Docket ID: **ED-2012-OVAE-0014**

Performance Partnership Response

July 31, 2012

The Institute for Educational Leadership (IEL) respectfully submits the following comments to the Office of Vocational and Adult Education, Department of Education regarding the Performance Partnership Pilots designed to improve outcomes for disconnected youth.

**Defining Disconnected Youth**

As the Administration develops this initiative, we strongly recommend broadening the definition of "disconnected youth" to include youth with disabilities to take into account the large proportion of disconnected youth who have identified and unidentified disabilities. The following statistics illustrated that youth with disabilities are disconnected youth:

- 26% of students with disabilities drop out of school before completing a high school credential and only 57% exit high school with a regular high school diploma (based on a 2008 Department of Education analysis of 2005-2006 school year data).[i]
- Youth with disabilities, ages 16 to 19, have an employment rate of only 10% compared to 25.9% among youth without disabilities in the same age group; Young adults, ages 20 to 24, with disabilities have an employment rate of 33.9% compared to 62.4% among those without disabilities in the same age group.[ii]
- On average across states, over one-third of youth in out-of-home juvenile justice placements receive special education services due to the existence of a disability and the percentage ranges from 9.1 to 77.5%.[iii]
- Youth with emotional disturbance (ED) comprise over 47.4% of students with disabilities in secure juvenile facilities, while within public schools they account for only about eight percent of students with disabilities.[iv]
- Youth with learning disabilities are overrepresented in the juvenile justice system, accounting for 38.6% of students with disabilities in these settings.[v]
- 47% of foster youth surveyed in one study reported having received special education services.[vi]
- Studies have found that between 13% and 62% of children entering foster care have developmental disabilities or delays.[vii]
- The Northwest Foster Care Alumni study of over 600 foster care alumni revealed that 54.4% had a mental health disorder.[viii]

As the RFI already acknowledges, the disconnected youth population is not homogenous and includes youth facing at least one and often multiple significant life challenges including living in poverty, experiencing homelessness, involvement in the juvenile justice system, involvement in the foster care system, teenage and/or single parenthood, mental and physical health challenges, substance abuse, and learning disabilities.

While the prevalence of learning and mental health disabilities among disconnected youth is acknowledged in the RFI, youth with disabilities should also be included as a part of the definition of "disconnected youth" for this initiative in order to ensure that the programs funded through this initiative are intentionally designed to be inclusive of and accessible to youth with disabilities and are held accountable for providing the same high quality services in integrated setting to this sub-group alongside their peers without disabilities.

**I. Effective or Promising Practices and Strategies**

**A. Common Framework for Youth Transition:** In order to increase the chances that disconnected youth will achieve positive employment, education, and independent living outcomes during the transition to adulthood, multiple institutions need to work collaboratively to provide youth with a comprehensive array of opportunities, supports, and services. In recognition that collaborating institutions and professionals need a common framework defining what opportunities, supports, and services all youth need for successful transition, the National Collaborative on Workforce and Disability for Youth (NCWD/Youth) developed the *Guideposts for Success*. Based on an extensive review of research, demonstration projects, and effective practices – including lessons from youth development, quality education, and workforce development programs – define what all youth, including youth with disabilities, need for successful transition to adulthood. All youth need:

- Access to high quality standards-based education regardless of the setting;
- Information about career options and exposure to the world of work;
- Opportunities to develop social, civic, and leadership skills;
- Strong connections to caring adults;
- Access to safe places to interact with their peers; and,
- Support services to allow them to become independent adults.

The Guideposts for Success national youth transition framework is organized into five areas: School-Based Preparatory Experiences; Career Preparation & Work-Based Learning Experiences; Youth Development & Leadership; Connecting Activities; and Family Involvement & Supports. For more specific guidance on what all youth need within these five areas, see the Guideposts for Success publication online at http://www.ncwd-youth.info/guideposts.

In addition, NCWD/Youth has developed youth sub-population specific Guideposts that identify additional needs of specific groups of disconnected youth including:

- youth in foster care *(*http://www.ncwd-youth.info/guideposts/foster-care*)*,
- youth in the juvenile corrections *(*http://www.ncwd-youth.info/guideposts/juvenile-justice*)*,
- youth with mental health needs *(*http://www.ncwd-youth.info/guideposts/mental-health*)*, and
- youth with learning disabilities *(*http://www.ncwd-youth.info/guideposts/learning-disabilities*)*.

The Performance Partnership Pilots should promote the use of a common framework, such as the Guideposts for Success, to guide the design and implementation of the pilots. Using such a framework will ensure that the partners take into consideration the comprehensive needs of all youth, including

unique needs of subpopulations, and guide their decisions about how to efficiently allocate available resources and coordinate services to provide a comprehensive intervention. The Guideposts can also support an infrastructure for defining and measuring common youth outcomes.

The Guideposts for Success have been used to inform federal and state policies and guide state and local coordination of youth services and systems. For example, Senate staff drafts of the Workforce Investment Act provisions for the vocational rehabilitation title include language about transition services based on the Guideposts and Congressman Harper based the content of the transition services for his TEAM Act legislation (HRs 602, 603, & 604) on the Guideposts. At the state level, the Guideposts were used by Florida Developmental Disabilities Council and its cross-system partners to create their Transition Strategic Plan, included within some states' (CA, MD, CO) WIA state plans for youth services, and incorporated into Colorado's state guidance for Career Technical Education.

NCWD/Youth has identified numerous programs and systems that are successfully implementing components of the Guideposts for Success from state-wide transition planning to specific components within local organizations. Many of these program and system examples, including any available evidence of effectiveness, are profiled in detail online at: http://www.ncwd-youth.info/innovative-strategies and others are highlighted in NCWD/Youth's various guides: Negotiating the Curves Toward Employment: A Guide About Youth Involved in the Foster Care System; Making the Right Turn: A Guide About Improving Transition Outcomes for Youth Involved in the Juvenile Corrections System; Tunnels and Cliffs: A Guide for Workforce Development Professionals and Policymakers serving Youth with Mental Health Needs; Transitioning Youth with Mental Health Needs to Meaningful Employment and Independent Living; and Charting the Course: Supporting the Career Development of Youth with Learning Disabilities.

**B. Universal Design:** Given that youth with disabilities are overrepresented in the disconnected youth population, it is necessary to ensure that any recommended effective strategies for improving outcomes for disconnected youth use a universal design approach. ***Universal Design*** attempts to create products and physical environments that are usable by all individuals to the greatest extent possible without the need for adaptation or specialized design.[ix] An example of universal design is curb cuts. Originally, these were designed for people using wheelchairs, however, now they are used by everyone: from a parent pushing a baby stroller to a shopper pushing a grocery cart.[x] ***Universal Design for Learning*** applies this user-friendly idea to the realm of education and curriculum design by acknowledging that all people, with and without disabilities, have unique learning needs. Universal Design for learning provides an opportunity to create flexible goals, methods, and materials that can meet the needs of diverse learners.[xi]

In short this means that systems, programs, materials, and services need to be welcoming, accessible to, and inclusive of people with various abilities and learning styles. Policies and practices should be adopted to improve programs, services, materials and physical environments so they benefit the greatest number of people, including people with disabilities, thereby enhancing systems', programs', and services' cost-effectiveness and quality. Universal Design at the beginning cuts down on adaptations and accommodations throughout the program. In addition, as many disabilities, such as learning disabilities and mental health needs, are non-apparent, this approach allows the most youth to have access to services and materials – even if their disability has not yet been disclosed or diagnosed.

**C. Career Exploration:** A critical area of transition for all youth is connecting to work experience and career information. Moreover, the key to improving outcomes for disconnected youth is to ensure that

education and career paths for youth with and without disabilities are the same and rooted in career exploration. As the Pathways to Prosperity: Meeting the Challenge of Preparing Young Americans for the 21st Century report states, not surprisingly, young people who have been in programs teaching them about "working life" and giving them soft skills as well as training and experience in a career area do better at finding jobs.[xii] As the report explains, workplaces "provide a good place to learn both hard skills on modern equipment and soft skills in terms of working with people in a real-world context." Any Performance Partnership Pilot design would need to include intentionally creating these vital career connections and work-based experiences for all youth.

## II. Public and Private Partnerships

Cross-system collaboration at both the state and local levels is critical to ensuring disconnected youth have access to the full range of opportunities, supports, and services tailored to their needs without having to navigate multiple systems and programs individually. It also allows agencies and service providers to maximize available expertise and to leverage diverse resources. The Performance Partnership Pilots should engage the widest possible array of youth serving agencies and providers including state and local education systems, including divisions of special education and career technical education; Workforce Investment Act youth and adult services; Vocational Rehabilitation Services agencies; Social Security agencies; child and adult mental health agencies; juvenile justice agencies and delinquency prevention programs; child welfare agencies; homeless and runaway youth programs; employers and industry representatives; and diverse community-based service providers that provide workforce preparation, education and training opportunities; youth development, leadership, and civic engagement opportunities; health and mental health services; disability-specific services; and support services such as housing, transportation, and child care.

In its selection of grantees, the Administration should give priority to proposed pilots that involve diverse partners and can demonstrate a track record of using inclusive service strategies that ensure all youth, including youth with disabilities, can access high-quality services in integrated settings. We have seen effective collaborations and positive results when SGAs mandate the inclusion of certain core partners across systems with the recommendation that additional partners from other systems serving the same population be included as the work is implemented.

## III. Outcomes, Data, and Evaluation Design

When focusing on youth outcomes, data, and evaluation for federal programs, policymakers should consider methods to incentivize programs to provide the most disconnected and hardest-to-serve populations with quality services. While performance targets are crucial for measuring success, rigidity in these targets leads youth-serving organizations and systems to only engage higher-performing individuals who have a greater likelihood of meeting outcome measures. This "creaming" leaves many youth without access to crucial services, especially youth with disabilities, youth with severe basic skill deficiencies, court-involved youth, homeless youth, and other more disconnected. Many of these youth won't finish high school, go on to postsecondary education, and obtain career-track or living wage employment. To better serve these youth, policymakers can re-examine the methods used to measure and assess youth success and incorporate interim measures and population-specific outcome goals.

As much as possible, policymakers and program administrators should consider assessments that ensure universal access and are usable by all youth, to the greatest extent possible, without adaptation or specialized design. Still, not all assessments work for all youth. Individuals with significant cognitive or

emotional disabilities should not be assessed the same way as youth without these disabilities. Assessments should be valid, reliable, culturally appropriate, and be understandable by the individual being assessed. Youth should continue to be measured for the ability to successfully transition into adulthood, in how they are ready to pursue postsecondary education and advanced training, and their ability to enter and remain in career-track employment. But this is not a full measure of success. We need to measure youth's strengths beyond reading and math. Youth should be measured against all five areas of youth development as outlined by the Forum for Youth Investment's commonly accepted youth development framework. In other words, in addition to Academic Learning and Working, youth should be assessed at their development in Connecting (building relationships, navigating the community, accessing resources), Thriving (making positive choices for physical and emotional health), and Leading (self-advocating, being involved in the community, setting and achieving goals).

IEL believes in high expectations for all youth. But it is not surprising that youth with one or more serious barrier to success do not meet performance measures at the same rate or in the same timeframe as youth without these barriers. For example, of older youth (ages 19 – 22) who were exited from Workforce Investment Act (WIA) services from October 2009 to September 2010, 64% of all youth had entered employment but only 59% of youth with disabilities and 57% of dropouts entered employment. Similarly, from April 2010 to March 2011, 70% of younger youth (ages 14 – 18) attained a diploma but only 62% of foster youth and 52% of young offenders earned a diploma (PY 2010 WIA Performance Measures for Demographic Service Groups, USDOL).

This performance gap for more disconnected youth populations does not necessarily indicate a lack of success or positive youth progress. These populations often have multiple barriers that make it difficult to achieve standard performance measures in the timeframe of most programs, but these youth are still making significant strides toward achieving programs' longer-term outcomes. To incentivize programs to serve harder-to-serve youth, policymakers can implement and give youth-serving organizations and systems credit for youth achieving quantifiable interim measures. The National Youth Employment Coalition has developed a variety of interim or "progress" measures aligned to the five areas of youth development mentioned above. For example, interim measures for youth placement in unsubsidized employment can include work readiness credential completion, placement in subsidized work experience, completion of service learning experience, and more.

Policymakers can further incentivize serving higher-needs youth by adjusting performance expectations for youth-serving organizations and systems that serve higher percentages of these youth. For example, if a program is expected to achieve a certain job placement rate and half of those it serves are youth from a specific disconnected population (which is placed in employment at a lower rate nationally in WIA), their performance expectations could be adjusted to a placement rate consistent with the lower national placement rate to acknowledge the challenge and barrier to success inherent with a given population.

## IV. Barriers

**A. Eligibility Alignment Across Systems:** One of the biggest barriers to working across systems is the varying ages, income eligibility, geographic, and other requirements for youth to be served under each funding stream. For example, WIA youth services divides youth into younger (14 – 18) and older youth (19 – 21) with different performance measures for each. WIA Job Corps services serve youth ages 16 – 24 and income and other barriers are part of the eligibility formula. The Job Corps upper age limit can be waived for youth with some disabilities. Many youth systems end at age 18 and others when the youth reaches age 22, which means a youth could simultaneously be a youth in

one system and an adult in another. The adult systems of education, mental health, Social Security, vocational rehabilitation, and workforce development often have different terminology, eligibility requirements, and service options than those of the corresponding youth systems. This disconnect can result in consequences such as termination of services and lost progress in transition planning. This disconnect also makes it difficult for systems to cooperate while both serving the same youth as they may have different times they can start and stop serving the youth as they age and different services they are able to provide depending on income and other eligibility criteria.

**B. Common Definitions:** Another barrier to serving youth across systems is the differing definitions of many basic terms, including disability, transition, and barrier. For example, youth with mental health needs (MHN) are referred to variously as *emotionally disturbed (ED), antisocial, psychiatrically disordered (PD), behaviorally disordered (BD), socially maladjusted, or emotionally and behaviorally disordered (EBD)*. In the mental health system, two broad and independent dimensions of mental health needs, internalizing and externalizing disorders, have been identified among children and youth. The public education system uses 13 disability categories defined by the Individuals with Disabilities Education Act (IDEA) to identify the students who need special education. The most visible label for youth with mental health needs in the public schools is emotional disturbance, which was previously known as serious emotional disturbance. It is important to note that this classification is based on a student's *inability to learn due to his or her mental health need*, not the mere presence of a mental health need. Since, public schools and mental health agencies use very different criteria to determine which youth are eligible for receiving special services, a youth who is classified as having a mental health need in school may not be defined as such by a mental health agency, and vice versa. It is critical that the correct disability label be used in order for the youth (1) to receive services from the public schools and/or the mental health system, and (2) to be referred from either of those two systems to the adult mental health system and related employment and career services. The correct disability label is the key to receiving transitional services from the schools and mental health agencies.

This definition of one specific disability is just one example of how multiple systems using multiple definitions can lead to misunderstandings and challenges in collaborating to serve the same youth. There are similar issues in the definition of what constitutes "transition" and a "barrier" to it. There are even differing definitions for what constitutes a "vulnerable", "at-risk" and/or "disconnected" youth. It is pretty difficult to work together to serve this youth when you cannot clearly define or identify who they are.

**C. Common Performance Measures:** Finally, all programs want to achieve results and successful outcomes for the youth they serve. In addition, many programs are funded based on achieving these outcomes. This becomes problematic when these results or success are identified as different outcomes or performance measures in different systems. While some systems get "credit" for gains in reading level or credentials, other systems only get placement when a youth is placed in a job or internship. This leaves little incentive for the latter systems to collaborate and serve "disconnected youth" who will not achieve the outcomes they need to report and show success. Although there should still be some specific program-related outcomes for each system, a set of common performance measures across systems would promote cross-system collaboration. Every system that could benefit a youth would be able to be brought to the table to create the best plan for that youth – while still achieving the performance measures that allow them to keep their doors open.

IEL appreciates this opportunity to support the US Department of Education as it seeks to improve outcomes for disconnected youth. Please feel free to contact us for any additional information or resources related to our comments.

---

[i] Planty, M., Hussar, W., Snyder, T., Provasnik, S., Kena, G., Dinkes, R., KewalRamani, A., & Kemp, J. (2008). *The Condition of Education 2008 (NCES 2008-031).* National Center for Education Statistics, Institute of Education Sciences, U.S. Department of Education. Washington, DC.

[ii] U.S. Department of Labor Bureau of Labor Statistics Current Population Survey (CPS), May 2012

[iii] Quinn, M. M., Rutherford, R. B., Leone, P. E., Osher, D. M., & Poirier, J. M. (2005). Youth with disabilities in juvenile corrections: A national survey. *Exceptional Children*, 71, 339-345.

[iv] Quinn et al, 2005

[v] Quinn et al, 2005

[vi] Courtney, M. E., Terao, S., & Bost, N. (2004). *Midwest Evaluation of the Adult Functioning of Former Foster Youth: Conditions of Youth Preparing to Leave State Care.* Chapin Hall Center for Children at the University of Chicago.

[vii] Zimmer M.H.& Panko L.M. Developmental Status and Service Use Among Children in the Child Welfare System: A National Survey. *Arch Pediatr Adolesc Med*. 2006;160(2):183-188.

[viii] Pecora, P., Kessler, R., Williams, J., O'Brien, K., Downs, A.C., English, D., et al. (2005). *Improving Foster Care — Findings from the Northwest Foster Care Alumni Study.* Seattle, WA: Casey Family Programs.

[ix] Timmons, J., Wills, J., Kemp, J. Basha, R., & Mooney, M. (2010). *Charting the course: Supporting the career development of youth with learning disabilities.* Washington, D.C.: National Collaborative on Workforce and Disability for Youth, Institute for Educational Leadership.

[x] CAST (2011). *Universal design for learning guidelines version 2.0.* Wakefield, MA: Author; Rose, D.H., & Meyer, A. (2006). *A practical reader in universal design for learning*. Cambridge, MA: Harvard Education Press.

[xi] Rose, D.H., Meyer, A., & Hitchcock, C. (2005). *The universally designed classroom: accessible curriculum and digital technologies.* Cambridge, MA: Harvard Education Press.

[xii] Symonds, W.C., Schwartz, R.B.,& Ferguson, R. (2011). *Pathways to Prosperity: Meeting the Challenge of Preparing Young Americans for the 21st Century.* Cambridge, MA: Harvard Graduate School of Education.