

TRAINING AND EMPLOYMENT NOTICE	<b>NO.</b> 32-14
	<b>DATE</b> June 2, 2015

**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 /s/  
 Assistant Secretary  
 Employment and Training Administration

JENNIFER SHEEHY /s/  
 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.*

- 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