#### MAY 2024

## YOUTH AND YOUNG ADULT DEVELOPMENT AND ECONOMIC OPPORTUNITY: A BLUEPRINT FOR A NEW FEDERAL SYSTEM



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# EXECUTIVE SUMMARY

Our current federal youth workforce development system, governed by the Workforce Innovation and Opportunity Act (WIOA), provides critical services for enrolled youth seeking education and work experience. At the same time, the system's inherent flaws often undermine the vital work that WIOA Youth programs carry out in our communities. The existing system's funding mechanism, governance structure, administrative requirements, and accountability measures severely limit its potential to create long-term positive change.

- Federal appropriations, which have always proved inconsistent, have dwindled to a small fraction of historical investments.
- WIOA's workforce board structure centers the interests of politically appointed business leaders rather than youth seeking opportunities to thrive in our communities.
- Regulations reward compliance with exclusionary enrollment, participation, and reporting rules over engaging youth who can benefit most from effective programs.
- Programs driven by standardized performance measures lead to short-term outcomes for individual youth rather than long-term opportunities that create community-level change.
- Youth are often forced to choose between unpaid education and training programs funded by WIOA Youth and low-wage work that meets immediate financial needs.
- Lack of coordination across federal and local agencies creates unnecessary administrative burden on youth and staff.

Strong communities invest in youth development, not just developing a workforce. They offer meaningful economic opportunities, not just pathways to entry-level jobs. For these reasons, we propose replacing WIOA Youth with a new federal Youth and Young Adult Development and Economic Opportunity (YYADEO) system.

The YYADEO blueprint centers young people as the system's participants, leaders, and primary stakeholders – a fundamental shift from the current system's priorities and leadership structure. This proposal incorporates proven models along with creative new ideas drawn from youth, practitioners, researchers, and local workforce leaders eager for large-scale change. We outline significant departures from the WIOA Youth model in areas ranging from governance structures to program goals:





**FUNDING:** The YYADEO system establishes a targeted entitlement that guarantees paid training and meaningful work experience for eligible youth.



**YOUTH LEADERSHIP:** Local boards made up of youth and adults will receive federal funds directly. Using a youth-adult partnership model, YYADEO boards will be led by youth and staffed by youth development professionals.



**GOALS:** The YYADEO system will be accountable for participant-level and community-level outcomes. Youth will evaluate the system based on its contributions to short- and long-term goals they define for themselves. In addition, boards will develop plans to reduce occupational segregation, improve employer practices, and build more equitable local economies.



**PROGRAMS:** Comprehensive youth development, education, training, and employment programs will begin in seventh grade and continue through age 26, supporting all the major transitions of adolescence.



**COLLABORATION:** The YYADEO system will facilitate coordination across youth-serving agencies at the federal and local levels.

Our communities thrive when we prioritize young people's development and access to economic opportunity. A sustained public investment in the YYADEO system will expand opportunity for all young people to experience economic success.





#### **DEVELOPING THE BLUEPRINT**

This document is grounded in the voices and vision of youth and young adults, who remind us to ask for what we deserve, not just what we think we can get. The system we propose responds to several of the Economic Justice and Opportunity Demands developed by young New Deal for Youth Changemakers. The model would also implement many of the National Council of Young Leaders'"Recommendations to Increase Opportunity and Decrease Poverty in America."

The policy details are deeply informed by the Communities Collaborating to Reconnect Youth Network (CCRY), a national learning community that was formed to continue the progress spurred by the Youth Opportunity grant program. CCRY members include local leaders from workforce boards, executive agencies, program providers, and youth advocacy organizations, co-convened by CLASP and FHI 360.

Many members have grown weary of pushing for small tweaks to current law when larger changes are needed. In 2022, a small group of CCRY leaders came together to envision a new approach. We reviewed recommendations from youth and lessons from the history of federal youth workforce investments. The group imagined a future where young people have the resources needed to thrive and pass on opportunities to the next generation. Then we identified the program elements needed to reach that future and compiled an initial set of guiding principles. That meeting birthed an initial outline of the YYADEO model and kicked off 18 months of collaborative system design, with research, interviews, and focus groups to develop and vet many iterations of the recommendations that make up this blueprint.



# INTRODUCTION

When we consider our country's economic future, we imagine it at its best: a nation of strong communities where work is fulfilling and well-compensated, our economy creates new career paths for each generation, and all families have what we need to thrive. Building this economy will require new strategies across the public, private, and nonprofit sectors. To begin, we propose a new federal approach to expanding economic opportunity for young people.

The current United States youth workforce development system is largely shaped by the Workforce Innovation and Opportunity Act of 2014 (WIOA),<sup>4</sup> which governs most federal funding for youth and young adult education, training, and job placement programs. There are several ways that the WIOA system strengthens our communities. The law's youth provisions (referred to as WIOA Youth) authorize programs that meet young people's needs for basic education and entry-level employment, with some also helping youth access higher education or advanced training. Local workforce boards, which are integral to the WIOA structure, can engage leaders of housing, transportation, education, and other public systems to enhance coordination across agencies. In some areas, workforce boards actively help businesses improve their employment practices. WIOA also requires local areas to prioritize youth who have the least access to economic opportunities. In many communities, WIOA Youth programs address needs unmet by any other resource. Unfortunately, WIOA's funding mechanisms, governance structure, and priorities undermine the system's potential and limit the opportunities available for youth to thrive.

Young people's goals and needs must be central to any plans for the economy they are entering. This blueprint proposes a model for a federal Youth and Young Adult Development and Economic Opportunity system that builds on WIOA's successes; replaces its most deeply flawed elements; follows the lead of young people; and strengthens our communities by positioning youth and young adults for economic success.

#### THE PROBLEM WITH APPROPRIATIONS

Over many generations, the federal government has made sizable investments in a range of program models meant to support young people's entry into the workforce. These have included appropriations for ongoing programs such as WIOA, as well as significant one-time injections of funds. For example, Congress invested more than \$10 billion annually (in 2024 dollars) in a swath of programs authorized by the Youth Employment and Demonstration Projects Act of 1977 (YEDPA).<sup>5</sup> Many of the YEDPA projects were intended to test new models for future replication, but a shift in the balance of partisan power led to YEDPA's abrupt termination before evaluations were complete.<sup>6</sup> In 2000, 36 communities received nearly \$1.8 billion (in 2024 dollars) through the Youth Opportunity (YO) grant program authorized under the Workforce Investment Act (WIA)<sup>7</sup>. YO grants allowed collaborating agencies to saturate target neighborhoods with easily accessible youth workforce development services. YO communities showed they could scale up effectively; results included new outreach and engagement strategies, thousands of new internship opportunities, alternative education programs for youth who were no longer in school, and higher levels of matriculation to postsecondary education.<sup>8</sup> Despite these successes and the need for such initiatives nationwide, Congress declined to renew the program.

This history confirms our country's ability to invest in economic opportunity at scale; it also demonstrates that Congressional support for youth workforce development has been inconsistent at best. Since these programs fall under the discretionary portion of the federal budget, they require annual approval and are subject to fluctuating spending caps. This makes local budgets dependent on the whims of federal appropriators, often leaving program providers scrambling to fill funding gaps while communities struggle to maintain cohesive systems.

Decades of federal spending reductions have left recent appropriations for youth workforce development activities hovering around just 10 percent of the YEDPA investments of the late 1970s,<sup>9</sup> with deeper cuts threatened every year.<sup>10</sup> We can no longer expect this trickle of appropriations to ensure economic opportunity for all.

#### A SYSTEM GONE ASTRAY

The workforce boards that manage WIOA funds trace their origins to Private Industry Councils (PICs), which were established in 1978<sup>13</sup> with the addition of Title VII to the existing Comprehensive Employment and Training Act.<sup>14</sup> The advent of PICs as recipients of federal funding signaled a fundamental shift in the federal workforce system's primary purpose — from serving the employment needs of workers and jobseekers, often with public sector jobs, to meeting the workforce needs of private sector employers. The Job Training Partnership Act of 1982<sup>15</sup> further cemented this approach.

In 1998, WIA replaced PICs with a state and local workforce board structure that siphons millions of dollars from programs for administrative purposes. Reauthorized in 2014 as WIOA, the law mandates that business executives — not workers, jobseekers, students, or even educators or training providers — hold at least 51 percent of workforce board seats, including the chair. This structure gives politically appointed business leaders the power to shape state and local use of federal dollars and determine which opportunities are available in our communities — and which are not.

Additional aspects of the WIOA Youth model sustain, and even exacerbate, economic inequities. WIOA Youth funding is notoriously onerous for small community-based organizations to administer. Stringent eligibility and documentation requirements can make it exceedingly difficult to enroll, especially for youth experiencing homelessness or other destabilizing circumstances. The law's performance measures often incentivize short-term achievements such as placement in low-wage jobs rather than investments in improving young people's long-term economic prospects.

WIOA takes an ostensibly race-neutral approach that disregards the realities of systemic racism and individual bias that perpetuate occupational segregation and separate young adults of color from the full range of economic opportunities enjoyed by their white counterparts.<sup>16</sup> The Department of Labor (DOL) publishes data on outcomes for WIOA Youth participants, including their median earnings during the fourth quarter after program exit (roughly one year after leaving the program). For Program Year 2022, former participants working in unsubsidized jobs earned an average of \$4,605 in the fourth quarter. Black youth were employed at a higher rate than any other participant group, but their earnings averaged just \$4,006 — 87 percent of the aggregate average. That represents an income deficit of \$2,396 per year for each young Black worker. Similarly, young women were employed at a higher rate than young men but only earned 85 percent of the young men's average income.<sup>17</sup> These findings mirror long-standing trends in earnings by race and gender in the labor market overall, highlighting the current model's failure to counter entrenched disparities.

We are calling for a new approach, and we are not alone in our desire for change. In a September 2023 Data for Progress survey,<sup>18</sup> 74 percent of likely voters expressed support for creating a federal Youth and Young Adult Development and Economic Opportunity system. Notably, this endorsement spanned self-identified conservative, moderate, and liberal voters, with more than two-thirds of each group backing the idea. Consensus across age, race, and education level confirms the broadly shared belief that economic opportunity for young people is fundamental to the social contract that grounds strong communities. Meanwhile, growing income inequality weakens our communities and jeopardizes our country's economic future.<sup>19</sup>

We can do better.







# THE BLUEPRINT

We propose a Youth and Young Adult Development and Economic Opportunity (YYADEO) system that will preserve the best elements of WIOA Youth while replacing those that waste public dollars, limit access to programming, overburden participants and program providers, perpetuate long-standing inequities, and weaken the economic outlook of our communities. This system will be structured as a targeted entitlement, to be supported federally by DOL and managed locally by boards led by young people, in partnership with adults. With leadership from those most familiar with the challenges of entering the workforce, communities will be able to build on the achievements of the current system while dismantling the inequitable power dynamics inherent in WIOA.

## THE GUARANTEE

The YYADEO system will operate as a targeted federal entitlement, which guarantees that eligible young people can access a full range of economic opportunities. Entitlements obligate the government to fund specific benefits for all eligible individuals as part of the mandatory portion of the federal budget. These programs codify basic elements of the social contract, such as ensuring certain needs are met for children and elders. Social Security, Medicare, Medicaid, the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), the National School Lunch Program, and the Child Tax Credit are all examples of entitlement programs.

The government uses a variety of mechanisms to fund entitlements. For example, states receive block grants to operate TANF programs, though this structure has not always kept up with inflation, population growth, or other factors that increase demand. Medicaid and school lunch programs are funded through reimbursement. Without a sizable portion of funding advanced, this strategy would be untenable for many YYADEO providers that cannot cover upfront costs. Social Security and Medicare draw on dedicated tax revenues and interest on reserves from a federal trust. A similar model would maximize stability for the YYADEO system.

Unlike WIOA funds, which are first distributed to states and then to local workforce development areas (LWDAs), the majority of YYADEO funding will be allocated directly to local boards. The funding formula will consider factors such as population, youth employment rate, disconnection rate (the percentage of youth ages 16-24 who are not working or in school), youth wages, community education levels, racial and economic disparities, occupational segregation, historic disinvestment, and the Census Bureau's community resilience estimates (measures of community capacity to absorb disaster-related stresses). Rural workforce development areas (including tribal areas as applicable) that serve smaller numbers of youth may require an adjustment to the base formula to develop and maintain infrastructure for their systems.

A smaller portion of YYADEO funds will support DOL's capacity to provide oversight and technical assistance, enhance capacity to produce and distribute useful data, and promote cross-agency collaboration.



The YYADEO system would not be the first targeted entitlement program aimed at increasing economic opportunity for young people. From 1978 to 1980, the Youth Incentive Entitlement Pilot Project (YIEEP) tested the feasibility of a targeted federal jobs guarantee for youth from households with low incomes in seventeen demonstration areas. YIEPP offered eligible youth a part-time job during the school year and a full-time job in the summer, under the conditions that they finished school and met academic and job-related performance standards. Seventy-six thousand young people gained jobs through the project, which resulted in reduced high school dropout rates, increased school reengagement, and higher employment rates — especially for Black youth, for whom the employment/population ratio more than doubled, nearing that of white male youth. Evaluators concluded that a program like YIEPP could be implemented successfully on a much larger scale.<sup>21</sup> Unfortunately, Congress eliminated YIEEP along with the other components of YEDPA.

#### PRINCIPLES FOR TARGETED ELIGIBILITY

As a targeted entitlement, the YYADEO system will identify eligible participants based on community criteria and a priority populations framework. Community criteria provide blanket eligibility for youth who live in targeted zip codes or census tracts, chosen based on historic disinvestment, occupational segregation, youth unemployment rates, and other challenges. To facilitate enrollment of young people most in need of services, the YYADEO system will accept declaration of residence (known as self-attestation<sup>22</sup>) in these target areas as proof of eligibility. In addition, students who attend schools with high rates of poverty, disconnection, or other relevant indicators will be automatically eligible for YYADEO programs. This approach has been used successfully by the National School Lunch Program, which funds meals for all students in schools that serve a large number of families who receive public assistance.<sup>23</sup>

Young people who do not qualify under the community criteria may be entitled to services under a secondary framework that prioritizes youth who face outsized challenges to economic opportunity. The YYADEO system's priority populations criteria, listed in the box, expand on the National Youth Employment Coalition's recommended eligibility framework.<sup>24</sup> All youth represented in this list will be eligible to enroll in YYADEO programs. When a young person's eligibility is in question, the YYADEO system will default to granting eligibility, including accepting self-attestation without further verification.

#### YYADEO PRIORITY POPULATIONS FRAMEWORK

- Youth experiencing homelessness or housing instability (including youth staying with others or living in motels).<sup>25</sup>
- Current or former foster youth.
- Youth who have been incarcerated or have other past or current involvement with the criminal or juvenile legal systems.
- Disabled youth.
- Pregnant or parenting youth.
- Youth who dropped out of school, have transferred frequently, or exhibit indicators of school disengagement, such as high absences, course failures, or exclusionary discipline (e.g., suspensions).
- Youth with low incomes, based on a percentage of the area median income.
- Members of a population that has been historically underserved, marginalized, or adversely affected by discrimination based on race, ethnicity, nationality, gender, or gender expression.
- Youth learning the English language.
- Youth who are unemployed or underemployed, including those working part-time.

#### EXPANDING THE AGE OF ELIGIBILITY

Our adolescent years are marked by constant change. In thriving communities, we receive sufficient guidance to navigate transitions successfully and get to choose from multiple paths toward economic opportunity. As Measure of America affirms, "The youth disconnection rate — the share of young people ages 16–24 who are neither working nor in school — is a strong indicator of a community's resources and a telling gauge of its residents' access to opportunity." <sup>26</sup>

Unfortunately, providers and youth assert that connections to the education system can start to weaken well before age 16. Available data confirms their assessment. A 2016 report revealed that 25 percent of Connecticut students enrolled in public high schools exhibited indicators of disengagement that are strongly tied to future disconnection from school — specifically, attendance below 85 percent, failing more than one course in a school year, or receiving multiple suspensions in a school year. Among those youth, 41 percent met this definition of disengagement as early as eighth grade.<sup>27</sup>

The education system carries primary responsibility for reversing school disengagement, and schools should receive resources such as counselors and other support services for that purpose. However, the problem requires a comprehensive approach, led by students' needs and interests, to address the range of factors that contribute to disengagement. As part of the solution, school partnerships with the YYADEO system can enhance students' understanding of the connections between their classwork and career aspirations, provide hands-on learning experiences, and offer opportunities to earn income.

Evidence-based recommendations from Measure of America include increasing support through the transition from junior high or middle school to high school.<sup>28</sup> Most WIOA Youth programs miss this key transition point since they cannot enroll youth under age 14. In the YYADEO system, youth will become eligible for supportive services, career exposure, and other program elements when they reach seventh grade. By beginning in middle school, YYADEO programs can expose youth to career options and build relationships that provide continuity when youth transition to high school or transfer between schools.

Major transitions continue throughout adolescence, which extends to at least age 25.<sup>29</sup> Many of us need continued guidance through our later adolescent years. Young adults finishing a training program or postsecondary degree may be unsure of their next steps or seek support adjusting to the expectations of a new professional environment. Those who are working may want to advance in their careers or look for new opportunities that better suit their interests or meet personal, family, or community needs. Other young adults may still need support to reconnect to education or employment after leaving school or becoming unemployed.

Eligibility for WIOA Youth ends at age 24, before young adults have emerged from adolescence. The WIOA adult workforce system may provide sufficient support for young adults who have begun to establish themselves in their careers, face few systemic barriers to opportunity, and have access to professional networks and other resources. However, many youth entitled to YYADEO services are unlikely to find themselves in those circumstances. The YYADEO system will extend eligibility to age 26 so older youth can continue to receive developmentally appropriate services as they transition into adulthood and the adult workforce system.



## LOCAL GOVERNANCE

Local YYADEO boards will lead the system in each local workforce development area. Like the workforce boards that govern WIOA systems, YYADEO boards will consist of a decision-making body supported by a full-time staff. However, YYADEO boards will operate as youth-adult partnerships. Young people, not business leaders, will hold at least 70 percent of board seats, including the chair. In addition to receiving YYADEO funding, local boards will be considered eligible entities for competitive grants, relief funds, and other federal, state, local, or tribal investments intended to enhance economic opportunity.

### BOARD MEMBERSHIP AND STAFF

Youth and young adult leadership is fundamental to all aspects of the YYADEO model. Youth board seats will be filled by current or former program participants, chosen through an application process co-designed by young people and adults. Boards should seek to achieve equitable representation from the neighborhoods and schools targeted for community eligibility, with special attention to groups included in the priority populations framework. Adolescents go through more transitions and have less autonomy than most adults, especially if they experience challenges such as homelessness or contact with the child welfare system. Given that reality, boards must provide intensive support services for youth members while also anticipating higher turnover. Strategies such as creating seats for members-in-training, alternates, or proxies can help boards maintain continuity and institutional knowledge.

YYADEO boards will compensate youth and young adult members with fair pay, not stipends or sub-minimum wages, for contributing their time and expertise. Intensive onboarding (potentially as part of a Summer Youth Employment Program [SYEP]) and other board-related activities will be treated as paid work experience. Local boards will work with education partners to offer secondary and/or postsecondary credit for YYADEO board participation whenever possible.

Adult board members are key to collaboration between the YYADEO system and other community stakeholders. These members should be chosen for their ability to help local boards meet the following goals:

- Ensure coordination with the adult workforce board.
- Enhance collaboration across intersecting public systems such as education, health and human services, and housing.
- Reflect the demographic makeup of the youth served by the system and honor unique cultural characteristics of local communities (e.g., YYADEO boards in communities with large Native populations may choose to include a tribal council member or elder).
- Build relationships with institutions of higher education, including four-year and community colleges, historically Black colleges and universities, tribal colleges, or other Minority-Serving Institutions; Registered Apprenticeship Programs; unions; and small, large, and worker-owned businesses that demonstrate commitment to partnership with the YYADEO system.
- Establish connections to other community stakeholders identified by local boards.

YYADEO boards will work in tandem with a staff composed primarily of youth development professionals with expertise in education, training, and economic justice. Board members will maintain authority to approve staffing plans, job descriptions, and individual hires, with youth members participating in staff hiring. Whenever possible, staff teams will include at least two salaried fellowships to be held by young adults between the ages of 18 and 26 who have participated in YYADEO programs.

YYADEO staff will collaborate with the adult workforce system to streamline communications and data-sharing, especially for young adults co-enrolled in or transitioning to WIOA adult programs. YYADEO boards may coordinate with the adult workforce board or other appropriate entity (e.g., a city's youth services office or a tribal council) to share IT, accounting, or other operational infrastructure that does not influence YYADEO policies or programs.

#### SCAFFOLDING YOUTH LEADERSHIP AND YOUTH-ADULT PARTNERSHIP

Youth and young adults are likely to be new to board membership and governance systems. Their adult counterparts may bring more procedural knowledge but little to no experience being led by young people or working with them as peers. YYADEO staff will provide support for both groups to ensure successful partnership.

For youth and young adults, YYADEO board membership is both a leadership responsibility and a learning opportunity that must be designed according to the principles of positive youth development. In their review of several county-level youth councils in Michigan, researchers Katie Richards-Schuster and Barry Checkoway noted that, "Like adults, these [youth] leaders vary in their information and ideas about public policy, their facility with critical thinking and public speaking, and their abilities to represent themselves and their constituents. Some easily express strong positions on issues and produce activities and accomplishments having outcomes in the community and an effect on themselves."<sup>30</sup>



YYADEO staff will provide ongoing training, technical assistance,

leadership development, and supportive services for young members. Best practices such as youth-only pre-meetings can equip youth with the background knowledge and procedural understanding to lead and deliberate effectively. Mentorship and case management help young people build networks and access services that enable them to carry out their board responsibilities. Supplementary supports may include food, transportation, connections to physical and mental health care, housing assistance, and other services that provide stability and continuity.

Adult members will require support to understand the YYADEO system, learn from the lived experience of young people, and become comfortable in their roles as partners in a youth-led body. YYADEO staff must ensure that all members receive training in youth development, ageism, adultism, and similar topics, with coaching as needed to help members bridge differences in experience and manage interpersonal power dynamics.

YYADEO staff will work with all members to make meetings and other board activities fully accessible. Accommodations, translation services, and resources such as child care during meetings facilitate participation for adult and youth members alike. Staff and board members will receive training on YYADEO programs and governance, youth-adult partnership, anti-racism/anti-oppression practices, trauma-informed approaches, and cultural knowledge of groups with a sizable presence in the community. In addition, YYADEO staff will provide training on roles and responsibilities, accountability measures, and processes for resignation or removal. DOL may offer technical assistance and resources such as agreement templates but must maximize flexibility for local boards to shape their own policies and procedures.



#### COMMUNITY IMPACT

The YYADEO system takes a youth-centered approach to creating community-level change. Boards will develop strategic plans based on local theories of change,<sup>31</sup> with flexible logic models that outline how each activity and interim outcome contributes to building more equitable communities over time. DOL will review local plans to confirm that they align with the system's goals.

This approach differs from WIOA state and local plans, which emphasize negotiated performance levels tied to short-term participant outcomes like earning a GED or securing a job. These are valuable achievements that can expand the opportunities available to an individual, but systemic interventions should also demonstrate community-wide results. The current focus on individual milestones, devoid of community-level context, masks inequities and limits our understanding of how the system affects indicators of equity and economic opportunity overall.

To build and monitor effective plans, communities need access to comprehensive, timely data that is specific to each local area. The Bureau of Labor Statistics, Census Bureau, and other relevant agencies must receive sufficient funding to develop user-friendly data tools and to collect, compile, and distribute local information, including but not limited to:

- Youth and young adult unemployment rates, earnings, and employment/population ratios, disaggregated with sufficient detail to identify the extent of local disparities by race, gender, or other characteristics.
- Indicators of access to opportunity such as youth disconnection rates, community education levels, and occupational segregation.
- Markers of community-wide job quality, including employee benefits surveys, safety and labor rights records (e.g., OSHA violations, Equal Employment Opportunity Commission [EEOC] complaints, and National Labor Relations Board petitions), and routine reviews of parity between wages and local cost of living.
- Labor market information, such as industry trends and job market projections that describe the local employment landscape.

YYADEO boards will use this data to set goals such as reducing occupational segregation and increasing employment for all youth in our communities. Although many factors outside the YYADEO system's purview affect indicators like these, community-level goals help leaders build strategies aligned with a theory of change that extends beyond impact on individual participants.

Boards will also use tools such as surveys, focus groups, and youth participatory action research<sup>32</sup> to collect data on young people's interests and the factors that limit their access to opportunities. Unlike workforce boards that often build strategies to fill positions in target industries, the young people at the center of the system will drive YYADEO boards' strategies to achieve community-level goals.



#### PROGRAMMATIC STRATEGIES AND ACCOUNTABILITY

YYADEO boards will be responsible for ensuring eligible youth can access all required program elements, but they may choose what roles they play in providing those services. All local boards will partner with schools, the adult workforce system, and other agencies that serve youth to coordinate services and enhance existing activities. Some may hire staff to operate programs themselves. They may also contract with qualified program providers to offer community-based services.



Local plans will describe each YYADEO system's community partnerships, the neighborhoods and schools targeted for community eligibility, strategies for engaging priority populations, and plans for program evaluation and accountability to youth. Boards must also demonstrate how they will guarantee that all eligible youth can easily access the program elements the YYADEO system requires. Services should be provided in or near target neighborhoods and schools as well as other locations that are frequented by youth from priority populations. In rural communities, red-lined neighborhoods, or other areas where good jobs are scarce, plans must address how the YYADEO system will provide meaningful employment. Strategies might include transportation support, remote work options, or public sector job creation.

#### AMERICAN JOB CENTERS

The WIOA system uses a network of American Job Centers (AJCs, often referred to as One-Stops) to co-locate services for jobseekers and employers.<sup>33</sup> In some communities, AJCs serve both youth and adults; other communities design separate One-Stops specifically for youth. Local plans will describe how the YYADEO and adult workforce systems will work together, including coordinating services with AJCs. Some boards may create youth centers that can facilitate co-enrollment in WIOA programs. They may also choose to hire youth development professionals to manage youthfacing services at existing AJCs.



#### PROVIDER ACCOUNTABILITY

Under WIOA Youth, DOL evaluates local workforce boards based on a standard set of outcomes that youth achieve during or after participation. These measures reward providers for quick job placements and incentivize boards to offer short, low-cost courses that lead to entry-level credentials. In the YYADEO system, young people will evaluate providers based on the quality of their program experiences and the providers' contributions to outcomes that youth define for themselves.

Upon enrollment, youth will work with staff to identify long-term goals, interim milestones, and the supportive services needed to achieve them. The goals and milestones will serve as measures of both participant success and program effectiveness. Many of us change our career goals throughout our lives, especially during the exploratory period of adolescence. When young people's goals change, these measures of success will change accordingly —without penalizing the provider.

Local boards, with support from DOL, will develop processes to evaluate the quality of young people's experiences in YYADEO programs. Focus groups, satisfaction surveys co-designed with youth, and other participatory evaluation tools can be used to monitor program climate, including staff and peer relationships; accessibility and cultural responsiveness; young people's sense of belonging, meaning, and well-being; program alignment with their needs and goals; and their confidence that they are prepared to navigate challenges in the workplace and progress in their chosen careers. Whenever possible, boards should avoid using standardized tests to assess knowledge and skills. Youth can demonstrate newly acquired skills through real-world performance assessments. Tools such as interviews and role plays can be used to gauge knowledge of careers and topics like financial literacy, workers' rights, and the labor market.

WIOA's focus on compliance leads to burdensome reporting requirements that divert resources away from programs and operations. For example, WIOA Youth providers devote immense amounts of time and money to collecting proof of employment, wages, and job retention. Although these outcomes are vital indicators of program effectiveness, contacting employers or visiting youth worksites for documentation is often disruptive, invasive, and even counterproductive to young people's employment goals. When providers work closely with employer partners, they should have access to this information; absent a formal relationship with an employer, YYADEO system providers will not be required to document these details.

DOL can provide toolkits, templates, or other assessment resources, including strategies for learning how youth fare after program participation. But local areas must determine the most appropriate tools for their needs. In all cases, data must be disaggregated by race, gender, and other indicators to the greatest degree possible while maintaining the privacy of individual youth.



#### **REPORTING REQUIREMENTS**

The YYADEO system will require program providers to report a very limited number of interim outcomes that contribute to community-level goals. Rather than prescribing a list of measures, we offer suggestions that may be tailored to local programs.

#### Education and training data:

- Enrollment, attendance rates, and retention.
- Milestones achieved during enrollment, such as credits earned toward a diploma or degree, sections passed on the GED exam, or short-term certifications earned as part of a longer-term training program.
- Course completion.
- Attainment of credentials that have been shown to increase job opportunities, wages, or advancement in a young person's field of interest.
- Advancement to a higher level of training (e.g., from pre-apprenticeship into Registered Apprenticeship).
- Postsecondary enrollment and degree completion.

#### Subsidized employment and other earn-and-learn program data:

- Employer of record.
- Occupation/career pathway and initial position or job type.
- Job retention and promotions achieved during enrollment.
- Initial wages and wage growth during enrollment.
- Benefits or other compensation.
- Additional program opportunities, such as on-site mentorship, skill development, or supportive services.
- Other relevant details, such as access to future unsubsidized employment, higher education, union membership, advanced training, or other career opportunities.

#### Indicators for other YYADEO program elements:

- Entrepreneurship training course completion.
- Businesses launched during enrollment.
- Re-connection to high school or alternative education.
- Mastery of technical skills.
- Knowledge of the topics outlined in the required YYADEO program elements.



#### IMPROVING EMPLOYER PRACTICES

In thriving communities, workers earn enough to sustain themselves and their families and weather unexpected challenges. However, in many communities, the job market falls far short of providing opportunities that meet this goal. Low wages, lack of paid leave and health care benefits, employment discrimination, unsafe workplaces, and other employment practices limit the impact of education and training programs. YYADEO boards cannot force employers to offer quality jobs or invest in young workers. However, they can and should incentivize improvements in employment practices as part of their strategies to achieve community-level goals.

Subsidizing employment gives boards leverage to reward employers that demonstrate commitment to supporting those goals. YYADEO boards should set standards for positions that are eligible for subsidies, with consideration for the following factors:

- Fair compensation: public funds should not be used to subsidize low-wage positions, particularly for large employers.
- Strong safety records: subsidized positions must never put young workers' health and safety at undue risk.
- Accessibility: workplaces must offer reasonable accommodations that, where possible, exceed the minimum legal requirements.
- Youth-friendliness: businesses that champion youth and young adult leadership and demonstrate sustained investment in developing young employees should receive preference. Tools co-designed with youth can measure factors such as inclusion and availability of workplace mentoring and professional development.
- Business size: YYADEO boards should increase engagement with small and medium-sized businesses rather than subsidizing large numbers of jobs at bigger companies.
- Diversity, equity, and belonging: businesses with a demonstrated commitment to equitable hiring practices, as well as strong employee retention and promotion records, should receive priority.
- Long-term economic opportunity: although short-term subsidized positions such as part-time or summer jobs do not come with full benefits, YYADEO boards should still give preference to employers that offer family-sustaining compensation packages for their permanent employees.
- Skill development: employers that offer young people meaningful workplace credentials and/or experience linked to specific skills and competencies should receive priority.
- Partnership: YYADEO boards should give preference to employers that actively participate in evaluation and coaching opportunities.

YYADEO boards can work with employers across our communities to develop more youth-friendly workplaces. Staff can offer training and technical assistance to any business that is interested in improving their practices, regardless of whether they receive subsidies or formally partner with the system. Strong relationships help boards and providers understand the skills needed for the job market and introduce employers to strategies that support young workers' career growth. Coaches can also work with hiring managers and supervisors to help troubleshoot on-the-job challenges and facilitate feedback loops among employers, youth, and program providers.

Local boards should invite young people to provide feedback on their experiences applying to and working for each employer. Using surveys or other tools, boards can collect information about skills gained on the job and young employees' feelings of inclusion and belonging in their workplaces.<sup>34</sup> They should track complaints and encourage reports to authorities such as the EEOC as appropriate. Although the YYADEO system holds little direct power to change employer practices, these efforts can build a measure of accountability into employer relationships.

### LEARNING AND EARNING: YYADEO PROGRAM ELEMENTS

The YYADEO system will guarantee more than a job: it will position young people to seize economic opportunity by providing supportive services and paid youth development, education, training, and work experience throughout the adolescent years.

Local YYADEO boards will be responsible for ensuring that all eligible youth can access each of the program elements described below. Individual providers cannot be expected to offer all program elements or serve youth across the age spectrum, but YYADEO boards can use a combination of partnerships, contracts with providers, board-run programs, remote and hybrid offerings, and job creation to guarantee equitable access to each element.

It bears repeating that all activities must be paid. Many of us need to support ourselves and our families financially during adolescence; often, those of us who face the greatest barriers to economic opportunity are forced to drop out of education and training programs to take low-wage jobs. Except for school-based activities that occur as part of the regular school day, all YYADEO programs will be treated as paid work experience for youth who have reached legal working age. Furthermore, youth will receive real wages: stipends, non-cash incentives, and sub-minimum wages are not acceptable. No one should have to choose between meeting immediate needs and preparing for a family-sustaining career.

### SUPPORTIVE SERVICES

To enable participation in the YYADEO system, boards must work with local agencies to help young people access public benefits programs and other resources to secure food, housing, transportation, child care, and physical and mental health care (including peer support services). Case managers will help participants navigate requirements imposed by the child welfare, immigration, and criminal legal systems, especially when they conflict with education, training, or employment opportunities. YYADEO boards must treat compliance with the Americans with Disabilities Act <sup>35</sup> and Individuals with Disabilities Education Act (IDEA, as amended by the Every Student Succeeds Act (IDEA)<sup>36</sup> as the bare minimum from which to develop meaningful accommodations. Similarly, they must ensure equitable access to programs regardless of a young person's home language. Translated materials, bilingual education, ESOL (English for Speakers of Other Languages) classes, and other approaches may help meet local community needs.

#### YOUTH AND YOUNG ADULT DEVELOPMENT

The YYADEO model is grounded in the principles of positive youth development, which are critical to preparing all of us to enter the economy successfully. Leadership development and civic engagement activities prepare young people to contribute to our communities, including as members of local YYADEO boards. Team-building activities encourage healthy relationships and strengthen communication skills. Young people benefit from peer support programs throughout adolescence, especially when they face challenging circumstances or transition into unfamiliar settings such as new schools or workplaces.

Program staff and curriculum must also acknowledge the realities of interpersonal and structural racism and other systems of oppression that young people face at school, in the workplace, and in our communities.<sup>37</sup> Activities that help youth critique these problems and provide tools to respond to them have been proven to contribute to the goals of the YYADEO system by strengthening personal development,<sup>38</sup> vocational<sup>39</sup> and career development,<sup>40</sup> postsecondary and entrepreneurship aspirations<sup>41</sup>, and mental health and well-being<sup>42</sup>, particularly among youth of color.

#### CAREER EXPOSURE

The YYADEO system will give youth the chance to discover their unique career interests. In partnership with schools targeted for community eligibility, local boards can enhance learning during the school day and in out-of-school-time programs. Activities that introduce students to careers should also help them understand the role of academics in their career paths. Older youth and young adults, including those who are working or pursuing higher education, can benefit from continued exposure to unfamiliar industries as well as specific careers within their industries of choice. From job shadowing and career fairs to paid internships and subsidized jobs, local boards will coordinate age-appropriate career exposure throughout adolescence.

The YYADEO system must also help equip young people with foundational skills that give them room to shift focus without falling behind in their education. This is particularly true as schools adopt career pathway models that focus curriculum on specific industries. Youth apprenticeship, career and technical education, early college, Advanced Placement, and other programs can jumpstart a young person's career and open doors to economic opportunity. Yet exposure to a narrow range of careers can also limit young people's alternatives, especially when specialized training in high school replaces coursework required for college. Integrating college preparation with career and technical education multiplies young people's options as they move into adulthood.

### DREAM PREPARATION

We often tell children they can be anything they want to be, but that promise falls flat without information about the steps needed to achieve their dreams. The YYADEO system will provide comprehensive, personalized career guidance aimed at helping young people chart their career paths. This work will begin at enrollment and continue into young adulthood. Teachers, guidance counselors, case managers, college entrance staff, mentors, career coaches, and others can all contribute, with local boards ensuring all eligible young people receive these services.

### LABOR MARKET EDUCATION

Labor market education works alongside career exposure and dream preparation to help us make informed choices as we move along career pathways. We need to know what jobs are available in the industries that interest us and understand the educational requirements, pay scales, and daily responsibilities of each occupation. DOL should continue to create and maintain resources such as the Bureau of Labor Statistics' Occupational Outlook Handbook,<sup>44</sup> Occupational Information Network (O\*NET) database,<sup>45</sup> and O\*NET's applications, My Next Move and Mi Próximo Paso. Local boards must ensure that schools, program providers, and young people are aware of resources like these and know how to use them.

#### LOCKED OUT OF OPPORTUNITY

Recent reports on access to the University of California (UC) system highlight the importance of individualized dream preparation. According to an EdSource analysis of California Department of Education data, less than half of the state's 2023 high school graduates completed the coursework required for entrance to the UC system. Only 12 percent of foster youth, 15 percent of disabled students, and 16 percent of English language learners completed these courses. American Indian or Alaska Native, African American, and Hispanic or Latino graduates met the requirements at rates far below their white and Asian peers.<sup>43</sup> Dream preparation, including individual counseling and exposure to college and career options, ensures young people know how to prepare for postsecondary education and other

### ACADEMIC SERVICES

The YYADEO system will provide services that help young people improve their academic skills and continue their education. Individual guidance can help youth advocate for educational accommodations or secure transcripts when they change schools or apply to college. Local boards must ensure that youth who disconnect from school before high school graduation have access to reconnection services and alternative education or high school equivalency programs such as GED, HiSET, NEDP, or TASC.

Regardless of their formal education level or placement test scores, all eligible youth should have access to tutoring, study skills assistance, Adult Basic Education, computer literacy, and ESOL courses. High school graduates may still need to improve basic academic skills or prepare for postsecondary education. Apprentices and college students also benefit from tutoring and study skills support. Integrated education and training (IET) programs, which teach academic skills in conjunction with work-based experience or occupational skills training, are well-suited for young adults anxious to join the workforce.<sup>46</sup>

The YYADEO system's postsecondary element will begin with college awareness activities in seventh grade. High school students, graduates, and youth in high school equivalency programs should all have access to college counseling. Local boards must offer help with admissions, financial aid, and scholarship applications as well as preparation for college entrance and placement tests. Unlike WIOA Youth services that quickly dissipate after postsecondary enrollment, YYADEO services will continue until young people complete their degrees or transition into the adult workforce system. Supports may include paid work experience in chosen career fields or preparing for post-college employment.

#### MENTORSHIP AND BUILDING SOCIAL CAPITAL

In our socially stratified society, many of us need assistance establishing, maintaining, and drawing on "opportunity networks"<sup>47</sup> of adults who have been successful in their careers. Mentors provide support during hard times and often open doors to personal and professional opportunities. Intergenerational relationships build social capital, keeping all of us connected to strong community networks. The YYADEO system must make sure young people can build and maintain professional networks that support their success as students, employees, and entrepreneurs.



#### FINANCIAL EDUCATION

Managing finances can be challenging at any age and in any income bracket. YYADEO boards must offer ageappropriate financial education so young people enter adulthood with an understanding of income tax and other payroll deductions, budgets and saving, consumer skills, types of credit, and related topics. Financial counseling can help young people minimize debt, establish a credit history, or improve credit scores. Participants should also learn how to access resources like tax preparation, public benefits, and business loans.

#### WORKERS' RIGHTS EDUCATION

We all need to understand our rights as job candidates and employees. YYADEO programs must educate youth about these rights and the tools to enforce them. Young people should also learn about the unemployment system, workers' compensation, salary transparency, wage theft, and the difference between employment and contracting. To build more equitable communities for all, staff and providers must be trained to help youth recognize and navigate employment discrimination and encourage reporting violations to the EEOC<sup>48</sup> or other relevant authorities.

#### TEACHING WORKERS' RIGHTS

Last year, the State of California mandated that schools ensure their students "enter the workforce with a strong understanding of their rights as workers, as well as their explicit rights as employed minors." California schools will now "equip pupils with this knowledge to protect them from retaliation and discrimination, to ensure that these young workers receive all wages and benefits to which they are entitled, to empower them to refuse unsafe work when necessary, and to prepare them to assert their labor rights whenever these rights are threatened." The law also requires that youth learn about their rights to organize and/or join a union as part of their public school curriculum and receive the information in writing with their work permits.<sup>49</sup> Lessons from these new requirements should inform the workers' rights element of the YYADEO system.

### OCCUPATIONAL SKILLS TRAINING

In many of our communities, training opportunities authorized by local workforce boards limit young people to a small number of industries and offer minimal support for career advancement after initial job placement. Preparing young people for local growth industries should be part of the YYADEO system, but boards must make a wide range of training options available in or near target neighborhoods and schools, as well as virtually.<sup>50</sup> Training may include classroom instruction, work-based learning, youth apprenticeships, pre-apprenticeships with facilitated entry to Registered Apprenticeship Programs,<sup>51</sup> IET, or other proven models, as well as emerging approaches. Ensuring a variety of options in target neighborhoods helps guard against occupational segregation while supporting each individual's goals. Cross-jurisdictional partnerships and virtual learning platforms may help fill gaps in fields where local training demand is low.

WIOA uses a broad definition of "industry-recognized credentials" that count as positive program outcomes. As discussed above, the pressure to maximize these outcomes on limited budgets incentivizes workforce boards and program providers to offer short-term training programs at minimal cost. These courses often lead to certifications that have little value in the job market. YYADEO boards must make sure youth can earn credentials that are required for entry or advancement in a career or have been shown to lead to wage growth, postsecondary credit, access to new industries, or other meaningful outcomes.

### ACCESS TO ALTERNATIVE CAREER PATHS

The YYADEO system will expose young people to the full range of ways to participate in the economy. Entrepreneurship training, coaching, and connections to small business resources can help young people explore freelance work or start companies that may even create jobs in our communities. The YYADEO system should also introduce cooperatives and other worker-owned business models that offer less-familiar alternatives to traditional employment. DOL's Economic Benefits Security Administration recently launched the Employee Ownership Initiative<sup>52</sup> in response to the Worker Ownership, Readiness, and Knowledge Act in the SECURE 2.0 Act of 2022.<sup>53</sup> This initiative is an important first step for the federal government to advance democratic workplaces. The YYADEO system's alternative career paths element can support that project's goals by educating young people on these non-traditional paths to family-sustaining work.

### GUARANTEED JOBS

The program elements described above will help prepare young people for success in the economy and provide guaranteed income through paid education, training, and work-based learning. But preparation alone will not end youth unemployment. The YYADEO jobs guarantee builds on the other elements of the program, subsidizing a quality job for every eligible young person who wants one. This effort will involve significant public sector job creation along with private sector partnerships, with emphasis on working with our communities' small businesses.

Subsidized employment models use government funding to cover wages, either in full or in part. Research on decades of subsidized jobs programs<sup>54</sup> shows positive short- and long-term impacts, especially for youth and others with limited work history.<sup>55</sup> SYEPs funded by local governments are the most common subsidized jobs programs for young people, though they rarely meet the full demand.<sup>56</sup>

Two existing proposals offer useful models for the YYADEO jobs guarantee. The Georgetown Center on Poverty and Inequality outlines a framework for a universal "Youth Opportunity Guarantee." This model would guarantee every young person in the United States age 16 to 24 a high school education or equivalent that prepares students for college and career; a range of postsecondary options designed to lead to a good job; and quality career training, national service, or employment.<sup>57</sup>

The Center on Budget and Policy Priorities proposes creating a National Investment Employment Corps (NIEC), to be administered by DOL. The NIEC would end involuntary unemployment by hiring workers (including but not limited to young adults) in sectors such as infrastructure, education, and health services. In this model, DOL would work with local leaders to ensure that the jobs created by the NIEC align with existing community needs.<sup>58</sup>

The public sector portion of the YYADEO jobs guarantee will help close gaps in our communities' physical and human services infrastructure. DOL will create public sector jobs through a combination of federal corps programs and subsidies for state and local government positions. Jobs will be fully funded through the YYADEO system, with benefits consistent with equivalent government positions.

The federal government has guaranteed employment with public sector jobs to boost the economy in the past. In the 1930s, President Roosevelt famously established the Civilian Conservation Corps (CCC),<sup>59</sup> which employed young men between the ages of 18 and 25 to work on conservation and public works projects that improved our country's public lands, forests, and parks. The CCC played a crucial role in rebuilding infrastructure while subsidizing employment for over 500,000 individuals annually.<sup>60</sup> Other New Deal jobs efforts like the Public Works of Art program kept artists employed during the Great Depression, producing paintings, sculptures, and architectural artwork for public buildings.<sup>61</sup> Local boards will implement the private sector component of the jobs guarantee by working with businesses and nonprofits to develop and subsidize high-quality, paid opportunities for youth. These new positions will supplement the existing staff at each workplace, expanding capacity without displacing incumbent workers. A comprehensive evaluation of the YIEPP jobs program highlighted the crucial role small businesses played in that project's success. The report notes that they often provided more accessible and flexible job opportunities for youth and facilitated a more localized approach to job creation.<sup>62</sup> Taking lessons from YIEPP, the YYADEO system will prioritize partnerships with small businesses in our communities.

The YYADEO jobs guarantee can also support innovative models like the Youth Mental Health Corps (YMHC). This multi-sector partnership was recently created to address the shortage of mental health workers amid a youth mental health crisis. YMHC employs and trains corps members to provide peer support and start careers in behavioral health.<sup>63</sup> Support to expand this program through the YYADEO jobs guarantee would help more young people kickstart their careers and add lasting capacity to our communities' mental health care systems.

Research shows that work experience in our late teens and higher wages in our early 20s predict higher job quality later in adulthood.<sup>64</sup> The YYADEO jobs guarantee will provide both. Public sector jobs, private sector subsidies, and on-the-job training will immediately increase individual, family, and community financial stability, and support lifetime job quality for each generation.



#### FOLLOW-UP SERVICES

WIOA Youth was designed as a short-term intervention with minimal funding for follow-up services once young people find a job or achieve other milestones. In contrast, the YYADEO system is designed to ensure all youth and young adults find support to explore, discover, prepare for, and access economic opportunities so they can achieve their own definitions of success as adults.<sup>65</sup> This approach requires boards to make support available through all the transitions of adolescence. Young people may stay in close connection to the system for years, join activities periodically, or return for new opportunities after lapses in their participation.

Many of us encounter significant challenges in young adulthood. Follow-up services provide stability when experiences such as job losses, housing insecurity, academic challenges, or involvement in the criminal legal system disrupt progress. Young people who are working may want to change jobs or enter a different industry. Others may seek support progressing in their careers or transitioning from college or advanced training into permanent employment. As young people approach age 26, follow-up services can create a seamless connection to services offered by the adult workforce system.



### SUPPORTING A NEW SYSTEM: FEDERAL ROLES

Federal government support will be key to positioning the YYADEO system for success, especially in the early years. Congress must grant DOL sufficient time and financial resources to develop regulations and guidance, professional development and technical assistance programs, infrastructure for distributing and monitoring funds, and practical tools to share with local YYADEO boards. To ensure continuity of services during the transition from WIOA Youth to the YYADEO system, each local area must receive at least three years of intensive technical assistance and start-up funding. Each community will need to secure physical space and technology, hire staff, develop administrative systems, recruit and train board members, determine local youth and young adult priorities, and engage community partners, providers, and employers before launching programs. During this time, the WIOA Youth system will continue to operate under existing law. DOL should support early adopters as they begin phasing in the new system, share lessons from their experiences, and respond to challenges with supportive technical assistance. Congressional reviews must account for expected trial and error rather than instant results as communities implement the new system.

Congress must also invest in DOL's capacity for research and development, including support for community-based efforts to pilot and evaluate emerging models, expand successful programs, explore non-traditional approaches, and share learning with the field. DOL should provide ongoing professional development and technical assistance for youth and adults at all levels of the system. An online library of training curriculum, policy templates, toolkits, and other resources will help all communities build efficient and effective local systems.

#### CROSS-AGENCY COLLABORATION

Public systems such as education, housing, transportation, human services, health care, child welfare, and the criminal legal system often intersect, yet each system operates independently of the others. Accordingly, each system's unique guidelines govern eligibility, documentation requirements, funding availability, program duration, performance measures, data management, and more. When youth are navigating multiple systems, conflicting requirements and duplicative processes add administrative burden to providers, agency staff, and youth themselves. Increasing coordination among public systems at the federal and local levels can increase efficiency and eliminate barriers to program participation.

Congress must ensure that income earned through participation in YYADEO programs does not cause unintended financial harm to youth and their families. Compensation from paid training and work experience should never be considered in determinations of need or eligibility for SNAP, TANF, Social Security Disability Insurance, housing support, or other benefits administered by any federal, state, local, or tribal entity. Congress must also direct the Internal Revenue Service to exempt a large portion of YYADEO program earnings from federal income tax.

#### FEDERAL INTERAGENCY COORDINATION

Interagency task forces with a strong charge, clearly defined common outcomes, and sustained financial resources can help improve coordination among agencies that administer federal programs.<sup>66</sup> Currently, the Interagency Working Group on Youth Programs (IWGYP) brings together leaders from 25 federal agencies and departments "to promote achievement of positive results for at-risk youth."<sup>67</sup> The IWGYP has created a strategic plan for federal collaboration, engaged a youth editorial board, and created a growing online youth engagement platform. However, the group's broad mandate does not prioritize youth employment and economic opportunity or focus its efforts on the kinds of regulatory coordination needed to streamline program administration. We propose a working group with an explicit focus on youth and young adult development and economic opportunity, coupled with sufficient funding to implement recommendations in each participating agency. This could take the form of a focused initiative within the existing IWGYP or a new, more narrowly focused group. Congress's FY2023 appropriation of \$3 million for a new Children's Interagency Coordinating Council "to foster greater coordination and transparency on child policy across their agencies"<sup>68</sup> demonstrates willingness to invest in this type of cross-agency work.

#### FACILITATING LOCAL COORDINATION

Statutory or regulatory waivers can play a role in streamlining and simplifying administrative procedures. Examples from the Performance Partnership Pilots for Disconnected Youth (P3) illustrate how waivers support collaboration among local agencies that serve youth. P3 communities can request exemptions from specific requirements connected to certain federal funds. These waivers often expand flexibility to blend discretionary funds in ways that help previously siloed programs collaborate smoothly. P3 evaluations point to successes in increasing co-enrollment and coordinating service delivery and offer lessons to consider when designing future waiver systems.<sup>69</sup>



#### FUNDING FLEXIBILITY

By braiding and blending funds (using waivers as needed), communities can pursue collaborative strategies like:

- Co-designing common intake forms and other administrative procedures to reduce duplicative paperwork and data entry.
- Cross-training case managers to provide direct access to services from any public agency, eliminating unnecessary referral and intake steps.
- Co-locating complementary services, such as teaching GED classes at a service center for youth experiencing homelessness or offering on-site child care at a training program.

DOL should also provide financial support for local youth-serving agencies to collaborate with the YYADEO system on projects such as strategic planning, technical assistance, and data sharing. A shared data collaborative or community of practice can help build policies that protect youth privacy while streamlining communication among agencies. With youth data fellowships, young people can lead participatory action research and data analysis about their own communities.<sup>70</sup>

Youth data must be handled with great care. At a minimum, YYADEO systems should follow the Fair Information Practice Principles developed by the Federal Privacy Council.<sup>71</sup> Boards and providers must only share data with young people's voluntary and fully informed consent. Personal data such as information related to physical or mental health or substance use should be shared only in extremely limited circumstances. To the greatest extent possible, YYADEO boards and providers must also shield youth data from use by immigration and law enforcement authorities.



# CONCLUSION

For decades, federal funding for WIOA Youth and its predecessors has been an indispensable but wholly insufficient resource for young people seeking economic opportunity. For just as long, a broad spectrum of stakeholders has fought to save these initiatives from budget cuts and worked to improve the surviving programs. Meanwhile, Congress has failed to use its power to do what youth employment and workforce development programs cannot: raise the minimum wage, increase enforcement of worker protections, establish paid family and medical leave, invest in debt-free education, or take other legislative measures to promote economic opportunity.<sup>72</sup>

This blueprint was born of a vision of thriving communities that equip each generation to transition into adulthood successfully. Young people entering the economy today implore us to ask for what we deserve, not just what we think we can get. With permanent funding at a scale to match the need, the YYADEO system can shift our expectations and create a new norm for every rural, urban, tribal, and suburban community.

We call on Congress to create a federal Youth and Young Adult Development and Economic Opportunity system that reaches every community in the United States and territories — a vital investment in the economic future we all deserve.



# ACKNOWLEDGEMENTS

This blueprint was informed by dozens of youth and young adults, practitioners, systems leaders, advocates, researchers, and others with relevant professional and/or lived expertise. We thank Dr. Nia West-Bey, CLASP's director of youth policy, for providing policy leadership and support throughout the development of this document. Thanks also go to founding CCRY Network member Lisa Johnson, director of FHI 360's National Institute for Work and Learning, for her continued practitioner leadership and the support of her team: Heidi Cooper Comenetz, Rebecca Corrigan, Caitlin Dawkins, and Robin Graham. We owe a great debt to Linda Harris, whose long career in the youth workforce development field included serving as the first director of CLASP's youth policy team and convening CCRY in its early years. Her wisdom and insight deepened our understanding of the history of the youth workforce system and encouraged us to push for greater federal investment than we thought possible.

CCRY Network members shared their expertise through focus groups, one-on-one interviews, and written feedback on several iterations of this document. They include: Josiah Akau, Kailua, HI (Kinai 'Eha); Kristina Baldwin, Hartford, CT (Department of Families, Children, Youth, and Recreation); Monica Badgett, Denver, CO (Denver Economic Development & Opportunity); Nilda Blanco, Orlando, FL (CareerSource Central Florida); Jim Boucher, Hartford, CT (Capital Workforce Partners); Kate Brennan, Philadelphia, PA (Philadelphia Youth Network); Donnice Brown, Baltimore, MD (Mayor's Office of Economic Development); Sheena Clarke, Seattle, WA (Workforce Development Council of Seattle-King County); Mimi Coenen, Orlando, FL (CareerSource Central Florida); Katie Condit, Tacoma, WA (WorkForce Central); Michael Davie, Seattle, WA (Workforce Development Council of Seattle-King County); Katy Gall, Boston, MA (Mayor's Office of Workforce Development); Faith Goldstein, Philadelphia, PA (Philadelphia Youth Network); Roxolana Golas, Philadelphia, PA (Philadelphia Youth Network); Michael Gritton, Louisville, KY (KentuckianaWorks); Michele Jacobs, Atlanta, GA (United Way of Greater Atlanta); Jonathan Jones, Albany, NY (Department of Recreation, Youth & Workforce Services); Marie Kurose, Seattle, WA (Workforce Development Council of Seattle-King County); Christie Lindsey, Southeast Arkansas (Phoenix Youth and Family Services); Aurscanta Mounger, Atlanta, GA (United Way of Greater Atlanta); Justin Oline, Philadelphia, PA (Philadelphia Youth Network); Hector Rivera, Hartford, CT (Our Piece of the Pie); Lisa Salazar, Los Angeles, CA (Youth Development Department); Raphael Tucker, Albany, NY (Department of Recreation, Youth & Workforce Services); Sunae Villavaso, New Orleans, LA (Mayor's Office of Workforce Development); Tammie Washington, New Orleans, LA (Mayor's Office of Workforce Development); and Evelyn Woock, Louisville, KY (KentuckianaWorks). We also received input from representatives of CCRY's two national policy partners, Opportunity Youth United (Lashon Amado and Kimberly Pham) and the National Youth Employment Coalition (Ervin Bishop and Thomas Showalter).

Many individuals outside the CCRY Network vetted key recommendations. They include Angel Brown (True Colors United); Dae'Janae Day (Prince George's County Youth Action Board and New Deal for Youth Changemaker); Allison Gerber (The Annie E. Casey Foundation); Alejandra Londono (CLASP); Kelly Gourdin (Prince George's County Department of Social Services); Tiffany Hart (True Colors United); Britnee Johnston (Native Nations Institute, The University of Arizona); Sophie Kidd (Afterschool Alliance); Lauren Leonardis (Mother & Changemaker Consulting); Landy Lin (CLASP); Janie McDermott (The Annie E. Casey Foundation); Alexis Obinna (Advocate and New Deal for Youth Changemaker); Clarence Okoh (CLASP); Daniel Rosebud (Georgia Reconnecting Youth, INC. and New Deal for Youth Partner); Lynn Sanders (Northeastern University); Amanda Leppert Gomes (Atlanta Youth Action Board); and Joan Timeche (Native Nations Institute, The University of Arizona).

We also thank photographer Triston Cooper for capturing some of the images in this report from the New Deal for Youth Week of Action.

Inclusion among these acknowledgements does not imply endorsement of this report, in whole or in part. Affiliations of each individual are provided for identification purposes only. Our apologies to anyone we inadvertently omitted from this list.

## ENDNOTES

<sup>1</sup> "Economic Justice and Opportunity," A New Deal for Youth, 2021, https://newdealforyouth.org/our-issues/#economicjustice.

<sup>2</sup> "Recommendations to Increase Opportunity and Decrease Poverty in America," National Council of Young Leaders and Opportunity Youth United, 2020, https://oyunited.org/wp-content/uploads/2020/01/NCYLRecommendationsJAN2020FINAL-1.pdf.

<sup>3</sup> "Communities Collaborating to Reconnect Youth Network (CCRY)," The Center for Law and Social Policy, https://www.clasp.org/about-ccrynetwork/.

<sup>4</sup> Workforce Innovation and Opportunity Act, Pub. L. 113-128, 128 Stat. 1425 (2014).

<sup>5</sup> Youth Employment and Demonstration Projects Act, Pub. L. 95-93, 91 Stat. 627 (1977).

<sup>6</sup> Charles L. Betsey, Robinson G. Hollister, Jr., and Mary R. Papageorgiou, editors, *Youth Employment and Training Programs: The YEDPA Years* (Washington, DC: National Academies Press, 1985), https://doi.org/10.17226/613.

<sup>7</sup> Workforce Investment Act, Pub. L. 105-220, 112 Stat. 936 (1998).

<sup>8</sup> Linda Harris, "Learning from the Youth Opportunity Experience: Building Delivery Capacity in Distressed Communities," The Center for Law and Social Policy, January 2006, https://www.clasp.org/sites/default/files/public/resources-and-publications/archive/0193.pdf.

<sup>9</sup> Adrienne L. Fernandes-Alcantara, "Vulnerable Youth: Employment and Job Training Programs," Congressional Research Service, August 31, 2020, https://www.everycrsreport.com/files/2020-08-31\_R40929\_3c645ba336ee93a7e08c3d602defb45c267f2372.pdf.

<sup>10</sup> "Committee Releases FY24 Labor, Health and Human Services, Education, and Related Agencies Appropriations Bill," U.S. House Committee on Appropriations, U.S. House, July 13, 2023, https://appropriations.house.gov/news/press-releases/committee-releases-fy24-labor-health-and-human-services-education-and-related.

<sup>11</sup> Economic Opportunity Act, Pub. L. 88-452, 78 Stat. 508 (1964).

<sup>12</sup> Maxine V. Mitchell, Davis Jenkins, Dao Nguyen, et al., "Evaluation of the Youthbuild Program," Applied Real Estate Analysis, Inc., 2003, https://www.huduser.gov/publications/pdf/youthbuild.pdf.

<sup>13</sup> Comprehensive Employment and Training Act Amendments, Pub. L. 95-524, 92 Stat. 1901 (1978).

<sup>14</sup> Comprehensive Employment and Training Act, Pub. L, 93-203, 87 Stat. 839 (1973).

<sup>15</sup> Job Training Partnership Act, Pub. L. 97-300, 96 Stat. 1322 (1982).

<sup>16</sup> Alex Camardelle, "Principles to Support Black Workers in the Workforce Innovation and Opportunity Act," Joint Center for Political and Economic Studies, October 2021, https://jointcenter.org/wp-content/uploads/2021/10/Principles-to-Support-Black-Workers-in-the-WIOA.pdf.

<sup>17</sup> WIOA Youth Performance Report PY22, Department of Labor - Employment and Training Administration, December 18, 2023, https://www. dol.gov/sites/dolgov/files/ETA/Performance/pdfs/PY2022/PY%202022%20WIOA%20National%20Performance%20Summary.pdf.

<sup>18</sup> Sapna Mehta, Nia West-Bey, and Kirby Phares, "Voters Favor Policy Investments to Support Young Adults, Including Employment Training and Paid Family and Medical Leave," Data for Progress and The Center for Law and Social Policy, March 2024, https://www.filesforprogress. org/memos/clasp-dfp-young-adult-training-employment.pdf.

<sup>19</sup> OECD, In It Together: Why Less Inequality Benefits All, (Paris: OECD Publishing, 2015), 26-27, https://dx.doi.org/10.1787/9789264235120-en.

<sup>20</sup> Small Area Estimates Program, "2021 Community Resilience Estimates Equity Supplement," U.S. Census Bureau, June 2023, https://www. census.gov/programs-surveys/community-resilience-estimates/data/supplement.html.

<sup>21</sup> George Farkas, D. Alton Smith, and Erns Stromsdorf, et al., "Impacts from the Youth Incentive Entitlement Pilot Projects: Participation, Work, and Schooling Over the Full Program Period," Manpower Demonstration Research Corporation, December 1982, https://files.eric.ed.gov/fulltext/ED236301.pdf.

<sup>22</sup> Olivia Hunt, "Self-Attestation is the Right Step for the Social Security Administration," Social Security Matters Blog, U.S. Social Security Administration, December 28, 2022, https://blog.ssa.gov/self-attestation-is-the-right-step-for-the-social-security-administration/.

<sup>23</sup> Stephanie Rogus, Joanne Guthrie, and Katherine Ralston, "Characteristics of School Districts Offering Free School Meals to All Students Through the Community Eligibility Provision of the National School Lunch Program," U.S. Department of Agriculture, August 2018, https:// www.ers.usda.gov/webdocs/publications/89948/err255-summary.pdf?v=6846.5.

<sup>24</sup> National Youth Employment Coalition, "Reimagining the Workforce Innovation and Opportunity Act: Recommendations of the National Youth Employment Coalition," p. 13, June 2021, https://x33888.p3cdn1.secureserver.net/wp-content/uploads/2021/06/NYEC-WIOA-Recommendations-June-2021.pdf.

<sup>25</sup> "Accurately Defining Homelessness: A First Step Towards Ending Youth Homelessness," National Network for Youth, October 2019, https:// nn4youth.org/wp-content/uploads/Policy-Brief\_2019\_Accurately-Defining-Homelessness.pdf.

<sup>26</sup> Kristen Lewis, "Ensuring an Equitable Recovery: Addressing Covid-19's Impact on Education," Measure of America, Social Science Research Council, 2023, https://measureofamerica.org/youth-disconnection-2023.

<sup>27</sup> Parthenon-EY Education Practice and Ernst & Young, LLP, "Untapped potential: Engaging all Connecticut youth," https://cdn.ey.com/parthenon/pdf/perspectives/Parthenon-EY\_Untapped-Potential\_Dalio-Report\_final\_092016\_web.pdf.

<sup>28</sup> Lewis, "Ensuring an Equitable Recovery."

<sup>29</sup> "The Core Science of Adolescent Development," UCLA Center for Developing Adolescent, https://developingadolescent.semel.ucla.edu/ core-science-of-adolescence.

<sup>30</sup> Katie Richards-Schuster and Barry Checkoway, "Youth Participation in Public Policy at the Local Level: New Lessons from Michigan Municipalities," *National Civic Review* 98(4): 26–30, https://doi.org/10.1002/ncr.273.

<sup>31</sup> Patricia Rogers, "Impact Evaluation 2: Theory of Change," Methodological Briefs, UNICEF Office of Research, 2014, https://www. betterevaluation.org/sites/default/files/Theory\_of\_Change\_ENG.pdf.

<sup>32</sup> "Why YPAR?" Berkeley YPAR Hub, UC Berkeley, https://yparhub.berkeley.edu/why-ypar.

<sup>33</sup> American Job Centers, Employment and Training Administration, U.S. Department of Labor, https://www.dol.gov/agencies/eta/americanjob-centers.

<sup>34</sup> Evan W. Carr, "The Value of Belonging at Work," Harvard Business Review, December 21, 2021, https://hbr.org/2019/12/the-value-ofbelonging-at-work.

<sup>35</sup> Americans with Disabilities Act, Pub. L. 101-336, 104 Stat. 327 (1990).

<sup>36</sup> Individuals with Disabilities Education Act, Pub. L. 91–230, title VI, §601, as added Pub. L. 108-446, title I, §101 (2004), 118 Stat. 2647; Pub. L. 111-256, §2(b)(1), 124 Stat. 2643 (2010).

<sup>37</sup> "The Intersection of Adolescent Development and Anti-Black Racism," The National Scientific Council on Adolescence, Council Report No. 1, UCLA Center for the Developing Adolescent, 2021, https://developingadolescent.semel.ucla.edu/assets/uploads/research/resources/ The\_Intersection\_of\_Adolescent\_Development\_and\_Anti-Black\_Racism.pdf.

<sup>38</sup> Maru Gonzalez, Michael Kokozos, Christy M. Byrd, et al., "Critical Positive Youth Development: A Framework for Centering Critical Consciousness," *Journal of Youth Development* 15(6): 24–43, https://doi.org/10.5195/jyd.2020.859.

<sup>39</sup> Germán A. Cadenas and Ellen Hawley McWhirter, "Critical Consciousness in Vocational Psychology: A Vision for the Next Decade and Beyond," *Journal of Career Assessment* 30(3): 411–35, https://doi.org/10.1177/10690727221086553.

<sup>40</sup> Matthew A. Diemer and David L. Blustein, "Critical consciousness and career development among urban youth," *Journal of Vocational Behavior* 68(2): 220–32, https://doi.org/10.1016/j.jvb.2005.07.001.

<sup>41</sup> Germán A. Cadenas, Elizabeth Angélica Cantú, Tameka Spence, et al., "Integrating Critical Consciousness and Technology in Entrepreneurship Career Development with Diverse Community College Students," *Journal of Career Development* 47(2): 162–76, https://doi. org/10.1177/0894845318793968.

<sup>42</sup> Elena Maker Castro, Laura Wray-Lake, and Alison K. Cohen, "Critical Consciousness and Wellbeing in Adolescents and Young Adults: A Systematic Review," *Adolescent Research Review*, 7(4): 499-522, May 13, 2022, https://doi.org/10.1007/s40894-022-00188-3.

<sup>43</sup> Emma Gallegos and Daniel J. Willis, "Most California High School Seniors Shut Out of Even Applying to the State's Universities," EdSource, February 12, 2024, https://edsource.org/2024/most-california-high-school-seniors-shut-out-of-even-applying-to-the-statesuniversities/705635.

<sup>44</sup> "Occupational Outlook Handbook," U.S. Bureau of Labor Statistics, https://www.bls.gov/ooh/.

45 "About O\*NET," O\*NET Resource Center, North Carolina Department of Commerce, https://www.onetcenter.org/overview.html#data.

<sup>46</sup> Advance IET, "Promising Practices for Integrated Education and Training Programs That Serve Beginning-Level Learners," IET Strategies in Action, https://lincs.ed.gov/sites/default/files/2023-11/IET-Sum2BeginLevelLearn-508.pdf.

<sup>47</sup> Edward DeJesus, "A Social Capital Framework," DeJesus Solutions, https://www.edwarddejesus.com/\_files/ugd/41b295\_ fc603482127849fba1f3d747bd61e7de.pdf.

<sup>48</sup> Camardelle, Principles to Support Black Workers.

<sup>49</sup> Workplace Readiness Week; work permits, Cal. Ed. Code, §49110.5, Chapter 271 (2023).

<sup>50</sup> Jill Pierce and Lindsey Liu, "Costs And Quality in Virtual/Hybrid Summer Youth Employment Programming," Research for Action, February 14, 2022, https://www.researchforaction.org/research-resources/out-of-school-time/pyn-cost-and-quality/.

<sup>51</sup> Noel M. Tieszen, Rosa M. Garcia, Asha Banerjee, et al., "Principles for a High-Quality Pre-Apprenticeship: A Model to Advance Equity," The Center for Law and Social Policy, April 10, 2022, https://www.clasp.org/publications/report/brief/principles-high-quality-pre-apprenticeship-model-advance-equity/.

<sup>52</sup> "Department of Labor Launches Initiative to Promote Worker-Owned Businesses, Increase Workplace Democracy, Improve Bottom Line for Many Americans," Employee Benefits Security Administration, U.S. Department of Labor, July 10, 2023, https://www.dol.gov/newsroom/ releases/ebsa/ebsa20230710.

53 SECURE 2.0 Act, Pub. L. 117-328, div. T, 136 Stat. 5275 (2022).

<sup>54</sup> Kathy Tran, "Centering Youth Voices and Equity in a National Youth Subsidized Employment Program," The Center for Law and Social Policy, May 2, 2023, https://www.clasp.org/publications/report/brief/centering-youth-voices-and-equity-in-a-national-youth-subsidized-employment-program/.

<sup>55</sup> Indivar Dutta-Gupta, Kali Grant, Matthew Eckel, et al., "Lessons learned from 40 years of subsidized employment programs: A framework, review of models, and recommendations for helping disadvantaged workers" Georgetown Center on Poverty and Inequality, Spring 2016, https://www.georgetownpoverty.org/wp-content/uploads/2016/07/GCPI-Subsidized-Employment-Paper-20160413.pdf.

<sup>56</sup> Noel Tieszen, "Toward a Vision of Quality Summer Employment for All Youth," The Center for Law and Social Policy, May 11, 2022, https://www.clasp.org/wp-content/uploads/2022/05/2022\_TowardAVision.pdf.

<sup>57</sup> Laura Tatum, Indivar Dutta-Gupta, Cosette Hampton, et al, "The Youth Opportunity Guarantee: A Framework for Success," Georgetown Center on Poverty and Inequality, March 2019, https://www.georgetownpoverty.org/wp-content/uploads/2019/04/Youth-Opportunity-Guarantee-20190411.pdf.

<sup>58</sup> Mark Paul, William Darity Jr., and Darrick Hamilton, "The Federal Job Guarantee - A Policy to Achieve Permanent Full Employment," Center on Budget and Policy Priorities, March 9, 2018, https://www.cbpp.org/research/full-employment/the-federal-job-guarantee-a-policy-toachieve-permanent-full-employment.

<sup>59</sup> Executive Order 6101 of April 5, 1933, Relief of Unemployment Through the Performance of Useful Work, https://www.presidency.ucsb. edu/documents/executive-order-6101-relief-unemployment-through-the-performance-useful-public-work.

<sup>60</sup> Melissa Bass, "The Politics and Civics of National Service: Lessons from the Civilian Conservation Corps, VISTA, and AmeriCorps," The Brookings Institution, 2013, 74.

<sup>61</sup> "New Deal Artwork: GSA's Inventory Project," U.S. General Services Administration, October 3, 2023, https://www.gsa.gov/real-estate/ design-and-construction/art-in-architecturefine-arts/fine-arts/new-deal-artwork-gsas-inventory-project.

<sup>62</sup> Farkas, et al., Impacts from the Youth Incentive Entitlement Pilot Projects.

63 "Youth Mental Health Corps," 2024, https://www.youthmentalhealthcorps.org/.

<sup>64</sup> Martha Ross, Kristin Anderson Moore, Kelly Murphy, et al, "Pathways to High-Quality Jobs for Young Adults," Metropolitan Policy Program at Brookings and Child Trends, 2018, https://www.brookings.edu/articles/pathways-to-high-quality-jobs-for-young-adults/.

<sup>65</sup> "Project 14 24 & Work-Based Learning," Teens Take Charge, April 2023, https://www.teenstakecharge.com/past-campaigns/project-14-24.

<sup>66</sup> "Leading Practices to Enhance Interagency Collaboration and Address Crosscutting Challenges," U.S. Government Accountability Office, May 2024, https://www.gao.gov/assets/830/825808.pdf.

<sup>67</sup> "Federal Collaboration," youth.gov, https://youth.gov/feature-article/federal-collaboration.

<sup>68</sup> "Children's Interagency Coordinating Council FY 2023 Report to Congress," U.S. Department of Health and Human Services, December 2023, https://aspe.hhs.gov/sites/default/files/documents/4edc7445ae83cad8294160e6c8b7ac39/fy23-aspe-rtc-cicc.pdf.

<sup>69</sup> Alexandra Stanczyk, Armando Yañez, and Linda Rosenberg, "Performance Partnership Pilots for Disconnected Youth (P3): Implementation Study Findings of the Pilots' Experiences," Mathematica, December 8, 2020, https://www.dol.gov/sites/dolgov/files/OASP/evaluation/pdf/ P3%20Final%20Implementation%20Report.pdf.

<sup>70</sup> "About CTData," CTData Collaborative, https://www.ctdata.org/hartfordyouth.

<sup>71</sup> "Fair Information Practice Principles (FIPPs)," Federal Privacy Council, https://www.fpc.gov/resources/fipps/.

<sup>72</sup> Kisha Bird, "Youth, Equity, and the Power of Now: Our Collective Responsibility," The Center for Law and Social Policy, 2020, https://www. clasp.org/wp-content/uploads/2022/01/CLASP\_youthyoungadultsequity\_jan2021.pdf.