

**PENNSYLVANIA'S YOUTH POLICY STATEMENT FOR  
TITLE I OF THE WORKFORCE INVESTMENT ACT OF 1998**

**Preamble**

Pennsylvania has the chance to define a new Commonwealth-wide strategy for workforce development under the Team Pennsylvania Human Resources Investment Council (HRIC). Moreover, under the direction of the HRIC, every region in Pennsylvania will have the chance to custom-design workforce development strategies that will ensure youth services are performance oriented, accountable, accessible and successful.

Under Pennsylvania's Unified Plan for Workforce Development, as well as the Federal Workforce Investment Act, Youth Councils are to be established by local Workforce Investment Boards working with local elected officials. These Youth Councils are to be responsible for developing and overseeing local youth workforce development programming. Youth Councils need to be innovative in their thinking and bold in their actions. They need to seek to change traditional approaches to education and workforce development by ensuring that youth services reflect local employment and workforce needs and opportunities.

The first priority of the Youth Councils should be to ensure as many of the WIA Title I eligible youth in their region as possible are served. Youth Councils will plan, develop, and oversee efforts related to the education and preparation of young people for successful careers and life-long learning. The Workforce Investment Act outlines the types of services that should be available. Youth Councils, however, should not feel mandated to limit their activities to eligible youth only. Working with local elected officials, the local Workforce Investment Board and providers of regional youth services, the activities of Youth Councils are limited only by their own imagination, energy, and resources. The range of activities and services to be provided is best determined at the local level.

**Background**

In keeping with Pennsylvania's Unified Plan for Workforce Investment (submitted on April 1, 1999 to the U.S. Department of Labor), and the Strategic State Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 and the Wagner-Peyser Act (submitted on April 15, 1999, and modified through an amendment submitted on June 28, 1999), Pennsylvania plans to coordinate youth activities funded under Title I of the Workforce Investment Act with other youth-directed State and local agencies. These agencies include local educational agencies, adult education agencies, county welfare offices, juvenile justice and local law enforcement agencies, local housing authorities, job corps centers/agencies, rehabilitation agencies and community-based organizations. This collaboration ensures the non-duplication of services and maximizes returns on financial investments and promotes effective and efficient delivery of high quality programs and services for youth.

As required by the Workforce Investment Act, local Workforce Investment Boards (WIBs) in partnership with local elected officials will establish Youth Councils as a subgroup within each local board responsible for the development and oversight of youth programs and policies within the local areas. Each Youth Council will be appointed within 60 days of the chartering of the Local Area's Workforce Investment Board. Beginning September 1999, the Commonwealth will provide orientation and technical support to Local WIBs and identified Youth Council members and partners regarding the state youth policies and vision set forth in Pennsylvania's Unified Plan.

Local WIBs will work with their Youth Councils to develop parts of the Comprehensive WIA plan that pertain to youth, recommend providers of youth services and coordinate local youth programs and initiatives. These Councils are intended to be an innovative new entity that will broaden

participation in the design and delivery and enhance the performance of youth services. Through Youth Councils, the federal legislation intends to help foster a systematic approach that offers youth a range of coordinated services. Such offerings could include opportunities for assistance in both academic and occupational learning, developing leadership skills; and preparing for further education, additional training and eventual employment.

### **Building Strong Youth Councils in Pennsylvania**

On September 10, 1999, this youth policy statement and a separate youth strategic technical support plan developed by the HRIC Workforce Education Committee and the WIA Youth Task Group, was presented to the full HRIC for its review and approval. A series of resource documents for local Workforce Investment Boards to use in the establishment and operation of Youth Councils in Pennsylvania is currently under development.

Under WIA, eligible youth are defined as low income individuals between ages 14 through 21, who can be characterized by one or more of the following: deficient in basic literacy skills, a school dropout, homeless, runaway or foster child, pregnant or parenting, an offender, or an individual who requires additional assistance to complete an educational program, or to secure and hold employment. Five percent (5%) of the total participant population assisted under Title I youth programs in each local area may be individuals who do not meet the minimum income criteria to be considered eligible youth if the individuals are in one or more of eight targeted groups. These targeted groups are individuals who are school dropouts, basic skills deficient, whose educational attainment is one or more grade levels below the grade level appropriate to the age of the individual, pregnant or parenting youth, individuals with disabilities, including learning disabilities, homeless or runaway youth, offenders, or youth who face other serious barriers to employment as identified by the local WIB. The priority of local WIBs and Youth Councils should be to ensure that as many of the WIA Title I eligible youth as possible are served in high quality programs within available resources.

Section 117 of the WIA outlines the role and responsibilities of the Youth Council. The Youth Council is responsible for:

- Developing portions of the local plan relating to eligible youth, as determined by the chairperson of the local board.
- Recommending eligible providers of youth activities, to be awarded grants or contracts on a competitive basis by the local board subject to the approval of local board.
- Conducting oversight with respect to the eligible providers of youth activities, in the local area, subject to the approval of the local board.
- Coordinating youth activities authorized under section 129 in the local area subject to the approval of the local board.
- Carrying out other duties determined to be appropriate by the chairperson of the local board.

The local board may delegate its responsibility for oversight of eligible youth providers, as well as other oversight responsibilities, to the Youth Council, recognizing the advantage of delegating such responsibilities to the Youth Council whose members have expertise in youth issues.

### **Focus on Improving Academic Performance**

The Workforce Investment Act strengthens the connection between academic excellence and success in the workplace. The Pennsylvania State Board of Education has adopted rigorous new standards in reading, writing, speaking, listening, and mathematics. Standards related to Science and Technology, Environmental and Ecology, and Civics and Government are pending. Additional

standards for health, safety and physical education, arts and humanities, family and consumer science, economics, geography, history, career education and work, and world languages will be developed in the future. These standards define what students should know and be able to do at specific grade levels.

The Pennsylvania state assessment instrument, and the development of the skills necessary to demonstrate proficiency on the state assessment is the keystone of the Commonwealth's statewide youth program service strategy. Local boards are encouraged to develop programs that assist youth in meeting the state academic standards and appropriate occupational skill standards as measured in the state system of occupational competency testing.

The Pennsylvania System of School Assessment (PSSA) is a mandated statewide assessment tool intended to gauge the ability of schools and their students to meet the academic standards at various curricular and instructional levels. Reading and mathematics assessments will be administered in grades 5, 8, and 11. Writing assessments will be administered in grades 6, 9, and 11. The administration of assessments is being phased in over the next several years.

Beginning in 2002 the PSSA will be administered annually to all public high school students in the 11<sup>th</sup> grade. The PSSA will identify the extent to which the students have achieved the state academic standards in reading, writing and mathematics. A local workforce investment board and its Youth Council may elect to use the results of the 11<sup>th</sup> grade PSSA to measure the academic achievement of WIA in-school youth. However, individual student PSSA scores and proficiency levels are not public information. Therefore, local workforce investment boards and Youth Councils will have to work collaboratively with local school officials, parents, and students to develop a process, if desired, to provide access to PSSA scores. If a local workforce investment board and its Youth Council agree to utilize other assessment instruments in addition to the PSSA, they may do so.

In September, 1996, the Pennsylvania State Board of Education approved the use of the National Occupational Testing Institute's (NOCTI) Job Ready/Student Assessment or other Pennsylvania Department of Education approved standardized tests that are recognized by industry groups or associations who employ the graduates of approved vocational-technical education programs. This approval is given to support the requirements of the federally mandated statewide system for core performance measures and standards under Perkins. All program completers are required to take the test. The results of these assessment instruments can be used to demonstrate occupational skill attainment.

In order to determine the extent of educational progress of WIA-eligible youth who are not enrolled in a secondary school, Youth Councils must adopt policies regarding how educational attainment will be measured. Currently, the Pennsylvania Department of Education requires all Title II funded adult education programs to meet established Adult Basic and Literacy Education Program Performance Standards. The standards include learning gains and attainment of educational credentials, as well as other areas of administrative and program performance. Use of specific portions of the Program Performance Standards pertaining to (1) learning gain and (2) attainment of the high school credential can be appropriately applied to WIA-eligible out-of-school youth. The learning gain standards allow local program providers to choose from a small menu of standardized instruments that are valid and reliable measures appropriately normed on an adult population. A trained professional must administer the assessment instruments within specified time frames. The standards also measure the attainment of a high school diploma or its equivalent, the GED. Use of these portions of the Adult Basic and Literacy Education Program Performance Standards will lend accountability for educational components of programs for out-of-school youth. Partnerships between out-of-school youth providers and adult education will allow access to assessment services, educational programming, assessment training, and data collection instruments. In addition, for out-of-school youth, local Youth Councils may choose to use the state system of occupational competency testing where occupation skill assessment is appropriate.

## **Youth Performance Measures**

Local WIBs, in collaboration with Youth Councils, will be responsible for meeting the specific performance standards negotiated with the Commonwealth and approved by the HRIC. The local WIBs and their Youth Councils will award contracts to local youth services providers based on the extent to which they provide services to youth to meet USDOL negotiated performance measures and the integration of the Commonwealth's academic standards and assessments and the state performance standards for Title I of the Carl Perkins Vocational and Applied Technology Education Act including occupational competency testing.

The WIA has identified core performance standards for youth served under Title I funding. These core standards for youth between the ages of 14 – 18 and 19 – 21 are:

- ages 14 – 18: (1) attainment of basic skills and, as appropriate, work readiness or occupational skills; (2) attainment of secondary school diploma or recognized equivalent; and (3) placement and retention in post-secondary education or advanced training, or placement in military service, employment or qualified apprenticeships.
- ages 19 – 21: (1) entry into unsubsidized employment; (2) retention in unsubsidized employment six months after entry; (3) earnings received in unsubsidized employment six months after entry; and (4) attainment of recognized credentials relating to achievement of education or occupational skills.

The Unified Plan contains some general performance criteria based on Malcolm Baldrige principles for Performance Excellence. These criteria will be coupled with the specific USDOL measures once they are available to form the basis of negotiations with the 22 local Workforce Investment Boards serving 23 Workforce Areas that have been established in Pennsylvania. More information about the statewide service strategy envisioned for Youth Services is contained under the "Services to Youth" section of the Strategic State Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 and the Wagner-Peyser Act.

The local area's negotiated performance measures will be used to evaluate local area's progress in meeting the needs of WIA Title I-eligible youth that receive WIA funded services. Local WIBs and Youth Councils should develop consensus of applicable performance measures across all local participating agencies and youth services providers.

The Strategic State Workforce Investment Plan for Title I of the Workforce Investment Act of 1998 and the Wagner-Peyser Act identifies customer satisfaction survey information provided by youth program participants and parents as an important factor in the final grant award determination. To insure fairness and consistency in the award of contracts to local youth program service providers, local WIBs and Youth Councils are required to develop written policies and procedures for advertising, evaluating, and awarding contracts. These local policies must be clearly described in the local area's Comprehensive WIA Plan.

Procurement policies and procedures currently used in JTPA may serve as the basis for the development of procurement policies and procedures under WIA. Local WIBs may also add youth providers to their eligible provider lists and utilize their individual training account process for youth age eighteen and older (in accordance with Section 664.510 of the Interim Final Rule).

As part of its oversight responsibilities, the Commonwealth will monitor the process to select youth program service providers for compliance with federal and state requirements.

### **Allowable Youth Activities and Practices**

In the development of local Youth program services, state partner agency staff, local workforce investment board members and board staff, and Local WIB Youth Council members are encouraged to utilize the resources of national organizations, federal and state government agencies, and local public and private organizations as sources for best practices modeling.

The Pennsylvania Department of Labor and Industry coordinates youth activities funded under Title I of the Workforce Investment Act with other youth-directed State and local agencies offering youth programs. This collaboration ensures the non-duplication of services and maximizes returns on financial investments. Eligibility issues and special-needs program issues are resolved and the coordinated delivery of services is facilitated with entities that include the local educational agencies, adult education agencies, county welfare offices, juvenile justice and local law enforcement agencies, local housing authorities, job corps centers/agencies, rehabilitation agencies and/or community-based organizations. Activities for pregnant and parenting youth are administered through welfare-funded programs in cooperation with partners. The Youth Councils are responsible for ensuring that services to Title I eligible youth at the local level are comprehensive and that services are coordinated with all participating state and local agencies offering youth programs.

Local youth program services will, at a minimum, entail the required youth program design, program elements and additional requirements in accordance with Section 129 of the Workforce Investment Act. The local elements and requirement for Youth programs require that the following be available to all youth within the local area:

- an objective assessment of the academic levels, skill levels, and service needs of each participant;
- development of a service strategy for each youth participant that shall identify employment goals, appropriate achievement objectives, and appropriate services for the participant taking into account the results of the objective assessment;
- preparation for postsecondary educational opportunities, in appropriate cases;
- strong linkages between academic and occupational learning;
- preparation for unsubsidized employment opportunities, in appropriate cases;
- effective connections to intermediaries with strong links to the job market, and local and regional employers;
- tutoring, study skills training, and instruction, leading to completion of secondary school, including dropout prevention strategies;
- alternative secondary school services, as appropriate;
- summer employment opportunities that are directly linked to academic and occupational learning;
- as appropriate, paid and unpaid work experiences, including internships and job shadowing;
- occupational skill training, as appropriate;
- leadership development opportunities, which may include community service and peer-centered activities encouraging responsibility and other positive social behaviors during non-school hours, as appropriate;
- supportive services;
- adult mentoring for the period of participation and a subsequent period, for a total of not less than 12 months, which may include inter-generational programs which use older individuals to act as mentors to youth for guidance and support to learn basic work skills;
- follow-up services for not less than 12 months after the completion of participation, as appropriate; and
- comprehensive guidance and counseling, which may include drug and alcohol abuse counseling and referral, as appropriate.

Local boards will provide, to as many WIA Title I-eligible youth as possible based on the available Title I resources, information on the full array of applicable or appropriate services, and referral to

appropriate training and educational programs. Applicants who do not meet the WIA Title I youth program eligibility requirements or who meet eligibility requirements but cannot be served due to resource availability, will be referred to other **CareerLink** partner programs and other youth programs in the local area for services. In addition to training needs, other supportive services including transportation, child care, dependent care, housing and needs related payments may be provided through **CareerLink** partners or other area youth providers.

All local Workforce Investment Board Youth programs, services and facilities for the provision of such will be in compliance with the Pennsylvania Human Relations Act and with Federal law, including Title VI and VII of the Civil Rights Act of 1964, Sections 502 and 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975 and the Americans with Disabilities Act of 1990. As part of the state's oversight role, compliance with these laws will be reviewed during monitoring visits.

### **Coordination with Job Corps**

There are four Job Corps centers in Pennsylvania: Drums, Philadelphia, Lopez, and Pittsburgh. The Job Corps contracts for purposes of recruitment, outreach and placement. Local Workforce Investment Boards serving areas where the four Job Corps Centers are located must include a Job Corps representative on the Youth Council. Local Workforce Investment Boards that serve areas where Job Corps Centers are not located, are encouraged to invite Job Corps representatives to serve on their Youth Council. Job Corps recruiters will be stationed at **CareerLink** sites. Additional services may also be provided through youth providers stationed in the **CareerLink** sites. In addition, **CareerLink** staff will work with Job Corps Business and Community Liaisons to coordinate services in accordance with Section 153 of the Workforce Investment Act.

### **Coordination with Youth Opportunity Grants**

Currently, in Pennsylvania, Harrisburg, Lock Haven, Philadelphia, Fayette County, Pittsburgh and parts of Allegheny county have enterprise communities and/or empowerment zones, and are eligible to submit proposals for Youth Opportunity Grants.

Under WIA, the Governor is authorized to designate additional communities to be eligible for Youth Opportunity grants. Designation will be made from the Keystone Opportunity Zones that meet the federal requirements for these grants. The State will provide guidance, technical assistance, economic data to local workforce investment boards and their Youth Councils in the preparation of proposals for Youth Opportunity Grants. The State will also provide educational data as available including dropout rates; local education agencies can also be consulted for appropriate local data.

State agency staff will work closely with local workforce investment board staff to co-locate Youth Opportunity Grant Centers either at the **CareerLink** sites or as a satellite of the **CareerLink** sites. Department of Labor and Industry staff will work closely with Youth Opportunity Grant Center staff to develop procedures for acquiring the necessary employment data that is needed to complete the required 24 month follow-up. State and local agencies will coordinate the grants with WIA and other federal, state, local and private sector resources to maximize dollars targeted for WIA Title I eligible youth residing in the enterprise zone/enterprise community. Supportive services will be provided under the Youth Opportunity Grants in order to assist youth in completing their educational programs, to promote the transition to employment, and to encourage long term job retention.

### **Pennsylvania's Youth Program Design Strategies**

The Commonwealth has developed the following guiding principles for youth program design strategies for local workforce investment boards and Youth Councils:

- Youth Councils should include a wide variety of organizations with expertise and resources to serve youth in the local area. The Comprehensive WIA Plan should describe the local area's

strategy to provide training and employment services for as many Title I WIA eligible youth as possible based on the availability of local resources and the development of a service network with other partners and community programs serving youth. This approach is more likely to yield positive results for both WIA Title I-eligible youth and for the broader youth population in the local area who are not eligible to receive WIA Title I services.

- The active involvement of private sector and foundation partners in the Youth Council can help sustain and nurture meaningful activities for area youth, with WIA and other public youth programs working collaboratively to augment these efforts and to support school-year interventions for in-school and out-of-school youth. Both the summer and year-round youth components of a local area plan should reflect program and service designs that have demonstrated effectiveness in preparing youth to assume productive roles in the workforce.
- Local workforce investment boards and Youth Councils should coordinate the delivery of youth services at the local level to ensure that all of the area's key players and programs for youth services are involved in the local *CareerLink* partnerships and youth program designs. The Comprehensive WIA plan should include a strategy that is built on program elements and allowable activities consistent with authorizing and funding statutes of each partner. The Comprehensive WIA plan should also reflect the priorities and goals of the various local youth program partners. For example, local performance measures for basic skills attainment can be developed to reflect progress on state assessments for in-school youth and related local efforts, an area of interest for all Pennsylvania school districts, thereby combining the efforts and outcomes of the WIA Title I program and the local educational programs administered through the local school districts.
- The **Team Pennsylvania CareerLink** system is Pennsylvania's delivery system for the Workforce Investment Act (WIA). There will be a minimum of one comprehensive *CareerLink* site in each local workforce investment area by January 1, 2000. Many local workforce investment areas will have multiple *CareerLink* sites. Through the local *CareerLink* sites, Pennsylvania's youth will be able to access a wide array of information designed to assist them in the transition from school to careers and lifelong learning experiences. The *CareerLink* system offers a framework to link academic and occupational learning and connections to the job market and employers.

In addition to the services available at the comprehensive *CareerLink* sites, youth will be able to access the Internet based virtual *CareerLink* site. The virtual *CareerLink* will enable students to access information from any computer and can be utilized by guidance counselors and teachers as well. Youth will have an opportunity to obtain information on careers as well as employment and training opportunities. For WIA Title I eligible in-school youth, the wide network of intensive and training services available through WIA Title I and other *CareerLink* partners will be closely coordinated with local school district programs/AVTS programs/services to maximize flexibility and opportunities for Pennsylvania's youth.

For out-of-school youth, the full array of *CareerLink* services is available. They will be able to receive a preliminary assessment of their skill levels, aptitudes, abilities, and support service needs to enter the workforce of the 21<sup>st</sup> Century. WIA eligible out-of school youth may participate in either youth or adult programs or both depending upon the decisions made in the development of their individual assessments.

Local workforce investment boards have the opportunity to develop innovative and creative programs to serve Pennsylvania's youth through the Workforce Investment Act. WIBs can access other available resources through partnering with grantees and other service providers eligible to receive funds through such programs as Wagner-Peyser, Carl Perkins, Adult Literacy and Welfare-to-Work. Such collaboration will enable Pennsylvania's youth to become productive members of Pennsylvania's workforce.

- Programming for WIA Title I-eligible youth should be framed within the economic development context of the local workforce investment area. Local youth program designs should include connections to employers and job markets. Local workforce investment boards and Youth Councils should develop policies and programs that take into account the full range of issues that can have an impact on the success of youth in the labor market.
- Youth Councils will develop a design framework that provides: (1) objective assessments of academic and occupational skill levels of participating youth, (2) individual service strategies that reflect the assessment and identify a career goal, and (3) preparation for post-secondary educational opportunities, linkages between academic and occupational learning, and connections to employers and job markets.
- Local boards and Youth Councils are strongly encouraged to think comprehensively and systematically about youth programs and services described under WIA, and to develop area youth plans that establish priorities that allow for as many eligible youth as possible based on available resources within the local area to receive services under WIA Title I. In this way, youth programming will be guided by the effective practices embodied in WIA program elements, and low-income students with multiple barriers to employment who are the focus of WIA funding will have access to the full range of education and career opportunities available within the local area.
- The HRIC further encourages local workforce investment boards to use “follow-up service” as an important feedback mechanism to gauge customer satisfaction and to improve program quality.

The Commonwealth encourages local workforce investment boards to develop strong Youth Councils with the full range of youth program responsibilities allowable under the Act.