility criteria and would be able to receive services from the LWDB and VR.

While youth with disabilities who are attending school must be considered low-income (see Table A3 in Appendix A) to be eligible for WIOA Youth services, youth with disabilities are considered to be a family of one, meaning that only their personal income is considered (not the total family income). Therefore, most ISY with disabilities are likely to be eligible for WIOA Youth services. VR counselors can be a great resource to LWDBs to help identify these ISY.

In addition, WIOA encourages LWDBs to co-enroll OSY in more than one core program as appropriate (e.g., in Title I Adult and Title II Adult Education). Therefore, 16-to-24-year-old OSY with disabilities could be eligible not only for Title I Youth programming, but for additional services and supports through other core programs. In this way, services can be organized and stacked in ways that provide a continuum of supports, enabling youth to move into and through career pathways towards successful employment while allowing agencies to braid and blend funding, further extending their resources.

For further detail on eligibility under WIOA Youth and VR, see Appendix A.

## What Services are Provided Under WIOA Youth?

Section 129 of WIOA requires each LWDB to ensure that 14 different youth services, called program elements, are provided in its local area. See Appendix B for a list of these 14 sets of activities. For further information and resources on each, visit [DOL's WorkforceGPS technical assistance site](#).

As shown in Table 1, WIOA Youth activities can support and complement Pre-ETS activities and VR adult services for those aged 18-to-24. Table 1 crosswalks the five required Pre-ETS activities with the 14 required WIOA Youth activities. At least two required WIOA Youth activities (e.g., supportive services and follow-up services) could bolster any of the five required Pre-ETS activities.

**TABLE 1**  
Comparing Pre-ETS and WIOA Youth Services

<b>Pre-ETS Required Services</b> (29 U.S.C. § 733) (WIOA Sec. 422; Rehab Act Sec. 113(b)(1-5))	<b>VR Services</b>	<b>Similar WIOA Youth Required Services</b> (WIOA Sec. 129(c)(2)(A-N)) (29 U.S.C. § 3164(c)(2)(A-N))
<b>(1) Job exploration counseling</b>	Counseling and Guidance, Vocational Evaluations, other interest, career, and preference indicators	<b>(G) Supportive services</b> <b>(I) Follow-up services</b> (M) Career awareness, career counseling, career exploration
<b>(2) Work-based learning experiences</b>	Paid and unpaid work experiences, job shadowing, internships, apprenticeships, summer work experiences	<b>(G) Supportive services</b> <b>(I) Follow-up services</b> (C) Paid and unpaid work experiences (N) Activities that help transition to post-secondary education and training
<b>(3) Counseling on post-secondary training and educational options</b>	Counseling and Guidance	<b>(G) Supportive services</b> <b>(I) Follow-up services</b> (J) Comprehensive guidance and counseling (K) Financial literacy education
<b>(4) Workplace readiness</b>	Job Club, classroom/school employment-related presentations and activities, summer instructional programs, soft skills, industry-specific training	<b>(G) Supportive services</b> <b>(I) Follow-up services</b> (E) Education offered concurrently with workplace preparation activities (H) Adult mentoring (L) Entrepreneurial skills training
<b>(5) Self-advocacy</b>	Job Club, support of Youth Leadership Forum participation, classroom/school advocacy-related presentations and activities, summer instructional programs, disclosure activities	<b>(G) Supportive services</b> <b>(I) Follow-up services</b> (F) Leadership development opportunities

WIOA further requires LWDBs to ensure all Title I-eligible youth receive information on all other services that may meet their needs in the area and refer them to other appropriate training and education opportunities (29 U.S.C. § 3164(c)(3)). Having strong connections with LWDBs and WIOA Youth providers helps LWDB staff and other Title I providers understand what VR can provide, enhancing their ability to refer clients who could benefit from those services. The Institute for Community Inclusion (Hoff, n.d.) provides an easy-to-understand [overview of WIOA Youth](#) populations and services through a question and answer resource that may be beneficial to youth service professionals, families, and youth.

## WIOA's Individual Service Strategy is Similar to the IPE

WIOA requires providers to develop an Individual Service Strategy (ISS) for both ISY and OSY. A 2017 DOL toolkit on case management for youth detailed the development of the ISS, which it describes as a document meant to be “flexible, realistic, and [one that] broaden[s] opportunities for participants” (Employment and Training Administration, 2017b, p. 22).

The ISS is based on the individual needs of each participant and must be linked to one or more of the core indicators of performance. In addition, the ISS must identify career pathways for each participating youth, including employment and educational goals with appropriate achievement objectives, and also specify services based on an objective assessment of the academic and skill levels of participants as well as youths' needs for supports.

Statutory and regulatory language leave many details of the ISS up to LWDBs, and most boards have established much more detailed procedures to implement the ISS process. The Y-TAC Curriculum Guide Resource Folder

(<https://tinyurl.com/YTACresources>) offers examples of ISS forms used by the San Diego Workforce Partnership, Workforce Solutions East Texas and the Philadelphia Youth Network. ISS plans may include identification of immediate needs; specific short- and long-term goals with interim benchmarks relating to education, employment, personal growth, and leadership development; retention strategies; referrals to external agencies; and a communications plan to ensure ongoing contact.

The ISS is similar to the IPE required under the Rehab Act. The Y-TAC Curriculum Guide Resource Folder also offers an example of an IPE from Texas (<https://tinyurl.com/YTACresources>). Similarities include a focus on employment; service needs, including transition services; and achievement objectives and timelines. The IPE also includes comparable benefits, which are services and benefits provided to the individual by other entities toward reaching the vocational goal (e.g., physical therapy provided by the school district, family medical insurance, and workforce services). Thus, the ISS may be a vehicle for VR units to identify Title I Youth participants who might also be eligible for rehabilitation services and vice versa.

## HOW CAN WIOA TITLE I HELP VR ACHIEVE ITS GOALS FOR YOUTH WITH DISABILITIES?

### WIOA Youth Changes Create Opportunities for VR

**New focus on OSY.** WIOA requires 75% of WIOA Youth funds to be spent on OSY (up from 30% under WIA). Further, the upper age range for OSY is extended from 21 to 24. These changes can promote collaboration between VR and Title I youth programming in several ways.

For example, some LWDBs are struggling to identify OSY. As noted earlier, 16-to-24-year-old VR clients who are not in school are eligible for WIOA services. Therefore, by connecting these youth to Title I Youth providers, VR can benefit both their young clients as well as the workforce system and VR through the blending and braiding of funding.

Diminished WIOA Youth funding available for ISY programs could mean that students formerly served will lose access to workforce-related programming. However, because many of the youth formerly served through WIOA Youth programming are likely to be potentially eligible for Pre-ETS services, VR counselors can engage in in-school programming and build relationships with WIOA Youth providers to provide needed career transition services for many vulnerable youth.

Finally, once Pre-ETS participants graduate from high school, they should be immediately eligible for OSY services available under the WIOA Youth program. Therefore, connecting graduates to WIOA Youth programming could help Pre-ETS graduates to continue their movement toward successful employment.

WIOA Youth 20% Expenditure Requirement for Work Experience. WIOA now requires LWDBs to spend 20% of the area's Title I Youth allocations on work experience for eligible youth. Since work-based learning and workplace readiness training are required Pre-ETS activities, there are clear opportunities for VR and LWDBs to work together to build collaborative approaches which support and possibly co-fund work experiences and work-based learning opportunities for eligible youth.

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**RECOMMENDATION for OSY:** Connect OSY to services available from WIOA providers. They are automatically eligible and will help LWDBs meet the increased OSY service requirement.

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**RECOMMENDATION for ISY:** Make use of Pre-ETS funding to serve youth in former WIOA ISY programs. Many WIOA-eligible ISY are potentially eligible for VR.

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## Common Performance Measures Across WIOA Titles

One of WIOA's most important contributions is the creation of a performance accountability system which establishes primary indicators of performance across each of the six core programs. Establishing similar performance indicators for each of the core programs not only helps to determine their effectiveness in serving customers, but also provides common language and incentives which can facilitate co-enrollment in multiple core programs, as appropriate.

The primary indicators of performance are identical for Title I adult and dislocated worker programs, as well as for Title II, Title III, and Title IV. The first two measures, relating to employment status after program exit, are expanded slightly for Title I Youth activities by taking into account younger participants' likely need for additional education and training. These augmentations are noted in parentheses below.

WIOA performance measures include:

- the percentage of participants who are in unsubsidized employment during the second quarter after exit from the program (Title I Youth: the percentage of participants in education or training activities, or in unsubsidized employment during the second quarter after program exit);
- the percentage of participants who are in unsubsidized employment during the fourth quarter after exit from the program (Title I Youth: the percentage of participants

in education or training activities, or in unsubsidized employment during the fourth quarter after program exit);

- the median earnings of participants who are in unsubsidized employment during the second quarter after program exit;
- the percentage of those participants enrolled in an education or training program (excluding those in on-the-job training [OJT] and customized training) who attain a recognized postsecondary credential or a secondary school diploma or its recognized equivalent, during participation in or within one year after exit from the program (the secondary credential language only applies if the participant is employed or is enrolled in an education or training program leading to a recognized postsecondary credential within one year after exit from the program);
- 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 measurable skill gains (e.g., documented academic, technical, occupational, or other progress, towards such a credential or employment); and
- effectiveness in serving employers, for which a standardized indicator is still forthcoming (Employment and Training Administration, 2017a).

While guidance on measuring the effectiveness in serving employers is still forthcoming, a Department of Labor guidance letter (TEGL 10-16) from August 2017 recommended state agencies pilot two of the following three approaches for this measure: 1) retention (of workers) with the same employer; 2) repeat business customers (of the workforce system); or 3) penetration of employer engagement within key industry sectors.

The similarity in performance indicators can promote collaboration, but it is also important to understand that while the measures themselves may be comparable, the negotiated levels of performance for each core program at state and local levels will not necessarily be the same. That is, while WIOA Youth and VR programs may both be judged on the median earnings of participants and the percentages enrolled in education or training programs, the actual target for earnings and education placements may differ.

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**RECOMMENDATION:** Look for opportunities to set performance levels in conjunction with other core programs to ensure seamless services and supports across all programming.

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## Infrastructure Cost Requirements Give VR New Leverage

WIOA requires core programs to contribute financially to the non-personnel costs of running local one-stop systems, documented through a memorandum of understanding (MOU) or similar document (29 U.S.C. § 3151(h)). WIOA is intentionally vague on how much programs must contribute (other than that all must contribute), leaving these negotiations up to local partners. The LWDB is the entity responsible for making these agreements happen. [DOL technical assistance](#) includes sample MOU language and calculations for local areas (Peterson, 2019). A [New Jersey state agency webinar](#) goes into detail on different potential cost allocation methods during negotiations (New Jersey Department of Labor, n.d.). Each state must develop a baseline MOU document for use as a resource or when local areas within the state have difficulty negotiating MOUs on their own.

This new requirement for financial contributions from a wide range of partners was in-

tended by Congress to amplify the voice of non-Title I programs in determining how the one-stop system is designed and run. For example, in exchange for their participation in the infrastructure MOU, which is incumbent on the LWDB to secure, VR and other workforce partners could demand changes, such as (a) developing internal processes that ease referrals between Title I and Title IV programs, (b) improving programmatic and physical accessibility of local one-stop facilities, and (c) instituting other collaborative processes and programs that would benefit youth with disabilities. The intent is to increase access to **all** services for all job seekers, and, specifically, for job seekers with disabilities (including youth).

In addition, WIOA requires that all WIOA-funded services abide by federal nondiscrimination requirements (29 U.S.C. § 3248). VR counselors can use their expertise to improve accessibility at one-stops and youth service providers, serving as a resource to Title I colleagues.

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**RECOMMENDATION:** Ensure strong accessibility provisions are in place for one-stop centers, work toward VR co-location in one-stops, and expand training on serving youth with disabilities for one-stop staff and WIOA youth service providers.

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## Part II: Serving Out-of-School Youth for VR Professionals

### INTRODUCTION

Part II of this curriculum guide is designed to help VR professionals better understand the composition of the OSY population, the services that are effective with this population, and the programs and networks that are available to support work in this area. Part II also proposes ways to translate and apply this information to local VR practice.

### OVERVIEW OF PART II

#### Part II covers...

1. Who are OSY;
2. What we know about successful programming for OSY;
3. Communities and organizations successfully serving OSY;
4. National networks and initiatives that provide more information about serving OSY; and
5. Translating what works for serving OSY to local VR practice.

#### Part II prepares VR practitioners to...

##### **Understand key characteristics of the OSY population, what works in serving OSY, and the stories of communities and programs that are serving OSY successfully.**

Part II describes the breadth and diversity of this population as well as details the way that WIOA addresses this population. This guide reviews decades of research on serving OSY with barriers to employment, detailing several key activities needed to serve this population effectively. Additionally, there are detailed examples of communities and programs that are using the key activities to effectively serve the OSY population.

**Tailor program offerings to OSY and refer OSY to other services.** Based on the evidence-based elements of effective practice for OSY, as well as examples of community and program success, VR practitioners will be prepared to assess their current offerings, tailor them to OSY, and implement the recruitment practices that will encourage OSY to enroll in their program.

**Serve OSY effectively.** VR practitioners will be able to draw from the information on effective practices to inform the design and delivery of their efforts with young adults.

### WHO ARE OUT-OF-SCHOOL YOUTH (OSY)?

The OSY youth population is large and diverse. [Measure of America's \(2019\) analysis](#) on the scope of youth disconnection, while not entirely congruent with the WIOA definition for this population, offers a sense of scale: their 2019 estimates found 4.4 million 16-to-24-year-olds were neither in school nor working.

This total is higher than the populations of more than half of the states in the country, and equates to about one in eight, or 12.3%, of teens and young adults in America (Measure of America, 2019). Young people in rural counties suffer an even greater disconnection with rates of up to 20.3%, and rural counties in the South as high as 24%, which is more than double the national rate. Washington, D.C. and New Hampshire have made the greatest progress in reducing the rate of disconnection with reduction by 43.9% and 32% respectively.

Measure of America (2019) also points to state-level disparities in disconnection between and among white, black, and Latino youth, particularly noting the stark differences between the black and white populations. This is consistent with findings by Paul Osterman

(2014), who notes that while youth unemployment rates are very high, most young adults eventually settle into the labor market. However, disconnected black and Latino youth find this journey much more challenging, and, he argues, should be the focus of public policy and resource allocation (Osterman, 2014).

## HOW DOES WIOA TITLE I ADDRESS OSY?

The WIOA Title I formula allocates funding to states, which in turn provide local workforce areas with resources to assist youth by delivering a comprehensive array of services to support out-of-school youth [OSY] and in-school youth [ISY] who have one or more barriers to employment. The goals of WIOA-funded services are to prepare youth to participate in postsecondary education and employment opportunities, to earn educational and/or skills training credentials, and to gain employment with career advancement opportunities.

To be eligible for OSY services, an individual must meet three criteria: (1) be between 16 and 24 years of age at enrollment, (2) not be attending any school, and (3) meet one or more additional conditions specified in the law. Importantly, because status as an individual with a disability is one of these conditions, any 16-to-24-year-old with a disability who is not in school is automatically eligible for Title I OSY services.

Although this guide is focused on OSY, 14-to-21-year-old in-school students with disabilities are also likely to be eligible for Title I youth services. While ISY must also be considered low-income (i.e., the total family annual income does not exceed either 70% of the lower standard of living guidelines or the higher level of the poverty line) to be eligible (see Table A3 in Appendix A), youth with disabilities are considered a family of one, meaning that only the income they possess individually, not that of their families, is considered in the deter-

mination process. This is vastly different than household income as it relates to VR. Therefore, most ISY with disabilities will also meet WIOA eligibility criteria.

For more details on the WIOA Title I eligibility determination process for youth, see the flow chart included in Appendix A of this curriculum guide.

Given that Title IV-eligible youth are likely to be eligible for and can benefit from Title I youth services and that Title I-eligible youth with disabilities would benefit from accessing Title IV supports, relationship building and collaboration among partners is essential. This mutuality of interest is underscored in the WIOA Final Rule, which recommends co-enrollment in services when youth can benefit from access to the appropriate activities, programs, and services.

The Rehab Act encourages state agencies, in their state plans, to specify the size of different VR-eligible subpopulations. OSY are an important and large subgroup. One subset of this group of young people is high school dropouts, of which there are approximately 2.3 million (U.S. Department of Education, National Center for Education Statistics, 2017). According to numerous reports, many of these OSY have disabilities which would qualify them for VR services. Some agencies already have outreach and initiatives in place for specific groups, such as youth in foster care or those subject to the juvenile justice system. These are large subpopulations: the foster care population in the United States is over 400,000 (Annie E. Casey Foundation, 2016), and on any given day about 48,000 youth are incarcerated or in some type of residential placement, with many times that number under court supervision in one way or another (U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention, 2019). Similarly,

eligible youth who are homeless, pregnant or parenting, or otherwise struggling to enter the economic mainstream could all benefit significantly from Title IV services.

Some VR agencies have recognized this need and are working collaboratively with facilities to provide employment and related transition services within the facilities, outside facilities, and upon release from facilities. Considerations should be given to size of the subgroups, funds available, ability to meet demands and provide services, and the goals of the agency.

## TERMS AND DEFINITIONS

Although WIOA includes a precise definition of OSY, researchers and practitioners often use other terms to describe these youth. For example, “disconnected youth” or “opportunity youth” (the latter a more recent attempt to embrace more asset-based language) is often used to refer to 16-to-24-year-olds who are neither employed nor enrolled in school. The term includes both high school dropouts without secondary credentials as well as those who have earned a diploma or GED but continue to struggle with labor market attachment. Low-income status is implied, since youth in these circumstances are unlikely to be earning substantial wages. VR professionals are likely to encounter these variations in terminology in research literature and among youth program practitioners. In these instances, it is reasonable to assume these terms are used interchangeably to refer to youth who are neither attending school nor working, and who, in most instances, will also meet the WIOA OSY definition.

## WHAT WE KNOW ABOUT SUCCESSFUL PROGRAMMING FOR OSY

### What the Research Says

#### First Studies: 1980s and '90s

As early as the 1980s, reports identified what came to be called youth disconnection as a serious challenge (Committee for Economic Development, 1987; Youth and America’s Future, 1988). By the mid-1990s, researchers were finding evidence linking specific practices to positive outcomes: relationships with caring adults (Grossman, Tierney, & Resch, 2000); connections to employers and work, as well as access to support services (Sum et al., 1997); and high expectations, connections to the workplace, and youth leadership (AYPF, 1997). In a related effort, the National Youth Employment Coalition in 1996 brought together leaders and practitioners to develop the Promising and Effective Practices Network (PEPNet), which created standards for youth-serving organizations covering activities, management, youth development, workforce development, and evidence of success (National Youth Employment Coalition, 2019).

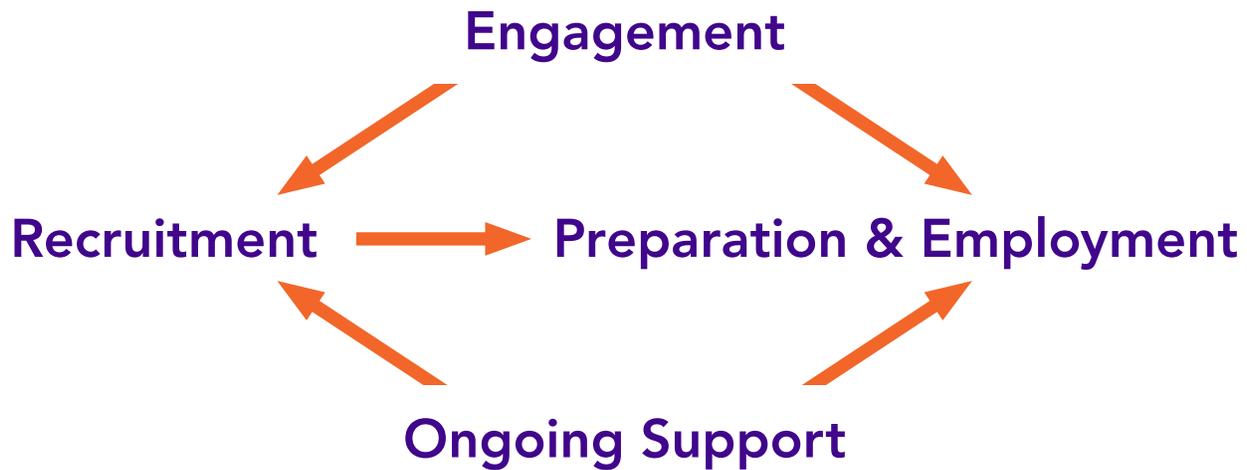
#### Recognition and Impact: WIA and the Obama Administration

The efforts of advocates and practitioners contributed to the 1998 enactment of the Workforce Investment Act (WIA), which reflected many of these emerging practices in its 10 required program elements.

Interest in youth disconnection increased throughout the 2000s. For example, *Learning from the Youth Opportunity Experience*, a report by the Center for Law and Social Policy (CLASP) identified effective practices from federal investments in 36 communities, including engaging and mobilizing community leadership, accessing resources from multiple systems, creating effective outreach strategies,

**FIGURE 6**

## Recruiting, Engaging, Preparing, and Supporting Out-of-School Youth (OSY)



and offering work experiences and internships (Harris, 2006).

The Obama Administration’s White House Council for Community Solutions produced important products, including return-on-investment estimates for youth reconnection (Belfield, Levin, & Rosen, 2012), a toolkit for employers (Gap Inc., 2012), and a final report (The White House Council for Community Solutions, 2012) that recommended using a collective impact framework (Hanleybrown, Tallent, Steinberg, & Corcoran, 2012) to address youth disconnection. These reports informed the [Performance Partnership Pilots \(P3\)](#), a federal initiative that helps communities combine federal funding streams to facilitate youth reconnection (youth.gov, n.d.).

### Recent Meta-Analysis

In 2016, Louisa Treskon of MDRC published *What Works for Disconnected Young People: A Scan of the Evidence*, which found that successful programs often include paid work and the use of financial incentives; connections among education, training, and the job market; youth development approaches; and comprehensive support during and after the

program (Treskon, 2016). For more details on this research literature, see Appendix C of this curriculum guide.

### What Works for OSY

Although there is no definitive list of programs and services that guarantee reconnection, the research, experience, and practices detailed in the previous section suggest a continuum of activities that assist OSY with and without disabilities to move progressively towards education and employment success. In the decentralized job training landscape, ensuring availability of this range of activities often falls to a variety of community-based organizations, public agencies, and employers, backed by political will and strong collaborative relationships.

For clarity, this discussion is divided into four parts: recruitment, engagement, preparation and employment, and ongoing support (see Figure 6). In practice, these four components are not necessarily sequential. It is important for providers to recognize this and design programs and funding models accordingly, as the path to achieving goals is not always a straight one for youth with multiple barriers.

## Recruitment

Engaging with youth who are out-of-school and out-of-work can be challenging. While many adults and systems have often failed these youth over the course of their lives, they are often eager to gain employment and support themselves and their families. Staff and organizations with good reputations often get most participants through word-of-mouth referrals.

**Recruitment through community partner organizations.** Strong connections to organizations and institutions serving OSY can be a boon to recruitment for VR agencies. For example, local schools may be able to identify students with disabilities who have recently dropped out, consistent with confidentiality safeguards. Youth-serving community-based organizations may have programs serving OSY, with some supported by LWDBs, that can also help to identify disengaged youth with disabilities who may be eligible for VR services. Additionally, strong connections to local or regional offices and agencies for juvenile justice, foster care, and behavioral health can help to identify candidates for VR services. Other community entities, like religious institutions and housing programs or shelters can also be useful partners in identifying and recruiting youth who may be in need of VR services.

**Recruiting youth directly.** Some larger organizations, as well as those with close community ties, have identified successful approaches for direct outreach and recruitment. Those with sufficient resources have found that hiring youth from target neighborhoods and communities to serve as recruiters – including alumni of OSY programs – can be a highly effective strategy. These youth have credibility with their peers and often can relate to and encourage OSY in ways that most adults cannot. Direct recruitment can also take place where youth

congregate, including at concerts and sporting events. Additionally, social media can be an effective tool in reaching youth.

## Engagement

Getting youth through the door is critical, but it is just the first step. Following up with appropriate strategies for enrollment, assessment, and counseling is critical. Further, these efforts must be designed in ways that continually engage youth, not only at the outset, but throughout the program. Successful approaches often include:

- ensuring youth referrals from one organization to another are carefully structured to promote smooth transitions and continuous support;
- placing positive youth development principles (strategies and practices that lift up youths' talents and assets rather than focusing on their challenges) at the center of programs and services (see principles at <https://youth.gov/youth-topics/positive-youth-development/key-principles-positive-youth-development>);
- providing access to caring, trained adults who are culturally competent and can communicate effectively with youth;
- ensuring the physical environment and climate is designed to be youth-friendly and appealing to young adults;
- minimizing hassle factors associated with enrollment (e.g., long wait-times, excessive eligibility documentation, and requiring returns at later dates for services);
- using motivational interviewing and other techniques which build on strengths and aspirations to promote positive change, while at the same time ensuring assessment techniques identify barriers to success;
- involving youth in developing an

- individualized plan for their activities/ services and in exploring career interests;
- offering immediate feedback and ongoing progress discussions so youth know they are heard and valued;
- forming cohorts of youth so that they can bond, learn to work cooperatively, and offer positive peer support to one another; and
- providing opportunities for youth to contribute to overall operations (e.g., shaping program direction, designing the physical space, and having input in hiring).

### Preparation and Employment

The service mix for youth can vary widely, depending on existing academic and technical skills, experience levels, support needs, and other life circumstances. Even so, basic factors associated with successful outcomes include:

- quick attachment to work or related activity to gain experience and confidence (e.g., service projects which produce something of visible and tangible value in the community, or work-based learning experience);
- wages or stipends, since most youth will need some source of income to participate in programming;
- instruction that involves youth as active participants in the learning process and responds to diverse styles of learning;
- curricula and training based in contextual, real-world situations which incorporate academics, including GED or other equivalent as needed;
- work-readiness training, including communications, teamwork, supervision, job search, interviewing, and resume-writing; technical instruction to perform the duties of the specific job; and life skills, including financial literacy and interpersonal skills;
- training designed to meet the needs of employers, with particular attention to industry sectors with high demand for entry-level employees;
- work experiences to apply classroom lessons, build self-confidence, and gain proficiency in the workplace;
- opportunities for tutoring and other forms of remediation without losing ground in the program;
- opportunities to progress toward a diploma or GED if OSY lack a high school diploma;
- opportunities to progress toward postsecondary credentials recognized and valued by employers;
- assignment of an adult or team of adults to monitor progress for each young person, coordinate supports, and, if applicable, communicate with other systems in which the young person is involved;
- placement into employment and/or postsecondary education;
- bridging the transition to placement, including counseling on interpersonal skills and the logistics of retention and success (to promote persistence, OSY often benefit from transition services/supports for at least a year); and
- systematic and transparent measurement of youth progress and retention, as well as competencies, placements, and certificates achieved.

### Ongoing Support

Many OSY will need a variety of support services to succeed in any training program. Further, these are likely to be necessary not only during training, but post-program as well (e.g., during the early stages of employment or postsecondary training). Some of the services often required by OSY include:

- personal counseling, including principles of trauma-informed care;
- financial and logistical assistance with various employment requirements (e.g., earning a driver's license, obtaining a social security card, or purchasing a uniform);
- transportation;
- child care;
- housing and food;
- health care; and
- job supports (e.g., job coaching through supported employment).

## COMMUNITIES AND ORGANIZATIONS THAT SUCCESSFULLY SERVE OSY

### Arizona Center for Youth Resources: Recruitment

[The Arizona Center for Youth Resources \(ACYR\)](#) in Phoenix is building pathways to success through an array of education, skill-building, and employment opportunities, all of which feature connections to caring, dedicated, and knowledgeable staff; a menu of programmatic and supportive options designed to ensure success; and research-based youth development principles and practices which impart meaning and relevance to programming (Arizona Center for Youth Resources, 2019). ACYR measures success in multiple ways, ranging from regular attendance at three GED classes per week to completing a career pathway and landing a job. Outreach and recruitment are continuous activities at ACYR. Staff hold information sessions in the morning and the evening to provide opportunities for as many young adults as possible to attend. They focus on getting to know youth so they can learn what services they need and which of the service options ACYR offers may best fit those needs. ACYR also recruits from other

public systems, working through partners who refer youth placed in delinquent placement facilities and living in public housing.

Other factors that facilitate recruitment for ACYR include:

- flyers to recruit for upcoming career pathway programming; and
- peer-to-peer outreach: many clients tell their friends and neighbors about their experiences and successes, and some will bring in their relatives for programs and services.

### Success Story: The Field School

[The Field School](#) is a WIOA-funded cohort training program in land management, conservation and sustainability. ACYR enrolls primarily out-of-school youth in cohorts for a 16-week program that incorporates academic and occupational training. Participants engage in academic work on Mondays at Phoenix Community College; Tuesday through Friday they travel the state to work on trail restoration, fire mitigation, public lands improvement, animal tagging, and other tasks deemed important by the Federal Bureau of Land Management (BLM).

Recruitment into the Field School is similar to ACYR's general approach but adds a focus on graduates of science-focused charter schools who are not connected to school or work. Phoenix Community College also refers youth who are interested in college but who do not qualify for or cannot afford college coursework. When deemed eligible, candidates must appear before an interview panel, which determines their readiness and commitment to the pathway. The Field School boasts a 97% completion rate for participants and a 93% placement rate in either postsecondary education or employment. Completers earn 15 college credits, a variety of occupational credentials and certificates, and are prepared

for a range of careers in conservation and land management. The BLM, Phoenix Fire Department, Phoenix City Parks, wildland firefighters, and other land preservation and management organizations around the country have hired graduates.

### **Success Story: Two Sisters and a Brother**

Two sisters, both of whom are opportunity youth, entered ACYR's Field School. Both successfully completed the program, earning college credits and certifications. One young woman gained employment with the BLM, while her sister was hired by the Arizona Audubon Society, each working in conservation and sustainability. Based on their successes, the sisters encouraged their brother to apply to the program.

Their brother has a disability. Partners including ACYR, BLM, Phoenix Community College, and American Conservation Corps worked together with him to ensure he was cleared to participate in the program and to provide ongoing support, resources, and mentoring to ensure his success. Today, the young man is thriving in the program, learning, developing skills and abilities, and most importantly, being a valued member of a team. As a result, he is on his way to joining the workforce and on a path to self-sufficiency. While this young man's story is notable, it is not unique. ACYR has enrolled and dedicated services to ensure success for several other youth with Individualized Education Programs (IEP) and has helped them to successfully complete the program and go on to join the workforce.

### **Our Piece of the Pie: Engagement**

**Our Piece of the Pie** (OPP) in Hartford, Connecticut helps youth reconnect with education and employment (Our Piece of the Pie, 2017). OPP's model focuses on forging and growing a personal, consistent relationship between each

young person and a caring, committed, and proactive adult staff member. These adults, called Youth Development Specialists (YDS), are by the side of every youth who participates in the program, helping them overcome challenges and move toward high school graduation, a college degree or vocational certification, and rewarding employment.

Upon enrollment, each youth, working with their YDS, develops a comprehensive, individualized success plan with longer-term goals (e.g., graduating from high school) broken into smaller steps, such as increasing class attendance to 90% or getting tutoring help. OPP also offers a spectrum of program offerings that meet different needs. For example:

- **Opportunity Academy Hartford** is an alternative school where over-aged, under-credited students can earn high school diplomas.
- The Pathways to Career Initiative offers wraparound supports as youth earn credentials and gain work experience in the manufacturing and allied-health sectors, then continues to support them as they enter full-time employment.
- **The Hartford Youth Service Corps** offers a one-year, paid service-learning opportunity coupled with wraparound and transition supports.
- For youth aged 14 to 17, OPP offers **two youth businesses** – one focused on making art and another on building boats – where youth can gain work experience and job readiness skills.

### **Success Story: Aarmari**

Aarmari was 19 in 2016, when he first came to OPP. Since he had not completed high school, he was enrolled in Opportunity Academy Hartford, OPP's alternative school. Aarmari struggled at first, but with support from his

teachers and goal setting guided by his YDS, he earned his high school diploma in December 2017. Unsure of his postsecondary plans and eager to stay involved with OPP, Aarmari joined the Hartford Youth Service Corps, which connects young adults to part-time, yearlong employment doing valuable community service projects. The Youth Service Corps gives unemployed youth an opportunity to earn a paycheck and master a variety of skills while also strengthening their community. The program also provides participating youth with mentors, assistance in building life skills, and employment services.

When he first arrived at OPP, Aarmari remembers having a closed mindset. He struggled to want to learn things that he did not find important. Now, he finds inspiration through people around him every day. Aarmari says he loves his role within the Youth Service Corps because he has found a form of leadership and realizes he must lead by example so others will see a peer doing the right thing. He believes maybe then it becomes cool and makes it easier to do the right thing. Aarmari has found a passion for continuing to do work that improves those around him, much like what his YDS did for him.

## Youth CAN: Ongoing Support

**Youth CAN** in Tennessee provides eligible youth ages 16 to 24 with the financial and educational support they need to receive a high school diploma or equivalent, postsecondary degree, or other industry-recognized credential (Mid-Cumberland WorkForce Services, n.d.). The program model includes a rich mix of paid work experience, career exposure and counseling, mentoring, tutoring, financial assistance, and a variety of support services. Youth CAN is operated by the **Mid-Cumberland Human Resources Agency**, which serves 13 counties in northern Tennessee. More than

90% of Youth CAN participants leave the program with credentials and have entered the workplace or are furthering their education. Utilizing WIOA funding, Youth CAN helped Ashley to become one of those success stories.

### Success Story: Ashley

Ashley (name changed to protect privacy) was a 19-year-old single mother from the small, rural town of Chestnut Mound when she enrolled in Youth CAN in 2016. Prior to joining the program, Ashley worked at a local fast food restaurant to support herself and her 2-year-old son but was having difficulty making ends meet. She was living with her mother, receiving public assistance, and wanting more for her family.

Ashley was referred to Youth CAN from the Smith County American Job Center. She had a clear goal – becoming a Registered Dental Assistant (RDA) – but needed help to get there.

Youth CAN worked with Ashley to develop a step-by-step plan to reach her employment goal. Her first challenge was to find a school that she could afford and that was also relatively close to home. Living in a rural county, Ashley faced transportation challenges. Fortunately, Youth CAN was able to utilize WIOA funding to assist her not only in paying tuition, but also in buying gas to get to and from classes. As a result, Ashley completed a 10-week Dental Assisting Program at Tennessee Professional Training Institute and became an RDA. Subsequently, Youth CAN helped Ashley to pay for her professional license and to find paid work experience so that she could develop a work history in her field while earning income. Ashley was such an exceptional worker that Dental Excellence in Murfreesboro hired her on as a full-time RDA. Since successfully exiting the program, Ashley has made dramatic changes in her life, including purchasing a home, buying a new car, and getting married.

## NATIONAL NETWORKS AND INITIATIVES FOCUSED ON SERVING OSY

Several national networks and initiatives work to promote positive outcomes for OSY and have useful resources for serving these youth.

The following organizations focus primarily on OSY:

- **The National Youth Employment Coalition** is a membership organization established in 1979 that advocates for policies that benefit out-of-school and other disconnected youth, and shares and promotes effective practices among member organizations serving these youth.
- **The American Youth Policy Forum** is another long-standing national organization whose mission is to educate, engage, and inform policymakers and practitioners about effective practice through research-based information, convenings, and peer-to-peer networking.
- **The Opportunity Youth Network** grew from the White House Council for Community Solutions and brings together hundreds of funders, policy-makers, practitioners, and youth in efforts to reduce the number of disconnected youth.
- **The Aspen Forum for Community Solutions** promotes and supports community collaboration to prevent youth disconnection and houses the Opportunity Youth Incentive Fund, which supports three-dozen communities' efforts to build cross-sector cooperation.

Other national organizations with broader workforce agendas, but that also address disconnected or opportunity youth, include:

- **The Center for Law and Social Policy (CLASP)** advances a broad range of policies at all levels of government

to improve outcomes for people who have low incomes. Specific initiatives of interest to disconnected youth include Communities Collaborating to Reconnect Youth, comprised of three dozen communities focused on dropout recovery and reconnection, and the Alliance for Quality Career Pathways, which promotes a comprehensive framework for the development and implementation of pathways.

- **Measure of America** tracks youth disconnection rates by gender and race/ethnicity for states, metro areas, rural and urban areas, and counties.
- **The National Skills Coalition** focuses on organizing, advocacy, and communications to advance state and federal workforce policies which promote a skilled workforce and economic competitiveness.
- Opportunity Nation is a coalition of several hundred employers, nonprofit organizations, and academic institutions that promotes upward mobility and strong communities. A notable contribution is the organization's "**Opportunity Index**", which charts opportunity in states and localities based on health, education, and economic and community-related issues.

## TRANSLATING WHAT WORKS FOR SERVING OSY TO LOCAL VR PRACTICE

The challenge for VR practitioners involves building partnerships with other OSY serving organizations. VR can begin with some initial tasks.

1. Identify unserved and underserved youth populations within the agency.
2. Using needs assessment results, identify specific populations, such as students with 504 plans, youth in foster care, or youth

involved in the juvenile justice system, to target for outreach and services.

3. Work with your local workforce agency to serve young people who are eligible for services under WIOA Title I and the Rehab Act.

Building such partnerships allows both agencies to collaborate and provide complementary services toward common outcomes and performance measures, such as credentials, increased academic skills, or employment. Since 75% of WIOA Title I Youth funds must be dedicated to serving OSY, VR can help by providing a referral base to workforce agencies and providing supports to ISY through its Pre-ETS funding. Similarly, workforce agencies can provide referrals to VR for any students with disabilities with whom they are working.

One example of such a referral base includes school districts that have programs for youth aged 18 to 21. These are students with disabilities who are commonly referred to VR for services. Once VR helps the students achieve a competitive integrated employment (CIE) out-

come, workforce agencies could follow up with the individuals even after VR case closure. Likewise, if workforce agencies are encountering youth who are homeless, who have dropped out, or who are pregnant or parenting teens, they can help reconnect those individuals to school programs and VR for access to Pre-ETS and other VR services.

Workforce agencies and VR each have the responsibilities noted in Table 1 and can rely on and support one another through the process. This includes continuing to implement procedures to assist in serving individuals with disabilities, as each agency stated in the combined or unified state plan. Regarding employer engagement, VR and workforce agencies can pool contacts and work together to support employers in finding qualified workers, eventually becoming the de facto staffing agency for local businesses. Implicit in this section is the recommendation that Title I and Title IV collaborate, co-serve individuals with disabilities, and blend or braid funds.

## Part III: Establishing Interagency Partnerships

### INTRODUCTION

Part III is designed to help VR professionals, whatever their role, begin the process of developing partnerships with counterparts in other agencies. It contains activities essential to forming effective partnerships, a variety of success stories from states and diverse agencies, and resources on programs and funding streams that may be good fits for VR agencies.

The content of Part III was influenced by conversations with individuals in a number of local and state VR offices.

### OVERVIEW OF PART III

#### Part III covers...

1. Key activities in forming interagency partnerships;
2. Stories of successful partnerships at the state and local levels; and
3. A wide array of agencies and funding streams that may be considered for partnerships with VR agencies (in the appendix).

#### Part III prepares VR practitioners to...

**Create durable partnerships, based on key activities for what successful partnerships look like and state and local examples.** Appendix E identifies a wide range of agencies and funding streams that may be good targets for partnerships with VR agencies.

**Confidently pursue partnerships.** Descriptions of successful partnerships cover rural and urban areas, small and large states, and a variety of agencies. The guide to potential partners in the appendix includes both federal funding streams and state and locally chartered organizations.

#### **Begin forming interagency partnerships.**

The key activities in this section offer different places for VR professionals to start in pursuing partnerships, depending on their agency context and existing relationships.

### CHALLENGES TO PARTNERSHIP: WHY IS IT SO HARD?

Throughout the 21st century, cross-agency partnerships have been increasingly viewed as effective vehicles for improving the coordination and delivery of education, workforce, and social services. By collaborating, agencies are able to plan and deliver services comprehensively, realizing efficiencies, targeting scarce resources, and improving services for people who need them. Yet, despite their clear potential to benefit clients, many agencies find it very difficult to create effective partnerships. Why is partnership-formation so challenging?

The simple answer, and probably the most accurate, is that the complexity of many related public care systems can make cross-agency collaboration difficult. The nation's public care systems are authorized by a variety of individual federal, state, and local statutes

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**“Our first consideration has to be: what does this mean for our customers? It’s much more than a physical move into workforce centers; it’s about building relationships with other systems and partners which make it easier for our customers to receive the services they need to be successful in the workforce.”**

**Cheryl Fuller, Director of Rehabilitation Services Division, Texas Workforce Commission**

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which address and promote public well-being across a wide range of functions (e.g., education, employment, health care, housing, and income maintenance). Even when these public purposes are related, such as education and training, specific programmatic interventions are likely to vary, with access to services often limited based on differing eligibility factors like age, income level, educational attainment, and disability. In addition, performance measures have typically varied across programs, necessitating the creation of discrete management systems to track and report on results for each.

It is important to realize most of these public programs and systems were put in place to address specific needs of individuals facing barriers and challenges, many of whom were not getting the services they needed and deserved. Regardless, it is clear that the resulting range of eligibility, service, and performance factors makes it difficult for agencies to work together, even when it is in the best interest of their clients to do so.

Fortunately, WIOA has eased a number of barriers to cross-agency partnership by (a) requiring unified planning across all core programs; (b) encouraging co-enrollment in core programs as appropriate, particularly for 16-to-24-year-old OSY; and (c) establishing common performance measures for all core programs. Given this, it is clear that the statutory framework supporting partnerships for VR and workforce agencies is beginning to catch up with the rhetoric about their importance. The next section will outline what types of partnerships might be possible and how they can be organized for long-term success.

## **EFFECTIVE PRACTICE PROFILE: SHARED UNDERSTANDING LEADS TO INTEGRATED SERVICE DELIVERY IN CONNECTICUT**

The Connecticut Department of Labor's Office of Workforce Competitiveness (OWC) and Department of Rehabilitation Services have partnered to create Integrated Resource Teams (IRT). Rooted in a shared understanding of the agencies' contexts, priorities, and professional language, IRTs provide complementary programs and services. Training for IRT members is extensive, which brings VR and workforce staff together to learn about their agencies' strengths and capacities. Connecticut workforce staff and dollars often support training and wage subsidies, while VR staff focus on placement, supports, and on-the-job training. In this way, IRTs put the participant at the center, offering coordinated resources directly to clients rather than having to refer them to external offices or agencies. IRTs are now part of new collaborations, such as exploring systems for universal intake, planning joint career fairs, and creating paid summer internships and work experiences for youth with disabilities, a priority for OWC.

## **KEY ACTIVITIES IN PARTNERSHIP FORMATION**

Throughout Part III, we highlight examples of local, regional, and statewide partnerships between VR agencies and several different organizations and institutions. In these instances, leaders and staff from offices and agencies have come together for a variety of reasons (e.g., in response to federal or state legislation, based on long-standing relationships, or due to the individual initiative of VR professionals who see needs and take actions to address them). While all partnerships are specific to their context, research and practice over the

last decade (Allen, 2010) have identified several characteristics of effective partnerships (The Partnering Initiative, 2019; Rosenblum, 2016; Melaville, Jacobsen, & Blank, 2011; Corcoran, Hanleybrown, Steinberg, & Tallant, 2012). This research is synthesized in the 11 steps below.

While these actions are critical to success, it is important to understand the essential principle in building and sustaining partnerships is to be rooted in the self-interest of the participating organizations. In short, generalized commitments to improved services or more efficient delivery are much less likely to produce results than clear and demonstrable benefits to the mission, goals, and priorities of the individual partners.

## Key Activities

1. Identify individuals within potential partner organizations key to accomplishing potential shared tasks *and* who are willing and able to work collaboratively.
2. Work with these individuals to define the goals of the partnership, specify measures of success, and build a common commitment to achieving them.
3. Identify and cultivate key players in the partnership, who may include:
  - a. leaders in each agency who can serve as champions;
  - b. staff who have expertise in, or an affinity for, making connections across programs and agencies;
  - c. staff throughout each agency whose work will be affected by the partnership;
  - d. staff who have access to and authority to use or allocate agency resources;
  - e. as appropriate, staff who have access to the data the partnership needs to plan and track results; and
  - f. potential “challengers” to the partnership, who need to be brought onboard.
4. In cases where staff or agencies do not have a history of working together, take the time to build knowledge and trust, learning each other’s contexts, priorities, and professional languages.
5. Agree on written ground rules for the partnership, such as strategies for ensuring communication among partners and confidentiality protocols for reviewing data.
6. Share available cross-system data on target populations, with an eye toward identifying the needs of and potential benefits for individuals served by partner agencies.
7. Based on the partnership’s goals and findings from shared data analyses, develop specific work plans with measurable outcomes and timelines which advance the work of both the partnership and its individual members.
8. In pursuing shared goals and strategies, expect to recalibrate work plans and tactics based on experience, changing staff and leaders, and evolving contexts.
9. Put in writing, through MOUs or Memorandums of Agreement (MOA), the roles and responsibilities of each partner to secure a stable and continuous partnership, regardless of possible changes in administration within either agency.
10. Measure and evaluate results (including how well the partners interact), acknowledging both successes and areas where additional work is needed.
11. Celebrate successes, distribute credit for achievements to reward and reinforce participation, and plan for scaling up and forming new collaborations.

**TABLE 2****Simplified Levels of Collaboration Tool**

Partners (List and rate current level of interac- tion)	Relationship Characteristics					
	0 No Interaction	1 Networking	2 Cooperation	3 Coordination	4 Coalition	5 Collaboration
	0	1	2	3	4	5
	0	1	2	3	4	5
	0	1	2	3	4	5

Table 2. Adapted from the “Levels of Collaboration Scale” by Frey, Lohmeier, Lee, and Tollefson (2006).

Effective partnerships often benefit from the leadership of a neutral intermediary organization, which can convene, manage, and help the partnership pursue its goals. In many instances, this type of external support may not be possible due to a lack of resources. However, in the absence of a neutral convener, it is essential that the partnership agree on how it will manage and coordinate its activities. Finally, remember that partners do not need to agree on everything – only on the specific goals of the collaborative and the strategies to accomplish them.

### ASSESSING PARTNERSHIP FORMATION

In addition to understanding key elements of successful partnership formation, it is also valuable to have accessible tools to help guide the development and progress of collaboration over time. To that end, Frey, Lohmeier, Lee, and Tollefson (2006) created the “Levels of Collaboration Scale” from several existing models to measure the levels of collaboration exhibited between and among partners. While initially developed to assess the extent of collaborations among recipients of grant

funding, the scale is also applicable to a wide range of partnerships. The complete Levels of Collaboration tool, with definitional details on different levels of collaboration, is available for use in the following resource folder: <https://tinyurl.com/YTACresources>. Table 2 contains a simplified version of the tool.

### SUCCESS STORIES

#### Oklahoma: New Partnerships Arise from Staff Commitment to Shared Goals

Local regions of Oklahoma’s Department of Rehabilitation Services (DRS) are partnering with a variety of institutions and systems to improve career prospects for young people. These partnerships are characterized by a common commitment to achieving shared goals, trust among participants, and buy-in from staff throughout the agency.

For example, partnerships with public schools on Pre-ETS have created new, earlier opportunities to help students understand career options and to prepare themselves for employment or postsecondary education and training. This

## EFFECTIVE PRACTICE PROFILE: PRE-ETS CO-DELIVERY ENABLES SERVICES FOR MORE STUDENTS IN MINNESOTA

Minnesota Vocational Rehabilitation Services (VRS) has partnered with the state Office of Youth Development (YD) to enhance opportunities for students potentially eligible for Pre-ETS and to support the schools that educate them. In 2017, VRS partnered with YD on developing a request for proposals (RFP) since YD had extensive experience drafting and evaluating RFPs and understood the elements of effective youth programming based on years of administering WIA/WIOA Title I youth funds.

Based on the 2017 RFP selection process, eight of the nine Pre-ETS contracts were awarded to LWDBs, primarily due to pre-existing relationships with schools through collaboration on Title I ISY programming and supplemental state funds. These contracts enable local boards to continue offering high school programs, while applying more WIOA Title I funds to OSY as required by statute. These close working relationships have resulted in the

following new collaborations:

- VRS and Title I partners present to schools together as a unified system with different levels of support. Educators learn there is “no wrong door” for referring students for services.
- Title I partners assist students with applying for VR services as needed. Some students get all employment needs met through Title I contracts and others need the more intensive assistance that VRS can provide.
- More Pre-ETS students are participating in state-supported summer internships administered by local boards.
- More students who cannot access VR services due to order-of-selection restrictions are served by Title I programs.

More information about Minnesota’s VRS programming is available at <https://mn.gov/deed/job-seekers/disabilities/youth/>.

includes not only counseling, but also assistance with Free Application for Federal Student Aid (FAFSA) completion, advising on essential coursework, and applying for accommodations. These efforts are enhanced by the Oklahoma state VR office, which provides tools to help special education teachers incorporate employment-related goals in students’ IEPs, particularly for youth with more significant disabilities.

VR regions are also working with institutions of higher education to identify 504-eligible students who could benefit from access to services. Student Affairs and Financial Aid Offices are particularly valuable resources in referring

students, many of whom are not aware they can receive services through VR.

Partnerships are also key to identifying OSY who could be eligible for VR services. For example, VR offices are working with local social services agencies, behavioral health, juvenile justice and probation, and drug recovery centers to identify and refer eligible young people.

Finally, based on a partnership between the DRS and the Oklahoma Office of Juvenile Affairs (OJA), VR counselors are assigned to work in residential facilities across Oklahoma. At the Central Oklahoma Juvenile Center (COJC) in Tecumseh and Southwest Oklaho-

ma Juvenile Center (SWOJC) in Manitou, DRS provides basic readiness training for youth, as well as opportunities to earn cardiopulmonary resuscitation (CPR), Occupational Safety and Health Administration (OSHA), and ServSafe certifications. DRS and OJA have developed a close working relationship with a local career and technology education center, Gordon Cooper Technology Center, near COJC. Youth from COJC travel to the center in the evenings for exposure and training in fields like robotics, welding, and advanced manufacturing. Young people also have access to a paid work experience inside the facility for cafeteria and maintenance work, and some even work outside the facility, paid through WIOA Title I youth activities dollars.

Additionally, in Norman, Oklahoma, DRS built upon the existing partnership with OJA and together formed a collaborative program with Norman Public Schools and the Child Welfare division of the Department of Human Services. The focus of this collaboration is to help youth in foster care get connected with VR services. This demonstrates a model example of shared resources on many levels (e.g., funds, space, and personnel).

### **Texas: State Agency Structure Facilitates Deep Collaboration**

State leadership can be a powerful force in promoting partnerships between VR and other workforce development organizations and stakeholders. In Texas, agency leaders cham-

panion collaboration as an approach, learn other agencies' contexts, and utilize cross-system data to facilitate goal setting. For more than two decades, House Bill 1863 has guided Texas workforce programming (1995). This foundational state statute and subsequent related legislation broadly define workforce programming and establish requirements for efficient and effective operations.

The Texas Workforce Commission (TWC) is the state agency that oversees employment-related programming. TWC houses and coordinates the work of all major workforce programs, including all six WIOA core programs, the Temporary Assistance for Needy Families "Choices" Employment Program, Supplemental Nutrition Assistance Program Employment and Training, and the Child Care and Development Block Grant. This serves to promote collaboration across systems.

The TX Workforce Investment Council (state workforce board) also promotes partnership and collaboration. Administratively attached to the Governor's Office, the board is charged with developing a strategic plan for the entire state workforce system, which is broadly defined to include not only WIOA-related programming, but also the work of the TX Higher Education Coordinating Board, the TX Education Agency, the TX Veterans Commission, the TX Department of Criminal Justice, the TX Juvenile Justice Department, and others. The planning process is collaborative and includes action plans for each agency, with regular progress reports to the gov

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**"So often, successful partnerships start at the front-line staff level. We aren't referring individuals to an agency; we're referring them to a person. Of course, MOUs are important, but it's still about the individual commitments, from the front-line staff level up to the leadership level, that really make this work for people."**

**Karen Quesnel, Operations Coordinator, Connecticut Department of Labor**

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ernor and legislature. These promote visibility and accountability for results.

Having all major programs within a single agency promotes data-sharing and analysis, which in turn can facilitate partnership formation. For example, when the agency staff ran several years of VR performance data through workforce common measures, they found VR outcomes were comparable to those of Title I programs. This analysis helped demonstrate VR programs could hold their own with other workforce programs and underscored that VR performance followed similar trend lines to those for Title I.

Coordination and partnership are also critical in regional service delivery. Texas Workforce Solutions-Vocational Rehabilitation Services (TWS-VRS) is in the process of co-locating VR services into one-stop centers throughout Texas' 28 local workforce areas. These accelerating efforts are providing Texans with disabilities with education, training, and related services to prepare for and succeed in employment. Further, all VR regions are either contiguous with LWDBs or are nested within geographic/political boundaries, with strong VR representation on most LWDBs and many youth standing committees.

TWC is active in building partnerships with other workforce agencies, including those supporting PreK-12, higher education, juvenile justice, and the veterans' commission. The following initiatives illustrate how this systemic approach helps the state to develop coordinated activities to address the needs of youth with disabilities.

**The Tri-Agency Initiative.** The Governor established the Tri-Agency Workforce Initiative, charging Commissioners of the TWC, the TX Education Agency, and the TX Higher Education Coordinating Board to identify innovative strategies to cultivate talent to meet the state's

workforce goals. Based on their work, the commissioners issued a series of recommended strategies promoting collaborative approaches to strengthening PreK-12 education, increasing postsecondary credentialing, and enhancing Texans' employment opportunities, several of which relate to youth and young adults with disabilities.

**Pathways to Careers Initiative.** The Pathways to Careers Initiative (PCI) grew from the commissioners' recommendations to expand opportunities for Texas students with disabilities to receive Pre-ETS and other forms of transition assistance. PCI features several strategies, including Explore STEM camps at public colleges and universities and Summer Earn and Learn, operated in collaboration with all of the state's LWDBs to provide work readiness skills and paid work experiences to approximately 2,500 students ages 14 to 22.

**Texas HireAbility.** TWC launched Texas HireAbility to raise awareness about the benefits of hiring people with disabilities and to highlight their contributions in the workforce. Going well beyond national shorter-term initiatives aimed at promoting employment for individuals with disabilities, TWC created a unified, year-round strategy which demonstrated how the workforce system is embracing VR as an integral component of Texas talent development.

More information is available at the following links:

- Texas Workforce Commission: <http://www.twc.state.tx.us/about-texas-workforce>
- Texas Workforce Investment Council: <https://gov.texas.gov/organization/twic>
- State Workforce Board's Strategic Plan for the Texas Workforce System: [https://gov.texas.gov/organization/twic/workforce\\_system](https://gov.texas.gov/organization/twic/workforce_system)
- Tri-Agency Initiative:

<http://www.twc.state.tx.us/files/partners/tri-agency-report-office-governor-twc.pdf>

- Pathways to Careers Initiative: <http://www.twc.state.tx.us/news/summer-work-program-aims-connect-2000-texas-students-jobs>
- TWC's HireAbility Initiative: <http://www.twc.state.tx.us/partners/texas-hireability>

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**“VR professionals need to function as integral parts of the larger team, learning how individual partners can play their best roles.”**

**Cheryl Fuller, Director of Rehabilitation Services Division, Texas Workforce Commission**

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## **Iowa and Nevada: Fostering Partnership Through Convening and Training**

Some states are finding that planning and delivering professional development trainings for multiple systems and programs can be a powerful way to build effective partnerships. In Iowa and Nevada, agencies identified potential partners in other agencies, took time to get to know each other's contexts, and created shared ground rules for working together.

Realizing many education and workforce programs and providers were not comfortable with delivering services to individuals who are blind or visually impaired, the Iowa Department for the Blind (IA Blind) planned and convened a major training for almost 20 related agencies, including those supporting the workforce, education, community rehabilitation providers, and juvenile justice. This training provided a basic overview of programs and services available and also identified what staff from attending agencies needed in the way of additional professional development.

Based on this input, IA Blind worked with the VR Youth Technical Assistance Center (Y-TAC), led by the Institute for Educational Leadership (IEL), to develop a two-day training. The training included IEL's **Youth Service Professionals' Knowledge, Skills, and Abilities (YSP/KSA)** module on community partnerships, a focus on high-need young adults, and techniques for infusing practices associated with trauma-informed care into programs and services. As a result, participants developed a new appreciation for working together and learning from one another. Based on the success of these trainings, IA Blind continues to explore opportunities to bring partners together to improve services for youth across all public systems.

Nevada is another example of a state utilizing training to bring together and build partnerships among multiple agencies. The Nevada Bureau of Vocational Rehabilitation Services (BRS) began offering YSP/KSA trainings with the goal of breaking down barriers and silos across different agencies providing services to individuals with disabilities. Initially, the convenings were predominately attended by VR personnel, but gradually the audience expanded to a point where at least half the attendees included partners from agencies relating to foster care, juvenile justice, education, and other related services.

The YSP/KSA training modules were highly interactive, including a mock transition fair. It took some time for participants to get comfortable with each other, since many attending staff were meeting each other for the first time. They soon began to learn how much they had in common, even including serving clients with similar needs. As a result, BRS hired a state-wide transition coordinator to assist in building and maintaining partnerships with other partner agencies.

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## Conclusion

For VR agencies, connecting with other parts of the workforce development system, implementing evidence-based practices to serve OSY, and systematically forging partnerships are key to achieving the vision set out by WIOA. The three parts of this guide address each of these activities, building on each other to create a comprehensive approach to integrated services for OSY.

Insights shared by the agencies and organization who informed the development of this guide illuminate the fact that many agencies are making strides in these areas, but also that many are looking for more in-depth resources in at least one of these areas. Using this guide, VR professionals, regardless of their role, can chart a path to increased and improved services to youth with disabilities.

This guide is one of a series of resources developed by Y-TAC to help VR professionals expand and strengthen transition services available to eligible youth ages 14 to 24. More information can be accessed at the Y-TAC website, [www.y-tac.org](http://www.y-tac.org).

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## Appendices

### APPENDIX A. ELIGIBILITY AND DEFINITIONS UNDER THE WORKFORCE INNOVATION AND OPPORTUNITY ACT (WIOA) OF 2014

#### WIOA Title I Youth Programs

WIOA aims to further align state VR programs with other core programs of the workforce development system, through unified strategic planning, common performance accountability measures, one-stop delivery, and increased services to youth with disabilities in the areas of workplace skills, exercising self-determination in career interests, and obtaining work-based learning experiences. Changes authorized by WIOA include significant updates to the youth program, including changes in youth eligibility, and five new program elements (i.e., financial literacy, entrepreneurship skills training, local labor market and employment information services, transition services for postsecondary education and training, and education concurrent with workforce preparation and occupational training). WIOA also places an emphasis on work-experience: under WIOA, at least 20% of local Youth formula funds must go towards work experiences (e.g., summer and year-round employment, pre-apprenticeships, on-the-job training, internships, or job shadowing).

#### Who Are the “Out of School” and “In School” Youth Populations, Broadly Defined?

WIOA Title I formula provides funding to states, who in turn provide local workforce areas with “resources to deliver a comprehensive array of youth services that focus on assisting out-of-school youth (OSY) and in-school youth (ISY) with one or more barriers to employment” ([Employment and Training Administration, 2019, p. 1](#)). The goal of these services should be preparation for postsecondary education and employment opportunities,

attainment of educational and/or skills training credentials, and acquisition of employment with career/promotional opportunities.

Eligibility for services hinges on the age of the individual (with different age requirements for “in-school” and “out-of-school” youth eligibility), whether that individual is attending school, and whether the youth experiences one or more barriers to employment. Status such as “low-income” plays a different role for ISY and OSY determinations. “Barriers to employment” are different for the in-school and out-of-school categories. Determinations as to whether a youth is “in-school” come from applicable state law and include both secondary and recognized postsecondary institutions. However, WIOA regulations clarify that dropout re-engagement programs, Job Corps, YouthBuild, high school equivalency, and Adult Education provided under WIOA Title II are not considered “schools” for the purposes of eligibility, but high school equivalency programs funded by the public K-12 school system are (20 C.F.R. § 681.230, 2018).

The eligibility criteria for WIOA Youth programs and funds (“in-school” and “out-of-school”) are different and separate from WIOA Adult and Dislocated Worker programs and funds. WIOA supports an integrated service delivery model for in-school and out-of-school youth to provide states and local teams the ability to leverage other resources, such as at the federal, state, or local level or from philanthropic organizations. The new framework expresses a commitment to high quality service delivery, starting with career exploration and guidance, continued support for educational attainment, and skills training in in-demand

industries and occupations, and culminating with enrollment in postsecondary education or training or working toward a competitive, integrated career path. Increasing our expectations of students and youth with disabilities and supporting the journey to achieving competitive, integrated employment is further addressed by Novak (2015). WIOA shifted focus from ISY to OSY, requiring that a minimum of 75% of Youth formula funds be spent on OSY (up from 30% in the Workforce Investment Act).

### WIOA OSY Eligibility Determination

To be eligible for services as an “OSY,” an individual must meet three eligibility criteria (WIOA, 2014). The individual must (1) be between 16 and 24 years of age at enrollment, and (2) not be attending any school, and (3) meet one or more of the conditions (“barriers to employment”) in Table A1.

Thus, eligibility determinations for WIOA out-of-school youth follows the three-step process in Table A2.

**TABLE A1**  
**Barriers to Employment**

School dropout
Within age of compulsory attendance AND not attended for at least the most recent complete school year calendar quarter
Hold a secondary diploma AND is low-income AND is basic skills deficient OR an English language learner
Involved in the juvenile or adult justice system
Homeless, foster care (including “aged-out” of foster care), Social Security Act Sec. 477 eligible, OR out-of-home placement
Pregnant or parenting
Individual with a disability
Low-income AND requiring additional assistance to enter or complete an educational program OR to secure/hold employment

**TABLE A2**

**Three-Step WIOA OSY Eligibility Determination**

Step 1. Is the individual between 16 and 24 years of age at the time of enrollment?		Yes	No
	If "yes," the individual MAY be eligible for services, continue to Step 2.		
	If "no," the individual is <b>not eligible</b> for out-of-school youth services under WIOA, do not continue to Step 2. Check to see if youth is available for in school youth services, which have a different age range.		
Step 2. Is the individual attending school*?		Yes	No
	If "yes," the individual is <b>not eligible</b> for out-of-school youth services under WIOA, do not continue to Step 3. Check to see if youth is available for in school youth services.		
	If "no," the individual MAY be eligible for services, continue to Step 3.		
<p>*Determinations of whether a youth is "in-school" come from applicable state law. ISY includes secondary and postsecondary institutions. WIOA regulations clarify that dropout re-engagement programs, Job Corps, YouthBuild, high school equivalency and WIOA Title II Adult Education are not "schools" for eligibility purposes, but high school equivalency programs funded by the public K-12 system are (20 CFR 681.230, 2018).</p>			
Step 3. Does the individual meet <i>one or more of the following conditions?</i>		Yes	No
	(i) school dropout		
	(ii) within age of compulsory attendance AND not attended for at least the most recent complete school year calendar quarter		
	(iii) hold a secondary diploma AND is low-income** AND is basic skills deficient OR an English language learner		
	(iv) involved in the juvenile or adult justice system		
	(v) homeless, foster care (including "aged-out" of foster care), Social Security Act Sec. 477 eligible ('Chafee Foster Care Program'), OR out-of-home placement		
	(vi) pregnant or parenting		
	(vii) individual with a disability***		
	(viii) low-income AND requiring additional assistance to enter or complete an educational program OR to secure/hold employment		
If "yes" to <i>one or more</i> of the conditions listed above, the individual is <b>eligible</b> for out-of-school youth services under WIOA.			

If "no" to <i>all of the conditions</i> listed above, the individual is <b>not eligible</b> for out-of-school youth services under WIOA.
<p>***"Low-income" means: (a) family income at or below 100% of poverty line or 70% lower living standard; (b) individual/family receives (within the past 6 months), TANF, SNAP, SSI, or other public assistance; (c) foster care or homeless; (d) eligible for FRPL; OR (e) lives in a high poverty census tract. Eligibility determinations will consider individuals with a disability as a "family of one" for income determination purposes if family income exceeds criteria and (a)-(e) do not apply.</p>
<p>***WIOA youth services utilize the definition of "disability" established by the ADA (42 U.S.C. § 12102) and Rehabilitation Act Section 504 (U.S.C. 34 § 104): individual with a physical or mental impairment that substantially limits one or more major life activities, record of such an impairment, OR regarded as having such an impairment. There is a different standard for VR service eligibility under the Rehabilitation Act and WIOA Title IV (see Table A-4). If a youth with a disability is not eligible or loses eligibility for the WIOA youth program, use the steps in Table A-5 to determine eligibility for adult VR services.</p>

### WIOA In-School Youth Eligibility Determination

"ISY" determinations have different age, income, and additional conditions. An ISY is a person between 14 and 21 years of age, who is currently attending school AND is low-income. Note that, whereas low-income status only applies to certain conditions for OSY determinations, for ISY it is required for eligibility. Additionally, to be eligible a person must meet

one or more additional conditions: (i) basic skills deficient, (ii) ELL, (iii) juvenile or adult justice involved, (iv) homeless or in foster care, (v) pregnant or parenting, (vi) individual with a disability, OR (vii) require additional assistance to enter or complete an educational program or to secure/hold employment.

Thus, eligibility determination for WIOA ISY follows the four-step eligibility determination in Table A3.

**TABLE A3**  
**Four-Step WIOA ISY Eligibility Determination**

Step 1. Is the individual between 14 and 21 years of age?*	Yes	No
	If "yes," the individual MAY be eligible for services, continue to Step 2.	
	If "no," the individual is <b>not eligible</b> for in-school youth services under WIOA, do not continue to Step 2.	
Step 2. Is the individual attending <i>any school</i> ?	Yes	No
	If "yes," the individual MAY be eligible for services, continue to Step 3.	
	If "no," the individual is <b>not eligible</b> for in-school youth services under WIOA, do not continue to Step 3.	

<b>Step 3. Is the individual "low-income,"** based on WIOA definitions?</b> ** (a) Family income at or below 100% of poverty line or 70% lower living standard; (b) recipient of TANF, SNAP, SSI, or other public assistance; (c) homeless or in foster care; (d) eligible for/receiving FRPL; OR (e) lives in high poverty census tract.		Yes	No
	If "yes," the individual MAY be eligible for services, continue to Step 4.		
	If "no," the individual is <b>not eligible</b> for in-school youth services under WIOA, do not continue to Step 4.		
<b>Step 4. Does the individual meet one or more of the following conditions?</b>		Yes	No
(i) basic skills deficient			
(ii) English language learner			
(iii) involved in the juvenile or adult justice system			
(iv) homeless, foster care (including 'aged-out' of foster care)			
(v) pregnant or parenting			
(vi) individual with a disability			
(vii) person who requires additional assistance to enter or complete an educational program or to secure and hold employment			
	If "yes" to <i>one or more</i> of the conditions listed above, the individual <b>is eligible</b> for in-school youth services under WIOA.		
	If "no" to <i>all of the conditions</i> listed above, the individual is <b>not eligible</b> for in-school youth services under WIOA.		
*There is one exception to age eligibility for ISY. Youth with disabilities who have an Individualized Education Program (IEP) may be eligible as ISY after the age of 21, <i>if their state allows youth with disabilities to be served in the K-12 public system beyond the age of 21</i> . In such cases, the individual may be eligible as an ISY up to the age allowed by state law for receiving secondary education services (Employment and Training Administration, 2017).			

## VR Transition Services Under Title IV of WIOA

In the alignment of state VR programs with other core programs of the workforce development system under WIOA, there was an emphasis on providing Pre-ETS to students with disabilities. The five required Pre-ETS include:

- job exploration counseling;
- work-based learning experiences, which may include in-school or after school opportunities, experiences outside of the traditional school setting, and/or internships;
- counseling on opportunities for enrollment in comprehensive transition or postsecondary educational opportunities;
- workplace readiness training to develop social and independent living skills; and
- instruction in self-advocacy, including peer mentoring.

Changes authorized by WIOA mandate state VR agencies spend 15% of their grant award on providing Pre-ETS to students with disabilities and potentially eligible students with disabilities.

### **Who are “Students with Disabilities,” Broadly Defined?**

WIOA (2014) Title IV defines a student with a disability as an individual with a disability in a secondary, recognized postsecondary, or other recognized educational program who:

- is not younger than the age at which transition services must be provided to students with disabilities receiving special education or related services under section 614(d)(1)(A)(i)(VIII) of the Individuals with Disabilities Education Act (IDEA) (20 U.S.C. § 1414(d)(1)(A)(i)(VIII) (i.e., upon turning 16 years of age), unless the state elects a lower minimum age for receipt of Pre-Employment Transition Services (e.g., 14), and is not younger than that minimum age; and
- is not older than 21; unless the individual state law provides for a higher maximum age for receipt of services under the IDEA Act (20 U.S.C. § 1400 et seq.); and is not older than that maximum age (e.g., age 22, 26, or that age identified by the state); and
- is eligible for, and receiving, special education or related services under Part B of IDEA (20 U.S.C. § 1411 et seq.); or
- is an individual with a disability, for purposes of section 504 of the Rehabilitation Act, as amended.

Eligibility for VR services is the same regardless of whether the applicant is a student or youth with a disability. Attending school is not a requirement to apply for VR services;

however, to receive Pre-ETS as a student with a disability, the applicant must meet the definition of a “student” under Title IV. In some cases, a student in a postsecondary educational institution (e.g., a two- or four-year college, university, or career and technology program) may meet the definition of a student with a disability who may receive Pre-ETS from VR. The new requirements demonstrate a commitment to better prepare students with disabilities for reaching competitive integrated employment outcomes.

### **Documentation for Eligibility Purposes Under Title IV for VR**

When applying for VR services, it is important to gather as much documentation regarding the disability(ies) as possible to assist with the eligibility determination process. Such documentation for students or youth may include, but are not limited to: (1) an IEP, (2) results from psychological and other assessments, (3) medical records, (4) diagnoses or statements from physicians, psychiatrists, or psychologists, (5) school records (e.g., transcripts, discipline records, or test results), and (6) Social Security Administration records. VR counselors will take into consideration all records and documentation submitted with the application when determining eligibility. If records do not exist or are not sufficient to make a determination, the VR counselor may authorize for additional assessments to be conducted.

### **VR Services Eligibility Determination**

Eligibility determination for VR services follows a four-step process, detailed in Table A4.

**TABLE A4**

**Four-Step WIOA Title IV and Rehabilitation Act Eligibility Determination**

Step 1. Does the individual have a documented physical or mental impairment*?		Yes	No
	If "yes," the individual MAY be eligible for services; continue to Step 2.		
	If "no," the individual is <b>not eligible</b> for VR services.		
Step 2. Does the impairment constitute or result in a substantial impediment to employment?		Yes	No
	If "yes," the individual MAY be eligible for services; continue to Step 3.		
	If "no," the individual is <b>not eligible</b> for VR services.		
Step 3. Does the individual need VR services to successfully achieve a competitive integrated employment outcome?***		Yes	No
	If "yes," the individual MAY be eligible for VR services		
	If "no," the individual is <b>not eligible</b> for VR services.		
Step 4. Can the individual "benefit" from VR services to successfully achieve a competitive integrated employment outcome?		Yes	No
	If "yes," the individual MAY be eligible for VR services		
	If "no," the individual is <b>not eligible</b> for VR services.		
	If "no" to <i>all of the conditions</i> listed above, the individual is <b>not eligible</b> for VR services under WIOA.		
<p>*The definition of a disability for VR services is based on the Americans with Disabilities Act, which includes (1) a documented physical or mental impairment, (2) that substantially limits one or more major life activities, and (3) the individual is regarded as having the impairment. For students and youth, this not only refers to students who receive special education and related services under an Individualized Education Program (IEP) but also to students who receive services under a Section 504 Accommodations Plan or who have other documented disabilities (e.g., depression, deafness, diabetes, or sickle cell).</p>			
<p>**In order to demonstrate that a person can 'benefit' from VR services, eligibility determinations will consider whether the individual needs services in order to prepare for, enter, engage in, or retain employment.</p>			
<p>***WIOA amended the Rehabilitation Act to update the definition of 'employment outcomes' from "gainful employment" to "competitive integrated employment."</p>			

## Implications of Order of Selection

Once eligibility is determined, the VR counselor will identify severity of disability and assign the applicant to a specific category or group (i.e., priority group) to assist with receipt of services. For example, in some states, they may implement an Order of Selection Policy which provides an explanation justifying the order in which eligible individuals will be served, as allowed by The Rehabilitation Act of 1973, as amended by WIOA (2014). Order of Selection is generally enacted when the VR agency cannot provide services to all eligible individuals (often due to budgetary, staffing, or other issues). Not all states implement such a policy, and, for those that do, the process varies, so it is critical to contact your state's VR agency to find out their policies and processes.

Order of Selection ensures priority is given to individuals with the most significant disabilities. Individuals are placed in the highest priority category for which they qualify. Upon determination of eligibility, the VR agency will inform the applicant of the priority category for which they qualify. Under an Order of Selection, those individuals with the most significant disabilities (i.e., Priority Group or Category 1) shall be served first, followed by those with significant disabilities (i.e., Priority Group or Category 2), and lastly those with nonsignificant disabilities (i.e., Priority Group or Category 3). The determination is based on the individual's functional capacities, barriers to employment, the services needed to reduce the impact of disability-related limitations and the duration of the rehabilitation services required for the individual to achieve an employment outcome. Significance is not based on a specific diagnosis or disability. It is important to note that significance of disability may be amended at any time during the life of the case, provided additional documentation is submitted for consideration.

An individual with a most significant disability (i.e., Priority Group or Category 1) means an individual:

- who has one or more physical or mental disabilities, which cause substantial functional limitations;
- who has a severe physical or mental impairment which seriously limits three or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) impacting an employment outcome;
- whose vocational rehabilitation will require multiple VR services over an extended period of time.

An individual with a significant disability (i.e., Priority Group or Category 2) means an individual:

- who has one or more physical or mental disabilities, determined by an assessment of eligibility and vocational rehabilitation needs, which cause substantial functional limitations;
- who has a severe physical or mental impairment which seriously limits one or more functional capacities (such as mobility, communication, self-care, self-direction, interpersonal skills, work tolerance, or work skills) impacting an employment outcome;
- whose vocational rehabilitation will require multiple VR services over an extended period of time.

An individual with a disability (i.e., Priority Group or Category 3) means an individual:

- who has a physical or mental impairment which does not meet the criteria set forth in Categories 1 and 2;
- whose impairment constitutes or results in a substantial impediment to employment;
- who can benefit in terms of an employment outcome from the provision of VR services.

In the case a VR agency is under Order of Selection and cannot serve all eligible individuals,

the VR agency will place them in delayed status (i.e., a waiting list) until the priority group/category for which that client is eligible is open for services (Hager, 2004). There may be times when one of the priority groups is closed, two groups are closed, or all groups are closed. It is imperative potentially eligible individuals continue to apply for services regardless of Order of Selection status so their application can be placed in the queue for services.

While on delayed status, the VR agency will provide information and referral to additional resources that may assist the applicant until the time at which VR services may begin. When the group is open for services, the client will be notified by the VR counselor, and steps will be taken to work with the student/youth and family to identify services needed and to be included in the IPE. Individuals placed on delayed status may appeal the determination of the priority category placement.

## APPENDIX B. WIOA PROGRAM ELEMENTS

**TABLE B1**

### WIOA Program Elements, Descriptions, and Regulatory Information

#	Element	Description	Regulation(s)
1	Tutoring, study skills training, instruction, and dropout prevention services	<ul style="list-style-type: none"> <li>Provide academic support and identify concerns, develop strategies for overcoming learning obstacles. Supports should lead to secondary diploma, PSE credential, or attendance certificate (if person with a disability)</li> <li>Includes dropout prevention and engaged learning services/activities</li> </ul>	20 CFR § 681.460(a)(1)
2	Alternative secondary school or dropout recovery services	<ul style="list-style-type: none"> <li>Assist youth who have struggled in traditional secondary settings, for example, with basic education skills training, individualized instruction, or ESL training</li> <li>Dropout recovery includes credit recovery, counseling and educational planning</li> </ul>	20 CFR § 681.460 (a)(2)
3	Paid and unpaid work experience	<ul style="list-style-type: none"> <li>Planned structured learning experience in a workplace, providing youth career exploration and skills development</li> <li>Summer/school year employment opportunity; pre-apprenticeship; internship/job shadowing; on-job training. Must include academic/occupational education concurrently or sequentially with contextual learning</li> </ul>	20 CFR § 681.600; 20 CFR § 681.590(a)
4	Occupational skills training	<ul style="list-style-type: none"> <li>Organized program of study providing specific vocational skills leading to proficiency in performing tasks and technical functions</li> <li>Outcome-oriented training, focused on a specific occupational goal, and sufficient in duration to impart the needed skills</li> </ul>	20 CFR § 681.540; 20 CFR § 681.550
5	Education offered concurrently with workforce preparation and training for a specific occupation	<ul style="list-style-type: none"> <li>Integrated education and training model, with workforce preparation activities, basic academic and hands-on occupational skills training</li> <li>Provided concurrently and with connection to a specific occupation, occupational cluster, or career path</li> </ul>	20 CFR § 681.630

6	Leadership development opportunities	<ul style="list-style-type: none"> <li>• Opportunities that encourage responsibility, confidence, employability, and self-determination</li> <li>• Promote positive social behaviors, exposure to postsecondary options, community and service learning projects, peer mentoring; teamwork, decision making, citizenship, life skills, leadership and work behavior training/activities</li> </ul>	20 CFR § 681.520
7	Supportive services	<ul style="list-style-type: none"> <li>• Services that enable an individual to participate in WIOA activities, such as community service linkages, reasonable accommodations, transportation assistance, work and education assistance</li> <li>• Also child/dependent care, housing issues, needs-related payment, legal aid services, health care referrals</li> </ul>	20 CFR § 681.570
8	Adult mentoring	<ul style="list-style-type: none"> <li>• Minimum 12-month formal relationship between youth participant and adult mentor that includes structured activities, guidance, support, and encouragement to develop the competence and character</li> <li>• Group and online activities may supplement face-to-face mentor activities</li> </ul>	20 CFR § 681.490
9	Follow-up services	<ul style="list-style-type: none"> <li>• Provided after youth's exit from the program to help ensure success in employment and/or PSE and training (12-month follow-up requirement)</li> <li>• May include supportive services, adult mentoring, financial literacy education, labor market and employment information services, PSE transition and training activities, regular contact with an employer</li> </ul>	20 CFR § 681.580
10	Comprehensive guidance and counseling	<ul style="list-style-type: none"> <li>• Individualized counseling, including drug and alcohol abuse or mental health counseling, and referral to partner programs, as appropriate</li> <li>• Either directly or by referral. Local youth program must coordinate with the organization it refers to in order to ensure continuity of service</li> </ul>	20 CFR § 681.510
11	Financial literacy education	<ul style="list-style-type: none"> <li>• Range of possible activities, including support in creating budgets; starting checking/savings account; making informed financial decisions; understanding and managing credit reports/scores; managing spending, credit, and debt, etc.</li> <li>• Activities targeting specific financial literacy needs of non-English speakers and youth with disabilities (e.g., connecting to benefits planning)</li> </ul>	20 CFR § 681.500
12	Entrepreneurial skills training	<ul style="list-style-type: none"> <li>• Provides the basics of starting and running a small business, including training that develops entrepreneurship skills</li> <li>• May include education on the basics of starting and running a business, enterprise development supports/services, and experiential programs</li> </ul>	20 CFR § 681.560

13	Services that provide labor market information	<ul style="list-style-type: none"> <li>• 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”</li> <li>• WIOA Youth programs and providers should make themselves familiar with local/state/federal labor market information (LMI) data and tools</li> </ul>	20 CFR § 681.460 (a)(13);  20 CFR § 651.10
14	Postsecondary preparation and transition activities	<ul style="list-style-type: none"> <li>• Prepare ISY and OSY for advancement to PSE after attaining a high school diploma/equivalent</li> <li>• Services include exploring PSE options, standardized test prep (SAT/ACT); assistance with college applications, scholarships and financial aid, etc.</li> </ul>	20 CFR § 681.460(a)(14)

### APPENDIX C. A SUMMARY OF RESEARCH ON SERVING DISCONNECTED YOUTH

There were two important studies on out-of-school and other disconnected youth as early as the 1980s: the Committee on Economic Development’s *Children in Need* in 1987 and the W.T. Grant Foundation’s *The Forgotten Half* in 1988 (Committee for Economic Development, 1987; William T. Grant Foundation & Washington, DC. Commission on Work, Family, and Citizenship, 1988). The modern era of out-of-school literature and practice began in the mid-1990s, largely in response to the growing belief by some researchers and policy-makers, fed by an evaluation of programs funded by the Job Training Partnership Act (JTPA), that there were no effective solutions to the problems faced by disconnected youth.

To counter these arguments, advocates and researchers undertook focused efforts to identify effective practices which increased positive outcomes for high-risk youth and young adults. Examples include Public/Private Ventures’ reports on the importance of relationships with caring adults, beginning in 1995 with *Making a Difference: an Impact Study of Big Brothers/Big Sisters* (Grossman, Tierney, & Resch, 2000); the Sar Levitan Center’s 1997 *A Generation of Challenge*, which stressed the importance of connections to employers and work, as

well as access to support services (Sum, et al., 1997); and the American Youth Policy Forum’s 1997 *SOME Things DO Make Difference* (AYPF, 1997) which highlighted local programs demonstrating effective practices (e.g., high expectations, connections to the workplace, and youth leadership).

In a related effort beginning in 1996, the National Youth Employment Coalition brought together thought leaders and practitioners to develop a set of effective practices to promote quality programming for disconnected youth. This work led to the [Promising and Effective Practices Network \(PEPNet\)](#), which created standards for youth-serving organizations covering activities, management, youth development, workforce development, and evidence of success.

The efforts of advocates and practitioners contributed to the 1998 enactment of the Workforce Investment Act (WIA). An update to JTPA and the antecedent to WIOA, WIA required the provision of many of these emerging practices in its 10 required program design elements. The mid-2000s saw another spike in interest in disconnected youth, driven primarily by investments from national foundations.

- For example, in 2003 the Hewlett Foundation supported *Connected by 25: Improving the Life Chances of America's Most Vulnerable 14-24 Year-Olds*, which argued for more attention to youth and young adults who are high school dropouts, pregnant and/or parenting, or involved in the juvenile justice or foster care systems (Wald & Martinez, 2003).
- Grants to local communities in 2004 by the [Youth Transition Funders Group](#) (YTFG) helped to develop integrated community approaches to reconnect youth.
- Another seminal study from this period, the Youth Transition Funders Group's (2008) *Safe Passage* proposed a framework for reconnection, including system collaboration, the availability of high quality alternative education options, and knowledgeable adult advocates.
- Additionally, the Center for Law and Social Policy's 2006 publication, *Learning from the Youth Opportunity Experience* identified effective practices emerging from the federal investment in 36 communities through the Youth Opportunity Grant program: engaging and mobilizing community leadership, accessing resources from multiple systems, creating effective outreach strategies, and offering work experiences and internships (Harris, 2006).

More recently, the Obama administration's White House Council for Community Solutions produced several important products:

- *The Economic Value of Opportunity Youth*, which quantified the benefits of reconnecting young people (Belfield, Levin, & Rosen, 2012);
- *Connecting Youth and Business*, a toolkit for employers to assist in hiring youth and young adults (Gap Inc., 2012); and

- *Final Report: Community Solutions for Opportunity Youth*, which recommended developing cross-sector community collaboratives; establishing shared accountability; engaging youth as leaders in finding solutions; and building more robust on-ramps to employment (The White House Council for Community Solutions, 2012).

These products informed the [Performance Partnership Pilots](#) (P3), a federal program to help communities combine federal funding streams to facilitate youth reconnection.

In 2012, the Annie E. Casey Foundation's (2012) *Youth and Work* made a series of recommendations for stakeholders at all levels of government and all sectors, while FSG's *Collective Impact for Opportunity Youth* argued for the expansion of collective-impact strategies to address youth disconnection (Hanleybrown, Tallent, Steinberg, & Corcoran, 2012). In 2017, the National Fund for Workforce Solutions' *Connecting Young Adults to Skills and Jobs* described what is needed to adapt sectoral strategies for young people (Spangler & O'Sullivan, 2017).

An important look back at these and other findings from recent decades is the 2016 meta-analysis *What Works for Disconnected Young People: A Scan of the Evidence*, which found that successful programs often include paid work and the use of financial incentives; connections among education, training, and the job market; youth development approaches; and comprehensive support during and after the program (Treskon, 2016).

## APPENDIX D. NON-FEDERAL INSTITUTIONS CONNECTING YOUNG PEOPLE AGED 14-25 TO WORK

**TABLE D1**

### Services Provided by Non-Federal Institutions

Institutions/ Organizations	Type Of Services	Key Statistics
<b>State Chartered or Accredited</b>		
Secondary schools (including middle and high schools)	Secondary education, which may include career and technical education (CTE) or access to work experiences	In 2014-2015, there were 24,181 public secondary schools in the U.S. (U.S. Department of Education, National Center for Education Statistics, 2019b).
CTE Schools or Centers (may be located at high schools, stand-alone centers, or training-focused postsecondary institutions)	Preparation for specific trade and occupational areas, as well as for postsecondary education/training in related occupational fields	In 2009, 54.5% of high school graduates earned at least 3 CTE credits (U.S. Department of Education, National Center for Education Statistics, 2009).
Charter and Alternative High Schools	Varies by state law in terms of role and designation of purpose	There are over 6,900 charter schools in the U.S., enrolling an estimated 3.1 million students (National Alliance for Public Charter Schools, 2017).
Community Colleges	Industry-recognized credentials, two-year associate degree programs, specific continuing and adult education, opportunities to transfer to four-year institutions	There are 4,627 degree-granting postsecondary schools in the U.S., 1,616 of which are two-year institutions (U.S. Department of Education, National Center for Education Statistics, 2019b).
Four-Year Colleges and Universities	Four-year and graduate degree programs; occasionally also two-year programs	There are 4,627 degree-granting postsecondary schools in the U.S., 3,011 of which are four-year institutions (U.S. Department of Education, National Center for Education Statistics, 2019b).
<b>Local Non-Profit Organizations or Private-Sector Led Organizations</b>		
Community Rehabilitation Programs	Employment services for people with disabilities	2010-11 survey estimated that there are 5,408 community rehabilitation programs in the U.S. serving people with disabilities (Haines, Domin, & Butterworth, 2013).
Community- and Faith-Based Organizations	Employment or human services, such as recreation and youth development activities, may or may not be a part of a national network	In 2013, there were 293,103 registered public nonprofits in the U.S., of which human services — such as food banks, homeless shelters, youth services, and family or legal services — made up 104,002 of the total (35.5%) (McKeever, 2015).

<b>Federally Mandated Advisory and Governing Bodies</b>		
<b>State Workforce Development Boards (SWDB)</b>	Serve as state governing bodies for WIOA programs, and work to build and strengthen local workforce systems. Private sector representatives hold the majority of seats. May allocate up to 15% of a state's dollars (sometimes called the "governor's reserve") to special projects	There are 53 SWDBs for states and territories.
<b>Local Workforce Development Boards (LWDB or WDB)</b>	Serve as local governing bodies for WIOA programs, and work to build and strengthen local workforce systems. Private sector representatives hold the majority of seats. Local boards typically competitively procure WIOA youth services.	WDBs exist in every state and local area in the U.S. and its territories. There are 593 LWDBs (Organisation for Economic Co-operation and Development, 2006).
<b>State Council on Developmental Disabilities</b>	Governor appoints state board, which develops a state plan for services. Consumers and representatives of state agencies responsible for oversight of services make up the Council. The statewide services plan includes workforce preparation activities.	There are 56 Councils on Developmental Disabilities across the U.S. and its territories. Developmental Disabilities (DD) Councils receive federal funding to support programs that promote self-determination, integration, and inclusion for all people with developmental disabilities in the U.S. (National Association of Councils on Developmental Disabilities, 2019).
<b>State Rehabilitation Council</b>	Appointed by the governor, the State Rehabilitation Council reviews, analyzes, and advises state rehabilitation agency about goals and priorities, effectiveness, and customer satisfaction. Annual reports to the governor and the Commissioner required.	There are 80 State Rehabilitation Councils in the U.S. states and territories.
<b>Statewide Independent Living Council</b>	Appointed by the governor to develop, monitor, and evaluate state independent living plans	There are 55 statewide Independent Living Councils in the U.S. states and territories.

## APPENDIX E: FEDERAL PROGRAMS CONNECTING YOUNG PEOPLE AGED 14 TO 24 TO WORK

**TABLE E1**

### Federal Employment Programs for Young People

Authorizing Act	Type of Services; More Information	Ages And Eligibility	Key Statistics
<b>Department of Labor</b>			
Employment and Training Administration			
WIOA, Title I, Subtitle B, Chapter 1 (29 U.S.C. §§ 3151-3153)	<p><b>One-Stop Centers (American Job Centers; AJCs)</b> AJCs offer self-service job search, training and referrals, career counseling, job listings, and similar employment-related services.</p> <p><a href="https://www.careeronestop.org/LocalHelp/service-locator.aspx">https://www.careeronestop.org/LocalHelp/service-locator.aspx</a></p>	Universal service at AJCs for job search activities, and referrals to training activities. Those aged 18 to 24 may be co-enrolled as youth and adults.	More than <b>2,500 AJCs</b> , funded by the U.S. Department of Labor’s Employment and Training Administration, are located throughout the United States—this includes <b>1,477 comprehensive AJCs and 977 affiliate AJCs</b> .
WIOA, Title I, Subtitle B, Chapter 2 (29 U.S.C. §§ 3161 – 3164)	<p><b>Youth Service Programs</b> Each LWDB must ensure the availability of 14 required services, such as tutoring, skills training, paid work experience, and supportive services. Most services are competitively procured and delivered through community-based organizations. The federal government manages similar Migrant and Seasonal Farmworker and Native American programs.</p> <p><a href="https://ion.workforcegps.org/resources/2017/01/31/09/44/WIOA_Youth_Program_Elements">https://ion.workforcegps.org/resources/2017/01/31/09/44/WIOA_Youth_Program_Elements</a></p>	<p><u>For OSY:</u> Youth aged 16 to 24 who are not in school and have one or more barrier to employment (disability is one)</p> <p><u>For ISY:</u> Youth aged 14 to 21 who are attending school, are low-income, and face another barrier to employment (youth with disabilities are usually eligible due to the “family of one” provision)</p>	156,520 total participants in program year 2015, including 94,636 out-of-school youth and 61,903 in school youth <a href="https://www.doleta.gov/performance/results/AnnualReports/annual_report.cfm">https://www.doleta.gov/performance/results/AnnualReports/annual_report.cfm</a>

<p>WIOA, Title I, Subtitle C (29 U.S.C. §§ 3191 – 3212)</p>	<p><b>Residential Training</b> Job Corps is a federally administered program that provides academic and occupational training, usually in a residential setting. <a href="https://www.jobcorps.gov/questions">https://www.jobcorps.gov/questions</a></p>	<p>Youth aged 16 to 21 who are low-income and face a barrier to employment (youth with disabilities are usually eligible due to “family of one” provision)</p>	<p>There are <b>125 Job Corps Centers</b> nationwide, including at least one in every state, that train more than 50,000 students annually (Job Corps, 2014).</p>
<p>The Wagner-Peyser Act as amended by WIOA, Title III, Subtitle A (29 U.S.C. §§ 49, 491 – 492)</p>	<p><b>Employment Service Offices</b> The act created a system of public employment offices. Each office has listings of available jobs and provides assistance to job seekers. <a href="https://www.doleta.gov/programs/wagner_peyser.cfm">https://www.doleta.gov/programs/wagner_peyser.cfm</a></p>	<p>The Employment Service provides job search assistance, job referral, and placement assistance for job seekers.</p>	<p>Employment Services are part of all AJCs, but there are additional offices in each state—search DOL services by location at the following web address: <a href="https://www.dol.gov/general/location">https://www.dol.gov/general/location</a></p>
<p>United States Code, Title 38, Chapter 41 (38 U.S.C. § 41)</p>	<p><b>Disabled Veterans Readjustment Benefits</b> These benefits include job counseling, training, and job placement.</p>	<p>Disabled veterans who are entitled to compensation or were released from active duty due to a service-related disability; spouses of persons who were totally disabled or died of a service-connected disability; or spouses of any active duty member of the Armed Forces who is missing in action, captured by hostile forces, or detained by a foreign government in the line of duty.</p>	<p>Many AJC/Career One-Stop Centers have specialized local Veterans’ Employment Representatives and Disabled Veterans’ Outreach Program Specialists who provide education, training, retraining, employment placement, and follow-up services to <b>over one million veterans every year</b> (U.S. Department of Veteran Affairs, n.d.).</p>

WIOA, Section 171	<p><b>YouthBuild Program</b></p> <p>YouthBuild grants are available to public or private nonprofit agencies, public housing authorities, state and local governments, Indian tribes, or any organization eligible to provide education and employment training. Community-based organizations assist participants to learn housing construction job skills and to complete their high school education.</p>	Youth aged 16 to 24 who have a barrier to employment (a disability is included) and are not attending school.	There are <b>260 urban and rural YouthBuild programs</b> in 44 states—each year about 8,000 low-income young people who have left high school without a diploma enroll full-time in YouthBuild Programs (YouthBuild USA, 2019).
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**Department of Education**

Office of Special Education and Rehabilitative Services

Rehabilitation Act of 1973, Title I (29 U.S.C. §§ 720 – 751)	<p><b>VR State Grants</b></p> <p>State rehabilitation agencies responsible for statewide vocational rehabilitation programs. Services are provided to people with disabilities based on the Individualized Plan for Employment (IPE). Transition services for youth is an allowable activity.</p>	An individual must have a physical or mental impairment that results in a substantial impediment to employment; be able to benefit from receiving vocational rehabilitation services; AND require vocational rehabilitation services to prepare for, secure, retain or regain employment. Age not specified.	<p>There are <b>80 state VR agencies throughout the country</b> (32 combined, 24 general, 24 blind), almost one million individuals with disabilities received services from VR in 2016—see link below for a list of VR agencies by state: <a href="https://www2.ed.gov/programs/rsabvrs/resources/fy2016-vr-performance-chart.pdf">https://www2.ed.gov/programs/rsabvrs/resources/fy2016-vr-performance-chart.pdf</a></p> <p>State agency contacts are at the following web address: <a href="http://www.askearn.org/state-vocational-rehabilitation-agencies/">http://www.askearn.org/state-vocational-rehabilitation-agencies/</a></p>
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<p>Rehabilitation Act of 1973, as amended, Title VII, Chapter 1, Part B (29 U.S.C. § 796e)</p>	<p><b>Independent Living Centers</b> Independent Living Centers help people with disabilities maximize opportunities to live independently in the community. Centers can provide employment related support to individuals but actual training or education is typically not provided.</p>	<p>Centers set their own age requirements.</p>	<p>In the United States, there are <b>403 Centers for Independent Living and 330 branch offices</b> (National Council on Independent Living, 2019).</p>
<p>Rehabilitation Act of 1973, as amended, Title VI, Part B (29 U.S.C. § 795)</p>	<p><b>Supported Employment Programs</b> VR state agencies develop collaborative programs to provide supported employment services for individuals with the most significant disabilities.</p>	<p>Individuals with most significant disabilities, age not specified, including transition services for students and youth. The regulations encourage agencies to work with students as early as possible.</p>	<p>All 80 state VR programs offer supported employment services for individuals with most significant disabilities.</p>
<p>Individuals with Disabilities Education Act (IDEA) 1997, Part B (20 U.S.C. §§ 1411 – 1419) and Part D, Subpart 1 (20 U.S.C. §§ 1451 – 1456) authorizes Program Improvement to states.</p>	<p><b>Individualized Education Programs (IEP)</b> Guaranteed right to free and appropriate education. IEPs are individualized plans to provide education for a young person including transition from school to positive adult outcomes.</p>	<p>Individuals are eligible for education services up to the age of 18 or through the age of 21 at the discretion of the state Transitioning planning can begin at age 14 but must occur by age 16.</p>	<p>Approximately <b>395,000 students ages 14–21</b> who received IDEA services exited school in 2014–15: 69% received a regular high school diploma, 18% dropped out, and 11% received an alternative certificate (U.S. Department of Education, National Center for Education Statistics, 2019a).</p>
<p>Office of Career, Technical, and Adult Education</p>			
<p>Strengthening Career and Technical Education for the 21<sup>st</sup> Century Act of 2018</p>	<p><b>CTE Programs</b> Funds can be used for a broad range of programs, services, and activities designed to improve career–technical education programs and ensure access to students who are members of populations with special needs.</p>	<p>Individuals in secondary and postsecondary schools. Age not specified but generally geared toward high school and community college.</p>	<p>In 2009, 54.5% of high school graduates earned at least 3 CTE credits (U.S. Department of Education, National Center for Education Statistics, 2009).</p>

WIOA, Title II (29 U.S.C. §§ 3101 – 3333)	<b>Adult Education and Family Literacy Programs</b> Provides basic education opportunities.	Over the age of 16, not currently enrolled in school, who lack a high school diploma or the basic skills to function effectively as parents, workers, and citizens.	In program year 2016, 2,136 organizations provided services supported by WIOA Title II, reaching 437,972 16-to 24-year-olds. (Social Policy Research Associates <a href="https://www.doleta.gov/performance/results/WIASRD/PY2015/PY2015-WIOA-Trends.pdf">https://www.doleta.gov/performance/results/WIASRD/PY2015/PY2015-WIOA-Trends.pdf</a> )
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**Department of Agriculture**

Supplemental Nutrition Assistance Program Education and Training Programs, Food and Nutrition Act (7 U.S.C. § 2015(d) (4) and 7 U.S.C. § 2015(o))	<b>Supplemental Nutrition Assistance Program Education and Training Program (SNAP E&amp;T)</b> Each state must administer a statewide education and training program for SNAP-eligible individuals. States have wide discretion in designing these programs.	An individual must be a member of a household receiving supplemental nutrition assistance benefits	About <b><u>629,000 people participated in E&amp;T programs in FY 2013</u></b> (47 million people received SNAP benefits (Rowe, Brown, & Estes, 2017).
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**Social Security Administration**

Ticket to Work and Work Incentives Improvement Act of 1999	<b>Training for Social Security Disability Eligible Individuals</b> Establishes approved providers called Employment Networks (ENs). ENs can fund vocational rehabilitation, employment, or support services to help an individual go to work.	An individual must be receiving Social Security Disability Insurance (SSDI) or Supplemental Security Income (SSI) and must have a disability for which medical improvement is not expected or possible; the individual must live in a state where Tickets are available.	In 2014, SSA had 666 ENs certified to provide employment services for ticket holders in all 50 states and D.C.—of the approximately 13.6 million active tickets at that time, 319,972 (2.4%) were “in-use,” or assigned to an EN or state VR agency (Congressional Research Service, 2014).
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<b>Department of Health and Human Services</b>			
Administration for Children and Families			
<p>Personal Responsibility and Work Opportunity Reconciliation Act, Title I (Temporary Assistance for Needy Families [TANF]) (42 U.S.C. § 601 et seq.)</p>	<p><b>Temporary Assistance for Needy Families Education and Training Programs</b></p> <p>Provides assistance and work opportunities to needy families by granting states the federal funds and flexibility to develop and implement their own welfare programs.</p> <p>Work activities can include education and training, work experiences, and job search.</p>	<p>TANF serves needy families; income and asset limitations vary by state; some assistance can only go to families with minor children. TANF regulations define minor child as an individual who has not attained 18 years of age or has not attained 19 years of age and is a full-time student in a secondary school (or equivalent level of vocational or technical training).</p>	<p>In calendar year 2017, a monthly average of 1.1 million families received TANF benefits, including 1.9 million children. (Congressional Research Service <a href="https://fas.org/sgp/crs/misc/RL32760.pdf">https://fas.org/sgp/crs/misc/RL32760.pdf</a>)</p>
<p>Foster Care Independence Act of 1999 which enacted the John H. Chafee Foster Care Independence Program</p>	<p><b>Support to Targeted Populations</b></p> <p>States assist youth in successful transition to adulthood. Activities and programs include help with education, employment, financial management, housing, emotional support and assured connections to caring adults for older youth in foster care as well as youth who have aged out of the foster care.</p>	<p>State can serve youth who are likely to remain in foster care and those who have aged out of foster care up to 21 years of age. Older youth (18 to 21) can receive housing assistance if needed.</p>	<p><b>More than 23,000 youth age out</b> of the U.S. foster care system each year (National Foster Youth Institute, 2017).</p>
<p>Community Action Agencies (Title I of the Housing and Community Development Act of 1974, as amended)</p>	<p><b>Community Service Block Grants</b></p> <p>Create, coordinate, and deliver a broad array of programs and services to assist individuals in securing and maintaining employment. Community action agencies provide linkages to job training, GED prep courses, and vocational education programs.</p>	<p>Programs and services are to low-income individuals.</p>	<p>State-administered local network composed of over 1,000 local agencies—predominantly community action agencies—serving approximately 15 million individuals per year. (Community Action Partnership <a href="https://communityactionpartnership.com/wp-content/uploads/2019/02/CAP-Report-2.26.19-revised MOBILE.pdf">https://communityactionpartnership.com/wp-content/uploads/2019/02/CAP-Report-2.26.19-revised MOBILE.pdf</a>)</p>

Substance Abuse and Mental Health Administration			
Public Health Service Act, as amended, Title V; Children’s Health Act of 2000	<b>Substance Abuse and Mental Health Services</b> Grants and cooperative agreements for substance abuse treatment, prevention and mental health needs of regional and national significance. Grants seek to expand the availability of effective substance abuse treatment and recovery services and to reduce the impact of alcohol and drug abuse.	States, communities, territories, Indian tribes, and tribal organizations are eligible.	Adolescents aged 12 to 17 are <b>identified as having rates of illicit drug use disorder</b> at rates of 4.7%, alcohol use disorder at rates of 4.2%, and cigarette dependence at rates of 2.8% (Centers for Disease Control and Prevention, 2019)
Public Health Service Act, Title V, Part E, Section 561, as amended (Public Law 102-321; 42 U.S.C. § 290ff.)	<b>Comprehensive Community Mental Health Services for Children with Serious Emotional Disturbances Program</b> Provides grants to states, communities, territories, Indian tribes, and tribal organizations for improvement/expansion of systems of care for children with serious emotional disturbances and their families.	Children with serious emotional disturbances and their families.	<b>Approximately 1 in 10 youth in the United States experience serious emotional disturbance</b> (SED) and are likely to require treatment or referral to appropriate mental health services (Williams, Scott, & Aarons, 2018).
<b>Center for Medicare and Medicaid Services</b>			
Title XIX of the Social Security Act (42 U.S.C. 1396 et seq.)	<b>Medicaid</b> Provides medical assistance	Individuals and families with low incomes and resources	In February 2018, 67.5 million people were enrolled in Medicaid (Centers for Medicare & Medicaid Services, 2019), and <b>over 10 million people qualified for Medicaid</b> on basis of disability (Medicaid and CHIP Payment and Access Commission, 2017).

<b>Department of Justice</b>			
Office of Juvenile Justice and Delinquency Prevention			
Juvenile Justice and Delinquency Prevention (JJDP) Act of 1974 (Pub. L. 93-415, 42 U.S.C. § 5601 et seq.) and subsequent amendments	<b>Services to Adjudicated Youth Grants</b> Funds collaborative, community delinquency prevention efforts; provide communities with funding and guiding framework for developing/implementing juvenile delinquency prevention plan.	States define the ages for juveniles.	The juvenile <b>arrest rate for youth ages 10-17</b> in 2016 was 2,553.6 per 100,000 (U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention, 2018); national estimates of the rate of <b>disability amongst incarcerated youth range from 40% to 70%</b> (Hagner, Malloy, Mazzone, & Cormier, 2008).
<b>Corporation for National and Community Service</b>			
National and Community Service Act of 1990 as amended (42 U.S.C. § 12501 et seq.)	<b>AmeriCorps (including AmeriCorps State and National, AmeriCorps National Civilian Conservation Corps, and AmeriCorps VISTA)</b> State and local programs that engage primarily young adults in full-time community service, training and educational activities.	Eligibility depends on source of funding and local decisions.	<b>Approximately 75,000 people participate in AmeriCorps</b> each year at 21,000 locations (Corporation for National & Community Service, 2018).

Note. **Green** designates mandatory one-stop partners under WIOA; these are top priorities for partnerships. **Blue** designates WIOA optional partners. **Orange** designates other potential partners.

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