



**THE NEXT GENERATION:  
IMPROVING SCOPE and FOCUS of THE EDUCATION  
and WORKFORCE DEVELOPMENT SYSTEMS for ALL**

**STATEMENT OF  
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**BEFORE THE  
U.S. DEPARTMENT OF LABOR:  
EMPLOYMENT AND TRAINING ADMINISTRATION &  
OFFICE OF DISABILITY EMPLOYMENT POLICY**

**WORKFORCE INVESTMENT ACT - LISTENING SESSION  
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## Introduction

The National Collaborative on Workforce and Disability for Youth, (NCWD/Youth), the national Technical Assistance Center supported by ODEP, submits these observations and recommendations around improving the legislative framework for the Workforce Investment Act. NCWD/Youth has been in existence over eight years, serving as a technical assistance and resource center on issues related to improving transition outcomes for youth with disabilities. NCWD/Youth is housed within the Institute for Educational Leadership, a nonprofit organization, dedicated to building the capacity of individuals and organizations in education and related fields to work together - across policies, programs and sectors.

These recommendations reflect the opinions of the leadership at the NCWD/Youth. Our recommendations also reflect knowledge we have gained through our work with other youth-focused organizations, such as the Campaign for Youth, the National Youth Employment Coalition, the Collaboration to Promote Self-Determination, and the Consortium for Citizen with Disabilities. We have also worked closely with many subject experts across the workforce system, including individuals with expertise around specific populations such as youth involved with the foster care and juvenile justice systems.

The approach we take to our work is to focus on all youth, with a particular emphasis on youth with disabilities. One of our core beliefs is that strategies designed to improve transition outcomes for youth with disabilities ultimately benefit all youth, particularly as it relates to serving those youth who are most vulnerable and most in need.

One of the first activities the NCWD/Youth undertook was to assess the available evidence-based research about what all youth need to help ensure success in the labor market as adults. This is accompanied by the additional evidence of the extra supports youth with disabilities need. To organize our work, we identified five broad categories of preparation and vetted them through a broad-based set of stakeholders. The categories are: 1) School-Based Preparatory Experiences, 2) Career Preparation and Work-Based Learning Experiences, 3) Youth Development and Leadership, 4) Connecting Activities, and 5) Family Involvement and Supports. We are

witnessing an ever increasing use of the *Guideposts for Success*, including use by the Social Security Administration's multi-year demonstration projects to serve the most significantly disabled youth. A review of the recommendations from the networks noted above show the value of having an evidence-based framework to help guide actions across multiple levels. We commend it to you as a tool for your own work as you seek to substantially improve the youth sections of the next generation of workforce development legislation. It is a good check list.

An example of how the *Guideposts* framework has been used is when we conducted a multi-year case study of 6 WIB areas to document how youth with disabilities have been served by the "generic" workforce development system. The *Guideposts* have also been used during the development of Guides to assist practitioners serving youth in the juvenile justice and foster care systems and for the creation of two disability specific Guides focused on common disability types served by the One-Stop system, youth with mental health needs and youth with learning disabilities.

Finally the several youth focused demonstration projects sponsored by ODEP provided the NCWD/Youth with a rich information base that provides the structure for the recommendations that follow. This body of work leads us to our recommendations around the following five broad strategies for improving the WIA system. Within each of these strategies we outline some relevant findings and observations that are followed by our specific recommendations.

1. Mechanisms and incentives need to be within the WIA to increase *collaboration* across the key institutions charged with assisting youth in the initial preparation for the work if work is essential. In order to improve the labor market success of youth with disabilities we believe it is crucial to better integrate the various parts of the workforce development system, particularly the youth program activities sponsored through the WIA.
2. A substantial need exists to *strengthen and align the infrastructure* across all titles in the WIA and related legislation. This is also a collaboration issue but is separated out due to its importance. Some have called these the back-office functions.
3. The WIA needs to be designed and driven by use and expansion of *evidence-based research*. And a research agenda needs to be aggressively developed and pursued that

centers on the development of a world-class workforce development system that includes substantial attention to increasing the labor market participation of all vulnerable populations including persons with disabilities.

4. *Promoting continuous improvement* in the design and delivery of services should be a key goal for implementation in the new legislation. This means the accountability and performance measures must be revamped.

5. *Recognizing the dependence on knowledge and skills of the providers of services.*

Currently professional development is treated—at best—marginally and without strategic focus to improve the workforce development system of the nation.

The recommendations that follow recognize that at minimum four pieces of legislation need to be included in the development of an improved and most definitely coordinated infrastructure. All of the WIA current Titles should remain in the bill. The WIA reauthorization can provide the basis for connecting the dots in terms of setting forth goals, service strategies, and accountability and performance to PERKINS, IDEA and ESEA. Also attention should be given to TANF, the Higher Education Opportunity Act, as well as any legislation with the primary purpose to promote workforce development (e.g. Trade Adjustment, Sector-based training, or Second Chance, etc.).

## **Strategy 1      Collaboration**

### ***Findings/Observations***

- The framers of the WIA legislation over a decade ago should be recognized for having succeeded by providing the pathway that leads us here today. The overarching goal of WIA is: *To consolidate, coordinate, and improve employment, training, literacy, and vocational rehabilitation programs in the United States, and for other purposes.* Today some would think this a modest goal. It was not at the time. WIA represented the first effort to define what the workforce development system is but there is still more that must be done before we have a system.
- The “youth agenda” portions of WIA, in all the Titles, did not systematically promote coordination or reward collaboration between youth serving organizations.

- Most communities involved in the Youth Opportunity demonstrations, prior to their untimely end, were making significant progress to promote collaboration and provide an array of services to youth based on strategies similar to those highlighted in the Guideposts. The youth were responding to the holistic approach these demonstrations promoted.
- Several efforts over the past decade such as the ODEP funding youth R&D projects and the multi-agency Youth Vision Initiative with the active support of ETA have highlighted the advantages of cross agency goal setting, establishment of priorities, and sharing of resources with a focus on the importance of assisting youth prepare for the world of work.
- Because youth with disabilities are significantly over represented in the drop out statistics from schools, the adult education programs, the ranks of foster care, and the juvenile justice systems it is important that collaboration strategies include attention to the needs of this population.

### ***Recommendations***

1.1 In order to improve the initial workforce preparation of all youth it is recommended that a *Transition Plan* be developed as a part of the state workforce development plan.

- The plan should focus on an age range determined by the state but at a minimum address the needs of those 14 to 24 to promote collaboration across the multiple agencies involved with this age group.
- The plan should address but not limit:
  - the capacity to share data across systems to better serve youth;
  - integrated approaches to the delivery of basic skills, career exploration and preparation, work exposure and work experience; youth development, leadership, and mentoring opportunities; and
  - strong connection mechanisms to mental and physical health services, transportation, financial support, and housing assistance.
- The plan should include:
  - how the total population in this age group will be provided the opportunity to prepare for careers of their choice;

- coordinated actions to be taken by the state agencies to promote collaboration at the local level; and
- the involvement of State agencies, especially those responsible for foster care, juvenile justice, mental health, developmental disability organizations, conservation corps and other service organizations, and after school programs along with the workforce development agencies.

1.2 Incentives need to be developed to promote collaboration. One approach could be implemented without legislative changes and that would be for the federal government to always include in the scoring for discretionary programs bonus points for collaboration efforts. Another approach, which may require Congressional approval, is that performance “awards” be based on some formula that includes rewards for evidence of serving the most vulnerable populations and achieving progress measures (see Section 4 below.)

## **Strategy 2     Strengthen and Align the Infrastructure**

This is part two of the NCWD/Youth agenda. Coherence and logic is lacking regarding the financing of the infrastructure. Attention needs to be given to finding ways to improve the development and core products that are needed by all workforce development programs. The term infrastructure can have multiple meanings, it can be narrow and include shared rent and payment of utilities or it can be broader. We encourage you to think broadly to identify the range of products and services that cross boundaries of federal programs. Examples follow:

### ***Findings/ Observations***

Definition issues first: The use of common definitions promotes collaboration and understanding on the part of all stakeholders in the planning, design, delivery, and tracking progress in workforce development programs. Definitions for transition and transition services should be embedded in relevant federal legislation and regulation. Definitions should be consistent while allowing for program focus. A review of GAO studies centered on issues related to the use and impact of definitions across education and workforce development programs and disability services is in order prior to reauthorization.

## ***Recommendations***

The lack of a definition in a workforce development law for career guidance is highly problematic. Other definitions that will go far to help integrate youth with disabilities are recommended for inclusion in law. These include:

2.1 *Career Guidance*: Services and activities intended to assist individuals, of any age and at any point throughout their lives, to make educational, training and occupational choices and to manage their careers. Such services may be found in schools, universities and colleges, in training institutions, in public employment services, in the workplace, in the voluntary or community sector and in the private sector. The activities may take place on an individual or group basis, and may be face-to-face or at a distance. They include career information provisions, assessment tools, counseling interviews, career education programs, job search programs, and transition services. Source: the Organization of Economic Co-Operation and Development. Adapted from Career Guidance: A Handbook for Policy Makers: <http://www.oecd.org/dataoecd/53/53/34060761.pdf>

2.2 *Transition Services*: A coordinated set of activities for a student, designed within an outcome-oriented process, that promotes movement from school to post school activities, including postsecondary education, vocational training, integrated employment (including supported employment), continuing and adult education, adult services, independent living, or community participation. The coordinated set of activities shall be based upon the individual student's needs, taking into account the student's preferences and interests, and shall include instruction, community experiences, the development of employment and other post school adult living objectives including career exposure and work-based learning experiences, and, when appropriate, acquisition of daily living skills and functional vocational evaluation.

2.3 *Universal Design*: The design of environments, products, and communication practices, as well as the delivery of programs, services, and activities, to be usable by all people to the greatest extent possible without adaptation or specialized design.

2.4 *Universal Design for Learning*: A scientifically valid framework for guiding educational practice that—(A) provides flexibility in the ways information is presented, in the ways students respond or demonstrate knowledge and skills, and in the ways students are engaged; and,(B) reduces barriers in instruction, provides appropriate accommodations, supports, and challenges, and maintains high achievement expectations for all students, including students with disabilities and students who are limited English proficient.

2.5 *Universal Design for the Workforce Development System*: The design of environments, products, and communication practices as well as the delivery of programs, services, and activities to meet the needs of all customers of the workforce development system.

### ***Other Infrastructure Issues***

- In order to strengthen collaboration across multiple agencies it is important to improve the sharing of information that meets the needs of clients, service organizations, local governing bodies, multiple state agencies, as well federal overseers. Substantial investments need to be made to improve IT systems – akin to the efforts now underway to improve medical records. It is not in the self-interest of a single organization at the federal or state level to bear the full burden of development and maintenance of such systems.
- Developing standards and assessments for use by organizations to document progress and competency attainment for the awarding of certificates by any workforce development program regardless of the setting has value for all organizations.
- Providing career guidance information that is easily accessible in multiple settings and institutions is another shared value set of products.
- States need to be key actors in the development of all of the aforementioned infrastructure products and services.
- A suggested definition is in order: *Infrastructure* includes the processes that multiple stakeholders use in the design and delivery of services, managerial and accountability processes, training of personnel, utilization of human resources, IT, and other support systems such as the development of standards-based materials including assessments to promote continuous improvement to meet the needs of the primary clients/customers.

- The Federal legislation pattern of providing state set asides for administrative purposes is a well established approach and one that could be emulated to support a wide range of infrastructure tasks. There is historical precedence for this strategy through the CETA and JTPA funded support for State Occupational Information Coordinating Committees (SOICC) that had the task of improving occupational supply and demand information for use throughout the workforce development system—one of the first cross-cutting efforts to ensure wise use of scarce resources. The funds for the SOICC were not a part of capped set aside administrative category nor should they be for the infrastructure activities (see Accountability and Professional Development discussions as well). Such a charter could include many of the same functions of the NOICC/SOICC network as well as addressing data quality issues, assist in the development of common definitions, be a clearinghouse for industry recognized credentials that meet the needs of both Education and Labor funded programs, supporting development of distance learning, and assessment activities in the states.

### ***Recommendations***

- 2.6 It is recommended that conversations be pursued with key stakeholders about the feasibility and desirability of having a separate strand of funds to finance the infrastructure from that of service and administrative funds intended to directly support services. Such a demarcation recognizes multiple agencies need to support many of the infrastructure activities and it is difficult to mix funds attached to services specifically authorized in separate Titles of laws.
- 2.7 Whatever the results may be regarding, the financing structure of the state plans should include an explanation of what organizational arrangements were developed and how the state will address the development and implementation of the infrastructure to meet the needs of stakeholders within the state.
- Possible functions could include: data collection, analysis, dissemination, translation of credentials across systems, cross cutting professional development, and translation of evidence-based practices across systems.
  - Developing forms of interoperability and promotion of cross silo data analysis and more integrative analysis across programs is crucial. Documentation could be

required showing how the stakeholders were involved in the development as well as their “satisfaction” with the results, and some form of documentation about the use of the quality assurance tools developed to meet their needs is necessary.

### **Strategy 3     Research and Evaluation**

#### ***Observations and Findings***

- In order to ensure a world class workforce development system information is needed regarding what the most important service strategies are that should be included in workforce development programs (i.e., program design features). This includes information about the most effective approaches for providing such services based on such factors as age, stage of development, labor market experience, culture of individuals and other influences such as having a disability that may need an accommodation for the individual to be successful in the labor market.
- When preparing a Guide centered on meeting the needs of youth in foster care the following observation was made that sums up our experience in the search for promising and effective practices and evidence-based research:

“Although the workforce, education and social service systems professionals now have an astounding ability to describe the status of young people prior to their leaving state custody, and are intimately familiar with their poor outcomes, it is only recently that attention has shifted to articulating strategies necessary to help these youth avoid falling off the “transition cliff.” Over the past decade, substantial and much needed research has centered on describing the conditions and documenting the often devastating results of what happens to foster youth during and after their participation in the foster care system. Nonetheless, evidence-based research that can fully inform policy and practice remains sparse. It is clear that increased attention is still warranted for research and evaluation focusing on validating the most effective program interventions, with an emphasis on cross-system program strategies.”

- Our work suggests a need for the development of a strand of research centered on “youth voice” issues in the design of their own service strategies and a range of other youth development strategies
- Our research strongly suggests a need to determine the following: what are the most effective forms of workforce transitions (e.g., placement and retentions)? What services promotes optimal career readiness? How crucial skills are most effectively learned? What competencies are needed by staff to provide the career development services?
- Unfortunately our research shows that it is not possible to identify promising and effective practices for a core “foundation service” of any workforce development program – career guidance and counseling.
- Major organizations involved in researching and evaluating any initiatives, should include efforts to collect information on number of persons with disabilities as we found far too many “gold standard” studies that did not even include efforts to identify persons with disabilities.

### ***Recommendations***

- 3.1 There needs to be a national structure with the lead responsibility for R&D, (e.g. a Workforce Development Institute), something similar to the U.S. Department of Education’s Institute of Education Sciences. Its purview should address issues embedded in all Titles of the next generation of workforce development legislation.
- 3.2 An approach to set R&D priorities should include a systematic process to collect information from the field (practitioners) about what it they believe is needed to promote continuous improvement in order strengthen the links between research and practice.
- 3.3 There needs to be support of R&D efforts to develop and test different forms of progress measures in various institutional settings to assess the most efficacious ways measure progress of individual clients as well as identify the most effective tools to improve the overall system.
- 3.4 There is a need for a longitudinal study to show the impact (return on investment) of receiving services over time.

## Strategy 4 Accountability and Performance

### *Findings and Observations*

- Too many stakeholder groups' performance measures are considered punitive, "they generate a gotcha mentality," or folks in the field want to know "for what purpose is the data needed." Distrust and/or dislike exist. Yet, there was recognition of the value—not just the inevitably—of having accountability systems within the intergovernmental system.
- While the power of accountability systems are recognized, there is growing recognition the full benefit of the systems cannot be realized because the current narrow range of measurements used is inadequate to inform practitioners and policy makers alike about what are the most effective and efficient practices.
- The current performance measures create disincentives to serve those persons with the most barriers—especially youth and adults with disabilities—even though supporting individuals with the highest barriers is a core purpose of federal education and workforce development legislation.
- The current approaches impede rather than encourage collaboration across parts of the system due to incompatibilities embedded in legislation (e.g., confusing and variable definitions, incompatible and inefficient management information systems, and clashing performance criteria for different programs).

### *Recommendations*

- 4.1 The next generation of accountability systems need to be built based on constructing the capacity to promote collaboration among all stakeholders and continuous improvement throughout all levels of the system. The development of this next generation of accountability will require experimentation to test new measures and methods of collection so legislation should be written to guide but not dictate rigid indicators or measurements.
- Federal legislation should establish the general parameters of accountability system(s) with three prongs:
    - The first to identify the core issues that need to be addressed in an accountability system but not the precise measures (see below).

- The second to support the development of the platforms to meet the accountability needs of state and local governments, specific programs and direct service institutions/ providers and clients.
- The third prong would be to invest in the development of tools needed to measure effects (e.g., assessments).

4.2 Consideration should be given to charging the Federal Departments of Labor and Education to establish an advisory panel composed of representatives of key stakeholder groups and assessment and measurement experts to advise the Secretaries on the development of measures that document the progress of individuals as well as measures to judge the efficacy of individual programs and sub-systems.

4.3 The allowable activities in the various titles/programs in all the laws should be used to develop the check list for use in the development of measures and metrics for (a) individual client outcomes, (b) individual progress, (c) program design and system improvement; and, (d) informing professional development strategies; use of common definitions across all the various legislation should occur to the maximum extent possible (e.g., career guidance, self sufficiency, purpose and forms of assessments, professional development, etc.).

4.4 All reporting should be based on the use of common target population categories for reporting results (e.g., building upon the ESEA sub-populations base approach). In other words, if something is important to be considered an allowable activity it should be considered important enough to be addressed as a part of the contentious improvement agenda.

## **Strategy 5 Promote Professional Development**

### ***Findings/Observations***

- The professional competencies of the staff of workforce development organizations represents one of the most important, if not the most important, part of the infrastructure. The significant emphasis on the part of the federal government to support the development of highly qualified teachers is laudable and essential, yet nothing comparable exists for the

workforce development system. This lack of support may well be a major contributor to the nation's incapacity to ensure a world class workforce development system.

- Professional associations representing specific parts of the workforce development system have responded to the call from their members for professional development opportunities (e.g., school counselors, organizations servicing out of school youth and after school programs, One-Stop counselors, and vocational rehabilitation counselors) but their efforts are hampered by lack of fiscal support. A few states have passed legislation requiring professionals in some workforce development organizations to show evidence of competencies by passage of tests or acquisition of certificates but remain soloed. However there is paucity of information about both pre-service and in-service opportunities.

### ***Recommendations***

5.1 No national office is designated to focus on supporting professional development activities for persons in leadership, administrative, and front line provider positions within the workforce development system. This should be corrected.

5.2 A dedicated funding source should be included in the national accounts of the WIA for professional development, including for youth service professionals.

5.3 A base line study of the state of professional development should be conducted that includes analysis of both the pre-service and in-service sources of training including the content of the various curricula. The study should include an analysis of the supply and demand for workers in the field – broadly defined. Wide consultation with associations representing the different stakeholders should occur and a report to Congress should be made.

### **Allowable Activities**

### ***Findings and Observations***

A few additional comments that do not fit neatly into the five categories above but we urge you to consider the following when preparing legislative language.

- There is confusion within the field as to whether or not some parts of the workforce development system (e.g., One-Stops Centers) are to assist individuals to develop their career goals and pathways or if it is to focus on immediate and available on- job- training and job placement regardless of the individuals personal interests.
- There is a need for clarity about what is purpose of career development and guidance. International research, including rich contributions from the U.S., points to the value of having the goal centered on assisting the individual learning to manage their own career. This focus is not embedded in our workforce development legislation. Such an outcome would need to be based on a staged development process that moves an individual through the (a) acquisition of academic knowledge, (b) understanding about their personal career interest, (c) knowledge of skill requirements for specific career paths, and (d) a process that informs the individual about how to manage their own career development process. This staged process would allow government to identify relevant services that need to be incorporated in different components of the workforce development system (e.g., within schools, youth programs, adult programs, etc.).
- Assuming the legislation will support efforts to promote more success through postsecondary pathways to occupational credentials and good jobs, we would urge you to take lessons from a study we conducted: *Career-Focused Services for Students with Disabilities at Community Colleges*. It will provide rich lessons such as how to design the all important Support Structures to promote both secondary and postsecondary persistence and completion of credentials.
- Another area that should be referenced in the allowable activities centers on the “connecting” services role in the *Guideposts*. There has been a growing recognition that for many youth it is important to have support to help the youth move through the transition process and cross institutional boundaries on behalf of the youth. This point of contact may go by different names, such as “navigator,” “youth development specialist,” “education and career advocate,” and “connector.” This concept was first initiated by the ETA and the Social Security Administration that supported the disability navigator demonstrations in One-Stops. But we found foster care and juvenile justice programs cloning the concept. Professionals in the workforce, education, and social services arenas need to have formal linkages among

themselves that ensure common sense and convenient accessibility for young people in transition.

## **Final Notes**

It is important to note that more resources are needed. Just more money is not always a solution and as many of our recommendations are geared towards wiser uses of current resources. Yet by any measure of need, insufficient funding issue must be addressed. It is not possible to pretend to meet the needs of high-risk youth when the organizations charged with assisting them (e.g. youth development, youth workforce, literacy programs, vocational rehabilitation, and other disability specific programs for those with developmental delays) are all under funded, fragmented, and have funds to serve only a small portion of those in need.

On another point, we would hope that the Office of Disability Employment Policy is officially authorized in law.