TO: AFFILIATE AMERICAN JOB CENTER DIRECTORS
    COMPREHENSIVE AMERICAN JOB CENTER DIRECTORS
    DEPARTMENT OF LABOR EMPLOYMENT AND TRAINING REGIONAL
    ADMINISTRATORS
    STATE WORKFORCE INVESTMENT ACT (WIA) LIAISONS
    STATE WIA ADMINISTRATORS
    STATE WORKFORCE INVESTMENT BOARD (WIB) CHAIRS
    LOCAL WIB CHAIRS
    STATE WIB EXECUTIVE DIRECTORS
    LOCAL WIB EXECUTIVE DIRECTORS

FROM: PORTIA WU
    Assistant Secretary
    Employment and Training Administration

    JENNIFER SHEEHY
    Acting Assistant Secretary
    Office of Disability Employment Policy

SUBJECT: Release and Availability of a Report, "Services for Youth with Disabilities
Provided under Title I of the Workforce Investment Act: Results from a Survey of
Local Workforce Investment Boards"

1. **Purpose.** To announce the release and availability of a report, "Services for Youth with
Disabilities Provided under Title I of the Workforce Investment Act: Results from a Survey of
Local Workforce Investment Boards;" and to provide information on recommended strategies
and resources for increasing effective service delivery for youth with disabilities.

2. **References.**
   - Workforce Innovation Opportunity Act (WIOA), Pub. L. 113-128, enacted July 22, 2014;
   - Workforce Investment Act (WIA) of 1998, as amended 29 U.S.C. 2801, et seq., Title 1,
     Subtitle B, Chapter 4 – Youth Services;
   - WIA Final Rule, 20 C.F.R. parts 661 and 664, published at 65 FR 49294, Aug. 11, 2000;
   - Training and Employment Guidance Letter (TEGL) No. 31-10 Increasing Enrollment and
     Improving Services to Youth with Disabilities;
   - Training and Employment Notice (TEN) No. 32-12 Administration of the Survey of
     Workforce Investment Act Services Provided to Youth with Disabilities for Local
     Workforce Investment Board Executive Directors; and
   - TEGL No. 27-09 Workforce Investment Act (WIA) Youth Program Guidance for Program
     Year (PY) 2010.

EMPLOYMENT AND TRAINING ADMINISTRATION
U.S. DEPARTMENT OF LABOR
WASHINGTON, D.C. 20210
3. **Background.** The U.S. Department of Labor (DOL) commissioned a study, "*Services for Youth with Disabilities Provided under Title I of the Workforce Investment Act: Results from a Survey of Local Workforce Investment Boards.*" This study explored and examined the extent to which Local Workforce Investment Boards (LWIBs) provide services to youth with disabilities in their American Job Centers and network of youth service providers under WIA.

The final report provides a snapshot of services received by youth with disabilities in the public workforce system at a single point in time, discusses several recent DOL initiatives targeting this population, summarizes a series of literature review findings, and describes the survey of LWIB Executive Directors. The goals of the survey were to address key research questions about current practices related to: 1) LWIB approaches to serving youth with disabilities, 2) identification of and responsiveness to the distinctive needs of youth with disabilities, 3) building staff capacity, 4) expanding services and funding for youth with disabilities, 5) reaching out-of-school youth, and 6) providing employment and community service opportunities to youth with disabilities.

While the study was commissioned under WIA, these results are also relevant to WIOA, which was enacted in July of 2014, and which supersedes WIA and amends Wagner-Peyser and Vocational Rehabilitation. WIOA continues to provide for the provision of workforce development services such as assessments, basic skills education, career readiness, occupational skills training, and job search assistance for both youth and adults, including individuals with disabilities.

4. **Research Design and Analytical Approach.** The primary source of data for this study is a Web-based survey administered to all 580 LWIBs across the country. Survey instructions encouraged the LWIB Executive Directors to forward the survey link to the person with the most knowledge about services provided for youth with disabilities. Survey responses were collected over an eight-week period with a total of 400 surveys completed or partially completed for an overall completion rate of 69 percent. The analysis is descriptive and results do not support causal relationships. However, results may be used to develop hypotheses about causality that may be used to conduct additional investigative studies. Other limitations are described in the report. The report also includes two appendices that include copies of TEN 32-12, survey instructions and instrument, and the list of experts that supported the development of the study.

5. **Key Findings.** The study recognizes the complexities of providing services in Local Workforce Investment areas through American Job Centers and the network of service providers and provides useful insights about distinct program philosophies, dedicated resources to enhance capacity, and expansion of partnerships to serve youth with disabilities. In terms of distinct programming philosophies, the majority of LWIBs (72 percent) that responded to the survey acknowledge that they view youth with disabilities as a natural component of the larger youth population and distinctions are generally not made when delivering services. Nonetheless, a distinct minority (28 percent) responded that they consider youth with disabilities a unique service population that requires proactive targeting
and customization of program resources. Regardless of service philosophy, the majority of LWIBs have dedicated some level of resources to enhance their capacity to effectively serve youth with disabilities. Examples include appointing constituent advocates to the Workforce Investment Board or Youth Council, hiring staff dedicated to serving those with disabilities, conducting targeted outreach and/or providing specialized staff development or employer training. However, many LWIBs also make proactive efforts to expand their resource and stakeholder base through the formation of partnerships with other organizations. As an example, nearly nine out of 10 LWIBs have partnerships with both vocational rehabilitation (89 percent) and secondary schools and alternative schools (87 percent).

The study further specifies a number of challenges including:

- **Resource availability.** Limited WIA funding presents a challenge to serving youth with disabilities particularly when faced with the intensive service level this population may require.

- **Prevalence of undisclosed disabilities.** Survey respondents report a high degree of undisclosed disabilities among the youth population. Strategic commitments to serving this population are compromised if there is uncertainty about the scope of those being targeted.

- **Employer perceptions.** Despite proactive training efforts, many LWIBs report that employers continue to perceive that hiring of youth with disabilities may entail additional costs and may compromise productivity.

- **Out-of-school youth with disabilities.** While an individual is enrolled in school there are generally more resources available to identify a disability, assess potential needs, and make appropriate referrals. Once an individual is no longer in school, the planning, identification, and delivery of these services becomes much more challenging.

- **Performance measures perceptions.** WIA performance measures are seen as a disincentive to providing the type of intensive services that youth with disabilities may need. Additionally, emphasis on different performance measures is perceived as a challenge to the formation of cross-agency partnerships.

- **Staff and provider preparedness.** While DOL makes investments in WIA staff development to ensure they have the knowledge and skills needed to serve individuals with disabilities, approximately nine out of 10 LWIBs continue to report the need for additional training.

The report concludes with a series of recommendations for the DOL, states, and LWIBs to consider, such as continuing to closely examine effective and promising practices, seeking greater insight into the size and mix of the youth with disabilities population, sustaining efforts to build staff capacity, adopting a broader perspective on the issue of “access,” seeking more work opportunities, in particular with the more “reluctant” employers, and expanding partnerships with the mental health community.
6. **Additional Resources.** To assist state and local workforce boards with addressing the challenges and adopting the recommendations, the Attachment describes the identified strategies and related resources for better service delivery to youth with disabilities.

7. **Inquiries.** To view an abstract of this publication, as well as download the full report, visit the Employment and Training Administration Research Publication Database Website at: http://wdr.doleta.gov/research/keyword.cfm.

8. **Attachment.** Strategies and Resources for Serving Youth with Disabilities
ATTACHMENT
Strategies and Resources for Serving Youth with Disabilities

The following strategies and resources are available to assist the workforce system in addressing challenges that were identified through the survey. Developed with the support of the Office of Disabilities Employment Policy, these guides, strategies, and tools are useful for improving service delivery to youth with disabilities; and available for employers, jobseekers, educators and employment service providers.

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<td>Guides and Strategies to Encourage Local Workforce Investment Boards to Serve Youth with Disabilities</td>
<td>The <strong>Guideposts for Success</strong>, a research-based policy and practice framework, delineates what all youth, including those with disabilities, need to succeed. Guideposts focused on serving other youth populations, including youth in foster care, youth with mental health needs, youth in the juvenile justice system, and youth with learning disabilities are also available. Visit: <a href="http://www.ncwd-youth.info/guideposts">http://www.ncwd-youth.info/guideposts</a>. Targeted <strong>Guideposts</strong> are also available for serving youth including those with disabilities in foster care, <a href="http://www.ncwd-youth.info/guideposts/foster-care">http://www.ncwd-youth.info/guideposts/foster-care</a>; youth with mental health needs, <a href="http://www.ncwd-youth.info/guideposts/mental-health">http://www.ncwd-youth.info/guideposts/mental-health</a>; and youth with learning disabilities, <a href="http://www.ncwd-youth.info/guideposts/learning-disabilities">http://www.ncwd-youth.info/guideposts/learning-disabilities</a>.</td>
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<td>Innovative Strategies, a Web-based database, provides information on innovative state and local workforce development programs and practices that serve youth with disabilities, either as a target population or as part of other youth populations. Visit: <a href="http://www.ncwd-youth.info/innovative-strategies">http://www.ncwd-youth.info/innovative-strategies</a>.</td>
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<td>Universal Design Strategies, such as accessible technology, enable workforce staff to provide easier access, a welcoming atmosphere, and better customer service in order to serve youth with a wide range of learning styles, languages, educational levels, intelligence, and abilities. Visit: <a href="http://www.dol.gov/odep/topics/technology.htm">http://www.dol.gov/odep/topics/technology.htm</a>.</td>
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<td><strong>Disability Inquiries in the Workforce Investment System</strong> clarifies what staff and youth service providers can, and cannot, ask about someone's disability. Visit: <a href="http://www.ncwd-youth.info/information-brief-09">http://www.ncwd-youth.info/information-brief-09</a>.</td>
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<td><strong>Performance Measures Adjustment &amp; Incentives: Key Strategies for Providing Improved Services to Harder-to-Serve Populations in the Age of Accountability</strong> discusses possible approaches to adjusting performance measures and creating incentives for better serving hard-to-serve populations. Visit: <a href="http://www.ncwd-youth.info/assets/background/Performance_Measures-Adjustment__Incentives.doc">http://www.ncwd-youth.info/assets/background/Performance_Measures-Adjustment__Incentives.doc</a>.</td>
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<td><strong>Building Staff Capacity</strong></td>
<td><strong>High Quality Professional Development for Youth Service Professionals</strong> (adults who work directly with youth) requires a mix of competencies from the youth development, education, workforce development, and disability fields in order to effectively meet the needs of all youth, including those with disabilities. Visit <a href="http://www.ncwd-youth.info/professional-development">http://www.ncwd-youth.info/professional-development</a>.</td>
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<td><strong>The Hidden Disabilities Quick Reference Guide</strong> aims to increase awareness of the broad spectrum of disabilities, and can assist youth providers in identifying support and service needs when serving youth who may or may not have been previously formally diagnosed with a disability. Visit: <a href="http://www.ncwd-youth.info/assets/guides/quick_reference_guides/hidden_disabilities.pdf">http://www.ncwd-youth.info/assets/guides/quick_reference_guides/hidden_disabilities.pdf</a>.</td>
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| Reaching Out-of-School Youth         | **Interagency Forum on Disconnected Youth**, established in March 2012, provides a wealth of resources on re-engaging and effective service delivery for young people ages 14-24 who are homeless, in foster care, involved in the justice system, or are neither employed nor enrolled in an educational institution. Youth with disabilities are over-represented within each of these populations. Visit: [http://www.findyouthinfo.gov/youth-topics/reconnecting-youth](http://www.findyouthinfo.gov/youth-topics/reconnecting-youth).  
Guides for Success for Youth Involved in the Juvenile Corrections System provides information about specific experiences, supports, and services that are relevant to improving education and employment outcomes for youth with and without disabilities involved or at risk of becoming involved in the juvenile justice system. Visit: [http://www.ncwd-youth.info/guideposts/ juvenile-justice](http://www.ncwd-youth.info/guideposts/juvenile-justice). |
| Expanding Services and Funding for Youth with Disabilities | **Map My Community** provides an interactive mapping tool to locate federally supported youth programs in your community. Visit: [http://www.findyouthinfo.gov/maps/map-my-community](http://www.findyouthinfo.gov/maps/map-my-community).  
Blending and Braiding Funds And Resources: The Intermediary As Facilitator focuses on how intermediary organizations can facilitate the blending and braiding of funds and resources to encourage cross-systems collaboration to improve educational and employment outcomes for all youth, including those with disabilities. Visit: [http://www.ncwd-youth.info/information-brief-18](http://www.ncwd-youth.info/information-brief-18).  
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<td><strong>Workforce Recruitment Program</strong> is an Office of Disability Employment Policy (ODEP) sponsored summer internship and work experience program for college students or recent graduates with disabilities. Visit: <a href="http://www.dol.gov/odep/wrp">http://www.dol.gov/odep/wrp</a>.</td>
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<td><strong>Service-Learning</strong> is a strategy that integrates meaningful community service with instruction and self-reflection to support a variety of goals, and is beneficial for students, organizations, and communities. Visit: <a href="http://findyouthinfo.gov/youth-topics/service-learning">http://findyouthinfo.gov/youth-topics/service-learning</a>.</td>
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<td><strong>Use of Social Security Work Incentives to Promote Work-Based Learning in Youth Employment and Training Programs</strong>, is a report that examines AmeriCorps as a model that includes an income exemption that allows youth with disabilities who are Social Security beneficiaries to participate in work-based learning experiences and receive a living allowance or stipend without it impacting their benefits. Visit: <a href="http://www.ncwd-youth.info/social-security-and-work-based-learning">http://www.ncwd-youth.info/social-security-and-work-based-learning</a>.</td>
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<td>Dispelling Employer Misperceptions</td>
<td><strong>Tax Incentives for Employers</strong>, provides information regarding tax incentives that may be available to private sector businesses that make structural adaptations or other accommodations for employees or customers with disabilities. Visit: <a href="http://www.dol.gov/odep/topics/TaxIncentivesForEmployers.htm">http://www.dol.gov/odep/topics/TaxIncentivesForEmployers.htm</a>.</td>
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<td>The Campaign for Disability Employment, an ODEP-funded outreach effort to promote the hiring, retention and advancement of people with disabilities, is a collaborative of several leading disability and business organizations convened by ODEP to work together to address disability employment. Visit: <a href="http://www.dol.gov/odep/topics/CampaignForDisabilityEmployment.htm">http://www.dol.gov/odep/topics/CampaignForDisabilityEmployment.htm</a>.</td>
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For additional information and resources on successful strategies that promote inclusive service policy development and practices, including universal design, disability disclosure and disability inquiries, front line staff training, assessment, blending and braiding of program funding, work-based learning, youth development and leadership, connecting activities, and accommodation, visit:

- National Collaborative on Workforce and Disability for Youth [http://www.ncwd-youth.info/](http://www.ncwd-youth.info/); and