



**STUDY OF SERVICES AND OUTCOMES:
YOUTH OFFENDER DEMONSTRATION
GRANT PROJECTS, ROUND I**

EMPLOYMENT AND TRAINING ADMINISTRATION

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ACRONYMS AND GLOSSARY

ACRONYMS

DOL	United States Department of Labor
ETA	Employment and Training Administration
GED	General Equivalency Diploma
GOTR	Grant Officer’s Technical Representative
OIG	Office of Inspector General
OJJDP	Office of Juvenile Justice and Delinquency Prevention
UI	Unemployment Insurance
YODP	Youth Offender Demonstration Projects

GLOSSARY

Chi-square test	Statistical test to examine hypotheses about data that are best summarized by a cross tabulation of two or more variables.
Criminal Justice Involvement	Incidence or reoccurrence of arrest, probation, and incarceration either before or during project participation.
Discriminant Analysis	A function for computing a new variable or index that will parsimoniously represent the differences between two or more groups.
Intensity and Duration of Services	Also referred to as “Level of Service.” None - Did not receive services; may or may not have filled out application for project. Low - Received intake services and limited counseling and employment/educational referrals for less than 3 months. Medium - Received continuous counseling and referrals, for 3 to 6 months.

	High - Received intake services, employment and educational counseling and referrals, job development, training and follow-up for 6 months and over.
Juvenile Justice Involvement	Incidence or reoccurrence of juvenile arrest, probation, and incarceration either before or during project participation.
Level of Job Placement	None – Did not receive job placement. Low – Remained in job placement under 3 months. Medium – Remained in job placement from 3 – 6 months. High – Remained in job placement for at least 6 months continuously.
Pearson’s Correlation Coefficient	Measurement of the strength of the linear association between two variables, utilizing the actual data values.
Regression Analysis	A mathematical model which summarizes the overall relationship between two or more variables.
Statistical Significance	Probability that the difference between two or more groups of variables is not due to chance; usually expressed at the 95% confidence level.
Subsidized Employment	Employment placement in which participants’ wage earnings are paid by the project.
Unsubsidized Employment	Employment placement in which participants’ wage earnings are paid by the employer.

EXECUTIVE SUMMARY

The Employment and Training Administration (ETA), in a joint venture with the U.S. Department of Justice, Office of Juvenile Justice and Delinquency Prevention, developed the Youth Offender Demonstration Projects to provide insights into which strategies are most effective for preventing or intervening in juvenile crime and providing transitional work experiences that will lead to long-term employment.

In FY 1999, Congress appropriated \$12.5 Million to initiate and develop projects aimed at youth offenders and youth at risk of participating in gang activity. Grants were awarded in a first round for a period of 24 months. In FY 2001, \$13.9 million was appropriated to continue 10 of the original 14 projects and to expand to 9 other sites. Currently, ETA has \$55 Million earmarked for a third round of Youth Offender grants to begin in FY 2002.

This study focused on the results of a nationwide survey of the ETA Youth Offender Demonstration Projects, in order to provide ETA management with independent information regarding project practices and preliminary outcomes. We recognize that the Youth Offender Demonstration sites are learning laboratories, and that the purpose of these pilot sites is to gain experience and insight for future rounds. This project may become either a component of the larger Workforce Investment Act, wherein local boards will voluntarily implement such projects based upon community needs, or may become a permanent ETA program.

RESULTS OF STUDY

Analysis of the information and data we gathered, along with our site observations and interviews, revealed that ETA has developed a demonstration project which has offered a wide range of types, intensity and duration of services to its participants. Varying intensity and duration of services resulted in different employment and employability outcomes. Moreover, grant sites varied in their definitions and practices of termination and activity status, resulting in the uneven duration of youth participation. We identified areas where ETA can strengthen its ability to serve project participants. Those areas are identified below.

Finding A: Differing Types, Intensity and Duration of Services Influence Project Outcomes

Overall, we found that approximately 24% (or 214) of youth ages 18 – 24 (total sample of 907) were placed in either subsidized or unsubsidized employment during the grant period. Further analysis disclosed that these youth had average earnings of \$1,409 per quarter, estimated at \$5,637 for a year. Our analysis revealed that participants were three times as likely to find work as a control group who did not receive project services and that participants' average estimated earnings were higher than those of another DOL youth demonstration project.

We determined that the intensity of services provided to youth participants varied across sites and had direct bearing upon employment, long-term employability and in criminal justice involvement. Grantees employed a wide range of types and intensity of employment,

educational and related services. The highest level of services produced a thirteen-fold greater outcome in higher job placements than the lowest level of services provided.

Further, with the same amount of dollars, different sites provided vastly different services. Those grantee sites that had an infrastructure already set up to work with at-risk youth were able to combine funding to deliver services more effectively. Our analysis indicated that overall, 54% of services provided to participants were of medium or high intensity and duration. We noted that the remainder of services provided were of low intensity and duration (involving minimal intake and very limited counseling and referral services) or none. Of participants receiving low services, the vast majority would have benefited from a greater array, intensity and duration of services.

Additionally, we found that repeat criminal and juvenile justice involvement was affected primarily by prior criminal involvement and secondarily, by types of services provided. Further regression analysis revealed that the type of intensive services provided also had an effect on recidivism rates: practices in one particular site proved effective in monitoring and deterring criminal justice involvement.

We noted that ETA has been successful in developing and continuing to refine a data reporting system, reportable by grantees to ETA on a quarterly basis. While service provision, educational achievement, criminal justice and cumulative job placement numbers were reported to ETA on a consistent basis during Round I, the reliability of the figures provided by the demonstration sites should be further monitored and verified by ETA in future rounds using a variety of administrative and participant case file review methods and interviews.

Finding B: Youth Are Not Provided with Comparable Opportunities to Stay and Succeed in the Projects

We found that not all sites provided their participants with comparable opportunities to succeed in the demonstration, because the policies and practices surrounding enrollment, activity status, duration of services, and termination of youth from the projects were uneven and often arbitrarily defined and applied. Our study indicated that clarified policies on enrollment, activity status, and duration of services would further assist in enhancing service delivery practices and potential outcomes.

Our review indicated that the definition of an “enrolled” participant varied across sites and often included no distinction between actual enrollees versus applicants. For actual enrollees, the majority were inactive in the projects at time of our review. Moreover, the majority of youth were enrolled a year or later after the start of the grant period and often, participated for well under one year. Furthermore, some sites had a “no termination” policy; others regularly terminated or placed participants on inactive status for a wide range of reasons.

Our review indicated that the definition of an “enrolled” participant included no minimal baseline, with inconsistencies in enrollment numbers attributable in part to a lack of clear distinction in counting enrollees versus applicants. We also found that over 80% of sampled participants were not actively receiving services at the time of our review. We counted as inactive, those youth who had not received services or been in contact with the projects for the

last 90 days. While inactive status *does not* mean that the participant was never served, we noted myriad challenges surrounding attendance: individual participants and families often move out of the area or cannot be reached; truancy is high and school attendance often poor; youth face problems getting to the projects site; and family and behavioral problems may be involved. Lack of youth attendance in counseling, training sessions, and employment were frequently cited as a problem by project managers and counselors.

Some project managers and counselors described the difficulty in undoing a lifetime of negative influence on a young person and emphasized that the project needed to do more to counter such influences on youth. These staff and managers employed an intensive approach of weekly contact and follow-up, whether at the project site, at their school or library, or at their homes. Others felt that participation in the project could not be enforced and, without demonstrated youth initiative or interest, counselors could opt to terminate a youth for non-attendance. Still others felt that an “empowerment” model meant that with proper counseling and services, youth would be able to “graduate” from the project, often within a year, with a positive termination.

Promising practices for improved project participation involved the systematic use of incentives, employed in two of the five sites we visited and associated with improved project participation, which could be more widely adopted.

RECOMMENDATIONS

We recommend that ETA take the following actions to maximize the effectiveness of service practices on the intended outcomes and goals of the Youth Offender Demonstration Projects:

1. Analyze data across sites to assess the relationship between project practices, participants’ services received and project outcomes.
2. Develop and implement in future rounds a strategy for ensuring that the types, intensity and duration of services rendered provides project participants with the optimal opportunity to succeed in the project. This should include a defined minimal set of services.
3. Verify and monitor educational achievements and job placements currently reported by grantees on a quarterly basis, via ETA’s program monitors (GOTRs) through more systematic review of participant case files.
4. Develop a clarified and more consistent set of policies and strategies on enrollment. While flexibility in locally relevant and innovative services should continue to be encouraged, enrollment should include a baseline of minimum services.
5. Verify and monitor services provided, enrollments, and activity status via ETA’s program monitors (GOTRs) through more systematic review of participant case files and interviews.
6. Utilize monetary and non-monetary participant incentives, including cash rewards, project points, certificates and achievement recognitions to improve project participation and outcomes.

AGENCY RESPONSE AND OIG CONCLUSION

In response to the OIG's official draft report, ETA generally agreed with our findings and recommendations. As a result of corrective actions planned or already taken by ETA, we consider all six recommendations to be resolved. In addition, recommendations 2 and 4 are closed. The remaining recommendations will be closed after those corrective actions are completed and appropriate documentation is provided, as specified in the report. The agency's complete response is found in Appendix C.

BACKGROUND

The US Department of Labor, in a joint venture with the Office of Juvenile Justice and Delinquency Prevention of the Justice Department, developed the Youth Offender Demonstration Projects to provide insights into which strategies are most effective for preventing or intervening in juvenile crime and providing transitional work experiences that will lead to long-term employment.

The central goals of the Youth Offender Demonstration Projects (YODP) are to:

“help youth offenders, gang members and youth at risk of gang involvement between the ages of 14 and 24 attain long-term employment at wage levels that will prevent future dependency and to break the cycle of crime and juvenile delinquency that contributes to recidivism.”

In FY 1999, Congress appropriated \$12.5 Million to the Employment and Training Administration (ETA) to initiate and develop projects aimed at youth offenders and youth at risk of participating in gang activity. Grants were awarded in a first round for a period of 24 months, beginning in Fall 1999. In FY 2001, \$13.9 million was appropriated to continue 10 of the original 14 projects and to expand to 9 other sites. Currently, ETA has \$55 Million earmarked for a third round of Youth Offender grants to begin in FY 2002.

There are three categories of projects:

- (I) Five operate in large communities and are Model Community Projects awarded \$1.5 M each in Round I. Grants were awarded to five communities where comprehensive community-wide approaches addressing the needs of youth have already been established. Grantees provide a combination of services including gang prevention, gang intervention, gang suppression, and alternative sentencing.
- (II) Three grants were awarded to juvenile correctional facilities that are developing a School-to-Work system, for approximately \$1.125 M each in Round I. The projects include work-based and school-based learning, job placement, further education, job training, and supportive services in the home communities to which youth return when they are released from the facilities.
- (III) Six are Community-Wide Coordination projects and operate in very small communities (of between 100,000 and 400,000 populations). ETA awarded grants of \$300,000 under this category in Round I. These projects are in areas of high crime and school drop-out rates, high unemployment rates, and high levels of gang activity.

Category I and III sites were both funded to provide alternative sentencing and gang prevention activities, while Category I sites were also funded to provide case management and/or aftercare services.

PURPOSE, SCOPE AND METHODOLOGY

PURPOSE

This study focused on the results of a nationwide survey of the Employment and Training Administration's Youth Offender Demonstration Projects, in order to provide ETA management with independent information regarding project practices and preliminary outcomes. We recognized that the Youth Offender Demonstration sites are learning laboratories, and that the purpose of these pilot sites is to gain experience and insight should there be interest in either developing the demonstration into a permanent ETA program or in building a component of it into the larger Workforce Investment Act. We also recognized that the demonstration projects under this model are aimed at assisting youth in impoverished communities facing severe problems of high poverty and unemployment and the inter-relatedness of poverty, juvenile crime, child abuse and neglect, school failure and teen pregnancy.

The study collected information on the multiple barriers that project participants face in employment and/or self-sufficiency; the types of employment, educational and related assessment, readiness, and placement services provided; the effectiveness and efficacy of these services; and their relationship to the goals of increasing employment/self sufficiency and reducing recidivism and criminal justice involvement.

SCOPE

Our study questions were as follows:

- How are youth participants in ETA's Youth Offender Demonstration Projects being educated, trained and placed in employment?
- How do the projects effectively intervene in youths' school performance, participation in gang activity, and rates of recidivism?

These study questions were designed to assist in understanding how service practices are linked to potential outcomes, in order to inform and improve upon the process of service delivery.

METHODOLOGY

We analyzed data from all the Category I (Model Community Projects/large cities) and Category III (Community-Wide Coordination/small cities) sites from Round I and wage records maintained by Unemployment Insurance (UI) state offices. We conducted site visit in the following randomly selected cities: Philadelphia, Pennsylvania; Denver, Colorado; Bakersfield and Richmond, California; and Knoxville, Tennessee. We also contacted the three Category II juvenile justice facilities and the US Department of Justice which is coordinating

the evaluation effort on two of the three sites. Because those project outcomes may involve different methodologies, we decided not to evaluate Category II at this time. Utilizing a stratified random sampling design, we developed two statistical samples, one which consisted of 322 participant case files from sites visited and the second comprised of 907 participants in seven of the sites for which UI wage records were available.

Quantitative Methods

Outcome variables were derived from case file record review and administrative data. These included measures of GED assistance, recidivism, job placement information recorded in participant files, and wage earnings as reported to the Unemployment Insurance (UI) system for the last five available quarters. We analyzed intensity of employment services, employment placement, and UI wages as distinct outcomes and combined the data sources into scales of intensity of services provided and of job placement (none, low, medium and high). (See Glossary).

Our analysis examined the following independent variables reported by the projects: age, gender, ethnicity, criminal justice involvement at the time of entry into the demonstration project, date of entry, and project site. We were unable to employ a pure experimental design because the project did not include randomized treatment and control groups. However, we did impute the difference in employment and wage outcomes between applicants (intake participants) and enrollees in three sites which tracked both groups, one Category I and two Category III site. The evaluation employed several non-experimental statistical methods of bivariate and multivariate analyses including Pearson's chi-square tests, analyses of variance, linear and logistic regressions, and discriminant analyses.

Please see Appendix A for more detailed technical and methodological concerns.

Qualitative Methods

We conducted interviews with ETA managers and program monitors (GOTRs), grantee project managers and staff, including job developers and counselors. We also interviewed a randomly selected selection of projects participants, who represented a cross-section of ages, gender, ethnicity and prior criminal justice involvement. At each site, we collected data on participants, services delivered, outcomes and client satisfaction.

We conducted this study in accordance with the *Quality Standards for Inspections* published by the President's Council on Integrity and Efficiency.

FINDINGS AND RECOMMENDATIONS

Finding A: Differing Types, Intensity and Duration of Services Influence Project Outcomes

We determined that the intensity of services provided to youth participants varied across sites and had a direct bearing upon employment, long-term employability and in criminal justice involvement. Our study revealed that even within categories, grantees employed a wide range of types and intensity of employment, educational and related services. The spectrum of service offerings across sites ranged from a minimum offering of resume writing and job referrals to a greater combination of structured job search, remedial education, classroom vocational or skills training, drug abuse screening and counseling, and on-the-job training (OJT).

Job Placement Outcomes

The central goal of the Youth Offender Demonstration Projects (YODP) is to help youth offenders, gang members and youth at risk of gang involvement between the ages of 14 and 24 attain long-term employment at wage levels that will prevent future dependency and to break the cycle of crime and juvenile delinquency that contributes to recidivism.

We found that approximately 24% (or 214) of youth ages 18 – 24 (total sample of 907) were placed in either subsidized or unsubsidized employment during the grant period. Further analysis disclosed that these youth had average earnings of \$1,409 per quarter, estimated at \$5,637 for a year.

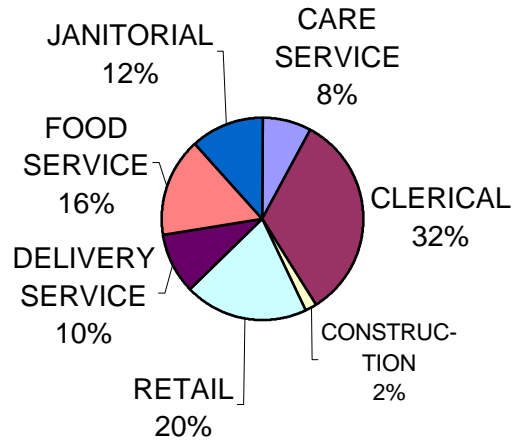
Figure 1: Universe of Participants Aged 18 – 24 with Reported Post-Enrollment Quarterly Wages in 7 Grant Sites

Category/City	Population of Participants Aged 18-24	Number of Participants with Earnings	% of All Participants with Earnings	Quarterly Wages Per Participant
Category I City A	167	67	40%	\$1,372
Category I City B	108	30	28%	\$1,406
Category I City C	43	10	23%	\$711
Category I City D	121	35	29%	\$1,812
Category III City E	185	24	13%	\$1,414
Category III City F	173	38	22%	\$1,007
Category III City G	110	10	9%	\$1,927
Averages and Totals, 7 cities	907	214	24%	\$1,409

Youth Were Placed in A Wide Range of Subsidized and Unsubsidized Job Types

From both administrative data on employment provided by the states and through our survey of five sites, we found that youth were placed in a wide range of subsidized (with earnings paid by the grantee agency) and unsubsidized (with earnings paid by private employers) job types:

Figure 2: Job Placements By Occupational Categories

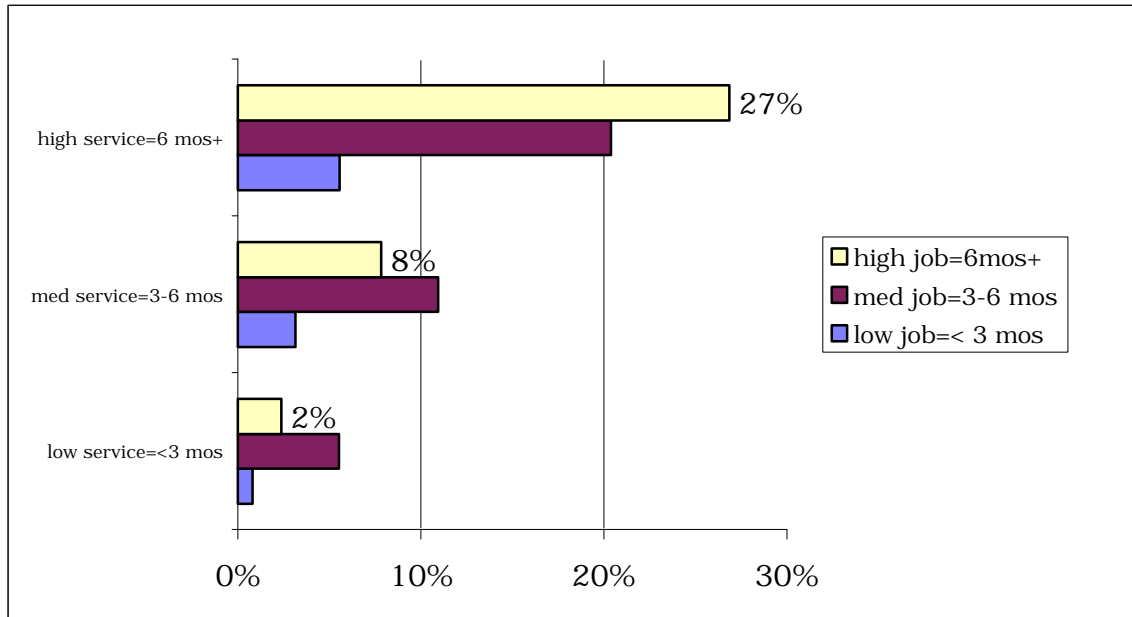


Youth were motivated to seek employment and earnings for a variety of reasons: the majority of youth of all ages we spoke with did not live on their own, yet most expressed an interest in becoming more self-sufficient; in gaining job experience; and in furthering career development. Others had young children to support or had to pay off restitution for property crimes committed. Job placements were made primarily to provide youth with job experience, and also to match participants with their expressed occupational interests and career goals.

Job Placement Outcomes Were Influenced By Levels of Service

We surveyed the relationship between levels (intensity and duration) of services provided and job placement outcomes. As shown by Figure 3, there is a significant relationship between greater intensity and duration of services offered and job placement outcomes, with differences not attributable to chance. The highest intensity and duration of services, with continual services offered weekly or biweekly for at least six months, produced a thirteen-fold greater outcome in higher job placements than minimal service provision of assessment and intake and limited counseling and referrals lasting less than three months. Our analysis revealed that the differences were statistically significant at the 95% confidence level (with less than 5% of variation attributable to chance).

Figure 3: Job Placements and Intensity of Employment Services



Our analysis further revealed that job placements were associated with the project’s success in diverting youth from criminal involvement during project enrollment. Youth who got in trouble during project enrollment were not placed in jobs at comparable levels as those who managed to stay out of trouble. (The differences between the two groups were statistically significant at the 95% confidence level.)

Levels of Services Varied Across Sites

Our analysis indicated that over 46% of services provided across observed sites were low (involving minimal intake and limited counseling and referral services) or none, when in fact the overwhelming majority of those participants could have benefited from a greater array, intensity and duration of services. These were followed by a 34% share of high services (continuous services and at least bimonthly meetings), with 20% of services of moderate intensity and duration.

We discovered that with the same amount of dollars, different sites provided vastly different services. Those grantee sites that had an infrastructure already set up to work with at-risk youth were able to combine funding and resources to deliver services more effectively. Category I sites included one private non-profit organization, contracted by the City government, which had provided youth-oriented services for over thirty years. This site offered a range of intensive services offered, including computer classes, GED training, life skills, drug testing, and strong networks of referrals and consistent follow-up. On the other end of the spectrum, another privately contracted organization funded under Category I offered limited job counseling and weak referral and follow-up services for its youth participants.

The spectrum of differences within Category III Community Partnership sites included one site which offered limited assistance with employment counseling, resume building and job referrals, and lacked strong follow-up services or actual job development. By contrast, other

Category III sites provided comprehensive, consistent counseling and differing ranges of educational, mental health and accompanying referrals.

Initial and Repeat Criminal Justice Involvement were Affected by Prior Involvement in the Criminal Justice System and by Types of Service Provided

A numeric analysis of arrests and other criminal justice involvement after enrollment yielded a low count of 17 incidents in our sample of 322 participants (5%). However, this figure is not a reliable indicator of recidivism rates, because many youth are already on probation or are currently serving time in alternative sentencing. Moreover, many demonstration sites have not effectively monitored for the information. A comparison of the 17 instances of justice involvement during project enrollment with other enrollees, revealed that the primary distinction between those who became involved or re-involved with criminal activity and those who were not were prior convictions:

Of those who became involved in criminal activity during the demonstration period, the majority (81%) had previously been involved with the criminal justice system, including arrests and probation. By contrast, less than half (48%) of those who *did not* become involved with the criminal justice system had previously been in trouble with the law.

A logistic regression of criminal justice involvement indicated that a variety of variables—high, medium, and low services and job placements included—had no noticeable effect on recidivism. Aside from prior convictions, only one other variable had a significant effect on recidivism:

One Category I site which was observed to offer intensive services focused on counseling, mentorship and gang prevention, demonstrated a significant effect on preventing criminal involvement and recidivism during project enrollment. The effect was statistically significant at the 95% confidence level (with less than 5% of differences attributable to chance).

The statistical analyses indicate that while criminal justice involvement and/or recidivism during the project period is most significantly affected by a prior history of criminal justice involvement, types of service provided were also associated with the a lower incidence of criminal justice involvement during project enrollment.

These findings corroborate our observations, which indicated the efficacy of certain practices in monitoring criminal justice involvement. Some sites worked closely with other institutions, such as schools and probation departments, and had access to youths' activities and achievements. Participant files in these sites included probation officers' notes, school attendance records, and academic test scores, as well as documentation of the counselors' ongoing assessment of participants' activities and progress. The counselors in these sites had the knowledge and ability to monitor truancy and criminal/gang activity, and successful employment activity.

The Collection of Administrative and Project Data Can Be Improved

We noted that ETA has been successful in developing and continuing to refine a data reporting system, reportable by grantees to ETA on a quarterly basis. While enrollment, service provision, educational achievement, criminal justice and cumulative job placement numbers were reported to ETA on a consistent basis in Round I, the reliability of the figures provided by the project sites should be further monitored and verified by ETA in future rounds using a variety of administrative and participant case file review methods:

- a. ETA's program monitors (GOTRs) should verify and monitor educational achievements and job placements which are currently being reported on a quarterly basis to ETA, through more systematic review of participant case files.
- b. Future grantee sites should also maintain intake files on non-enrollees, for purposes of comparative research and evaluation on the effects of participation.

The additional steps in data collection and verification should involve a minimal time and cost burden and is useful in 1) monitoring the accuracy of data at the site level and 2) gauging project impact in the future.

Grantees further spoke of the need for better understanding and advancing the state of research on factors which contribute to recidivism and successful long-term employment. One project manager spoke of developing a tracking database which could identify and highlight "triggers" of recidivism, through the development of further methods of tracking participants' lifestyles and activities, such as measures of mental health, family involvement, and educational participation. Future project and outcome/impact evaluations could assist in this effort by analyzing data across sites to assess the relationship between participants' recidivism, services received, and project outcomes.

Comparison of YODP with Another Youth Job Training Demonstration Project and with Control Group of Non-Participants

Our analysis of wage earnings revealed that participants' average estimated earnings of \$5,637 were higher than those of another DOL youth demonstration project, the Youth Opportunity Grant Program, for which youth with reported earnings totaled \$4,217 on average for each program year.

A comparison of YODP participation in three sites for which data was available revealed that project participation had a positive effect on labor market participation, in comparison with a control group of non-participants. Older youth participants' labor market participation was three times greater (24%) than that of a control group of youth who were assessed but received no services from the projects (8%). Overall, enrollees also participated in sustained employment rates for at least six months at an almost two-fold higher rate (11%) than the control group (6%) during the project period.

Summary

Overall, we found that approximately 24% (or 214) of youth ages 18 – 24 (total sample of 907) were placed in either subsidized or unsubsidized employment during the grant period. Further analysis disclosed that these youth had average earnings of \$1,409 per quarter, estimated at \$5,637 for a year. Our analysis revealed that participants' average estimated earnings were higher than those of another DOL youth demonstration project and that participants were three times as likely to find work as a control group who did not receive project services.

We found that intensity and duration of services influenced job placements, with higher services producing the best job outcomes. Levels of services were significantly affected by site and category differences, with grantees employing a wide range of types and intensity of employment, educational and related services. While more intensive levels of service did not always produce immediate job placement outcomes, overall, the highest levels of service yielding a thirteen-fold greater share of high job placements.

Our analysis indicated that 54% of services received were of medium or high intensity and duration. We noted that the remainder of services provided were of low intensity and duration (involving minimal intake and very limited counseling and referral services) or none. Of participants receiving low services, the vast majority would have benefited from a greater array, intensity and duration of services.

Grantees spoke of the need for better understanding and advancing the state of research on factors that contribute to successful long-term employment and recidivism. Further project and outcome/impact evaluations could assist in this effort by analyzing data across sites to assess the relationship between services received and project outcomes.

RECOMMENDATIONS

We recommend that ETA:

1. Analyze data across sites to assess the relationship between project practices, participants' services received and project outcomes.
2. Develop and implement in future rounds a strategy for ensuring that the types, intensity and duration of services rendered provides project participants with the optimal opportunity to succeed in the project. This should include a defined minimal set of services.
3. Verify and monitor services provided, educational achievements and job placements currently reported by grantees on a quarterly basis, via ETA's program monitors (GOTRs) through more systematic review of participant case files.

ETA's Response to Recommendations

- (1) *“In demonstrations, it is difficult to compare one site to another, especially when different rounds of the experiment (as in the case of the Youth Offender demonstrations) have different project service requirements. However, ETA agrees to incorporate this type of analysis into future evaluations of the Youth Offender Demonstration Projects.”*
- (2) *“ETA already has identified a minimum set of reentry services, beyond WIA and Wagner-Peyser Act tailored services available at the local One-Stop centers, which has been found to help youth offenders and at-risk youth. This set of reentry services includes gang prevention, alternative sentencing, case-management (route counseling), and aftercare services. To complement locally-based service strategies in each area, ETA required in Round Three grants (SGA/DFA 01-109) that applicants provide these minimal reentry services along with other appropriate workforce development services for youth offenders and at-risk youth. Please know that these reentry services are in addition to those services required in Rounds One and Two.”*
- (3) *“ETA agrees to this recommendation and will conduct more frequent reviews of grantees' services and achievements through a systematic assessment by federal project officers of grantees' quarterly progress and data reports. (ETA initiated this quarterly reporting system for Youth Offender Demonstration Project grants in the summer of 2000.) ETA also agrees to review this issue in its forthcoming Youth Offender Demonstration Project federal review guide, which will include a careful analysis of at least three to five case records per monitoring visit.”*

OIG's Conclusion

We concur with the proposed corrective actions and consider recommendations 1 through 3 resolved and recommendation 2 closed. Specifically:

- Recommendation 1 will be closed pending receipt of documentation from ETA that upcoming evaluations of future rounds will incorporate analyses of project practices, services received and project outcomes.
- Recommendation 2 is closed, based on ETA's identification of a minimum set of reentry services and the requirement in Round Three grants that applicants provide these minimal services for youth offenders and at-risk youth.
- Recommendation 3 will be closed pending receipt of documentation that more frequent, systematic reviews of grantees' services and achievements are being conducted, as required review protocol included in ETA's March 2002 Federal Review Guide.

Please submit the requested written documentation for recommendations 1 and 3 by no later than **September 30, 2002**.

Finding B: Youth Are Not Provided with Comparable Opportunities to Stay and Succeed in the Projects

We found that not all sites provided their participants with comparable opportunities to succeed in the demonstration, because the policies and practices surrounding enrollment, activity status, duration of services, and termination of youth from the projects were uneven and often arbitrarily defined and applied. Our review indicated that the definition of an “enrolled” participant varied across sites and often included no distinction between actual enrollees versus applicants. For actual enrollees, the majority were inactive in the projects at time of our review. Moreover, the majority of youth were enrolled a year or later after the start of the grant period and often, participated for well under one year. Furthermore, some sites had a “no termination” policy; others regularly terminated or placed participants on inactive status for a wide range of reasons.

Enrollment Figures Are Inconsistently Reported

Our review indicated that the definition of an “enrolled” participant included no minimal baseline. For example, in a few instances, participants who did not receive services (no case file opened) were considered “enrolled.” While the demonstration nature of the projects allowed a good degree of project flexibility, future rounds could benefit from clearer criteria for enrollments.

We determined that possible inconsistencies in enrollment numbers were attributable in part to a lack of clear distinction in counting enrollees versus applicants, as was the case in three of the five cities we visited. Individuals were often referred to the project but did not receive in-depth assessments or other employment and educational services. While we included intake assessment in the category of “minimal service provision,” we noted that in many instances intake assessment was neither in-depth nor was feedback or referrals provided to the youth. In the majority of sites, either intake participants were not tracked or intake participants were also counted as enrollees.

The Majority of Participants Are Inactive

Our review of case files revealed that the majority of youth were enrolled a year or later after the start of the grant period and often, participated for well under one year. Over 80% of sampled participants were not actively receiving services at the time of our review. We counted as inactive, those youth who had not received services or been in contact with the project for the last 90 days. While inactive status *does not* mean that the participant was never served, we noted a myriad of challenges surrounding attendance: individual participants and families often move out of the area or cannot be reached; truancy is high and school attendance often poor; youth face problems getting to the project site; and family and behavioral problems. Youth attendance in counseling, training sessions, and employment were frequently cited as a problem by project managers and counselors.

Some project managers and counselors described the difficulty in undoing a lifetime of negative influence on a young person and emphasized that the project needed to do more to

counter such influences on youth. These staff and managers employed an intensive approach of weekly contact and follow-up, whether at the project site, at their school or library, or at their homes. Others felt that participation in the project could not be enforced and, without demonstrated youth initiative or interest, counselors could opt to terminate a youth for non-attendance. Still others felt that an “empowerment” model meant that with proper counseling and services, youth would be able to “graduate” from the project, often within a year, with a positive termination.

Terminations Are Inconsistently Applied

Terminations of project participants before the end of the grant period occurred at significantly different rates across grant sites, ranging from no terminations to upwards of 50%. We found that not all sites provided their participants with a comparable shot at succeeding in the project, because the policies and practices surrounding termination of youth from the project were uneven and often arbitrarily defined and applied.

Terminations are necessary in certain circumstances: for instance, a youth may have been arrested and sentenced to three years in prison; or, a parent may have objections to their child’s continued participation. Moreover, some youth sometimes verbally declined to continue with project participation. However, we noted that there were many terminations that were neither necessary nor sufficiently justified. In one city, participants were terminated from the project for non-attendance at two orientations, even if they had not previously agreed to attend and there was no verification that they received the invitations via phone or mail. In instances where strategic planning on enrollment was not comprehensively conducted, wholesale terminations of students often occurred in the interest of administrative efficiency and the development of more realistic caseworker loads.

Because the demonstration nature of the projects tends to emphasize processes rather than outcomes, it is understandable that the practice of terminations has not been uniformly addressed. However, our study indicated that clarified policies on enrollment, activity status, and duration of services would further assist in enhancing service delivery practices and potential outcomes.

The Use of Incentives Appears to Improve Project Participation

Promising practices for improved project participation which were implemented in some sites included the use of incentives, such as the use of a wide range of monetary and non-monetary participant incentives. Incentives included cash rewards, project points, gift certificates, and achievement recognitions. These practices, observed in two of the five sites we visited, appeared more effective in encouraging participant retention and individual performance than the threat of terminations. The systematic use of incentives observed in these sites, which demonstrated consistent and continued project participation, could be more widely adopted by other sites.

Summary

In summary, youth are not provided with comparable opportunities to stay and succeed in the demonstration projects. Our review indicated that the definition of an “enrolled” participant varied across sites and often included no distinction between actual enrollees versus applicants. For actual enrollees, the majority were inactive in the projects at time of our review. Activity status is unevenly and often arbitrarily decided and terminations are inconsistently applied. The demonstration projects could benefit in future rounds from clearer guidelines and possibly a minimal baseline for duration of project participation and for project activity status. Enrollments, duration of project participation and activity status should be clarified and planned as inter-related policies and practices.

Our findings indicate that future rounds of grants may benefit from clearer monitoring of enrollments, duration of participation, and activity status, which in turn will assist the in developing more accurate assessments of outcomes including labor market participation and wages.

RECOMMENDATIONS

We recommend that ETA:

4. Develop a clarified and more consistent set of policies and strategies on enrollment. While flexibility in locally relevant and innovative services should continue to be encouraged, enrollment should include a baseline of minimum services.
5. Verify and monitor services provided, enrollments, duration of participation, and activity status via ETA’s program monitors (GOTRs) through more systematic review of participant case files and interviews.
6. Utilize monetary and non-monetary participant incentives, including cash rewards, program points, gift certificates, and achievement recognitions to improve project participation and outcomes.

ETA’s Response to Recommendations

- (4) *“ETA already has distinguished between “recruitment” and “enrollment” in the data elements for round two and future rounds (see attached project-required data elements). In addition, future grants will provide the enhanced services of gang prevention, alternative sentencing, and case management and aftercare services as a complement to existing locally relevant services.”*
- (5) *“ETA agrees to this recommendation and will conduct more frequent reviews of grantees’ enrollments, terminations, and activity status through a systematic*

assessment by federal project officers of grantees' quarterly progress and data reports. ETA also agrees to review this issue through a careful analysis of at least three to five case records per monitoring visit via the forthcoming Youth Offender Demonstration Project federal review guide."

- (6) *"ETA agrees with the recommendation and will explore this issue further in its federal review guide. In addition, in future rounds ETA will consider incorporating an incentive protocol into the demonstration solicitations to test its efficacy."*

OIG's Conclusion

We concur with the proposed corrective actions and consider recommendations 4 through 6 resolved and recommendation 4 closed. Specifically:

- Recommendation 4 is closed, based on ETA's identification of "recruitment" and "enrollment" in the data elements for round two and future rounds in its project-required data elements and in its March 2002 Federal Review Guide.
- Recommendation 5 will be closed pending receipt of documentation from ETA that more frequent, systematic reviews of grantees' enrollments, terminations, and activity status are being conducted, as required review protocol included in ETA's March 2002 Federal Review Guide.
- Recommendation 6 will be closed pending receipt of documentation from ETA that incentive protocol has been explored, and if appropriate, incorporated into the demonstration solicitations for future rounds.

Please submit the requested written documentation for recommendations 5 and 6 by no later than **September 30, 2002**.

APPENDIX A

Technical/Methodological Issues

I. Bivariate Correlations

Crosstabulation of two variables was employed to look for statistically significant differences not attributable to chance. Pearson's correlation coefficient measures the strength and direction of the relationship.

Correlations

		DOB	UIWAGE	ETHNIC	SITE	GENDR	RECID	GEDPRI	GEDASS	ACTIV	PRIORCN	LOS	OBPLAC	CATSITE
DOB	Pearson Correl	1	.090	.083	-.027	-.079	.076	-.043	.017	.034	.068	-.029	-.005	-.047
	Sig. (1-tailed)	.	.337	.084	.325	.094	.102	.238	.387	.283	.127	.315	.465	.216
	N	279	24	279	279	279	279	279	279	279	279	279	279	279
UIWAGE	Pearson Correl	.090	1	-.249	.333	-.111	.238	-.011	.272	.097	-.040	-.252	.586*	-.223
	Sig. (1-tailed)	.337	.	.121	.056	.303	.131	.480	.099	.325	.427	.117	.001	.147
	N	24	24	24	24	24	24	24	24	24	24	24	24	24
ETHNIC	Pearson Correl	.083	-.249	1	-.312*	.265*	-.039	.063	.010	.107*	.016	.150*	.021	-.232*
	Sig. (1-tailed)	.084	.121	.	.000	.000	.246	.130	.426	.028	.389	.004	.356	.000
	N	279	24	319	319	319	319	319	319	319	319	319	319	319
SITE	Pearson Correl	-.027	.333	-.312*	1	.081	-.053	.034	.157*	.031	-.036	-.267*	-.095*	.589*
	Sig. (1-tailed)	.325	.056	.000	.	.074	.173	.270	.002	.292	.260	.000	.044	.000
	N	279	24	319	319	319	319	319	319	319	319	319	319	319
GENDR	Pearson Correl	-.079	-.111	.265*	.081	1	.001	-.092	-.085	-.065	.237*	.047	-.066	-.103*
	Sig. (1-tailed)	.094	.303	.000	.074	.	.492	.050	.064	.124	.000	.202	.121	.033
	N	279	24	319	319	319	319	319	319	319	319	319	319	319
RECID	Pearson Correl	.076	.238	-.039	-.053	.001	1	-.055	-.003	-.056	.151*	.024	-.054	-.004
	Sig. (1-tailed)	.102	.131	.246	.173	.492	.	.166	.476	.159	.003	.335	.170	.470
	N	279	24	319	319	319	319	319	319	319	319	319	319	319
GEDPRI	Pearson Correl	-.043	-.011	.063	.034	-.092	-.055	1	.397*	.154*	-.092	-.059	-.024	-.048
	Sig. (1-tailed)	.238	.480	.130	.270	.050	.166	.	.000	.003	.051	.145	.337	.196
	N	279	24	319	319	319	319	319	319	319	319	319	319	319
GEDASS	Pearson Correl	.017	.272	.010	.157*	-.085	-.003	.397*	1	.151*	-.163*	-.171*	-.001	.063
	Sig. (1-tailed)	.387	.099	.426	.002	.064	.476	.000	.	.003	.002	.001	.496	.131
	N	279	24	319	319	319	319	319	319	319	319	319	319	319
ACTIV	Pearson Correl	.034	.097	.107*	.031	-.065	-.056	.154*	.151*	1	-.166*	-.156*	-.061	.116*
	Sig. (1-tailed)	.283	.325	.028	.292	.124	.159	.003	.003	.	.001	.003	.140	.019
	N	279	24	319	319	319	319	319	319	319	319	319	319	319
PRIORCN	Pearson Correl	.068	-.040	.016	-.036	.237*	.151*	-.092	-.163*	-.166*	1	.031	.013	-.022
	Sig. (1-tailed)	.127	.427	.389	.260	.000	.003	.051	.002	.001	.	.293	.407	.348
	N	279	24	319	319	319	319	319	319	319	320	320	320	320
LOS	Pearson Correl	-.029	-.252	.150*	-.267*	.047	.024	-.059	-.171*	-.156*	.031	1	.021	-.307*
	Sig. (1-tailed)	.315	.117	.004	.000	.202	.335	.145	.001	.003	.293	.	.352	.000
	N	279	24	319	319	319	319	319	319	319	320	320	320	320
JOBPLAC	Pearson Correl	-.005	.586*	.021	-.095*	-.066	-.054	-.024	-.001	-.061	.013	.021	1	-.194*
	Sig. (1-tailed)	.465	.001	.356	.044	.121	.170	.337	.496	.140	.407	.352	.	.000
	N	279	24	319	319	319	319	319	319	319	320	320	320	320
CATSITE	Pearson Correl	-.047	-.223	-.232*	.589*	-.103*	-.004	-.048	.063	.116*	-.022	-.307*	-.194*	1
	Sig. (1-tailed)	.216	.147	.000	.000	.033	.470	.196	.131	.019	.348	.000	.000	.
	N	279	24	319	319	319	319	319	319	319	320	320	320	320

**Correlation is significant at the 0.01 level (1-tailed).

*Correlation is significant at the 0.05 level (1-tailed).

N = total number of observations for each variable pair.

II. CrossTabulations

Crosstabulation of variables was employed to look for patterned relationships between variables not attributable to chance. The Pearson chi-square statistic measures the significance of association between two variables.

A. Job Placement by Level of Service

Case Processing

	Cases					
	Valid		Missing		Total	
	N	Percent	N	Percent	N	Percent
JOBPLACE *	309	99.7%	1	<.1%	310	100.0

LEVEL OF SERVICE				
	no service	low service	medium service	high service
low job	0	1	2	6
medium job	0	7	7	22
high job	0	3	5	29
none/unknown	19	116	50	51
total	19	127	63	108

Chi-Square

	Value	df	Asymp. Sig. (2-sided)
Pearson Chi-Square	71.38 ^a	16	.000
Likelihood Ratio	29.27	16	.022
Linear-by-Linear Association	3.878	1	.049
N of Valid	310		

N = total number of observations for each variable pair.

B. Level of Service by Site

Case Processing Summary

	Cases					
	Valid		Missing		Total	
	N	Percent	N	Percent	N	Percent
LOS * SITE	314	98.1%	6	1.9%	320	100.0%

LOS * SITE

Count		SITE				Total
		Cat I Site I	Cat III Site I	Cat I Site II	Cat III Site II	
LOS	None	2	3		8	13
	Low	5	7	12	105	129
	Medium	10	18	30	6	64
	High	52	17	38	1	108
Total		69	45	80	120	314

Chi-Square Tests

	Value	df	Asymp. Sig. (2-sided)
Pearson Chi-Square	220.875 ^a	9	.000
Likelihood Ratio	251.728	9	.000
Linear-by-Linear Association	124.776	1	.000
N of Valid Cases	314		

a. 4 cells (25.0%) have expected count less than 5. The minimum expected count is 1.86.

III. Discriminant Analyses

Discriminant function analysis, a.k.a. discriminant analysis or DA, is used to classify cases into the values of a categorical dependent, usually a dichotomy. If discriminant function analysis is effective for a set of data, the classification table of correct and incorrect estimates will yield a high percentage correct. Here, discriminant analysis is used to:

- Investigate differences between groups.
- Determine the most parsimonious way to distinguish between groups.
- Discard variables that exhibit few distinctions among groups.

A. Job Placement

Analysis Case Processing Summary

Unweighted Cases		N	Percent
Valid		109	34.1
Excluded	Missing or out-of-range group codes	210	65.6
	At least one missing discriminating variable	0	.0
	Both missing or out-of-range group codes and at least one missing discriminating variable	1	.3
	Total	211	65.9
Total		320	100.0

Tests of Equality of Group Means

	Wilks' Lambda	F	df1	df2	Sig.
ACTIV	.989	.614	2	106	.543
LEVSVC	.970	1.648	2	106	.197
RECID	.916	4.831	2	106	.010
GENDR	.999	.068	2	106	.934
SITE	.944	3.117	2	106	.048
ETHNIC	.991	.475	2	106	.623
PRIORCNV	.997	.149	2	106	.862
GEDASSIS	.953	2.636	2	106	.076
GEDPRIOR	.984	.840	2	106	.435

Analysis 1 Stepwise Statistics

Variables a,b,c,d

Step	Entered	Wilks'							
		Statistic	df1	df2	df3	Exact			
						Statistic	df1	df2	Sig
1	RECID	.91	1	2	106.00	4.83	2	106.00	.01

At each step, the variable that minimizes the overall Wilks' Lambda is entered.

- a. Maximum number of steps is 18.
- b. Minimum partial F to enter is 3.84.
- c. Maximum partial F to remove is 2.71.
- d. F level, tolerance, or VIN insufficient for further computation.

Variables in the Analysis

Step	Tolerance	F to Remove	
1	RECID	1.000	4.831

We employed several measures in the study in order to learn which one(s) offer the best prediction, in order to determine the ones that discriminate between groups. In our stepwise discriminant function analysis, we built a model of discrimination step-by-step. Specifically, at each step all variables were reviewed and evaluated to determine which one will contribute most to the discrimination between groups. That variable will then be included in the model, and the process starts again. Our discrimination model yielded recidivism as the one factor which had an effect on job placement.

IV. Regressions

Regression Analyses were employed to summarize the overall relationship between two or more variables.

Logistic regression is a form of regression used when the observed outcome is **restricted to two values**, which usually represent the occurrence or non-occurrence of some outcome event, (usually coded as 1 or 0). The predicted values of the dependent variable can be expressed as the probability of the joint occurrence of a specific number of events.

A. Logistic Regression of Site on Level of Service

Variables

Mode	Variables Entered	Variable Remove	Method
1	Cat I, Site II, Cat II, Site I Cat II, Site II	.	Enter

- a. All requested variables
- b. Dependent Variable: Level of Service

Model

Mode	R	R	Adjusted R	Std. Error the
1	.333 ^a	.111	.102	.831

- a. Predictors: (Constant), Cat I, Site II, Cat III, Site I, Cat III, Site II

ANOVA

Mode		Sum Square	df	Mean	F	Sig.
1	Regression	27.16	3	9.055	13.12	.000 ^a
	Residual	218.02	316	.690		
	Total	245.18	319			

a. Predictors: (Constant), Cat I, Site II, Cat III, Site I, Cat III, Site II

b. Dependent Variable: LOS

Coefficients^a

Mode		Unstandardize Coefficient		Standard zed Coefficie ts	t	Sig.
		B	Std.	Beta		
1	(Constant)	3.190	.091		35.20	.000
	Cat III Site	-.346	.153	-.137	-2.255	.025
	Cat III Site II	-.348	.118	-.193	-2.946	.003
	Cat I Site II	.381	.134	.180	2.834	.005

The results of the Logistic Regression of site against level of service revealed statistically significant differences between levels of service provided by site, corroborating the results of the earlier crosstabulation. (Category I, Site I is the excluded category against which comparisons are made). The logistic regression further indicates that Category III sites generally provided lower levels of services, as indicated by the negative Beta coefficients.

B. Logistic Regression of Recidivism

Case Processing Summary

Unweighted Cases ^a		N	Percent
Selected Cases	Included in Analysis	319	99.7
	Missing Cases	1	.3
	Total	320	100.0
Unselected Cases		0	.0
Total		320	100.0

a. If weight is in effect, see classification table for the total number of cases.

Dependent Variable Encoding

Original Value	Internal Value
No	0
Yes	1

Block 0: Beginning Block

Classification Table

Observe			Predicted		
			RECID		Percentage
			No	Yes	Correct
Step	RECID	No	302	0	100.0
		Yes	17	0	.0
	Overall				94.7

- a. Constant is included in the model.
- b. The cut value is .500.

Variables in the Equation

	B	S.E.	Wald	df	Sig.	Exp(B)
Step 0 Constant	-2.877	.249	133.232	1	.000	.056

Variables not in the Equation

			Score	df	Sig.
Step	Variable	GEND	.000	1	.983
0		PRIORC	7.270	1	.007
		Cat III Site I	.186	1	.666
		Cat III Site II	.053	1	.818
		Cat I Site I	2.704	1	.100
		MEDIUM	.979	1	.323
		LOW	.004	1	.949
		HIGH	.158	1	.691
		SUCCESS	.413	1	.520
	Overall		16.20	9	.063

Block 1: Method = Enter

Omnibus Tests of Model Coefficients

		Chi-square	df	Sig.
Step 1	Step	18.694	9	.028
	Block	18.694	9	.028
	Model	18.694	9	.028

Model Summary

Step	-2 Log likelihood	Cox & Snell R Square	Nagelkerke R Square
1	114.071	.057	.167

Classification Table^a

Observed		Predicted			
		RECID		Percentage Correct	
		No	Yes		
Step 1	RECID	No	302	0	100.0
		Yes	17	0	.0
Overall Percentage					94.7

a. The cut value is .500

Variables in the Equation

		B	S.E.	Wald	df	Sig.	Exp(B)
Step 1	GEND	.256	.377	.462	1	.497	1.292
	PRIORC	-2.073	.683	9.223	1	.002	.126
	Cat III Site II	.239	.795	.091	1	.763	1.271
	Cat III Site I	-1.214	1.012	1.439	1	.230	.297
	Cat I Site I	-2.351	1.127	4.346	1	.037	.095
	MEDIUM	5.755	22.39	.066	1	.797	315.90
	LOW	5.981	22.38	.071	1	.789	395.99
	HIGH	5.823	22.39	.068	1	.795	338.06
	SUCCESS	-.576	.710	.660	1	.417	.562
	Constant	-5.360	22.42	.057	1	.811	.005

The results of the Logistic Regression of recidivism against a variety of other independent variables highlighted two variables which affected criminal involvement or re-involvement during the project period: prior convictions and Category I Site I. The logistic regression indicates that various levels of service, per se, had no effect on recidivism or criminal involvement. Rather, a record of prior criminal involvement increases the probability of criminal re-involvement during the project period, and that Category I Site I was effective in reducing criminal involvement and re-involvement.

APPENDIX B

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BIBLIOGRAPHY**

SELECTED BIBLIOGRAPHY

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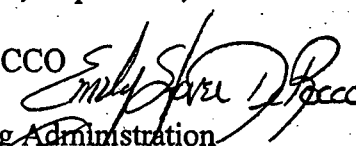
APPENDIX C

AGENCY RESPONSE



FEB 25 2002

MEMORANDUM FOR: WILLIAM H. PICKLE
Assistant Inspector General
Office of Communications, Inspections, and Evaluations

FROM: EMILY STOVER DeROCCO 
Assistant Secretary
Employment and Training Administration

SUBJECT: Comments on Office of Inspector General
Audit of Youth Offender Demonstration Grant
Projects, Round One

Thank you for providing the Employment and Training Administration (ETA) with the opportunity to comment on your draft report on the Youth Offender Demonstration Grant Projects. This analysis is very helpful because it supplements Research and Evaluation Associates, Inc. (REA)'s third-party evaluation of the projects and confirms many of its findings.

We are pleased that the Office of Inspector General (OIG) has found that ETA developed a demonstration project that has offered a wide range of types, intensity, and duration of services to its participants. As a result of the services that our grantees provided, your report estimated, based upon a sample in 7 sites, that approximately 24% of youth offenders and youth at risk of court involvement, ages 18 to 24, were employed during the grant period, with average yearly earnings of \$5,637. According to ETA-captured data, based upon site reports from 14 sites, the entered employment rate for round one grantees is 40% (as of September 30, 2001). Both the OIG and ETA studies have found that the type of reentry and workforce development services provided to these hard-to-serve youth in the demonstrations had a positive effect on employment rates.

We agree with the OIG recommendation that we need to ensure that all participants are provided with comparable opportunities to succeed in the projects. We will work with our grantees to clarify their enrollment and termination policies.

There are several other points that I would like to make about the OIG report. First, the report briefly mentions the difficulty associated with serving this target population of young offenders and at-risk youth. However, it does not evaluate the demonstration in terms of these challenges. The target group for the Youth Offender Demonstration Projects is a high-risk group of young people who generally are disconnected from the workforce development system and the education system, and who are more likely to come into contact with either the juvenile or criminal justice systems. As such, it can be more challenging for the grantees to provide consistent services to this target group that already has only a tenuous connection with the workforce and education communities. ETA therefore requests that you preface your comments in the report with a stronger caveat acknowledging the difficulties of serving this group.



Second, under the WIA, state and local areas have broad flexibility to tailor services to meet the needs of job seekers such as these hard-to-serve youth offenders and youth at risk of court involvement.

We recognize, as you do, that these projects were implemented as learning laboratories to understand “how” institutional processes affect outcomes. As a result, individual outcomes are an important measure of performance; however, they are not the sole purpose of the demonstration. ETA is attempting to learn how best to organize service providers and services to serve this population within state and local One-Stop delivery systems.

We have attached our response to each of the specific recommendations in the report and a list of project-required data elements. ETA believes that it has made good progress in identifying an effective model for state and local workforce development agencies. We appreciate your support in this effort, and your continued involvement. Please direct questions to David Balducchi at 693-3678 or Stephen Wandner at 693-3663.

Attachments

OIG RECOMMENDATION: Analyze data across sites to assess the relationship between participants' services received and program outcomes.

ETA RESPONSE: In demonstrations, it is difficult to compare one site to another, especially when different rounds of the experiment (as in the case of the Youth Offender demonstrations) have different project service requirements. However, ETA agrees to incorporate this type of analysis into its future evaluations of the Youth Offender Demonstration Projects.

OIG RECOMMENDATION: Develop and implement in future rounds a strategy for ensuring that the level of services rendered provides program participants with the optimal opportunity to succeed in the program. This should include a defined minimal level of services.

ETA RESPONSE: ETA already has identified a minimum set of reentry services, beyond WIA and Wagner-Peyser Act tailored services available at the local One-Stop centers, which has been found to help youth offenders and at-risk youth. This set of reentry services includes gang prevention, alternative sentencing, case-management (route counseling), and aftercare services. To complement locally-based service strategies in each area, ETA required in Round Three grants (SGA/DFA 01-109) that applicants provide these minimal reentry services along with other appropriate workforce development services for youth offenders and at-risk youth. Please know that these reentry services are in addition to those services required in Rounds One and Two.

OIG RECOMMENDATION: Verify and monitor educational achievements and job placements currently reported by grantees on a quarterly basis, via ETA's program monitors (GOTRs) through more systematic review of participant case files.

ETA RESPONSE: ETA agrees to this recommendation and will conduct more frequent reviews of grantees' services and achievements through a systematic assessment by federal project officers of grantees' quarterly progress and data reports. (ETA initiated this quarterly reporting system for Youth Offender Demonstration Project grants in the summer of 2000.) ETA also agrees to review this issue in its forthcoming Youth Offender Demonstration Project federal review guide, which will include a careful analysis of at least three to five case records per monitoring visit.

OIG RECOMMENDATION: Develop a clarified and more consistent set of policies and strategies on enrollment. While flexibility in locally relevant and innovative services should continue to be encouraged, enrollment should include a baseline of minimum services.

ETA RESPONSE: ETA already has distinguished between "recruitment" and "enrollment" in the data elements for round two and future rounds (see attached project-required data elements). In addition, future grants will provide the enhanced services of gang prevention, alternative sentencing, and case management and aftercare services as a complement to existing locally relevant services.

OIG RECOMMENDATION: Verify and monitor enrollments, terminations, and activity status via ETA's program monitors (GOTRs) through more systematic review of participant case files.

ETA RESPONSE: ETA agrees to this recommendation and will conduct more frequent reviews of grantees' enrollments, terminations, and activity status through a systematic assessment by federal project officers of grantees' quarterly progress and data reports. ETA also agrees to review this issue through a careful analysis of at least three to five case records per monitoring visit via the forthcoming Youth Offender Demonstration Project federal review guide.

OIG RECOMMENDATION: Utilize monetary and non-monetary participant incentives, including cash rewards, program points, certificates and achievement recognitions to improve program participation and outcomes.

ETA RESPONSE: ETA agrees with the recommendation and will explore this issue further in its federal review guide. In addition, in future rounds ETA will consider incorporating an incentive protocol into the demonstration solicitations to test its efficacy.

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DATA ELEMENTS AND THEIR DEFINITIONS (Revised 11/15/01, page 1 of 4)

No.	Name	Description	Operational Definition
	Youth Offenders	(see operational definition)	Youth who have been adjudicated for committing delinquent acts, such as, crimes against persons, crimes against property, and crimes related to substance abuse. Note: Participant's status is determined upon entry into the program and does not change during the program.
	At-risk Youth	(see operational definition)	Youth who have not been adjudicated for committing illegal acts but who have risk factors* associated with the potential for delinquent behaviors. Note: Participant's status is determined upon entry into the program and does not change during the program.
1	Recruited	Number recruited	Number of youth for which project staff have name and contact information.
2a	Enrolled (Total)	Number enrolled	Number of participants who have completed the entire application process for the YODP, for example: 1) required documents, 2)parent/guardian release, 3) diagnostic assessments.
2b	Enrolled (Gender: Male)	Number of male participants	
2c	Enrolled (Gender: Female)	Number of female participants	
2d	Enrolled (Race: White)	Number of White participants	Number of participants having origins in any of the original peoples of Europe, the Middle East, or North Africa.
2e	Enrolled (Race: Black)	Number of Black participants	Number of participants having origins in any of the black racial groups of Africa or the West Indies.
2f	Enrolled (Race: Hispanic)	Number of Hispanic/Latino participants	Number of participants of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture in origin, regardless of race.

*Note. Risk factors include poverty, drug and alcohol abuse, gang involvement, and a lack of supportive and/ or stable family environment.

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No. Name	Description	Operational Definition
2g Enrolled (Race: Native American)	Number of Native American participants	Number of participants having origins in any of the original people of North America and South America (including Central America), and who maintains cultural identification through tribal affiliation or community recognition.
2h Enrolled (Race: Asian)	Number of Asian participants	Number of participants having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent (e.g., India, Pakistan, Bangladesh, Sri Lanka, Nepal, Sikkim, and Bhutan). This area includes, for example, Cambodia, China, Japan, Korea, Malaysia, the Philippine Islands, Thailand, and Vietnam.
2i Enrolled (Race: Multiracial)	Number of Multiracial participants	Number of participants who self-report having origins in more than one of the aforementioned categories.
2j Enrolled (Race: Other race)	Number of participants not in aforementioned categories	Number of participants who do not list their race, or list their race in a category not listed.
3 In Federally Funded Job Training	Number who entered federally-funded training	Number in Federally Funded work readiness training, other work preparation programs, for example, vocational certification programs, leadership development classes, and job shadowing.
4 In Other Job Training	Number who entered other job training programs (i.e., not Federally Funded)	Number supported by private industry, faith-based, and community-based employment training programs not directly supported by any Federal funds.
5 Entered Apprenticeship	Number actually in apprenticeship programs	The number of participants who have begun training in a registered apprenticeship occupation, through Bureau of Apprenticeship and Training (BAT) or a State Apprenticeship Council (SAC).
6a Total In-school	Number of in-school youth served	Sum of categories 6b, 6c, 6d, and 6e

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No.	Name	Description	Operational Definition
6b	In High School	Number who entered or reentered secondary school	Number of participants who have not received a secondary school diploma or its recognized equivalent and are attending a high school institution (traditional or alternative) or are between school terms and intend to return to school.
6c	In College	Number who entered or reentered post-secondary school	Number of participants who are attending a program at an accredited degree-granting institution that leads to an academic degree (e.g., AA, AS, BA, BS).
6d	GED preparation	Number who are preparing for the GED	Number of participants preparing for the GED exam, either self-directed or in groups.
6e	Other	Number of participants enrolled in basic skills, elementary, middle school, literacy, pre-GED or Internet classes.	Number of participants enrolled in basic skills, elementary, middle school, literacy, pre-GED or Internet classes.
7	Total Out-of-School	Number of out-of-school youth served	1) The number of participants who are no longer attending any school and have not received a secondary school diploma or its recognized equivalent. 2) The number of participants who are not attending any school, but have either graduated from high school or hold a GED.
8	Employed (subsidized)	Number who entered subsidized employment	The number of participants working in employment subsidized by YODDP, WIA, other public or private funds (e.g., foundations).
9	Employed (unsubsidized)	Number who entered unsubsidized employment	The number of participants working in employment not subsidized by YODDP, WIA, or by other direct wage subsidies.
10	Total Employed	Participants who are working full time or part time with a wage provided entirely by the employer, or partially or entirely by YODP funds.	The number of participants who can submit proof of wages earned for the period.
11	Enlisted in Military	Number who entered the military	The number of participants who have enlisted in the military.

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No. Name	Description	Operational Definition
12 In Aftercare Programs	Number served by aftercare programs	The number of participants under court supervision and treatment designed to reintegrate formerly incarcerated youth.
13 Entered in Community Service	Number who entered national and community services	The number of participants who are in court-defined, program-defined assignment or made a voluntary choice of employment for a stipend rather than a market wage.
14 Receiving Other Services	Number receiving other services such as drug rehabilitation, mental health and substance abuse treatment	Number of participants in treatment services (i.e., drug/alcohol, and anger management or other mental health services) and other miscellaneous, job-searching/employment related services (e.g., transportation, tattoo removal, assistance to obtain driver's license, and work clothing).
15 Convicted of a Crime	Number of participants who are convicted of a crime during program.	The number of participants who are arrested AND convicted of a crime during the program.
16 Incarcerated	Number of participants who are incarcerated for committing a crime during the program	The number of participants who are arrested, convicted, and incarcerated for a crime during the program.