

Performance Data and Youth with Disabilities

Introduction

This paper examines 2007 performance data under the Workforce Investment Act of 1998 (WIA) on youth with disabilities. WIA authorizes the national workforce development system that delivers services, which include employment and training services for adults, dislocated workers, and youth. Congress outlined the following six purposes for WIA youth services: (1) support in achieving academic and employment success; (2) ongoing mentoring opportunities; (3) opportunities for training; (4) continued supportive services; (5) incentives for recognition and achievement; and (6) opportunities for leadership development, decision-making, citizenship, and community service.

The governance structure of WIA involves six primary entities: (1) The United States Department of Labor (USDOL); (2) State Workforce Investment Boards (SWIBs) and Board Staff; (3) One-Stops; (4) Local Workforce Investment Boards (local WIBs); (5) Youth Councils; and (6) Providers.

USDOL's Employment and Training Administration (ETA) issues regulations on the implementation of WIA services, and authorizes funding for over 600 local WIBs nationwide. Local WIBs develop policy and provide oversight for their regions' local workforce delivery system. Local WIBs are composed of approximately 45 representatives from businesses, local educational entities, labor organizations, community based organizations (CBOs), economic development agencies, and One-Stop partners.

States and their local WIBs are required to track the expenditures of funds, participants' characteristics, and performance outcomes. WIA contains a series of performance measures that are intended to gauge the success of their efforts. USDOL ETA negotiates with states to establish statewide levels of performance. In turn, states negotiate with their local WIBS to establish levels of performance for their regions. Incentives are provided to encourage states to meet their performance goals. If states do not meet their performance goals for two years or more, sanctions are imposed and technical assistance is offered.

Measuring the Performance of Youth

WIA contains separate performance measures for youth and adult programs. Youth's performance can be measured by using either the current performance measures or common performance measures that states must obtain a waiver to use. There are seven separate youth performance measures that are broken out into two categories – younger youth (up to age 18) and older youth (age 18 and older). The current **performance measures** are:

Younger Youth: Attainment of a Diploma or Equivalent; Skill Attainment; and Placement Retention into Post-Secondary Education or Employment

Older Youth: Attainment of a Credential (including high school diploma or equivalent); Placement into Employment or Post-Secondary Education; Placement Retention; and Earnings Gains

ETA has issued a Training and Employment Guidance Letter (TEGL) 17-05 that defines each of these performance measures which can be found at http://wdr.doleta.gov/directives/attach/TEGL17-05_AttachD.pdf.

Several years ago, ETA along with other federal agencies participated in an Office of Management and Budget (OMB) led initiative to develop “common measures” that were intended to simplify and standardized the performance measures used by the various programs across agencies. For example, three measures were established that apply to all youth programs, regardless of the age of the youth. The **common measures** are:

- Placement in Employment and Education
- Attainment of a Degree or a recognized Credential
- Literacy and Numeracy Gains

ETA, in concert with OMB and other federal agencies, developed definitions for each of these measures. One notable change, however, from the WIA measures is that the Literacy and Numeracy Gains measure applies only to out-of-school youth, leaving no measure of skill attainment for in-school youth. Because these new common measures are substantially different from the existing WIA measures, ETA could not require states to use these new measures for their youth programming. Instead, states were encouraged to seek waivers to allow them to use the new measures instead of the existing WIA measures. Over half of the states have adopted the common measures.

States report the data that are needed to compute the performance measures on a quarterly basis. Once a year, they report data on individual participants that have “exited” WIA programs. ETA has defined an “exiter” as an individual who has completed the services provided or who has not participated in any program activities for the prior three months. ETA publishes annual report data that include both state and national data. In addition, states compile annual reports that include data for local workforce areas. This paper uses data for program year (PY) 2007 (July 1, 2007 – June 30, 2008).

A National Picture of the Performance of Youth in WIBs

Nationwide, 13.76% of the youth served under WIA had reported disabilities. ETA’s published data include national results for PY 2007 WIA performance

measures and common measures. The WIA non-waiver performance measures data for youth are categorized by specific target groups, including youth with disabilities. The following tables display the available national results for each of the performance measures.

Table 1. National WIA Results for Youth under the Common Measures

Measure	Negotiated Performance Level	Actual Performance Level for All Youth	Actual Performance Level for Youth with Disabilities*
Placement in Employment or Education	61.6%	62.3%	61.4%
Attainment of Degree or Certificate Rated	47.8%	56.8%	59.1%
Literacy & Numeracy Gains	36.9%	30.4%	29.4%

*Source: PY 2007 WIASRD Data Book

Table 2. National WIA Results for Older Youth under the Performance Measures

Measure	Negotiated Performance Level	Actual Performance Level for All Youth	Actual Performance Level for Youth with Disabilities
Entered Employment	75.9%	77.5%	72.7%
Employment Retention	83.7%	85.2%	84.3%
Earnings Change	\$3,723	\$3,980	\$3,882
Credential Rate	56.8%	53.6%	53.3%

Table 3. National WIA for Younger Youth under the Performance Measures

Measure	Negotiated Performance Level	Actual Performance Level for All Youth	Actual Performance Level for Youth with Disabilities
Skill Attainment Rate	84.7%	86.1%	86.9%
Diploma or Equivalent Rate	66.5%	74.1%	80.0%
Retention Rate	68.8%	74.1%	70.1%

For the majority of measures, the averages for youth with disabilities are similar (1 to 6 percentage point difference) to the actual performance levels of the general population. As Table 2 demonstrates, older youth appear to be retaining employment at a rate of 84.3% compared to 85.2% in the general population. However, greater differences can be found in the earnings change. Older youth with disabilities have an earning change that is about \$100 less than the general population: \$3,980 and \$3,882 respectfully (see Table 2). Table 3 indicates that the performance averages for the younger youth measures are mostly equivalent or higher than the negotiated and actual levels of the general population. The one exception is the retention rate for youth with disabilities (70.1%) which is higher than the negotiated level (68.8%), but lower than the actual level of performance for all youth (74.1%).

The WIA youth performance measures data seem to suggest that there are few appreciable differences in the performance results achieved for youth with disabilities as compared to all youth. This seems contradictory to a commonly held view that serving youth with disabilities negatively impacts performance.

A Review of Performance Data of Local WIB's Serving Youth with Disabilities

The National Collaborative on Workforce and Disability for Youth decided to look deeper into this issue by selecting a sample of WIA areas to examine their individual performance data. The selected sample targeted those WIBs that served significantly higher numbers of youth with disabilities than average, but also had a large enough pool of exiters so that small numbers of youth would not skew the results.

The sample selected included WIBs in which at least 25% of the youth served had reported disabilities. In addition sites selected served at least 150 youth In PY 2007. This sample yielded 33 WIBs, for which data were available. Annual reports for several of the states that use the common measures, as opposed to the WIA performance measures, did not include a breakdown by WIB. Nonetheless, the 33 WIBs for which we did have data served a very significant percent of the youth with disabilities. These 33 WIBs served less than 10% of all youth served under WIA, but served over 35% of all the youth with disabilities served under WIA.

We looked at how these WIBs performed compared with the national average, as well as against their own negotiated levels of performance. This allowed us to determine if local sites that served a significant amount of youth with disabilities were able to meet their own negotiated performance levels and if they had outcomes that were comparable to the outcomes of all youth nationwide.

Review of Waiver Common Measures Results for Local WIBs Serving High Numbers of Students with Disabilities

Table 4 shows how many of the 9 local WIBs met or exceeded the national average for each of the measures. Eight of nine areas met the placement in employment or education and attainment of a degree or certificate measures and six of nine met the literacy and numeracy gains measures. (See attachment 2 for comparison of each of the local WIBs performance to their negotiated levels.)

When compared to national averages, the performance results are similar. (See attachment 3 for comparison of each of WIBs' performance to national averages.)

Table 4. Comparison of Local WIBS Using Waiver Common Measures to National Averages (n=9)

Measure	Number of WIBS Meeting Negotiated Performance Level	Number of WIBs Meeting or Exceeding National Average
Placement in Employment or Education	8	5
Attainment of a Degree or Certificate	8	5
Literacy and Numeracy Gains	6	7

Table 5 shows sites that exceeded the national performance averages and met all of their negotiated performance levels. Erie County met all of its negotiated performance levels and achieved the national average on two of the three performance measures. For the third performance measure, it was less than two percent below the national average thus for the purposes of this analysis it was included as a site that met all negotiated performance levels. The four sites along with the percent of youth with disabilities that they served are as follows:

Table 5. Local WIBs that Met All Negotiated Performance Levels Using the Common Measures

WIB	Percent youth with disabilities
Idaho Balance of State*	27.5%
Erie County, NY	47.8%
Onodago County, NY	37.5%
WIA area 6, Ohio, Stark & Tuscarawas	52.6%

Review of Waiver Performance Measures Results for Local WIBs Serving High Numbers of Students with Disabilities

Among the sites for which we had data, few of the 24 local WIBs using the WIA performance measures met all of their negotiated performance measures under WIA. However, many WIBs that used performance measures did meet or exceed the national performance averages for each of the measures. Tables 6 and 7 indicate how many of the 24 local WIBs met or exceeded the national averages for each of the performance measures (See attachment 5 to see each local WIB’s performance measures compared to the national averages).

Table 6. Comparison of Younger Youth Performance Measures to National Averages (n=24)

Measure	Number of WIBs Meeting Negotiated Performance Level	Number of WIBs Meeting or Exceeding National Average
Skill Attainment	14	10
Diploma or Equivalent Attainment Rate	19	16
Retention Rate	17	13

Table 7. Comparison of Older Youth Performance Measures to National Averages (n =24)

Measure	Number of WIBs Meeting Negotiated Performance Level	Number of WIBs Meeting or Exceeding National Average
Entered Employment	12	10
Employment Retention Rate	16	13
Earnings Change	18	12
Credential Rate	14	17

Table 8 shows the sites that met all of their negotiated levels of performance measures and also met or exceeded all of the national averages. Northwest Michigan met the national average for six of the seven measures, falling only

slightly below the earnings change national average; thus, it was included. These three local WIBs along with the percent of youth with disabilities that they served are listed in Table 8.

Table 8. Local WIBs that Met All Negotiated Levels of Performance Measures

WIB	Percent youth with disabilities
North and NW Cook County, Ill	68.6%
Northwest Mi. Council of Governments, MI	55.9%
Central MN Jobs and Training Service, MN	67.3%

Conclusions and Next Steps

Because this effort was only an initial exploratory analysis, we are unable to draw firm conclusions about the actual effect serving youth with disabilities has on performance outcomes of local WIBs. However, we can make some observations. The national data suggest that youth with disabilities have similar performance outcomes as youth without disabilities. In contrast, it does appear that many of the local WIBs that serve a large number of youth with disabilities do struggle with attaining the performance measures. Few meet their negotiated performance levels, for example, and across the board, many fall below the national averages for each of the measures.

This gives some credence to the commonly held view that serving large numbers of youth with disabilities adversely impacts performance. However, there are a number of notable exceptions; with seven of the 33 local WIBs met all of their negotiated levels of performance (see Tables 5 and 8). WIBs that used common measures meet their negotiated levels at a higher rate than the WIBs that used the performance measures. However, because our sample is small and data are missing for many of the WIBs, we must interpret these findings with great caution.

We do believe that the data suggests some further steps that ODEP should consider around this issue.

1. **Common Measures** -- WIA is likely to be reauthorized this year. One aspect of WIA that is clearly on the table is the performance measures. ODEP needs to be part of the policy debate as it has profound implications for serving youth with disabilities under WIA. We suggest that ODEP work with ETA to do the following: 1) Explore the feasibility of obtaining the performance data for the remaining WIBs using the common measures so that we can validate whether our

observation around youth with disabilities and these measures is correct; 2) Continue to work with ETA in providing input into the legislative proposal for the new measures under WIA and in implementing the measures that ultimately become part of WIA.

One related note is about the numeracy and literacy gains measure. Results for this measure, using either the national average or the average negotiated level, are very low for all youth. This raises questions about the measure itself and whether the measure or its definition properly assesses the services provided under WIA. We suggest that this measure be revisited before it is recommended to be incorporated in new WIA legislation.

2. Guidance to the States -- ETA might consider providing states with a detailed analysis that focuses on performance and youth with disabilities by local WIBs. Such an analysis may be useful to states and their local WIBs in negotiating levels of performance.

3. Case Studies -- ODEP should consider doing in depth case studies in the seven local WIBS that met all the negotiated levels of performance measures (see Tables 5 and 8), either under existing performance measures or under the common measures. These seven WIBS represent six different states. The purpose of these case studies would be to gain a better understanding of why these areas were so successful in meeting the measures and to highlight effective practices for other local WIBs to use.

4. Focus Groups -- ODEP in conjunction with ETA staff should consider holding focus groups with a number of the local WIBs that have struggled with attaining negotiated levels of performance measures. The purpose of these focus groups would be to gain a better understanding of the issues that these areas face so that ODEP and ETA can determine what kinds of technical assistance would be useful for all states and local WIBs in serving youth with disabilities.