

**WORKFORCE INVESTMENT ACT**  
**EVALUATION OF YOUTH PROGRAM**  
**ENROLLMENTS, SERVICES, AND**  
**RECORDED OUTCOMES**



**Office of Inspector General**  
**Office of Audit**  
**Report No. 06-03-006-03-390**  
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**TABLE OF CONTENTS**

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ABBREVIATIONS..... ii

EXECUTIVE SUMMARY ..... 1

FINDINGS ..... 4

    1. The WIA youth program focused predominantly on in-school, younger youth ages 14 through 16..... 4

    2. Younger youth were enrolled equally in employment-related, educational, and work-readiness activities, whereas older youth were enrolled more in employment-related activities. Participation in these reported activities was documented to any extent in only 72 percent of the cases. .... 6

    3. Almost half the youth exited the program within 1 year. Furthermore, almost one of every four youth we sampled, and two of every five youth who enrolled during the months of May and June, may have enrolled only for the summer employment program..... 12

    4. *Skill attainment* was the overwhelming accomplishment (91 percent) for younger youth, while *entered employment* (57 percent) was the predominant outcome recorded for older youth. Only 37 percent of these recorded accomplishments were adequately documented. .... 16

RECOMMENDATIONS ..... 24

APPENDIX A: PARTICIPANT EXAMPLES ..... 26

APPENDIX B: BACKGROUND ..... 29

APPENDIX C: OBJECTIVES, SCOPE, AND METHODOLOGY ..... 31

APPENDIX D: ETA’S RESPONSE TO THE DRAFT REPORT ..... 34

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**ABBREVIATIONS**

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DOL	Department of Labor
ESL	English-as-a-Second Language
ETA	Employment and Training Administration
GED	General Equivalency Diploma
LWIB	Local Workforce Investment Board
MIS	Management Information System
OIG	Office of Inspector General
OJT	On-the-Job Training
OYS	Office of Youth Services
TEGL	Training and Employment Guidance Letter
WIA	Workforce Investment Act of 1998 (Public Law 105-220)

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## EXECUTIVE SUMMARY

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The U.S. Department of Labor (DOL), Office of Inspector General (OIG) conducted an evaluation of the Workforce Investment Act of 1998 (WIA) youth programs operated by Local Workforce Investment Boards (LWIB). For the individuals in our sample, the program more often than not provided summer employment opportunities to in-school, younger youth. Also, only 72 percent of reported activities and 37 percent of the recorded performance measures for our sample youth were adequately documented<sup>1</sup>. We performed this evaluation to answer the following questions:

### **Objective 1: What youth group(s) did the program serve?**

The WIA youth program focused on younger, in-school youth ages 14 through 16. During our evaluation period<sup>2</sup>, 86 percent (7,104 of 8,284) of the youth participants enrolled by the 14 LWIBs we reviewed were younger youth (defined by the WIA as ages 14 through 18). We evaluated a random sample of 420 youth cases (359 younger youth, ages 14 through 18; and 61 older youth, ages 19 through 21) from a judgmental sample of 14 local workforce investment boards (LWIB) across the continental United States.

Of our randomly selected sample of 359 younger youth, at the time of enrollment:

- 78 percent were in school.
- 67 percent were age 16 and under.
- 17 percent were dropouts.
- 4 percent were high school graduates not currently attending any school.
- Less than 1 percent was enrolled in post-secondary education.

### **Objective 2: What services did the LWIBs provide the youth?**

The younger youth participants were enrolled equally in employment-related, educational, and work-readiness activities, whereas, older youth were enrolled more in employment-related activities. We determined that services were recorded for 95 percent of the participants we sampled. Conversely, we did not find **any** evidence that 5 percent of the sampled youth were enrolled in any activity.

Although the LWIBs recorded 95 percent participation, we concluded that participants' involvement in these recorded activities, **in total**, was adequately documented in only 72 percent of the cases. The levels of documentation for each activity individually were:

- 81 percent of employment-related activities were adequately documented;
- 51 percent of educational activities were adequately documented; and
- 85 percent of work-readiness activities were adequately documented.

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<sup>1</sup> See Appendix C, Objectives, Scope, and Methodology for examples of adequate and inadequate documentation.

<sup>2</sup> See Appendix C, Objectives, Scope, and Methodology for explanation of evaluation period and procedures.

Almost half the youth exited the program within 1 year. Furthermore, over half (227 of 420) the sampled youth enrolled in the youth program during the months of May and June, including 23 percent (96 of 420) who exited the program in June, July, August, or September of the same year. We concluded that individuals who both entered and exited the program during the summer months might have enrolled only for the summer employment program. Our conclusion is further supported by the fact that of the 96 participants enrolled in May and June and exited in June, July, August, or September, 82 (85 percent) were enrolled in the summer employment program, including 36 (38 percent) whose only recorded activity was summer employment.

**Objective 3: What performance measure accomplishments (skill attainments and/or outcomes) did the LWIBs record for these youth?**

Of the **total** 389 younger youth performance measures<sup>3</sup> recorded, 91 percent were **skill attainments** (an interim performance measure). The remaining recorded measures were 7 percent **diploma or equivalent attainment outcomes**, and 3 percent were **retention outcomes**.<sup>4</sup>

**Outcomes** were recorded for only 23 of the 43 older youth (53 percent) who exited the program. Of the 23 outcomes, 13 (57 percent) were *entered employment*, 7 (30 percent) were *credential attainments*, and 3 (13 percent) were *employment retentions*.

Only 37 percent of the total 412 recorded skill attainments and outcomes -- 389 younger youth, 23 older youth -- were adequately documented.

**Recommendations:**

In our Draft Report, we recommended the Assistant Secretary for Employment and Training:

- Continue to push the Employment and Training Administration's (ETA) proposed amendments to the Workforce Investment Act of 1998 as they relate to the WIA youth program. The proposed amendments would focus the program on those youth supposedly most in need; i.e., out-of-school, at-risk youth.
- Promote amendments to the Workforce Investment Act of 1998 to allow summer employment as a stand-alone activity for those participants whose individual assessments indicate only such a need. Furthermore, for those summer employment program participants whose individual assessments indicate a need for educational or other services in addition to summer employment, we

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<sup>3</sup> Youth can have more than one skill attainment and/or outcome; therefore, the number of skill attainments and/or outcomes may exceed the number of participants.

<sup>4</sup> See pages 20 and 21 for a discussion of the *diploma or equivalent attainment* and *retention* measures.

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recommend providers be required to demonstrate that such additional services are *bona fide*, meaningful interventions that address the youth's identified needs, and that participation in such additional services is fully documented.

- Require that youth program administrators and/or contractors/service providers better document services provided and outcomes recorded to ensure that programs are accurately evaluated.

### **ETA's Response to Draft Report and OIG's Conclusions**

ETA concurred with the report's first recommendation. We consider this recommendation closed.

ETA responded that the second recommendation, to allow summer employment as a stand-alone activity, is contrary to the original legislative intent, and is in conflict with the first recommendation. We disagree that the recommendations conflict. Even in a fully integrated program, a youth's only need may be occupational and work-readiness skills. Employment during the summer months could be sufficient to teach these skills. We continue to believe that services should be provided based on assessed needs, and that program providers should have the flexibility to determine which services will best meet those needs. We consider this recommendation unresolved.

In response to the third recommendation, ETA agreed that improved documentation of services provided and outcomes recorded is necessary. ETA responded that the implementation of its Data Validation Initiative should serve to improve local program management of WIA youth programs through the practice of collecting program management data through a quality management information system (MIS). We consider this recommendation resolved; it will be closed upon ETA's demonstrating, through data validation or other means, that youth services and outcomes are adequately documented.

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## FINDINGS

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### **1. The WIA youth program focused predominantly on in-school, younger youth ages 14 through 16.**

We concluded that the LWIBs focused their programs on younger, in-school youth ages 14 through 16 because the WIA allows that 70 percent of youth

program funds can be spent on in-school youth. Furthermore, younger youth provide the LWIBs with an easy to find target audience, and provide the LWIBs with multiple options to record positive program outcomes, while participants are still enrolled. Yet, the Assistant Secretary for Employment and Training testified<sup>5</sup> that research has shown that out-of-school, at-risk youth between the ages of 16 and 21 face the greatest workforce development barriers. Consequently, the program does not appear to be serving those most in need.

During our evaluation period, 86 percent (7,104 of 8,284) of the participants enrolled by the 14 LWIBs we reviewed were younger youth (defined by WIA as ages 14 through 18). Consequently, our evaluation sample was 85 percent (359 of 420) younger youth. Of our sample of 359 younger youth:

- 78 percent (281 of 359) were in school.
  - 55 percent (199 of 359) were basic skills deficient, and
  - 23 percent (82 of 359) were not basic skills deficient.
- 67 percent (240 of 359) were age 16 and under.
  - 23 percent (83 of 359) were age 14.
  - 24 percent (85 of 359) were age 15.
  - 20 percent (72 of 359) were age 16.
- 17 percent (60 of 359) were dropouts.
- 4 percent (15 of 359) were high school graduates.
- Less than 1 percent (3 of 359) were postsecondary education students.

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<sup>5</sup> On March 11, 2003, the Assistant Secretary for Employment and Training testified on the Administration's Workforce Investment Act reauthorization proposal before the Committee on Education and the Workforce Subcommittee on 21<sup>st</sup> Century Competitiveness, U.S. House of Representatives.

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Section 136 of the WIA specifies the following seven core performance indicators for youth programs:

- For **younger youth**:
  - skill attainment rate
  - diploma or equivalent attainment rate
  - retention rate
  
- For **older youth**:
  - entered employment rate
  - employment retention rate
  - average earnings change
  - credential attainment rate

The younger youth *skill attainments* can be claimed while the participants are still enrolled; i.e., they are an interim measure of program accomplishment prior to the participants' exiting the program. The LWIBs can claim a skill attainment if the participant meets one of three skill goals: *basic skills, occupational skills, or work-readiness skills*. Furthermore, the LWIBs can claim as many as three skill attainments per participant, per year.

The other younger youth performance measures (excluding *skill attainments*), and all older youth performance measures, are program **outcomes** and cannot be claimed until the youth have exited the WIA program. In our opinion, younger youth are easier to locate, serve, and claim positive program accomplishments for than older youth.

The Administration's WIA reauthorization proposal targets out-of-school, at-risk youth for services under the formula grants awarded to each state government. Younger, in-school youth would be one group of youth to be served by competitively awarded *challenge grants*.

Furthermore, it is our understanding that in the future performance indicators for **all** youth will be the same; i.e., youth ages 19 through 21 will no longer be evaluated against the adult standards.



**2. Younger youth were enrolled equally in employment-related, educational, and work-readiness activities, whereas, older youth were enrolled more in employment-related activities. Participation in these reported activities was documented to any extent in only 72 percent of the cases.**

Most youth were reported enrolled in one or more of three broad activities classifications -- employment-related, educational, and work-readiness. However, we did not find any evidence that youth were involved in 28 percent of the training activities in which they were reported enrolled.

In this report, we have reported the participants' enrollment both when enrollment was adequately documented and when some evidence indicated the youth participated in an activity; e.g., enrollment shown on a management information system (MIS) form but with no substantiating evidence such as attendance forms, timesheets, or completion certificates. Therefore, we accepted **any** evidence of services to give the LWIBs credit for providing services in order to fully present the activities youth may have been involved in. **Still we were unable to evaluate any evidence that 5 percent of the sampled youth (22 of 420) were enrolled in any activity.**

We classified the following specific LWIB recorded services into the following three broad activities classification:

- **Employment-related** activities are meant to prepare youth for success in entering and staying in the job market. These activities include:
  - summer employment
  - work experience
  - internship
  - apprenticeship
  - on-the-job training (OJT)
  - occupational/vocational skills training
  - job shadowing/counseling
  
- **Educational** activities are meant to help youth achieve educational goals, such as high school completion. Such activities include:
  - basic educational skills
  - General Equivalency Diploma (GED) preparation
  - English-as-a-second language (ESL)
  - tutoring/counseling
  - other instruction leading to secondary school completion
  - postsecondary education

**Work-readiness** activities are all activities not included in employment-related or educational activities except supportive services. Such activities include:

- job search techniques
- preemployment skills
- life skills
- peer centered activities
- organizational/teamwork training
- community service activities

**A. The different training activities the younger youth were reported enrolled in were fairly evenly distributed among the type of activities.**

The 359 sampled younger youth were reported enrolled in the following activities:

- 238 (66 percent) were enrolled in **employment-related** activities
- 237 (66 percent) were enrolled in **educational** activities
- 236 (66 percent) were enrolled in **work-readiness** activities

We did not find **any** evidence that 14 (4 percent) younger youth participants were enrolled in any activity.

**B. Older youth were enrolled more in employment-related than educational or work-readiness activities.**

Of the 61 older youth in our sample:

- 33 (54 percent) were enrolled in **employment-related** activities
- 23 (38 percent) were enrolled in **educational** activities
- 26 (43 percent) were enrolled in **work-readiness** activities

We did not find **any** evidence that eight (13 percent) older youth participants were enrolled in any activity.

**C. Most youth were enrolled in more than one type of activity.**

The percentages of training **combinations** for both younger and older youth are shown in the table below:

<b>YOUTH ENROLLED IN MULTIPLE ACTIVITIES BY AGE GROUP</b>		
Combinations of Activities	Percent Younger Youth N=359	Percent Older Youth N=61
Employment-related, educational, and work-readiness	30 percent	8 percent
Employment-related and educational	10 percent	7 percent
Employment-related and work-readiness	12 percent	10 percent
Educational and work-readiness	21 percent	15 percent

### 1) Employment-Related Activities

For 238 younger youth, the LWIBs recorded 284 employment-related activities. For 33 older youth, the LWIBs recorded 38 employment-related activities. Summer employment (60 percent) was the predominant employment-related activity for youth followed by work experience (30 percent) then classroom occupational/vocational skills training (10 percent). The following analysis shows the breakdown of these employment-related activities by youth age groups:

#### Younger Youth (284 activities)

- Summer employment -- 184 activities (65 percent)
- Work experience<sup>6</sup> -- 82 activities (29 percent)
- Classroom training --18 activities (6 percent) .

#### Older Youth (38 activities)

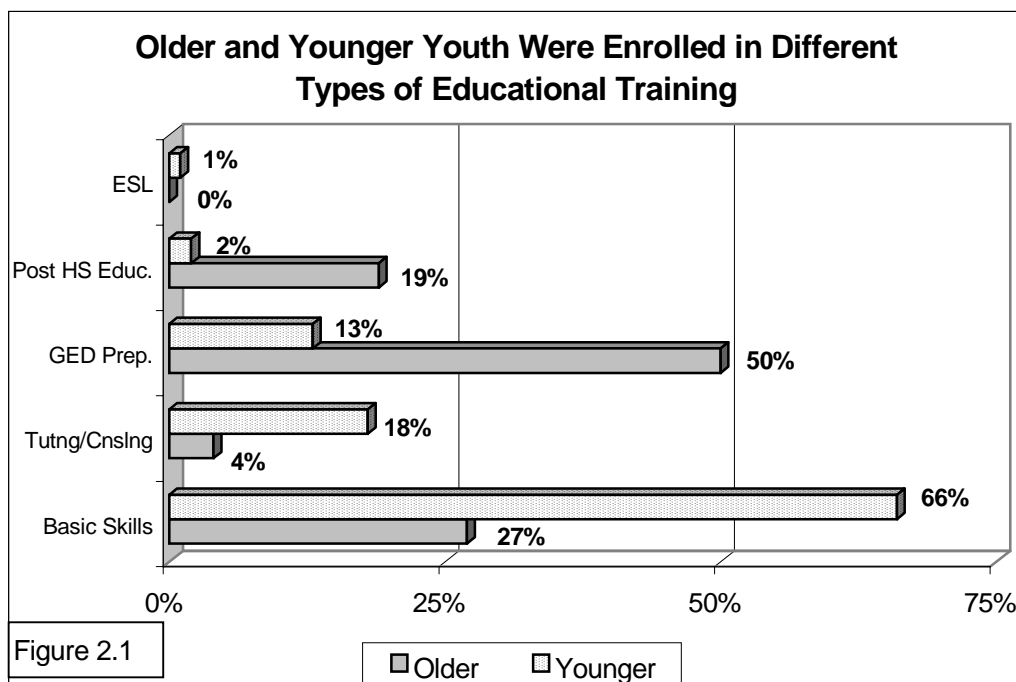
- Summer employment -- 11 activities (29 percent)
- Work experience<sup>7</sup> --14 activities (37 percent)
- Classroom training --13 activities (34 percent)

### 2) Educational Activities

As figure 2.1, below, shows, younger youth educational activities focused on basic skills training and tutoring and/or counseling services. Older youth received more basic skills and GED preparation.

<sup>6</sup> Includes work experience, internships, apprenticeships, on-the-job training, and job shadowing.

<sup>7</sup> Ibid 6.



### 3) Work-Readiness Activities.

Work readiness activities are all activities not included in employment-related or educational activities. These activities include, but are not limited to, pre-employment training, such as labor market knowledge, world of work awareness, career planning and job search techniques. Also included are life (soft) skills training and leadership development. Both older and younger youth were involved primarily in two work-readiness activities: *pre-employment* (including job search) and *life skills*.

#### D. Activities compared to educational status

We analyzed the services LWIBs recorded the youth were enrolled in by the youths' educational status, as determined by the LWIBs, at the time the youth were enrolled. We analyzed services provided to 341 **younger youth** who were either in school -- 199 who were basic skills deficient; 82 were not basic skills deficient<sup>8</sup> -- or were dropouts (60 youth). We also evaluated services provided to 22 **older youth** dropouts.

<sup>8</sup> Of these 82 youth, the LWIBs tested and determined that 69 youth were not basis skills deficient; they did not test the other 13 participants for basic skills proficiency. For the purpose of this analysis, we have included all 82 as being "not basic skills deficient."

### **In-school, basic skills deficient younger youth**

Of the 199 in-school, basic skills deficient younger youth:

- 154 youth (77 percent) were enrolled in 183 educational activities, predominantly basic skills activities (135 or 74 percent).
- 141 youth (71 percent) were enrolled in 177 employment-related activities, predominantly summer employment (126 or 71 percent).

### **In-school, not basic skills deficient younger youth**

The 82 in-school, **not** basic skills deficient younger youth, received a mix of services:

- 64 youth (78 percent) were enrolled in 71 employment-related activities, predominantly summer employment (53 or 75 percent).
- 30 youth (37 percent) were enrolled in 35 educational activities, mainly basic skills (18 or 51 percent) and GED and/or high school completion (9 or 26 percent). While over half the youth were enrolled in basic skills activities, youth in this group were not basic skills deficient.
- 48 youth (59 percent) were enrolled in work-readiness activities.

### **Dropouts**

Of the 60 **younger youth** dropouts, 45 participants were enrolled in 55 educational activities (49 or 89 percent, were basic skills and GED preparation), 22 were enrolled in employment-related activities, and 36 were enrolled in work-readiness activities.

Twenty-two of the 61 **older youth** (36 percent) were dropouts of which the LWIB determined 17 to be basic skills deficient. Yet, only nine received educational activities -- two in basic skills and seven in GED preparation.

### **E. Only 72 percent of the total recorded activities were adequately documented.**

Only 72 percent of the **total** recorded activities for all youth (643 of 893) were adequately documented. As figure 2.2, on the following page shows, individually, only 81 percent of employment-related activities, 51 percent of educational activities, and 85 percent of work-readiness activities were adequately documented.

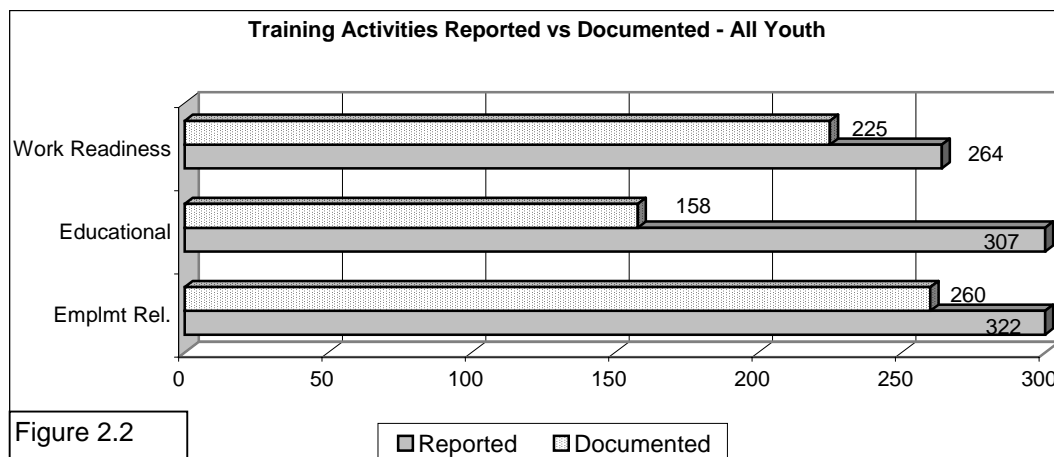


Figure 2.2

A lack of evidence that participants actually participated in their recorded training activities might indicate inaccuracies in the reported performance outcomes; i.e., if the activity is not adequately documented, what reliance can be placed on the recorded outcomes? Especially important is the number of **undocumented** educational activities (49 percent) since 52 percent of the recorded younger youth attainments are basic skills related. (See finding 4 for attainments information.)

**3. Almost half the youth exited the program within 1 year. Furthermore, almost one of every four youth we sampled, and two of every five youth who enrolled during the months of May and June, may have enrolled only for the summer employment program.**

Almost half the youth exited the program within 1 year, even though the majority of youth were younger, in-school youth, ages 14 through 16.

Furthermore, over half (227 of 420) the sampled youth enrolled in the youth program during the months of May and June, including 23 percent (96 of 420) who exited the program in June, July, August, or September of the same year. We concluded that individuals who both entered and exited the program during the summer months might have enrolled only for the summer employment program.

**A. Younger Youth.**

Of the 359 younger youth, 210 (59 percent) had exited the program at the time of our evaluation. The table, below, provides the distribution of total time in the program from registration to exit date, or until August 30, 2002, our evaluation cutoff date, if the youth had not exited.

LENGTH OF TIME YOUNGER YOUTH SPENT IN THE PROGRAM						
Time in Program	Exited		Not Exited		Total	
	#	%	#	%	#	%
1-30 days	6	1.7			6	1.7
31-90 days	84	23.4			84	23.4
3-6 months	28	7.8			28	7.8
7-12 months	48	13.4			48	13.4
13-24 months	44	12.3	120	33.4	164	45.7
Over 24 months			29	8.1	29	8.1
Totals	210	58.5	149	41.5	359	100.0

As the table above shows, almost half (166 of 359) the younger youth exited the program within a year:

- 25 percent (90) exited within 90 days,
- 33 percent (118) exited within 6 months, and
- 46 percent (166) exited within 12 months.

This high exit rate may point to the emphasis on summer employment instead of sustained services year round.

Furthermore, 41 percent of the younger youth who had not exited had no record of activities from over 6 months to over 2 years from the time of their last activity until the end of our evaluation period (August 30, 2002). Of the 149 youth who had not exited:

- 13 percent (20) had no recorded training activity for over 6 months to a year.
- 28 percent (42) had no recorded training activity in over a year.

### **B. Older Youth.**

Of the 61 older youth, 43 (71 percent) had exited the program at the time of our evaluation. Thirty-one, or 51 percent, exited within 1 year after enrollment. All of the older youth who had not exited were in the program over 13 months at the time of our evaluation.

In general, the status of the older youth at WIA exit were as follows:

- 14 (33 percent) dropped out or terminated for cause
- 16 (37 percent) were employed
- 7 (16 percent) were unemployed
- 6 (14 percent) were in school

The status of youth who dropped out or were terminated prior to program completion varied, including relocation to another state, medical problems, incarceration, and lack of cooperation. In some cases, we did not know the status of the youth at exit because of inadequate documentation or the LWIBs could not locate them.

Youth employed at exit included those who had been working while in the WIA program and prior to WIA registration. Some participants working at the time of exit may not have met the youth *entered employment* performance indicator standard of being employed in the calendar quarter after the quarter of exit.

### **C. While most participants were reported enrolled in multiple activities, over 40 percent of the enrollees who enrolled in May and June may have enrolled only for the summer employment program.**

Under WIA, summer youth employment is not intended to be a stand-alone program. Title 20 Code of Federal Regulations, Subpart F, § 664.600(d) states:

The summer youth employment opportunities element is not intended to be a stand-alone program. Local programs should integrate a youth's participation in that element into a comprehensive strategy for addressing the youth's employment and training needs. Youths who participate in summer employment opportunities must be provided with a minimum of twelve months of followup services, as required in § 664.450.



Because of the summer employment program's dominance in terms of activities, we analyzed the exit dates of those individuals whose program enrollment dates were in May and June to attempt to determine how many may have been enrolled only for the summer program; i.e., exited in either June, July, August, or September of the same year. Specifically, we found:

For younger youth:

- 57 percent (206 of 359) were enrolled in May and June.
- 63 percent (130 of 206) of May and June enrollees exited the program.
- of these, 68 percent (88 of 130) exited the program in June, July, August, or September of the same year.

For older youth:

- 34 percent (21 of 61) were enrolled in May and June.
- 43 percent (9 of 21) of May and June enrollees exited the program.
- of these, 89 percent (8 of 9) exited the program in June, July, August, or September of the same year.

Therefore, 42 percent (96 of 227) of all youth who were enrolled in May and June exited the program in June through September of the same year, indicating they may have been enrolled for the summer program only. Our conclusion is supported by the fact that of the 96 participants (enrolled in May and June and exited in June, July, August, or September), 82 (85 percent) were enrolled in the summer employment program, including 36 (38 percent) whose only recorded activity was summer employment.

**D. Approximately 40 percent of younger youth who had summer employment as an activity had summer employment as their only activity or their participation in other recorded activities was not documented.**

In addition to the analysis in finding C above (for those enrolled during May and June and exited in May through September), we determined that 166 younger youth participants, regardless of enrollment date, had summer employment as an activity. Of these 166 participants:

- 40 (24 percent) had summer employment as their only recorded activity.
- 27 (16 percent) had summer employment and other activities; however, participation in the other activities was not documented.

Consequently, for 67 of these 166 summer employment program participants, summer employment was either a stand-alone activity or the LWIBs did not document that it was not a stand-alone activity. Simply recording enrollment in other activities does not document that the activities actually happened.

**4. Skill attainment was the overwhelming accomplishment (91 percent) for younger youth, while entered employment (57 percent) was the predominant outcome recorded for older youth. Only 37 percent of recorded accomplishments were adequately documented.**

For our 359 younger youth and 61 older youth samples, the LWIBs recorded 389 younger youth skill attainments and outcomes and 23 older youth outcomes.<sup>9</sup> *Skill attainment* (91 percent) was the overwhelming accomplishment for the younger youth, whereas,

*entered employment* (57 percent) was the predominant outcome for older youth. However, only 37 percent of younger youth and 48 percent of older youth performance measurements recorded -- 37 percent in total -- were adequately documented.

Although it was not within the evaluation's scope to verify officially reported **state** performance indicators, we did examine the accomplishments (skill attainments and outcomes) the LWIBs recorded in their MIS for each youth sampled.

Section 136 of the WIA specifies seven core performance indicators for youth programs:

For <b>younger youth</b>	For <b>older youth</b>
• skill attainment rate	• entered employment rate
• diploma or equivalent attainment rate	• employment retention rate
• retention rate	• average earnings change
	• credential attainment rate

The younger youth **skill attainments** can be claimed while the participants are still enrolled. The other younger youth **outcomes** and all older youth performance **outcomes** cannot be claimed until the youth have exited from the WIA program. The older youth performance indicators are virtually the same as for adults.

We understand that in the future performance indicators for **all** youth will be the same; i.e., youth ages 19 through 21 will no longer be evaluated against the adult standards.

#### **A. Younger Youth Skill Attainment Rate**

The younger youth *skill attainment* is the only WIA performance measure that can be measured and reported while the participant is still enrolled in the younger youth program. Skill attainments are limited to a measured increase of knowledge in *basic skills, occupational skills, or work-readiness skills*. All youth measured in the skill attainment rate must have a minimum of one skill goal set per year, may have a maximum of three goals per year, and the target for accomplishing each skill goal must

<sup>9</sup> Youth can have more than one skill attainment/outcome; therefore, the number of skill attainments and/or outcomes may exceed the number of participants.

be set for no later than 1 year. If a youth accomplishes a skill goal, the accomplishment is included in the skill attainment rate program performance indicator.

We examined the younger youth skill attainments recorded during the first year subsequent to the registration date, regardless of WIA exit date. TEGL 7-99 provides the following regarding skill attainments:

To measure skill attainment for the younger youth skill attainment measure, local programs must assess youth at intake to determine whether they are in need of basic skills, work readiness skills, and/or occupational skills. This assessment will include a review of basic skills, occupational skills, prior work experiences, employability, interests, aptitudes and supporting service needs. From this assessment, skill attainment goals will be established. . . . To determine whether youth meet the skill attainment goals **will require** a pre-assessment and post-assessment of skill level. The use of a standardized assessment procedure such as a standardized test or a performance-based assessment with a standardized scoring method is encouraged. . . . In cases where a standardized test or a performance-based assessment is not available (such as for work-readiness skills), assessment techniques **must be objective**, unbiased, and conform to widely accepted, clearly defined criteria, be field tested for utility, consistency, and accuracy, and provide for the training/preparation of all raters/scorers. . . . All data and methods to determine achievement of skill attainment goals must be documented and are subject to audit. [Emphasis added.]

Of the 359 younger youth, the LWIBs recorded one or more attainments for 237 youth, or 66 percent. The following table shows the number of attainments claimed per youth for the 237 youth who received one or more attainments.

Number of Skill Attainments Recorded Per Youth			Total Youth
1	2	3	
138 (58%)	81 (34%)	18 (8%)	237 (100%)

The 237 youth recorded a total of 354 attainments as follows:

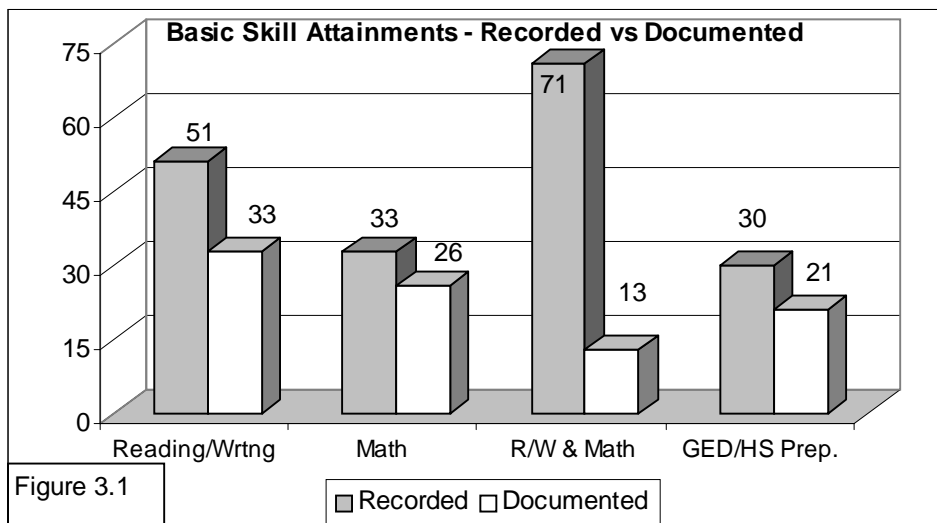
Type Skill Attainment	Attainments Claimed	Percent
Basic skill	185	52%
Occupational skill	62	18%
Work-readiness skill	107	30%
Total	354	100%

For those with only one attainment recorded:

- 62 percent of the attainments claimed were for basic skills,
- 15 percent were for occupational skills, and
- 23 percent were for work-readiness skills.

### 1) Basic Skill Attainments.

Basic skill attainments accounted for 185 (52 percent) of the LWIBs' recorded youth skill attainments. The basic skill attainments are accomplished by attaining a measurable increase in basic skills such as reading comprehension, writing, speaking, listening, problem solving, reasoning, and the capacity to use these skills. Figure 3.1, below, shows the specific basic skill attainments recorded by the LWIBs and the number of attainments that were adequately documented. In our opinion, only 50 percent (93 of 185) of the claimed basic skill attainments were adequately documented. (See appendix B, Objectives, Scope and Methodology, for adequate/inadequate documentation examples.)



See appendix A, participant example 1, for an example of recorded basic skill attainments not adequately documented.

## 2) Occupational Skill Attainments

Occupational skill attainments accounted for 62 (18 percent) of the 354 youth skill attainments recorded. Occupational skill attainments are achieved by gaining a measurable increase in knowledge of an occupational skill. Our evaluation revealed the types of training used to attain an occupational skill attainment included classroom and vocational training, work experience (on-the-job training, internships, and apprenticeships), and summer employment. The 62 recorded occupational skill attainments were based on the following activities:

- 35 (56 percent) were based on summer employment.
- 21 (34 percent) were based on regular work experience.
- 6 (10 percent) were based on classroom/vocational training.

We concluded only 1 of the 62 (2 percent) LWIB recorded occupational skill attainments were adequately supported. The following type documentation was used by the LWIBs to support the skill attainments<sup>10</sup>:

- 1 (2 percent) was based on a post-test taken to measure knowledge gained from the occupational training.
- 34 (55 percent) were supported only by a statement in the youths' case files, case management notes, or some form of MIS information.
- 20 (32 percent) were supported by subjective evaluations. Most of these evaluations are performed by the youth's instructor or supervisor and consist of a numerical rating on several different segments of the training performed prior to and subsequent to the training activity. This type documentation usually resulted in low ratings at the start of training followed by high ratings at training completion.
- 6 (10 percent) were based on a completion certificate. In our opinion, completion certificates issued by the LWIB, its partners, or contractors are not an objective form of support for attainments.
- 1 (2 percent) was based on the completion of one semester at a community college.

## 3) Work-Readiness Skill Attainments.

Work-readiness skill attainments accounted for 107 (30 percent) of the LWIBs' recorded youth attainments. Work-readiness skills include (but are not limited to) such topics as labor market knowledge, career planning and decision-making, job search techniques,

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<sup>10</sup> Percents add to 101% due to rounding.

and survival/daily living skills (soft skills). In order to claim a work-readiness skill attainment the LWIB must show the youth achieved a measurable increase in knowledge of work-readiness skills.

We concluded only 20 percent of the 107 work-readiness skill attainments claimed were adequately documented.

- 21 (20 percent) were based on a post-test taken by the youth to measure knowledge gained from the work-readiness training.
- 15 (14 percent) were supported only by a statement in the youths' case files, case management notes, or some form of MIS information.
- 41 (38 percent) were based on a subjective evaluation. These evaluations were very similar to the ones used to support the occupational skill attainments.
- 30 (28 percent) were based on completion certificates. In our opinion, completion certificates issued by the LWIB, its partners, or contractors are not an objective form of support for a skill attainment.

See appendix A, participant example 2, for an example of not only work-readiness, but also occupational and educational skill attainments not adequately documented. Furthermore, this example shows how two performance outcomes (*basic skill attainment* during enrollment and *diploma or equivalent attainment* after exit) were claimed for the same accomplishment – obtaining a high school diploma.

## **B. Younger Youth Diploma or Equivalent Attainment Outcome**

The *diploma or equivalent attainment* performance outcome represented 7 percent of **total** younger youth recorded accomplishments (26 of 389).

To achieve the *diploma or equivalent attainment* performance outcome the younger youth participant must have attained a secondary school diploma or equivalent by the end of the first quarter **after exit**. The participants who exit WIA while still enrolled in secondary school are excluded from this measure. Our evaluation was designed to collect the performance accomplishments the LWIBs recorded for our participant sample overall. As it was not our objective to separately evaluate subsets of exiters, we do not know how many of the 210 sampled younger youth exiters were still in school at the time of exit. The LWIBs recorded that 26 of the 210 younger youth exiters (12 percent) achieved this outcome. The actual percentage may be higher, because participants enrolled in school at the time of exit would be excluded from the denominator, resulting in a higher calculated percentage of outcome attainment.

Twenty-two of the 26 (85 percent) recorded outcomes were adequately documented.

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### C. Younger Youth Retention Rate Outcome

This performance outcome represented 2 percent of **total** younger youth recorded accomplishments (9 of 389).

The *younger youth retention* outcome can be claimed if the youth is involved in any one of five activities -- postsecondary education, advanced training, employment, military service, or qualified apprenticeships -- during the third quarter after the exit quarter. It does not matter if the youth did not exit WIA into one of the activities, it only matters that he/she was involved in one of these activities at any time during the third quarter after exit quarter. All younger youth who exit WIA while still enrolled in secondary education are excluded from this measure.

As discussed in finding B above, our evaluation was designed to determine the performance accomplishments the LWIBs recorded for our participant sample, not to determine the LWIBs' levels of accomplishment for this performance outcome. In addition to us not knowing how many of the 210 sampled younger youth who exited the program were still enrolled in secondary school at the time of exit, it takes an extensive time frame after WIA exit to determine this performance measure. At the time of our evaluation, some participants may not have yet qualified to be evaluated against this outcome because of the time frame. This may account for the small number of retentions recorded. However, the *retention* outcome was recorded for 9 of the 210 youth (4 percent) in our sample who had exited the program. Actual accomplishment of this outcome may be higher for those who were **not** still enrolled in secondary school at the time of exit and sufficient time frame has now passed.

Only six of the nine outcomes (67 percent) were adequately documented.

See appendix A, participant example 3, for an example of a verified recorded retention outcome that does not measure program success.

### D. Older Youth Entered Employment Rate Outcome

The entered employment performance outcome means the youth was employed sometime during the first full quarter after the quarter the youth exited the WIA program; i.e., if unemployment insurance wage records show **any** earnings for the quarter after exit quarter. This measure includes only those youth who were not employed at WIA registration and were not enrolled in postsecondary education or advanced training in the quarter after exit.

Although wage records are the primary data source, supplemental wage data sources may be used if the employer is exempt from reporting wages to the state such as Federal



employment, postal service, military, railroad, self-employment, and employment where earnings are primarily based on commission.

The entered employment outcome was recorded for 30 percent (13 of 43) of the exited older youth; yet, we could substantiate only 7 of the 13 outcomes, or 54 percent.

This performance outcome represented 57 percent of **total** older youth recorded outcomes (13 of 23).

### **E. Older Youth Retention in Employment Rate Outcome**

A youth is considered as retained in employment if state wage records show **any** earnings in the first and third quarter after the WIA exit quarter, not necessarily with the same employer, and the youth was not enrolled in postsecondary education or advanced training in the third quarter after WIA exit.

As in the entered employment indicator, supplemental wage data sources may be used if the employer is exempt from reporting wages to the state.

We found that 7 percent (3 of 43) of the exited older youth were recorded as retained in employment; yet, we could substantiate only one of the three outcomes. As with the younger youth retention attainments, this small number of older youth recorded retentions is most likely because not enough time had elapsed subsequent to the WIA exit date to determine if the youth had actually been retained in employment.

This performance outcome represented 13 percent of **total** older youth recorded outcomes (3 of 23).

### **F. Older Youth Credential Attainment Outcome**

A credential is defined as a nationally recognized degree or certificate or state/locally recognized credential. Credentials include, but are not limited to a high school diploma, GED or other recognized equivalents, post-secondary degrees/certificates, recognized skill standards, and licensure or industry-recognized certificates. All state education agency recognized credentials should be included.

Credentials must be obtained either while the participant is still participating in the WIA program or by the end of the third quarter after exit from the WIA program. The participant must have been employed or participating in training by the first quarter after exit to receive a credential by the third quarter after exit.

The LWIBs claimed that 16 percent (7 of 43) of the exited older youth received one or more credentials. We could substantiate only three of these recorded credential outcomes.

This performance outcome represented 30 percent of **total** older youth recorded outcomes (7 of 23).

## RECOMMENDATIONS

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We recommend the Assistant Secretary for Employment and Training:

- Continue to push ETA's proposed amendments to the Workforce Investment Act of 1998 as they relate to the WIA youth program. The proposed amendments would focus the program on those youth most in need; i.e., out-of-school, at-risk youth.
- Promote amendments to the Workforce Investment Act of 1998 to allow summer employment as a stand-alone activity for those participants whose individual assessments indicate only such a need. Furthermore, for those summer employment program participants whose individual assessments indicate a need for educational or other services in addition to summer employment, we recommend providers be required to demonstrate that such additional services are bona fide, meaningful interventions that address the youth's identified needs, and that participation in such additional services is fully documented.
- Require youth program administrators and/or contractors/service providers better document services provided and outcomes recorded to ensure that programs are accurately evaluated.

### **ETA's Response to Draft Report and OIG's Conclusions**

ETA concurred with the report's first recommendation. We consider this recommendation closed.

ETA responded that the second recommendation, to allow summer employment as a stand-alone activity, is contrary to the original legislative intent, and is in conflict with the first recommendation. We disagree that the recommendations conflict. Even in a fully integrated program, a youth's only need may be occupational and work-readiness skills. Employment during the summer months could be sufficient to teach these skills. We continue to believe that services should be provided based on assessed needs, and that program providers should have the flexibility to determine which services will best meet those needs. We consider this recommendation unresolved.

In response to the third recommendation, ETA agreed that improved documentation of services provided and outcomes recorded is necessary. ETA responded that the implementation of its Data Validation Initiative should serve to improve local program

management of WIA youth programs through the practice of collecting program management data through a quality management information system (MIS). We consider this recommendation resolved; it will be closed upon ETA's demonstrating, through data validation or other means, that youth services and outcomes are adequately documented.

## Participant Example 1

### Example of recorded basic skill attainments not adequately documented

A 15-year old youth completed the 8th grade prior to entering the WIA program. On July 5, 2000, this youth was purported at program entry to have grade-level test scores of 8.0 in reading and 7.4 in math. On July 27, 2000, 3 weeks after entry, this participant was purported to have increased her grade-level test scores to 8.5 in reading (½ grade level increase) and 9.8 in math (almost 2½ grade level increase). A 2½ grade level increase in math is a remarkable achievement in a 3-week period (during summer months) for someone who had just completed the 8th grade.

We determined the LWIB's supporting documentation to be inadequate to record two basic skill attainments for the following reasons:

**Reading attainment:** The participant's file included both a pre- and post-test. Both tests have the same answers. However, the pre-test has a grade of 8.0 and the post-test has a score of 8.5 without any further explanation as to why the post-test is scored higher. Furthermore, was the participant basic-skills deficient in reading at the **tested** 8.0 entry grade level when she had just completed the 8th grade prior to enrollment? If she was not basic-skill deficient at entry, can a basis skill attainment be recorded?

Furthermore, in our opinion, the same person did not mark the answers on both forms. The "x" marking the answers on the pre-test form are in a different style than the "x" marking the answers on the post-test.

**Math attainment:** The participant's file included two *Wide Range Achievement Test, Revision 3* test sheets to document both pre- and post-test scores. Both test sheets were blank with the exception of the participant's name, date, and handwritten raw and grade-level scores. This documentation is inadequate to justify almost a 2½ grade level increase in math skills in a 3-week period.

In our opinion, the LWIB's evidence for these attainments was not adequate.

## Participant Example 2

### Example of work-readiness, occupational, and educational skill attainments not adequately documented

This 18-year-old female youth was halfway through the 12<sup>th</sup> grade headed toward graduation at the time she registered for the WIA program. She entered the program in December 2000 and exited the program in May of 2001 with a special education diploma from high school.

The LWIB set three goals for this youth:

- Improve math score by 0.1 grade (basic skills).
- Achieve 80 percent efficiency on indicators from work skills inventory (occupational skills).
- Improve use of working time by one point on personal evaluation sheets (work-readiness skills).

Services she was reported enrolled in were:

- undocumented counseling/mentoring and some basic skills; and
- documented work experience --1 hour and 45 minutes a day, Monday through Friday -- as a general clerk while attending high school.

The LWIB recorded all goals had been met and claimed three skill attainments (basic, occupational, and work readiness) for this participant.

- The participant's work-readiness attainment was supported by a pre- and post-program evaluation form with only two of the potential twelve performance measures completed. One of the performance measures was for *attendance* for which she was rated the same, *absent or late often*, on both the pre- and post-program evaluation forms. For the *use of working time* goal, she exceeded the goal because she increased two points (not one) on her use of working time. According to the pre- and post-program evaluation forms, she went from *wastes time* on the pre-evaluation to *keeps busy* on the post-evaluation.
- The basic skill attainment was not documented other than the youth obtained her special education diploma from the high school she was already attending in the 12<sup>th</sup> grade when enrolled. Obtaining a diploma is an outcome separate from a basic skill attainment. In fact, the LWIB also claimed the *diploma or equivalent attainment* performance indicator for the youth graduating from high school.
- The occupational skill attainment was documented with very subjective, partially completed evaluation form. The mid-year evaluation was dated **April 18, 2001**, showing 56 percent efficiency on the work skills inventory (rather than the 80 percent necessary to achieve the attainment). No post-program evaluation was completed after April 18, 2001. Yet, her file shows she met the goal on **May 15, 2001**.

### Participant Example 3

**Example of a verified, recorded retention outcome that does not measure the success of the program.**

We verified that the *retention* the LWIB recorded in its MIS for this youth was accurately recorded because state wage records showed the participant had wages during the third quarter after his WIA exit quarter.

The youth exited the WIA program during the first quarter of 2001 and had part-time employment during the exit quarter (\$301 earnings) and first quarter after exit (\$168 earnings). We did not find any earnings in the second quarter after exit. In the third quarter after exit, the State wage files showed earnings of \$12 from a different employer. Consequently, the State can report a positive *retention* outcome for this youth because of \$12 of wages in the third quarter after the WIA exit quarter. Even though this recorded positive outcome meets ETA's performance measurement criterion, it raises questions if the outcome truly represents a meaningful outcome.

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## BACKGROUND

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The DOL's Employment and Training Administration (ETA), Office of Youth Services (OYS), administers the nation's WIA youth programs. DOL grants funds to the states that, in turn, subgrant funds to local communities to implement youth programs.

Authorized under Section 126 of WIA, state and local activities are formula-funded youth programs that provide improved comprehensive services to eligible youth, 14 to 21 years old in local communities. Funds are allocated to state and local areas on a formula distribution determined by the number of unemployed individuals in areas of substantial unemployment; the relative excess number of unemployed individuals in a state; and the relative number of disadvantaged youth in a state.

Section 129 of WIA allows that 70 percent of youth program funds can be spent on in-school youth by providing that a minimum of 30 percent of the funds shall be used to serve out-of-school youth. Therefore, we conclude the WIA emphasizes services to in-school youth.

The purposes of the WIA youth program are to provide youth with:

- assistance in achieving academic and employment success;
- training opportunities;
- mentoring opportunities;
- supportive services; and
- incentives for recognition and achievement.

To determine what services each youth needs, local areas are to objectively assess each youth's basic skills, occupational skills, prior work experience, employability, interests, aptitudes, supportive service needs, and developmental needs. The WIA, Section 129(c)(1)(B) requires that every participant shall have a individual service strategy as a "roadmap" for training and employment.

WIA section 129(c)(2) provides that the following services are available to youth participants:

- (1) tutoring, study skills training, and instruction leading to secondary school completion, including dropout prevention strategies;
- (2) alternative secondary school offerings;



**APPENDIX B (cont'd)**

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**BACKGROUND (cont'd)**

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- (3) summer employment opportunities directly linked to academic and occupational learning;
- (4) paid and unpaid work experiences, including internships and job shadowing,
- (5) occupational skill training;
- (6) leadership development opportunities,
- (7) supportive services,
- (8) adult mentoring for a duration of at least 12 months, that may occur both during and after program participation;
- (9) followup services, and
- (10) comprehensive guidance and counseling, including drug and alcohol abuse counseling, as well as referrals to counseling, as appropriate to the needs of the individual youth.

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**OBJECTIVES, SCOPE, AND METHODOLOGY**

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Our overall evaluation objective was to identify participant services and training activities as well as outcomes information on participants who registered during program year 2000 -- July 1, 2000, through June 30, 2001.

**Specific Evaluation Objectives**

- What youth group(s) did the program serve?
- What services did the LWIBs provide the youth?
- What performance measure accomplishments (skill attainments and/or outcomes) did the LWIBs record for these youth?

**Scope**

We evaluated a sample of 420 youth (359 younger youth, 61 older youth) who registered and entered the youth program between July 1, 2000, and June 30, 2001. First, we selected a judgmental sample of 14 LWIBs across the continental U.S. Each LWIB provided a universe of participants who enrolled during the period July 1, 2000, and June 30, 2001. We examined the universes to ensure that all participants were enrolled during this period. Then, we randomly sampled 30 participants per selected LWIB. Proportionate groups of younger (14 through 18 years old) and older (19 through 21 years old) participants were selected based on their numbers in the LWIBs' participant universes. The following sites were included in the evaluation.

Kern/Inyo/Mono Consortium	Bakersfield, CA
San Diego Workforce Partnership, Inc.	San Diego, CA
Larimer County Workforce Investment Board	Fort Collins, CO
Delaware Workforce Investment Board	Wilmington, DE
Hillsborough County Workforce Board, Inc.	Tampa, FL
Northwest Georgia Workforce Investment Area – Coosa Valley Regional Development Center	Rome, GA
Hennepin County Training and Employment Assistance	Minneapolis, MN
Central Area Workforce Investment Board	Albuquerque, NM
Three Rivers Workforce Investment Board	Pittsburgh, PA
Workforce Investment Network (Shelby-Fayette Counties and City of Memphis)	Memphis, TN
Coastal Bend Workforce Development Board	Corpus Christi, TX
Tacoma-Pierce County Workforce Development Council	Tacoma, WA
East Baton Rouge Parish Workforce Investment Board	Baton Rouge, LA
Dallas - WorkSource for Dallas County	Dallas, TX

## Methodology

Our evaluation procedures included, but were not limited to:

- Comparing selected MIS data (e.g., services received, recorded outcomes, etc.) with information obtained from reviewing the LWIB and service providers' participant files.
- Reviewing participants' files for documentation of services and outcomes recorded (including types of training provided to participants).
- Interviewing LWIB and service provider staff regarding participant file information, evaluating and comparing Workforce Investment Act Standardized Record Data definitions to states' and LWIBs' definitions.
- Reviewing states' wage files to confirm recorded entered unsubsidized employment and employment retention outcomes.

We recorded all training activities where there was **any** evidence of the youths' participation from their dates of enrollment, which could be between July 1, 2000, and June 30, 2001, to the date of our fieldwork. For some analyses, when youth had not exited, we used a cutoff date of August 30, 2002, for consistency. Skill attainments were recorded only for the first 12 months subsequent to the younger youth's registration date.

### Documentation standards

Because each state and LWIB establish their own standards regarding what constitutes adequate documentation for training activities provided to WIA participants, the level of documentation of such services varied greatly. As a result, the OIG made its own conclusions as to what the OIG considered adequate documentation for the purposes of this evaluation.

**Documentation of services provided:** Some examples of adequate documentation of services provided would include attendance records, sign-in-sheets, payroll records, course grades, invoices, progress reports, completion certificates, diplomas and participant interviews. Less adequate documentation (especially if only one type exists) would include case management notes, contract or training agreement (but no invoices), participant self-attestation, staff interviews, correspondence, and various types of MIS information (without any other corroborating evidence). In many cases in this evaluation the only documentation in the file to support services supposedly provided was an MIS form. When several types of less acceptable documentation were in the file, such

accumulation of documentation might provide stronger assurance to the auditor in exercising his/her judgment regarding the adequacy of the documentation.

**Documentation of youth skill attainments and other outcomes:** ETA's TEGL 7-99 addresses the methodology necessary to support all youth performance measures except younger youth *skill attainments*. TEGL 7-99 provides the following regarding skill attainments:

To measure skill attainment for the younger youth skill attainment measure, local programs must assess youth at intake to determine whether they are in need of basic skills, work readiness skills, and/or occupational skills. This assessment will include a review of basic skills, occupational skills, prior work experiences, employability, interests, aptitudes and supporting service needs. From this assessment, skill attainment goals will be established. . . . To determine whether youth meet the skill attainment goals **will require** a pre-assessment and post-assessment of skill level. The use of a standardized assessment procedure such as a standardized test or a performance-based assessment with a standardized scoring method is encouraged. . . . In cases where a standardized test or a performance-based assessment is not available (such as for work-readiness skills), assessment techniques **must be objective**, unbiased, and conform to widely accepted, clearly defined criteria, be field tested for utility, consistency, and accuracy, and provide for the training/preparation of all raters/scorers. . . . All data and methods to determine achievement of skill attainment goals must be documented and are subject to audit. [Emphasis added.]

Therefore, in looking for support for skill attainments, we looked for **objective** pre- and post-assessments of skill levels. Obviously, the most objective documentation of a *basic skill* (reading and math) attainment would be copies of graded pre- and post-tests demonstrating a measurable gain in reading or math skill levels. Documentation not adequate to support a basic skill attainment would be a record made in the MIS that an attainment was achieved with no corroborating evidence. Additionally, while attendance records or completion certificate may adequately support that a participant was in a specific training activity, such records would not support a skill attainment outcome because a skill attainment must show some measurable gain of knowledge. Simple attendance at or completion of an activity does not ensure success. Examples of the type documentation used for our evaluation of *occupational* and *work-readiness* skill attainments are provided in finding 4.

Our evaluation was not intended to provide opinions on the LWIBs, the states, or overall WIA program's performance.

We conducted our evaluation in accordance with the Quality Standards for Inspections published by the President's Council for Integrity and Efficiency.

## **APPENDIX D ETA'S RESPONSE TO THE DRAFT REPORT**



SEP 30 2003

MEMORANDUM FOR: ELLIOT P. LEWIS  
Assistant Inspector General for Audit

FROM: EMILY STOVER DeROCCO *Maureen M. Bishop*  
Assistant Secretary  
Employment and Training Administration

SUBJECT: Workforce Investment Act Evaluation of Youth Program  
Enrollments, Services, and Recorded Outcomes  
Draft Audit Report No. 06-03-006-03-390

Thank you for the opportunity to review and share our comments on the Office of Inspector General's draft audit report on the "Workforce Investment Act (WIA) Evaluation of Youth Program Enrollments, Services, and Recorded Outcomes," dated July 31, 2003. We applaud the effort your staff has put into this report. As part of its monitoring and assessment of state and local WIA programs, the Employment and Training Administration (ETA) has focused on how the Local Workforce Investment Boards (LWIBs) implement the youth provisions under WIA. This continues to be a high priority for ETA. We will use this report to make further improvements to this program and as a resource during the WIA reauthorization process. Our comments on the report are as follows:

- We concur with your first recommendation and acknowledge your support of the Administration's proposal to focus primarily on serving out-of-school youth. Notwithstanding the large numbers of in-school youth currently served under WIA, we believe that the limited resources should be targeted to improving opportunities for out-of-school youth, especially school dropouts, by helping them attain academic and occupational credentials and workplace skills that lead to employment.
- Your second recommendation to amend WIA to allow summer employment as a stand-alone activity for those who only desire a summer job is contrary to the original legislative intent to improve youth programs under WIA and in conflict with your first recommendation. The WIA legislation moved youth programming away from one-time, short-term interventions, such as a stand-alone summer employment program, towards a comprehensive youth development approach centered around a broad range of coordinated services embodied in the ten required program elements. While the findings from the study sample indicate that a large percentage of the youth who exited the



program within one year had summer employment as their only recorded activity, this is counter to the WIA regulations. You correctly note that the WIA Regulation at Section 664.600(d) states that "the summer youth opportunities element is not intended to be a stand-alone program." ETA, in its guidance to the system, has continuously encouraged state and local areas to integrate summer employment opportunities with other program elements in a comprehensive strategy to address youth employment and training needs. We believe that the system has continued to focus on summer jobs programs because of the relative ease in serving in-school youth. Although this practice continues, we believe the legislation should reinforce the original legislative direction rather than retreating from it.

- We agree with your third recommendation to improve documentation of services provided to clients and the recorded outcomes. This is a key area in which ETA continues to focus. A comprehensive case management manual, developed in October 2002, is currently being revised and will be made available to all youth workforce investment areas by mid-November 2003. This manual contains a specific section on documentation of services and outcomes. With regard to the validity of client-level data, ETA is implementing a data validation project that addresses the accuracy of these data and the required documentation to substantiate reported performance outcomes. Training and Employment Notice (TEN) No. 14-02, "Data Validation Initiative," was issued in May 2003 to the workforce investment system regarding this initiative for employment and training programs. We are also examining ways to leverage the investments made on the Youth Opportunity Grant management information system (MIS) to improve local program management of WIA youth programs. We believe that the practice of collecting program management data through a quality MIS will also improve the documentation and recording of services and outcomes by front-line youth workers.

Once again, we thank you for the opportunity to comment.