



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.