July 31, 2012

Annie Blackledge
U.S. Department of Education
400 Maryland Avenue SW, Room 11089
Potomac Center Plaza
Washington, D.C. 20202-7241

Attention: Docket ID: ED-2012-OVAE-0014, Performance Partnership Response, Improving Outcomes for Disconnected Youth RFI

Dear Ms. Blackledge:

I appreciate the opportunity to submit comments on the Department of Education's Federal Register Notice regarding the proposed performance partnership pilots for disconnected youth.

The Forum for Youth Investment is a nonprofit, nonpartisan "action tank" dedicated to helping communities and the nation make sure all young people are ready for college, work and life. Informed by rigorous research and practical experience, the Forum forges innovative ideas, strategies and partners to strengthen solutions for young people and those who care about them. We work with multiple communities and states across the country, and have discussed this proposed pilot with several partner government agencies and non-profit service providers.

The Forum staff have been involved with a number of Federal initiatives across multiple administrations that address comprehensive, multi-system approaches for young people, from the President's Crime Prevention Council in the Clinton Administration, to the White House Task Force on Disadvantaged Youth, Shared Youth Vision and Helping America's Youth initiatives in the George W. Bush Administration, to the White House Council for Community Solutions, Promise Neighborhoods, and Choice Neighborhoods in the Obama Administration, to the Interagency Working Group on Youth Programs and the Coordinating Council on Juvenile Justice and Delinquency Prevention which have spanned across administrations.

Additionally, we have deep expertise in state policies that address comprehensive, multi-system approaches for young people. Our Governor's Children's Cabinet network convenes the directors and chairs of state policy coordinating bodies (Children's Cabinets, P-20 Councils, Early Childhood Advisory Councils, etc.) which are typically made up of the heads of all state government agencies that run child- and youth-serving programs.

Most recently, we have worked in support of the Presidential Memorandum on Administrative Flexibility (all our related resources can be found at: http://www.forumfyi.org/content/administrative-flexibility), and strongly support the Performance Partnership Pilots as a vehicle with which to advance the important work of aligning federal policies for young people. We appreciate this opportunity to respond to the request for information regarding the Performance Partnership Pilots.

Part I: Effective or Promising Practices and Strategies

Question 1: *"What Federal, State, and local programs or community collaborative efforts have improved outcomes for disconnected youth? What is the objective evidence of their success (e.g., evidence from rigorous evaluations using, for instance, random assignment and regression discontinuity design)?"*

The Forum for Youth Investment works to help community and state collaboratives achieve collective impact for children and youth, and are able to point to numerous collaborative efforts that have improved

outcomes for children and youth. In our work in support of the Presidential Memorandum on Administrative Flexibility, we focused on four members of our Children's Cabinet Network who had great readiness and interest in aligning policies in support of disconnected youth. The work of each can be instrumental in understanding how collaborative efforts can improve outcomes for disconnected youth.

While each site is slightly different in its target disconnected youth population or the funding streams it hopes to gain flexibility from, the commonalities include the ability to blend funds from different funding streams while streamlining application and intake processes, as well as reporting requirements across different funding streams. All of them represent strong state/local partnerships with both state and local government working together to align policies to serve disconnected youth.

The **Colorado Prevention Leadership Council** in the state of Colorado has begun the work of blending state funding and using that funding to produce a broad network of connected services that are more readily responsive to the complex needs of disconnected youth and families. They are working in concert with a number of localities across the state, including **Joint Initiatives for Youth and Families in Colorado Springs.** Having the ability to include funding from federal sources would allow for even greater opportunities to effectively serve disconnected youth. Additionally, Colorado has also experimented with rewarding programs for achieving performance-based outcomes (Pay for Success). Programs that are successful in meeting outcomes are awarded discretionary, flexible dollars to support services. Colorado envisions aligning federal funding streams to expand these practices and further support increased service coordination and streamlined reporting efforts.

Similarly, in the state of Iowa, the **Iowa Collaboration for Youth Development,** working in concert with **Sioux City**, intends to use increased administratively flexibility to provide proper supports to youth ages 18-21 that are preparing to transition out of youth systems. Many of the youth in the juvenile justice system, child welfare system, mental health system, and vocational rehabilitation services have similar issues that need to be addressed. Iowa plans to address the needs of these youth in a more effective and efficient way by coordinating federal, state, and local funding streams in addition to creating joint goals and programs between the multiple systems and agencies that address similar issues, with flexible eligibility requirements, based on need instead of age.

Florida's Children's Cabinet and the **Children's Services Council of Broward County** are working together to blend funds from state and federally funded programs at the local level to provide services and supports that increase high school graduation rates and successful transition to post-secondary education or employment. Florida is exploring ways to create a common eligibility criteria and a shared client database for WIA, 21st Century, and Supplemental Education Services, allowing for streamlined intake, client tracking and outcome measurement. This will reduce the number of staff needed to administer the programs and consequently lower the cost per participant. Youth and their families would also not be subject to multiple enrollment processes.

The state of **Nevada,** working with **Clark County**, is targeting young people ages 14-24 and their families that are the most frequent and chronic users of expensive public systems. This would be defined as those who have accessed three or more systems simultaneously, four or more separate systems in a year, or a repeated high volume of contacts with two or more systems over the same period. Nevada proposes the development of an acuity score to assess disconnected youth risk factors – youth with high acuity scores could then gain access to administrative flexibility from the multiple funding streams likely involved, and bypass rigid income guidelines and time limits to allow for comprehensive services. To address systems disconnect and the competing needs of each agency, an Integrated Case Coordination Organization would play a key role. This concept has been successfully implemented for systems and agencies serving Southern Nevada's homeless population.

Question 2: *"What program designs have great promise of improving educational, employment, or other key outcomes for disconnected youth? What is the best evidence to support these program designs (e.g., correlational or longitudinal outcomes analyses)?"*

In addition to wonderful organizations serving disconnected youth with which we have had the pleasure of working with, such as Roca (Boston), the Teen Outreach Program, and various localities implementing models of wraparound services, there are several national organizations whose affiliates or members are exemplars, such as: YouthBuild USA, the Corps Network, Jobs for the Future sites, the National Youth Employment Coalition, and the Center for Law and Social Policies' Communities Collaborating to Reconnect Youth Network.

There are also a few organizations that maintain databases of programs which have evidence of effectiveness, such as Child Trends' LINKS database (http://www.childtrends.org/LINKS/), and the Interagency Working Group on Youth Programs' program directory:
(http://www.findyouthinfo.gov/program-directory)

Additionally, Washington State Institute for Public Policy has been generating nonpartisan cost/benefit analyses for more than a decade to help achieve better outcomes at lower costs in many policy areas in Washington State. Their analyses allow state policymakers to make decisions on program funding based on the potential return on investment and the benefits that accrue to program participants as well as taxpayers. Programs are ranked based on the projected benefits, costs, and risks of all programs in a Consumer Reports-like ranking of public policy options. Their *Return on Investment: Evidence-Based Options to Improve Statewide Outcomes, July 2011 Update* report identified the following programs that, in Washington State, provide significant benefits and return on investment for disadvantaged older youth.

Selected programs from *Return on Investment: Evidence-Based Options to Improve Statewide Outcomes*
Juvenile Justice Programs:
- *Aggression Replacement Training* – a cognitive behavioral intervention program to help children and adolescents improve social competence and moral reasoning, better manage anger, and reduce aggressive behavior. The program specifically targets chronically aggressive children and adolescents.
- *Drug Court* - Eligible drug-addicted persons may be sent to Drug Court in lieu of traditional justice system case processing. Drug Courts keep individuals in treatment long enough for it to work, while supervising them closely.
- *Family Integrated Transitions* – a re-entry program specifically designed for juvenile offenders with co-occurring mental health and substance use disorders.
- *Functional Family Therapy* - family intervention for at-risk youth ages 10 to 18 whose problems range from acting out to conduct disorders to alcohol and/or substance abuse. Often these families tend to have limited resources, histories of failure, a range of diagnoses and multi-system exposure.
- *Multidimensional Treatment Foster Care (MTFC)* – aims to decrease problem behavior and to increase developmentally appropriate normative and pro-social behavior in children and adolescents who are in need of out-of-home placement. Youth come to MTFC via referrals from the juvenile justice, foster care, and mental health systems.
- *Multi-Systemic Therapy (MST)* - intensive family-and community-based treatment program that focuses on the entire world of chronic and violent juvenile offenders — their homes and families, schools and teachers, neighborhoods and friends. MST works with the toughest offenders -- adolescents, male and female, between the ages of 12 and 17 who have very long arrest histories.

Child Welfare Programs:
- *Healthy Families America – a* home visiting program model designed to work with overburdened families who are at-risk for adverse childhood experiences, including child maltreatment. Best equipped to work with families who may have histories of trauma, intimate partner violence, mental health and/or substance abuse issues.
- *Incredible Years* - group-based intervention guided by behavioral and social learning theory. 12–14 weekly sessions using videos, role play, modeling and group discussions to help parents rehearse and adopt positive parenting strategies.

- *Intensive Family Preservation Services (IFPS)*-family-focused, community-based crisis intervention services designed to maintain children safely in their homes and prevent the unnecessary separation of families. IFPS are characterized by small caseloads for workers, short duration of services, 24-hour availability of staff, and the provision of services primarily in the family's home or in another environment familiar to the family.
- *Multi-Disciplinary Team/Team Decision Making* – offers alternatives to families instead of residential placements of children. Results in dramatic decreases of youth in residential care.

K-12 Education and College and Career Pathways:
- *K-12 Parent Involvement Programs* - programs and interventions that engage families in supporting their children's learning are linked to higher student achievement.
- *Special Literacy Instruction: English Language Learners* - English-based literacy programs involve a structured, direct instruction approach to teaching reading to ELL students.
- *Tutoring for English Language Learners* - One-on-one tutoring programs for ELL students.

Question 3*: "What discrete interventions, strategies, or practices would need to be included in pilot designs or innovative programs to increase the likelihood of their success, particularly untested designs?"*

Performance Partnership Pilots should focus attention on using the waiver flexibility to improve:
- *Application Processes* – Much of this work will need to be done at the federal level to ease the burden on states and localities.

- *Eligibility Criteria* – Disconnected youth and youth on the verge of disconnection often have multiple risk factors and touch multiple systems. The development of an acuity score or assessment of potential for disconnection may provide a less intrusive, arbitrarily restrictive and more realistic measure of eligibility.

- *Intake Processes* – Youth and their families should not be subject to multiple enrollment processes. The local workforce boards report that it takes about three hours to complete WIA enrollment paperwork for one youth. Adding additional time may prove prohibitive to youth and their families.

- *Data Management* – Such as a shared client database to streamline intake, client tracking and outcome measurement.

- *Reporting Requirements* – Determining appropriate measures of performance for the blended programs that don't encourage creaming yet push sites to really move the dial on the most at-risk or disconnected youth.

The specific blend of interventions required will vary by community and individual youth, but should contain elements designed to promote physical, intellectual, psychological, emotional, and social development. Youth face a myriad of challenges as they struggle to successfully transition to adulthood, a transition that for most takes a decade or more. Today's young people are expected to advance in several areas of development - academic, physical, vocational, financial, social, emotional, and civic. Research shows that youth who are not hopeful, engaged, and thriving are less likely to be developing assets and more likely to be engaged in risky behaviors.

Because the transition from youth to adulthood spans multiple years, multiple systems and multiple facets of life, one solution or one program is not enough to make a substantial impact on severely disadvantaged youth. Some youth are at high risk of disconnection because of complicating behaviors (e.g., truancy, pregnancy, substance abuse) and contributing factors (e.g. poverty, failing schools, domestic violence, mental health problems, involvement with the juvenile justice or child welfare systems). We know from research that co-occurring problems require co-occurring interventions and ongoing support and coordination of services.

A bundled suite of targeted, evidence-based youth programs tailored to local needs has the potential to target all areas of disconnection for disadvantaged youth, including truancy and dropout prevention, educational and career support, and initiatives to drive down child welfare and juvenile justice out of home placements. The specific blend of interventions required will vary by community and individual youth, but should contain elements designed to promote physical, intellectual, psychological, emotional, and social development, ultimately providing a complete spectrum of integrated wrap-around services and supports anchored by and coordinated with a universal positive youth development program. Treating the entire person with a suite of services designed to treat the root causes of the problem is the best way to achieve sustained behavior change.

More broadly, reduction in the barriers for participation in certain programs, including common eligibility, would be very important for a youth-centered approach, as this would allow each participant to be connected with appropriate services in a streamlined manner. As an example, creation of common eligibility criteria and a shared client database for WIA and 21st Century participants at the high school level would streamline intake, client tracking and outcome measurement, which would then reduce the number of staff needed to administer the program and consequently lower the cost per participant. Youth and their families would also not be subject to multiple enrollment processes. Measures such as these would lower the overall cost per participant and reduce duplicative administrative burdens.

It is expected that different pilot sites may incorporate different interventions, strategies and practices from site to site. Rather than mandating a specific set of strategies for each pilot site, it is recommended that pilot sites have the flexibility to design a set of strategies that are supported by the local community and tailored to the needs of their vulnerable youth population. The Forum recommends setting a collective and standardized set of outcomes required for all pilot sites. Therefore, pilot sites will be held more accountable to outcomes and given the flexibility to modify strategies to their specific communities that will deliver the intended outcomes.

We also support the Model Policy Elements put forth by **Jobs for the Future in *Six Pillars of Effective Dropout Prevention and Recovery*:**
- Reinforce the right to a public education (to meet the particular needs of older students and to target recruitment efforts at bringing older dropouts back to school);
- Count and account for dropouts;
- Use graduation and on-track rates to trigger transformative reform; invent new models;
- Accelerate preparation for postsecondary success; and
- Provide stable funding for systemic reform.

Question 4: *"What are the best ways to involve youth in planning and implementation in order to help ensure that projects will be effective in meeting their needs?"*

Disadvantaged youth should participate in planning and implementing pilots. Prioritizing applicants who engage youth in the pilot development process would incentivize such efforts.

Young people are disproportionately involved in and affected by the problems that beset communities and states. Young people are not only at the center of many problems, they are the source of many solutions. Studies show that young people want to be engaged as change makers. The true engagement of young people in change processes, however, requires a fundamental shift in how decisions are made.

Youth involvement goes beyond providing input – it means being active in the work: brainstorming, identifying goals and carrying out solutions. Providing youth with authentic decision-making power on issues they want to focus on is a critical step in youth engagement and youth/adult partnership efforts. It is best to integrate young people into existing community change agendas by working with them to connect the issues they are passionate about – typically those that affect them on a regular basis and are part of their life experiences – to a broader framework and agenda. An example of this process is connecting immediate issues like broken school bathrooms to systemic challenges such as crumbling

school infrastructure, which can be further linked to root causes like racism and poverty. This process is critical for both adults and young people engaged in community change.

Youth Advisory Boards – sometimes referred to as Youth Councils– are one popular approach to ensuring youth are engaged in community work that impacts them. Pilot sites should each partner with existing youth councils, or form new ones if none already exists. More information on them can be found in *Building Effective Youth Councils: A Practical Guide to Engaging Youth in Policy Making* (http://forumfyi.org/content/building-effective-you)

Effective teams have a structure through which all youth and adults members are held accountable. Young people can and should assume a range of meaningful roles as team members, including being involved in research, planning, training, recruitment and office management. Additionally, compensating young people, whether it is through salaries, credits, or other creative strategies, is an important way to send the message that they are not recipients of services but rather colleagues in the community change work.

Nashville, Tennessee, provides an excellent example of successful youth engagement. Nashville youth and families were critical in contributing ideas and implementing activities during the development of a community-wide youth master plan. The Mayor's Task Force charged with developing this plan included youth representatives, as well as a Mayor's Youth Council, consisting of a group of 32 high school juniors and seniors who represent the geographical, racial, and ethnic diversity of Metropolitan Nashville and Davidson County. Nashville's youth offered their insights in a series of surveys, and community members participated in focus groups held across the city.

Effective youth and family engagement ensures that solutions are crafted with the voices of those who are affected, that the efforts take deeper root, and that a wider range of players develop their leadership skills – be it a local business owner, a parent looking to improve safety or a teenager who wants to improve her neighborhood. Young people and adults working together can create the necessary conditions for the successful development of themselves, their peers, their families and their communities'.

Part II: Public and Private Partnerships

Question 1*: "Which State, local, non-profit, and business partners have been involved in the successful initiative(s) addressing the needs of disconnected youth that you may have described in response to one or more of the questions in this RFI? Which partners should be involved in the future?"*

With various people and organizations playing unique roles in a community – focusing on particular issues, populations and geographic areas – someone needs to keep an eye on the big picture, and connect the work of existing groups. The Forum advises states and communities in developing, maintaining, and sustaining successful overarching leadership councils, oftentimes referred to as children's cabinets, commissions, committees or councils. This overarching leadership council works best when it has a clear governance structure, responsibilities to engage public and private stakeholders, and members that hold each other accountable for carrying out their part of the big picture action plan.

To change the odds for children and youth, communities need the involvement of influential leaders from all sectors including education, business, government, nonprofits and families. Coordinating body members include state agencies and a range of others (see a sampling from six survey states below).

Types of Partners Represented in this Sampling of Coordinating Bodies						
Type of Partner	**State**					
	1	2	3	4	5	6
State agency of administration and finance	X		X			
State agency of housing and economic development	X		X			
State agency of education	X	X	X	X	X	X
State agency of health and human services	X	X	X	X		X
State agency of public safety and security	X					
State agency of corrections				X		
Child advocacy group	X					
Governor and first lady		X				
State agency of mental or behavioral health		X	X	X		
Private and nonprofit youth-serving providers		X		X		
Foundations			X			
United Way			X			
Parent associations			X	X		
Secondary school staff			X	X	X	X
Community college staff (chancellors or designees)			X	X	X	X
University/college staff (chancellors or designees)			X	X	X	X
Technical/vocational college staff			X	X	X	X
Family court system			X	X		X
State agency of migrant/ immigrant services			X			
Business community/chamber of commerce				X		

These leaders need to be committed and collaborative in ways that contribute to the overarching mission of the group.

They show this by their:
- Sense of urgency to improve conditions and outcomes.
- Commitment of human and financial resources.
- Interest and experience in collaborating.
- Commitment to "big picture" goals that extend beyond their immediate interests.

Pilots should be awarded to communities with a demonstrated track record of working across multiple funding streams and systems to serve youth in a coordinated way. Stakeholders of particular importance for the disconnected youth population might include the local workforce agency, local education agency, local post-secondary institution(s), child welfare and juvenile justice systems, and a strong community-based provider network. Recommended participants include:

State Level
Governor's office
Labor agency
Education agency
State legislators
Lead coordinating agency
Juvenile Justice
Welfare
Child and Family Services
Health and Human Services

Regional and Local Levels
School districts
Municipal officials
Service providers for all youth-serving systems
Workforce agencies

Due to the multiple agencies, sectors, and levels of government that must be involved, the Forum recommends providing preference for pilots which align not just federal policies, but state and local policies as well. Preference should be given to pilots proposing efforts that align across federal, state and local (city/county) jurisdictions. For a pilot to be fully successful, it will need to align efforts both vertically (federal, state, local) and horizontally (across government agencies and disciplines). To do this, it will need flexibility from not just federal regulations, but from state and local regulations as well. Projects

demonstrating buy-in and commitments to participate from state and local governments working together should receive preference.

"What role did or what role could philanthropic organizations play in supporting these types of initiatives you may have described in response to one or more of the questions in this RFI?"

Philanthropic organizations can play an important role in supporting Performance Partnership Pilots by providing grants and technical assistance to pilot sites. To achieve collective impact, pilot sites need three things:
- Funding to support the core partnership management;
- Technical assistance on how to achieve better outcomes through collective action; and
- Flexibility in how existing funding can be used to implement the collective strategy.

The Performance Partnership Pilots, as they are currently crafted, only provide flexibility. Foundations could play a key role by providing funding for the pilot sites as well as for the related technical assistance.

While the barriers identified and the changes being requested are low cost, pilots should be awarded grants to cover the time it takes to design and implement the deep, system-wide changes envisioned through these pilots. Waivers on federal policy barriers are a critical component, but states and localities are going to need funding to ensure they have the capacity to use this flexibility in optimal ways. Foundations should provide these funds if the federal government cannot.

Philanthropic organizations can also fund technical assistance. Pilots should receive significant training and technical assistance and peer learning opportunities. Pilot sites should not have to reinvent the wheel; they should receive support from an organization working with a network of all sites to cull and disseminate best practices. Foundations should provide these funds if the federal government cannot.

Examples of successful public-private partnerships include:
- A partnership between the state of California and the Bill & Melinda Gates Foundation, in which the state provided funding for school district/community partnerships through the High School Pupil Success Act (HSPSA), and Gates provided one million dollars to support a robust technical assistance plan to help ensure successful implementation.
- Promise Neighborhoods: government provided grants to communities and foundations covering the cost of technical assistance.

Encouragement from the federal government for large national philanthropic organizations to support efforts identified as priorities for the pilot sites would be of great value. The ongoing work, time and expertise involved in maintaining a strong, healthy partnership able to nimbly respond to requests for flexibility and to trouble shoot sticky policy barriers cannot be overlooked.

In particular, the expertise of the **Youth Transitions Funders Group** and their *Connected by 25: Effective Policy Solutions for Vulnerable Youth* paper should play a strong role in shaping the roll out of the Performance Partnership Pilots.

"How were the partnerships involved in those initiatives structured (e.g., governance models, provision of services, shared funding, collaborative professional development)?"

A partnership's capacity to achieve collective impact is deeply influenced by its structural characteristics. Through the Forum's research and experience with state child and youth policy coordinating bodies over the past decade we have determined six components of structure associated with positive systemic change (the full report, *State Children's Cabinet and Councils Series Elements of Success: Structural Options*, can be found at http://www.readyby21.org/resources/state-childrens-cabinets-and-councils-series-elements-success-structural-options):

1. **Scope of the Vision and Mission** –*the scope of a partnership.* Coordinating bodies that adopt a broad scope are better positioned to coordinate and improve services for children and youth. It is no longer sufficient to tackle issues in isolation from bigger picture planning that cuts across

systems and settings. Having broad goals requires a high level of commitment from key decision makers. Entities with a broad focus are better positioned to engage important officials because they are more likely to be invested in the major issues concerning children and youth. The cabinet thus becomes an umbrella organization for all children and youth issues, which increases the capacity to secure commitments for change. Additionally, the mission of a cabinet should be clear and adhered to. A clear mission is vital for the success and effectiveness of a cabinet. A mission describes why the body exists and its specific tasks. A clearly defined mission provides specificity to the types of activities the body engages in and guides the work of the cabinet and ensures coordination of efforts for children and youth.

2. **Authority** – *the power to control resources, set policy, formulate strategies and give direction to state agencies.* A cabinet should have the ability to make policy decisions and control resources. The range of authority a cabinet may possess includes the ability to directly control resources, develop policy and formulate strategies that agencies are responsible for implementing. The ability of a cabinet to authorize implementation and control resources has a direct link to its effectiveness and its ability to implement long-lasting change. Several effective cabinets and councils do not have the direct authority to allocate funds but their membership includes leaders who have control over the funds and administration of individual agencies and so they are able to influence resource allocation. The most effective cabinets have at the core of their membership the heads of all the agencies and departments which offer programs, services and supports within the scope of the cabinet's mission. Without the regular engagement of all relevant agency heads, it is extremely difficult for a cabinet to exercise the needed authority to make and implement policy decisions.

3. **Organizational Home** – *the administrative and fiscal agent of the cabinet.* There are advantages and disadvantages to all cabinet locations. A cabinet can be housed inside a governor's office, an existing state agency, an agency created to staff the cabinet, a nonprofit organization or it may be an informal structure. The most common three organizational homes are inside a governor's office, inside an existing agency, or an agency whose primary responsibility is staffing the cabinet. The organizational home impacts credibility with stakeholder groups and the ability to convene key stakeholders. It also affects the authority to receive and expend funds and to maintain dedicated staff.

4. **Scale of Composition and Formality** – *the composition of stakeholders involved and their formal and informal roles and the time devoted to cabinet duties*. A cabinet's official membership should include high level government leaders to demonstrate the importance of the body and to ensure that there is adequate capacity to make key decisions. Non-governmental stakeholders should also be included in an advisory capacity, capturing the voices and concerns of nongovernmental stakeholders such as youth and families. A cabinet should be established as a permanent structure. Establishment through executive order and legislative statute is the recommended process to achieving permanency. Permanency increases legitimacy, facilitates the ability to coordinate and ensures the authority to bring key stakeholders together and implement change. It also ensures that the coordinating body will survive leadership changes.

5. **Resources** – *the staffing configurations for the cabinet and the financial commitment of the state to the operation of the cabinet.* A cabinet's staff size should fit its scope – cabinet staff perform essential functions between meetings to ensure decisions are implemented. Although a dedicated staff is important, cabinet members should be responsible for some results and initiatives. This will empower members and increase investment and dedication to the work. The cabinet should ensure that each department has action items they must follow through which will increase engagement in the cabinet and its work. Funding for a cabinet is essential. States vary widely on the sources and level of funding provided for the cabinet. Funding ranges from unfunded structures to cabinets with a steady stream of resources. All cabinets, regardless of their funding levels, rely on some form of operational resources to fund their work.

6. **Local Connections** – *the way in which the cabinet interacts with local communities from a funding, infrastructure, technical assistance and data collection perspective*. A cabinet must maintain contact with local jurisdictions. It is critical to establish and maintain two-way communication between the state and local levels. Having this connection will help guide the cabinet's work to provide the supports and resources most needed at the local level and will improve the cabinet's ability to understand the impact of its work. It will also improve the

implementation of the cabinet's work if all jurisdictions use the same language and frameworks to measure child and youth outcomes, indicators and benchmarks.

As can be noted from the above structural considerations, setting up a highly effective cross-agency partnership takes a significant amount of time, resources, and political will. This is why it is fundamental that <u>pilots should be awarded only to communities that already have highly effective state and local partnerships in place</u>. To take full advantage of federal flexibility, sites will need a sophisticated, high quality network of partners spanning multiple agencies and systems.

Question 4: *"Which Federal programs should be involved in performance partnership pilots for disconnected youth?"*

All relevant policies administered by **the Departments of Education, Health and Human Services, Labor, Justice, and Housing and Urban Development**, should we waivable, as should those administered by the **Corporation for Community and National Service** and the **Office of National Drug Control Policy**. We applaud the Senate for including the departments of education, health and human services and labor in the Performance Partnership Pilots, and call on Congress to ensure that Justice, HUD and ONDCP get added to the list. Many disconnected youth are court-involved, struggle with drug abuse, and live in public housing. For a pilot to fully succeed they will need the ability to apply for waivers from those departments in addition to Education, Labor, and Health and Human Services. We also encourage the administration to explore the feasibility of adding a select few **Department of Defense** programs to the list. While DOD waivers would need to be carefully and narrowly constructed, the Department of Defense invests heavily in youth development activities for the children of military families, and oversees the National Guard Youth ChalleNGe Program.

Below is a list of potential programs and funding streams that can and often do impact vulnerable youth both before and after disconnection.

Corporation for National and Community Service
- Americorps State Grants
- Social Innovation Fund

Department of Agriculture
- Federal Afterschool Snack Program & Summer Food Program
- SNAP - formerly Food Stamps

Department of Defense:
- National Guard Youth ChalleNGe Program

Department of Education
- 21st Century Community Learning Centers
- Adult Education
- Career and Technical Education
- Gear Up
- Homeless Children and Youth Education
- IEP / Special Education
- Individuals with Disabilities Education Act (IDEA)
- Investing in Innovation
- NCLB Title I Supplemental Education Services
- Neglected and Delinquent Children and Youth
- Race to the Top
- Successful, Safe and Healthy Students - National Activities
- TRIO Programs
- Promise Neighborhoods

Department of Energy
- Vocational Rehabilitation Grants to States

Department of Health and Human Services
- Chafee Education and Training Vouchers
- Child Care Development Act
- Community Mental Health Services Block Grant
- Community Services Block Grant
- Federal Foster Care Program
- John H. Chafee Foster Care Independence Program
- Medicaid (targeted case management funds/TCM)
- Promoting Safe and Stable Families
- Runaway and Homeless Youth Program
- Social Services Block Grant
- Teen Pregnancy Prevention
- Temporary Assistance for Needy Families
- Title IV-E of the Social Security Act
- Title V

Department of Housing and Urban Development
- Community Development Block Grant
- Housing and Urban Development (HUD) programs
- Choice Communities

Department of Justice
- Community Based Violence Prevention
- Gang Resistance Education and Training (G.R.E.A.T)
- Juvenile Drug Courts
- National Forum on Youth Violence
- OJJDP's Civil Rights/Anti-bullying/Juvenile Justice programs
- Second Chance Reentry
- Tribal Youth
- Youth Mentoring

Department of Labor
- Job Corps
- Reintegration of Ex-offenders
- Workforce Investment Act-Youth Activities Formula Funds
- YouthBuild

Question 5: *"What has been your experience with other Federal initiatives that address issues related to disconnected youth by facilitating comprehensive, multi-system approaches and using existing resources in more coordinated and comprehensive ways, such as Promise Neighborhoods and Choice Neighborhoods within the Neighborhood Revitalization Initiative?"*

The Forum's staff have been involved with a number of Federal initiatives across multiple administrations that address comprehensive, multi-system approaches for young people, from the *President's Crime Prevention Council* in the Clinton Administration, to the *White House Task Force on Disadvantaged Youth*, *Shared Youth Vision* and *Helping America's Youth* initiatives in the George W. Bush Administration, to the *White House Council for Community Solutions*, *Promise Neighborhoods*, and *Choice Neighborhoods* in the Obama Administration, to the *Interagency Working Group on Youth Programs* and the *Coordinating Council on Juvenile Justice and Delinquency Prevention* which have spanned across administrations.

Below we present the lessons learned from this experience: what elements are vital to successful collaborations (the Ready by 21 Leadership Capacity Standards), as well as what types of collaborations often fail to achieve collective impact.

Elements of Successful Collaborations (the Ready by 21 Leadership Capacity Standards)
Broader Partnerships

- Build an overarching leadership council – that establishes accountability for improved outcomes from birth to young adulthood.
- Align and strengthen coalitions, commissions and intermediaries – to ensure full coverage of issues, populations and strategies.
- Engage key stakeholders in setting priorities and solving problems – from young people to professionals, from front-line providers to policymakers.

Bigger Goals
- Establish a balanced set of goals and indicators for all children, youth and young adults – that includes preparation and problem-reduction in all areas of development.
- Define supports that the full community must provide – and specify high-quality standards across all systems and settings where young people spend time.
- Create a big picture, goal-oriented action plan – that establishes action strategies, stakeholder commitments and ongoing accountability mechanisms.
- Define common terms and communicate core messages – to improve communications among joint efforts and to the general public.

Better Data
- Collect complete data about youth outcomes, community supports and leadership actions – to inform collective efforts and demonstrate the link to improved outcomes.
- Align and connect data for decision-making – horizontally (across systems) and vertically (from individual and neighborhood through community and state).
- Use the best information about what works – to make strategies more effective.

Bolder Strategies
- Improve systems and settings – by increasing their quality, coordination and reach.
- Align policies and resources – to be more consistent, effective and aligned to maximize return on investments.
- Increase demand – for improving effectiveness, scale and sustainability, and for reducing gaps in services.
- Engage youth, families and community members in solutions – building their capacity in the full range of action strategies.

Types of Coordination Which Often <u>Fail</u> to Achieve Collective Impact

- *Narrow-Topic Coordination*: This is perhaps the most prevalent form of coordination, which is not surprising because the logic that drives this response is so compelling. It does not take long for a political leader who is passionate about an issue to realize that fully addressing that one issue will require a coordinated interagency response. It is common, therefore, to find several different coordinating bodies related to child and youth issues at any given time, in any administration, at any level (local, state, or national). This approach falls short in two areas. First, a similar set of staff often find themselves rushing between multiple coordinating bodies addressing similar populations from different vantage points, leading to the ironic need to coordinate the coordinating bodies. Second, single-topic coordination by definition not only fails to address the fragmentation in all the other areas of child and youth policy – it perpetuates it.
- *Time-Limited Coordination*: Sometimes a coordinating body is set up for a fixed amount of time, for example, to complete a report. In those instances, we have often observed an unfortunate situation in which the coordinating body issues a powerful set of recommendations but then dissolves, leaving no clear entity in place to complete the child and youth strategy, oversee governmental efforts to implement the strategy, and continue the stakeholder engagement. Knowing what needs to be done but not having a standing body tasked with accomplishing it can be as frustrating as it is fruitless.
- *Personal Network Coordination*: Interagency coordination is often undertaken by a few key high-ranking officials with close working relationships. "Of course I believe in coordination: I talk to Sally and Tom all the time" is the type of refrain common in this type of coordination. Indeed, a tremendous amount of effective coordination comes from just these types of personal connections. They are particularly useful in institutions that have slim bureaucracies (one should

never underestimate, for example, how much coordination can be achieved by strong personal ties between, say, chiefs of staff of several key legislative committees). The bigger the bureaucracy one is overseeing, however, the harder it is to coordinate through personal relationships alone. The sheer scale of federal executive branch institutions limits the ability of even the most competent of political appointees to scratch the surface of what could and should be coordinated. Personal network coordination tends to be a very effective way to coordinate a few signature initiatives but cannot by itself align the hundreds of federal programs serving children and youth. Furthermore, coordination based on personal networks is very difficult to sustain. As soon as a key political appointee steps down or changes roles, the coordination gains that he or she achieved are quickly lost.

- *Ad Hoc Coordination*: When specific interagency problems surface, they are handled on a one-off basis. "We are happy to coordinate – tell me specific places where agencies are stepping on each other's toes and we'll fix it" is a common refrain in this type of coordination. As with the other types of coordination, this type is also well intentioned and very valuable, especially for putting out individual fires that flare up between agencies. But although it fixes isolated problems, it does not fully leverage what is possible. Effective coordination aligns efforts toward common goals articulated in a national strategy, making the best possible use of scarce resources. Ad hoc coordination addresses isolated areas of dysfunction but does not create a national vision or path to move efforts toward optimal functionality.

- *Appointees-Only or Career Staff-Only Coordination*: Collaborations composed primarily of appointees have great ability to reorient departmental efforts toward common goals articulated in a coordinated strategy. But without career staff, the nuts and bolts of getting change implemented can be difficult, and the likelihood of the work continuing in the next administration are low. On the other hand, collaborations composed primarily of career staff often achieve a lot in terms of interagency information sharing and on addressing tasks that career staff have the authority to perform themselves, such as developing common definitions on requests for proposals. But these efforts can quickly hit a glass ceiling of the level of coordination which staff have the authority to do without the involvement of appointees.

We support as well the conclusions and key recommendations in the **Center for Law and Social Policy's** *Learning from the Youth Opportunity Experience: Building Delivery Capacity in Distressed Communities:*

- Young people by the thousands are anxious for a chance to reconnect;

- Communities can manage to scale;

- Requiring the involvement of multiple systems and resources as a contingency of funding is effective in bringing disparate players to the table;

- There must be a convening entity;

- Local and state officials have an extremely important role to play;

- Local delivery capacity is directly related to the ability to hire and maintain quality staff;

- Communities with large numbers of dropouts will need to explore multiple avenues for connecting these youth to quality education options;

- The child welfare and mental health systems must be more fully engaged in the local visioning, strategic planning, and delivery of these interventions;

- The YO communities were successful in motivating youth to post-secondary aspirations;

- Economically stressed communities can't replace the loss of millions in federal funding;

- Foundations and other funders have an important role to play in incubating and sustaining these innovations

- There is a need for expanded participation of employers and business leaders in crafting pathways for youth to connect with high growth, high skill areas of the economy.

Question 6: *"Do you see an opportunity to use the Pay for Success model which is currently being pursued under existing authority by the Departments of Labor and Justice, but which could potentially be expanded to other areas such as programs serving disconnected youth?"*

There is a natural complement between increased administrative flexibility under the Performance Partnership Pilots and innovative new financing mechanisms including Pay for Success/Social Impact Bonds, as both initiatives provide great flexibility for what activities are undertaken, in return for strong accountability for results

As noted throughout the RFI, disconnected youth interact with multiple systems, agencies, and funding streams. According to national experts studying the use of Social Impact Bonds for philanthropic purposes, one of the clear advantages of using these innovative financing models is the ability to treat the entire person using an individualized approach that has the ability to tap into a host of services, ultimately treating the root cause of the problem instead of just the symptoms to influence positive and sustained behavior change.

Unfortunately, wrap-around approaches such as these have been notoriously difficult to finance and sustain due to the multiple systems, entities, and funding streams involved. The Pay for Success (or Social Impact Bond) model provides a venue to bypass some of these complexities by allowing private investors to bear the bulk of the initial risk and investment, using social outcomes as the underlying asset.

Private investors represent an important form of quality control – nonprofit service providers must convince investors that their program model and management team will achieve the agreed upon outcomes. Investors and underwriters have strong incentives to regularly monitor program performance; if outcomes are not achieved, investors will not be repaid.

The financial risk to the government is minimal - investors are repaid only if the interventions improve social outcomes. Examples of social outcomes in the case of disconnected youth may include increases in high school graduation rates, career preparedness, employment rates, successful transitions to post-secondary education and decreases in truancy rates, teen pregnancy rates, suspension rates, substance abuse, and violence and crimes. If the agreed upon outcomes are not achieved, the government is not required to pay. In this way, the risk of funding prevention services that may not show an immediate return on investment is transferred from the government to private investors.

Part III: Outcomes, Data, and Evaluation Design

Question1: *"What are the key outcomes that pilots should measure, and what indicators should be used to track intermediate and long-term success for youth?"*

Three levels of outcomes should be evaluated for all child and youth collaborations. Short term: performance of the partnership; Intermediate term: community and school programs and services; Long-term: child and youth outcomes.

Short Term Outcomes: the Performance of the Partnership	
In General	Specific to the Performance Partnership Pilots
• All the critical stakeholders engaged, bought-in, and participating in the work.	• All related government agencies at the state and local levels at the table.
• A clear data-based assessment of the community needs and resources and a strategic plan for the work the partnership will undertake.	• A plan for how federal, state and local funding will be used differently to achieve better results.
• A set of outcomes participants agree to be collectively accountable for achieving.	• a set of outcomes (partnership performance; community and school programs and services; child and youth outcomes) for which

	they agree to be collectively accountable and which ensure that the flexibility provided through the pilots does not have any adverse effect on the most vulnerable populations.
• An integrated data infrastructure to hold the partnership collectively accountable for results	• A method of monitoring those outcomes and using them for continuous improvement.

Intermediate Outcomes: Improvements in Community and School Programs and Services	
In General	**Specific to the Performance Partnership Pilots**
• *Available and accessible*, so no one is stranded on waiting lists and street corners.	• *Increased availability and accessibility* – through an increase in the time providers are working with clients (from time saved by reduced red tape, paperwork, application and reporting requirements); and an increase in the number of services clients access (from reduced restrictions on eligibility).
• *Balanced*, so that available programs and services address all of the community's needs, and the relative proportion of each service matches the unique distribution of needs in the community.	• *Better balanced* – through a realignment of funds to serve community needs for the most vulnerable.
• *Connected*, so that if a young person accesses one programs or service, they are let through a path of programs and services to meet all their needs as they grow and develop.	• *More connected* – through new common intake systems and integrated case management.
• *High quality*, so the services and programs delivered achieve results.	• *Higher quality* – through pooling of training and technical assistance funds.
• Sustainable, so quality programs and services are there for the long-haul.	• *More sustainable* — through the demonstration of improved results.

Long-Term Outcomes: Youth Well-Being
Examples of Productivity Outcomes

- % students absent more than 10 days in the school year
- % students with "on-time" credit accumulation
- % students scoring "3" or higher on AP exams
- High school graduation rate
- % 16-19-year-olds who are dropouts
- % students who participate in career awareness activities
- % 16-24-year-olds who are attending school or working
- % students with job internship/apprenticeship experience
- % 18-24-year-olds enrolled in college, or completed college
- % of full-time, first-time students who complete degree programs within 150% of normative program length
- % of 18-24-year-olds who have a 2- or 4-year degree
- % 18-24-year-olds employed
- Among parents, % age 20 or older, married, with >= 12 years' education, and >= 1 is employed
- Career preparedness (employability skills)
- Employment status
- Employment retention

Examples of Health and Safe Outcomes

- % children with a medical home
- % who had adequate sleep every night in past week
- % who exercised vigorously 3+ days in past week
- % overweight or obese
- % who bullied or were bullied
- % youth who felt sad or hopeless for more than 2 weeks in the past 12 months
- % youth who smoked cigarettes in the past 30 days
- % youth who drank alcohol before age 13
- % youth who drank alcohol in the past 30 days
- % who are sexually abstinent
- % sexually active youth who used a condom at last intercourse
- Rate of births to women ages 15-19
- Decrease in problem severity and improved level of functioning.
- Increase in youth that obtain health insurance coverage.
- Rate of youth that successfully complete substance use treatment.
- Number (rate) of served youth placed into inpatient mental health care while receiving services (or after six months of services).
- Decrease in substance abuse rates
- Social and emotional functioning
- Mental health status
- Housing status

Child Welfare Health and Safety Outcomes
- Rate of substantiated reports of child abuse/neglect
- Rate in foster care at any time in the past year
- Children remain in their home when safe to do so
- Out of home placements stay in their school of origin
- Out of home placements return home or achieve permanency as soon as possible
- Number (rate) of youth with new open involvements in child welfare.
- Number of moves that youth experience when in out-of-home placement.

Juvenile Justice Health and Safety Outcomes
- Reduced recidivism
- Reduced referrals to juvenile justice
- Reduced incarceration
- Reduced truancy rates
- Reduced violent crime rates

Examples of Connected Outcomes

- % given useful roles in family and community
- % who eat a meal with their family 6 or 7 days per week
- % of children whose parent describes the parent-child relationship as "very warm and close"
- % of whose "family life provides high levels of love and support"
- % who "receive support from three or more nonparent adults"
- % in a supportive neighborhood/community
- % ages 6-17 who participated in sports teams, clubs, organizations, or other organized after-school activities in the past 12 mos.
- % students who are positively connected with school
- % who attend religious services at least once per month
- % who participate in school decision-making
- Rate per 100K involved in delinquency cases in juvenile court

- Arrest rates
- % volunteering in their community
- % of 18-24-year-olds who voted in the previous general election

Question 2: *"What existing data collection mechanisms can be harnessed to track indicators, outcomes, and participant characteristics?"*

Pilot sites should be allowed to pool existing resources and develop one single, effective, interconnected, interagency data system. Fragmented data systems waste government resources – that alone should be a compelling enough reason to act. But the greatest waste of all is the loss of young lives shattered by missed warning signs, missed connections, and missed opportunities to intercede. Unfortunately, child and youth data is every bit as fragmented as child and youth policies and programs.

A small sampling of fragmented federal efforts underway to create data systems with child and youth information includes:
- Head Start allocates $100M to State Advisory Councils on Early Childhood Education and Care which must "develop recommendations for a unified data collection system for public early childhood programs and services";
- McKinney-Vento Homeless Assistance Act ($70M) requires local education agencies to "collect and disseminate data and information regarding the number and location of homeless children and youth, the education and related services such children and youths receive, and the extent to which the needs of homeless children and youth are being met";
- the National Youth in Transition Database (NYTD) will collect case-level information on youth in care including the services paid for or provided by the State agencies that administer the Chafee Foster Care Independence Program (CFCIP), as well as the outcome information on youth who are in or who have aged out of foster care;
- the Workforce Data Quality Initiative ($15M) will "provide competitive grants to support the development of longitudinal data systems that integrate education and workforce data";
- the Department of Education provided $245M for "statewide, longitudinal data systems to improve student achievement"; and
- the Centers for Medicare & Medicaid Services was appropriated $140 million a year for FY 2009 through 2015 (and $65 million for FY2016) to accelerate the adoption of certified electronic health records (EHRs) by health professionals through the development of systems and incentives.

These efforts are being implemented, by and large, in isolation from each other, even though in many cases they are collecting information about the same children. Instead of pooling resources to develop one effective, interconnected, interagency set of data systems, many states and localities are developing parallel data systems – one for each federal, state, local and foundation-funded grant. *These parallel data systems often make redundant technological expenditures, collect overlapping sets of information, and are built in ways which inhibit the flow and transfer of data among them.* As a result, despite new resources devoted to data systems, most state and local policy makers and practitioners still do not have the information they need to be effective.

The Forum recommends encouraging the following actions for pilot sites and their states:
- **Integrate data across systems**. A comprehensive data system would allow education, child welfare, early childhood, juvenile justice, workforce development, health and other systems to better track and understand how well youth are doing across systems.
- **Integrate data across levels and boundaries**. Data sharing conversations are occurring at many different levels, national, state and local. Within states themselves there are different geographic boundaries such as municipalities, school districts, counties and service regions that need to be aligned.
- **Integrate data across age groups**. As President Obama called for in his Address to Joint Session of Congress, we need a system to support young people "from the day they are born to the day they begin a career."

- **Integrate data across common outcome areas**. We must pay attention to the full range of ways young people grow and develop, including academic development, vocational development, social/emotional development, physical development, and civic/cultural development.
- **Integrate multiple types of information**. A complete data system would include information on:
    - child and youth demographics (e.g., census data)
    - child and youth well-being (indicators of well-being)
    - child and youth enrollment and participation data
    - quality or performance level data for programs serving children and youth
    - program availability and participation rates for programs serving children and youth
    - provider workforce capacity data for programs serving children and youth
    - resource and investment data for programs serving children and youth

Without interagency data we can never truly have interagency accountability; without interagency accountability, efforts to collaborate will ultimately be futile. Performance Partnership Pilots provide a perfect and timely opportunity to align disparate data systems containing critical information about children and youth. By aligning data systems impacting children and youth, we can help states and localities reduce the fragmentation of policies and programs, make efficient use of scarce resources, prevent young people from falling through the cracks, and transform young lives.

Question 4: *"What are the best examples of communities and programs using data to track progress, inform course corrections, and evaluate program effectiveness?"*

There are several different levels at which communities and programs can benefit by using data to track progress, inform course corrections, and evaluate effectiveness, including using interagency data systems or cost-benefit analyses to influence state policy decisions, or using data about program components to influence program quality.

Intelligence for Social Policy (ISP) has been working with several states that already have existing interagency data sharing systems in place. ISP reports that policymakers are regularly using this data to help identify service population overlap with other agencies, and develop a richer sense of need to inform course corrections. Administrators report that the power and importance of integrated data sharing systems was profound, including better targeting of resources to needy or at risk populations, generating data to better inform social policy, and greater efficiency in the application of resources, resulting in notable budgetary savings.

The Washington State Institute for Public Policy has been generating nonpartisan cost/benefit analyses for more than a decade to help achieve better outcomes at lower costs in many policy areas in Washington State. Their analyses allow state policymakers to make decisions on program funding based on the potential return on investment and the benefits that accrue to program participants as well as taxpayers. Programs are ranked based on the projected benefits, costs, and risks of all programs in a Consumer Reports-like ranking of public policy options. The MacArthur Foundation has funded Pew Results First to bring this model to other states across the country.

At the program level, the Weikart Center for Youth Program Quality empowers education and human service leaders to adapt, implement, and scale best-in-class, research validated quality improvement systems to advance youth development. The Weikart tool allows providers to assess program quality, identify gaps in service, and use that information to improve and influence quality at the programmatic level.

Question 5: *"What evaluation designs should be used to demonstrate improved outcomes or improved cost-effectiveness of Performance Partnership Pilots?"*

The Aspen Institute's Roundtable on Community Change's work on evaluating Comprehensive Community Initiatives (CCIs) is the best source of information about related evaluation designs. Two key perspectives should guide this work:

- Some sort of participatory evaluation and research should be used as a key component of the evaluation, through which the partnership staff and members play key roles in helping determine measures of success, actively participate in self-evaluation activities, and use the data real-time to improve practices.
- The evaluation should focus on (1) evaluating management performance of the partnership itself in the short-term (stakeholder engagement, data-based assessments and strategic plans, integrated data infrastructure); (2) community and school programs and services in the intermediate-term (community and school programs and services which are more available and accessible, balanced, connected, high quality, scaled, and sustainable); and (3) child and youth outcomes in the long-term.

As discussed in How to Evaluate Choice and Promise Neighborhoods (Robin E. Smith, The Urban Institute, March 2011) a combination of high-quality performance measurement, locally focused process study, linked chain of causality hypotheses, and rigorous evaluation of selected links in the chain could be well suited for this project.

Question 6: *"How do the Federal Government, States, and local entities ensure that the flexibility provided through the pilots does not have any adverse effect on the most vulnerable populations?"*

Ensuring flexibility does not have an adverse effect on the most vulnerable populations is an important and challenging aspect of crafting flexibility, and one which requires significant thought.

Sadly providers often end up working with the least vulnerable population which they are allowed to spend their time helping. For example, when the Center for Law and Social Policy (CLASP) explored select sector and employer initiatives designed to create pathways for underserved individuals, they found very few that engaged youth who were high school dropouts or in other high-risk categories.

Sometimes this "creaming" as it is called happens unconsciously – it is simply easier to work with less vulnerable populations, and it can be easier to see the fruits of your labor with someone ready to progress quickly. Other times it happens, as CLASP has written, as an unintentional byproduct of inappropriate attention to outreach, program design, community input, and connectivity to community organizations or supports with a history of success with more difficult youth populations. And still other times it happens consciously, especially when reporting requirements focus on the ultimate outcomes of the population served. Providers who work with less vulnerable young people will be able to report back that their clients achieve good outcomes. Their statistics look strong and they receive more funding. Providers who work with more vulnerable people report back less good statistics, and they lose their funding over time. Especially since the pilots are going to be granted broad flexibility in what they do as long as they achieve agreed-upon outcomes for an agreed upon population, if the outcomes and populations are not selected well the whole premise of the pilots will become unraveled.

At the same time, one can't go too far to the other extreme. Providing proscriptive descriptions of the exact population who is to be served and firm eligibility criteria would work against the spirit of the pilots, and will prevent young people who are about to become disconnected, but don't quite fit the narrow criteria, from receiving the services they need to avoid bad outcomes.

The best path forward, therefore, is likely somewhere in the middle. One approach worth exploring is ways to measure a client's growth (the difference between their starting point and end point) rather than just the end point. Since it is Olympics season, a rough analogy can be drawn to gymnastic routines that are scored not just by how well they were executed, but also for the difficulty of what they attempted. Finding ways such as these to reward and incentivize work with the most difficult populations, without firmly locking out a young person who does not quite fit into a particular definition of vulnerability, appear most promising. If a community wants to tackle both dropout prevention and dropout recovery, they should be

allowed to do so, especially since the activities can be closely related. The best approach may well be one which provides extra credit for working with the most vulnerable young people and evaluates based on their relative growth (rather than by absolute outcomes), without preventing communities from also helping young people teetering on the edge.

Part IV: Barriers

Question 1: *"What are the legislative, regulatory, or other barriers that impede a community's ability to implement the most cost-effective strategies to assist disconnected youth?"*

Years of research and practice have shown that reconnecting disconnected youth is difficult, if not impossible, within the bounds of a single intervention. Unless the single intervention is not really a single program—or even a comprehensive one—but rather, a reasonably complex strategy to change young people's environments and opportunity structures. Success with disconnected youth, therefore, requires a sophisticated effort that crosses over multiple departmental lines. Similarly, the identification of barriers tends to cross departmental lines. Through our worked in support of the Presidential Memorandum on Administrative Flexibility we identified a long list of federal barriers (all our related resources can be found at: http://www.forumfyi.org/content/administrative-flexibility, which include the items below sorted and presented in different ways).

Cross Agency Barriers for Disconnected Youth
- Federal funding for youth prevention efforts is currently distributed separately, using varying funding schedules, across multiple agencies, each which support similar evidence-based and promising programs that address many if not most of the same prohibitive behaviors. This duplicative Federal funding process and request to states and thereby local sub-grantees, creates uncoordinated activities that drain capacity and compromise the quality and effectiveness of each separate initiative towards desired outcomes.
- Funding for Case Management/Case Managers. The financing of case management or care coordination occurs in multiple federal programs: Title IV, Title V, Title XIX, Title XXI, etc. A youth involved with multiple systems might end up with several case managers. It is not clear how much flexibility states and localities have to blend those funding streams to provide each youth/family with one case manager that coordinates services funded by multiple sources.
- Many federal programs have their own requirements for state advisory groups, which makes it difficult to merge these groups despite their overlapping missions.
- New policies should allow the topic du jour to be addressed by existing governance structures/collaborations/advisory bodies, if effective ones exists and are willing and able to address the new topic.
- Agencies should clearly and explicitly communicate where existing policies allow for existing governance structures/collaborations/advisory bodies to be used instead of creating new ones.
- Diagnosis/assessment systems. Currently, a young person has to get diagnosed under an assessment to access Medicaid-funded services, and then get diagnosed with the same disorder under a different assessment to access IDEA-funded services.
- Emotional disturbance eligibility definition. The definition of emotional disturbance should be consistent between federal agencies. (It is currently different under IDEA, SSA and Medicaid/CMHS.) Under IDEA, the term emotional disturbance "does not apply to children who are socially maladjusted, unless it is determined that they have an emotional disturbance." Socially maladjustment is a somewhat unscientific and contentious term.
- Definitions of Case Management/Case Managers. The definition of "case management/case manager" varies from federal agency to federal agency, and needs to be better aligned. In some cases there are different definitions of case managers across programs, and in other cases there is no clear delineation of responsibility. For example, there are multiple ways of financing case management under Title XIX and they do not necessarily fit the more recent approaches to health care delivery (e.g., medical home, managed care). In other instances, there is a form of care coordination delivered in a social services setting and another form of care coordination delivered in a health care setting.

- There are many youth who present with both mental illness and chemical abuse/addiction (MICA) and criminogenic issues, but the mental health and substance abuse systems do not appear to consider the whole need of the youth. Some youth have relatively minor criminal risk, i.e., they have committed only one or very few misdemeanor crimes. Many of these youth also have relatively minor learning deficits (such as difficulty reading) and minor mental health diagnoses (not all have been evaluated or diagnosed) such as depression, anxiety and Attention Deficit Hyperactivity Disorder (ADHD). Despite having little criminal history and relatively minor mental health diagnoses, these youth are not attending school, may refuse to live at home due to parental conflict and might be engaging in very risky (i.e., drug-related or criminal) activity that is not charged – yet the courts typically have insufficient resources to access either system.
- Family Services Planning Team model. It is not clear which federal funding streams could be used to replicate the successful Family Services Planning Team model initiated in some states as a multiagency team model identifying and accessing eligible services for youth at risk of out of home placement due to behavioral issues. The model provides for cost-effective interagency coordination of service needs and reduces or eliminates the need for residential juvenile justice placement.
- It is not clear to what extent states and localities are allowed to use funding from SAMHSA, DOE/IDEA, Medicaid, Mental Health Block Grant and juvenile justice funding to support hybrid programs that address mental health needs and substance abuse needs together. There are many youth who present with both mental illness and chemical abuse/addiction (MICA) and criminogenic issues, but the mental health and substance abuse systems do not appear to consider the whole need of the youth. Typically a community has treatment services for people with mental illness in one agency and treatment for substance abuse in another. Clients are referred back and forth between them in what some have called "ping-pong" therapy. Some youth have relatively minor criminal risk, i.e., they have committed only one or very few misdemeanor crimes. Many of these youth also have relatively minor learning deficits (such as difficulty reading) and minor mental health diagnoses (not all have been evaluated or diagnosed) such as depression, anxiety and Attention Deficit Hyperactivity Disorder (ADHD). Despite having little criminal history and relatively minor mental health diagnoses, these youth are not attending school, may refuse to live at home due to parental conflict and might be engaging in very risky (i.e., drug-related or criminal) activity.
- It is not clear if it is allowable to channel funding allocated for foster care youth who are also juvenile justice involved youth to provide mental health or substance abuse overlay services essential to better serve these youth in the juvenile justice system.
- The Office of Juvenile Justice and Delinquency Prevention (OJJDP) provides block and discretionary grants to states to address underage drinking. The Substance Abuse and Mental Health Service Administration (SAMHSA), Center for Substance Abuse Prevention (CSAP) provides the Strategic Prevention Framework State Incentive Grant (SPF SIG), which in some states has prioritized underage drinking. It is not clear to what extent these funding streams can be blended together to support an overlapping initiative.

Department of Labor Barriers
- Job Corps eligibility. The document "Facts about the Job Corps for Courts, Institutions, and Other Agencies" unnecessarily restricts certain categories of youth involved with the juvenile justice system from participating in Job Corps, such as felony level juveniles who are under supervision (e.g., for outstanding restitution or community service work).
- Lack of coordination between WIA program guidance and Education's afterschool and summer learning programs funds via 21st CCLC to maximize academic and work-force skills development year-round.

Department of Education Barriers
- Supplementary Educational Services funding creates barriers to applications which makes it difficult for community based-organizations/21st Century Community Learning Centers to compete with for-profit tutoring businesses (for example, programs need to be certified or somehow approved for specific programming identified by the federal government; also some for-

profits offer parents incentives such as free laptops in exchange for selecting the for-profit's tutoring program).

- Behavioral health services in schools is difficult because of the paperwork required. There is a need to have broader school-based services, such as school based health clinics.

Department of Health and Human Services

- The Intensive Temporary Residential Treatment (ITRT) process works only for kids who need out-of-home placements AND who essentially meet inpatient hospitalization criteria (in other words, a level of mental illness that would warrant inpatient hospitalization). There are other criteria, too (such as the need to have exhausted in-home services.). The kids who need to be out of their homes because of risk issues (theirs or their parents') usually do not meet those criteria and fall through the cracks – often ending up in detention.
- There needs to be better integration between the IV-E waiver and Medicaid and administrative simplicity with substance abuse. This is complicated by the fact that some of the problem is 1) our drug treatment programs failure to claim Medicaid and 2) some of these problems could be solved by corrections to our state Medicaid plan. Substance abuse is a trauma based problem which is co-occurring with mental health problems. As such, it merits the same treatment modalities and Medicaid claiming opportunities as mental health treatment receives. This artificial distinction should be eliminated.
- SAMHSA – Federal priorities for substance abuse are not focused currently on youth. The mental health needs of youth are often impacted by co-occurring substance abuse issues and vice-versa. Currently, there are limited options to serve co-occurring issues and fewer options for only substance abuse interventions.
- Chafee – This program creates barriers to permanency since the State narrowed eligibility beyond what was required at the federal level, thereby only some children benefited from this rich resource.
- The state block grant only applies to totally uninsured children. Many children can no longer receive mental health services under the block grant.

Medicaid

- Medicaid eligibility. The regulations are currently interpreted as allowing coverage only for services that are "medically necessary" to meet the mental health needs of youth, with a narrow interpretation of "medically necessary." (States report that "part of the problem here is that [the state HHS department] has been chastised for providing services that the Feds did not believe were a fit under definitions for an 'insurance' program, which is what Medicaid actually is. Thus the increased restrictiveness.")
- A Medicaid waiver for managed care (around a capitated system of care) could create the flexibility to provide more services of a less "medical" nature, which would better allow for planning for a youth's individual needs.
- Medicaid will fund services for a child, but not for the child's family. This restriction might prevent funding for family- and home-based therapy that would be more effective than a therapy targeted only at the child.
- Getting entitlement services (like Medicaid) transferred from state-to-state is difficult, if not impossible. There may be a long lag time before any coverage implements.
- Federal regulations prohibit undocumented children from receiving medical care through Medicaid. They are unable to receive treatment in residential treatment centers and the costs are passed along to local community. Local Mental Health Center has a block grant to serve these children but others do not.
- There is state-level variability in the federal restriction on using Medicaid for services for "inmates of public institutions." When it comes to juveniles, some states interpret this restriction to mean that they must revoke Medicaid eligibility when a youth is detained but not yet adjudicated, or after a youth is committed at a disposition hearing. Some states allow the youth to remain on the Medicaid rolls but do not request federal reimbursement for services while the youth is committed.

Title IV-E

- Title IV-E eligibility. Title IV-E funds cannot be used to prevent out of home placement, even though such prevention is more cost-effective than paying for out of home placement. While the federal government has granted several IV-E demonstration waivers addressing other barriers, it has not granted waivers to allow states to use Title IV-E funding to keep kids at home.
- Eligibility for short-term foster care/emergency shelter. Title IV-E funds can pay for room and board (but not services), and Medicaid can pay for services (but not room and board). So young people have to qualify for both Title IV-E and Medicaid to get Therapeutic Foster Care, which creates confusion and increases the likelihood that the young person in need will fall through the cracks between these two systems.
- Title IV-E of the Social Security Act – The federal rules on Title IV-E adoption subsidies are rigid and can only be stopped through adoptive parent approval.
- Make it easier to access Title IV-E (foster care and adoption) waivers and use this funding to keep children at home who are in imminent danger of out-of-home placement. (This could also help with temporary and emergency placement.)
- Multiple Systemic Therapy or Multi-Dimensional Treatment. Title IV-E funds cannot be used to provide high-risk, non-state custody youth with Multiple Systemic Therapy or Multi-Dimensional Treatment.

Department of Housing and Urban Development

- HUD's requirement to prove homelessness before being eligible for housing. The United States Code contains the official federal definition of homeless (in Title 42, Chapter 119, Subchapter I). Currently, the HUD definition of homelessness excludes people living in motels, as well as those who are sharing the housing of others temporarily because they have nowhere else to go. However, both of these living situations are considered "homeless" by other federal programs, including public education funding Head Start, Runaway and Homeless Youth Act, and Early Intervention. In 2008-2009, 72% of all homeless children and youth enrolled in public schools lived in these situations described above and therefore were not eligible for HUD homeless services.
- The federal Basic Centers program, which funds shelters across the country, has little interest in the youth at-risk population we are concerned about, especially kids who are not already homeless.

Question 2: *"Are the barriers created at the Federal, State, or local level?"*

Barriers appear at all three levels. For a pilot to succeed, it is absolutely vital that officials from all three levels come to the table to address them. We have seen again and again times when a community-based organization wants to do something, and the city or county government tells them that unfortunately, the state won't let them do so. The state in turn stays that the federal government won't let them do so. And then the federal government says that, in fact, there is no federal policy preventing it, but there might be a state or local law blocking it.

While this can at times be simply passing the buck, it can also be far less intentional. It is very hard for local government to fully understand precisely what is allowed or not allowed by state government, and them in turn by federal government. The formal and informal incentives are designed in ways that generally inhibit rather than encourage the boundaries of what is allowable. Even when a government program person tries to say "yes," they are often told by the government accountants and audit officials – whose careers are intentionally built around mitigating risk – that they need to say "no." For a city, the risk of doing something the state later says you can't do often far outweighs the benefits of trying. Likewise of a state with the federal government. So often what is perceived as allowable is only what is *explicitly* said to be allowable. Since neither state nor federal government can publish explicit lists of everything under the sun which is *not* prohibited, huge gaps remain between what is allowable and what is perceived as allowable in a risk-adverse context. Therefore the Performance Partnership Pilots must include

partnerships and communications channels that connect local, state and federal government officials, including at all levels both program officials and accountants/auditors/lawyers.

Question 3: *"Could the barriers be overcome through administrative action?"*

Some barriers can be overcome through administrative action, but many can't, at least under existing authorities. The most highly sought-after flexibilities (eligibility criteria, allowable uses of funds, and reporting requirements) are often proscribed in statute, without provision of waiver authority. That being said, there are indeed barriers which can be overcome through administrative action, both by "myth-busting" through clear information about activities which states and localities think are not allowable, when actually they are, and by adjusting regulations, many of which have not been reviewed in a number of years.

Question 4: *"Would overcoming the barriers require changes in Federal or State laws?"*

For most pilots to be fully implemented, Federal, State and local statues and regulations would all have to be changed – if not changed for everyone, waiver provisions would be needed for the pilot sites. But rather than doing a careful analysis to show that this is the case (we have done such analyses in the past and can provide them to you), it would be better to think of this from a different perspective: that of the community shaping the pilot. The people on the ground working with young people will know precisely what needs to happen to transform young lives on the precipice. But they will likely not have a clue whether the things they are being prevented from doing are due to barriers in federal, state or local policies, nor whether the barriers are statutory or administrative. It is not fair nor a good use of resources to have a pilot applicant do all the hard work to say exactly how they want to transform local efforts for disconnected youth, and list all the reasons they are being told that they are not allowed to, and then come back to them at the end and say, sorry, turns out 9/10 of the things you want to do are policies which can't be changed. If they knew at the outset that what they are trying to do would not be allowed, then they would not have diverted scarce staff resources to crafting the pilot. The only practical way to advance this work is by lining up broad waiver authority for as many state and federal laws and regulations as possible in advance, so that the site preparing the pilot will not find out at the end that, while the pilot proposal reviewers agree the idea is sound and would lead to improved outcomes, they will not be allowed to proceed because the policies in question cannot be changed.

Part V: Alternative Pilot Designs

Question 1: *"Which of the following design models would best enable effective pilots at the community level? Formula Grant Model: Communities would carve out a portion of funds from multiple formula grants serving youth and use the funds for a coherent, focused strategy to improve outcomes for disconnected youth. The community, the State, and Federal agencies would negotiate an agreement that would include a limited set of key outcomes and performance measures, a streamlined set of reporting requirements, and a strong evaluation strategy. Competitive Grant Model: The Federal Government would issue a joint solicitation for grant applications that would pool funds from multiple competitive programs for outcome focused projects. Hybrid Model: The Federal Government would use a joint solicitation for grant applications to fund competitive grants for pilots. Competitive preference would be given to applicants proposing to achieve better results by blending their formula funds to support a more effective service strategy.*

To achieve collective impact, pilot sites need three things:
- Funding to support the core partnership management
- Technical assistance on how to achieve better outcomes through collective action
- Flexibility in how existing funding can be used to implement the collective strategy

The Performance Partnership Pilots, as they currently are crafted, only provides flexibility, without the needed funding and technical assistance.

The pilot design we were initially drawn to was the formula grant model. Blending formula funds helps ensure that the pilots are doing deep integration work, and sets the stage for wider adoption of this flexible approach in more communities. However, since the pilot sites will not receive any funding to support the core partnership management, **we recommend doing the hybrid model, IF the competitive funding would provide a way to give pilot sites support to offset their significant costs in planning and implementing innovative ways to work across agency lines.**

In terms of pilot designs, we also recommend you use the following **selection criteria** for judging pilot proposals:

- **Provide Preference for Pre-Existing, Highly Effective Partnerships**. Preference should be given to sites that have an effective partnership in place. To take full advantage of federal flexibility, sites will need a sophisticated, high quality network of partners spanning multiple agencies and systems. Starting from scratch in a place that does not have a high quality partnership in place would strain capacity beyond what is reasonable to expect. Pilots should be awarded to communities with a demonstrated track record of working across multiple funding streams and systems to serve youth in a coordinated way. Stakeholders critical to this kind of partnership might include the local workforce agency, local education agency, local post-secondary institution(s), child welfare and juvenile justice systems, and a strong community-based provider network.
- **Provide Preference for Pilots which Align Not Just Federal Policies, but State and Local Policies as Well.** Preference should be given to pilots proposing efforts that align across federal, state and local (city/county) jurisdictions. For a pilot to be fully successful, it will need to align efforts both vertically (federal, state, local) and horizontally (across government agencies and disciplines). To do this, it will need flexibility from not just federal regulations, but from state and local regulations as well. Projects demonstrating buy-in and commitments to participate from state and local governments working together should get preference.

We also recommend that Congress **remove the cap on funds within the waivers.** The imposition of an arbitrary limit on how many federal dollars may be used in the pilots will limit their effectiveness. If, for example, a community applies for a waiver to pool funding from three federal programs, and if the community received a total of $30 million from those federal programs, and if the federal government only grants them waivers on $20 million of the funds, then the community will have to account for $10 million of the funding streams one way, and $20 million the other way. This will increase rather than decrease the bureaucratic burden on the community. Creating fewer but more comprehensive pilots is preferable; that will allow a true demonstration of what is possible when we change the way business is done.

Question 2: *"What is the recommended duration of the performance partnership pilot projects for the model or models you selected as effective?"*

Pilots should last for a minimum of five years. There should be process checks during interim periods to ensure the pilots are on track, but the expectation should be that the pilots will remain in effect for a minimum of five years. At year two or three, it could be expected that some system improvement measures could be met (i.e., dollars flowing more directly to on-the-ground efforts, timeliness of data, reporting time reduced). If the identified system improvements aren't happening in year two, readjustments can be made with the expectation that by year five, youth outcome measures will improve.

Thank you for the important work you are doing to improve outcomes for communities and states to better serve our nation's neediest populations by easing and eliminating unnecessary administrative barriers.

Sincerely,

Thaddeus Ferber
Vice President for Policy
Forum for Youth Investment