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ABSTRACT

This report is a summary assessment of the contents of the FY 78 Year End Reports on Youth Employment and Training Programs (YETP) and Youth Community Conservation and Improvements Projects (YCCIP) programs that were submitted to the National Office of Youth Programs. Section 1 introduces the study. It covers Youth Employment and Demonstration Projects Act (YDEPA) legislation, instructions for drafting year-end reports, and characteristics of sample prime sponsors. Section 2 provides a detailed review and analysis of the year end reports. It begins with an overall assessment of content quality. A summary of findings of the overview sections is followed by a detailed discussion of the content with respect to ten separate topics related to the planning, targeting, design, administration, monitoring, and evaluation of local programs by prime sponsors. Section 3 summarizes prime sponsors' recommendations for future changes in youth programs. Their plans for altering program aspects during FY 79 are also discussed. The section concludes with an overview of their perceived needs for technical assistance. Section 4 contains detailed recommendations by the authors for improving the quality and usefulness of future YEDPA-related Year End Reports. (YLB)

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YOUTH KNOWLEDGE DEVELOPMENT REPORT

PROGRAM EVALUATIONS
CETA Prime Sponsor Self-Perceptions



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May 1980

THE DEVELOPMENT REPORT

EVALUATIONS for Self-Perceptions.



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1980



U.S. Department of Labor
Ray Marshall, Secretary

Employment and Training Administration
Ernest G. Green, Assistant Secretary for
Employment and Training Administration
Office of Youth Programs

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YOUTH KNOWLEDGE DEVELOPMENT REPORT 3.20

CETA PRIME SPONSOR SELF-REVIEWS

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May 1980

OVERVIEW

CETA planning and management procedures reflect a quantitative rather than qualitative orientation; decisions are based on needs analysis rather than past experience; there is little retrospection or conscious goal setting based on past lessons. The manpower planning paradigm emphasizes distribution of resources and "slots" according to the relative distribution of needs. The analytical sections of plans usually focus on compliance with regulatory proscriptions and procedures but are not designed to evoke self-analysis. Enforcement from the federal level emphasizes a "planned vs. actual" approach based primarily on numbers, with sporadic attention to enforcing certain regulatory finepoints, usually those that can be quantifiably documented.

YEDPA's aim was to encourage experimentation and change at the federal as well as local level, to promote linkages between agencies and to increase attention on the quality of services for youth. These goals were enumerated in the original Planning Charter for the Youth Employment and Demonstration Projects Act which was meant to inform prime sponsors in a straightforward way as to federal objectives and priorities. With the start of a new program, with new mandates and procedures, it was not possible nor was it desirable to put as much emphasis on traditional plans and quantitative enforcement; the "plan vs. actual" approach only makes sense once an effort has stabilized and realistic planning is possible. It was assumed that local sponsors would use the flexibility, and, in some cases, purposeful vagueness in the regulations to develop their own agendas within the national goals framework.

One effort in this direction was the requirement for an end-of-year report on local YEDPA programs. This was designed to encourage prime sponsors to review their experience, particularly the institutional and qualitative dimensions, and to use this as a basis for redirection and change in the second and third years of YEDPA. The format for the reports was structured around the planning charter goals, and the instructions were general in order to permit creative responses by the prime sponsors.

As this summary assessment of the end-of-year reports suggests, these aims were rarely achieved. Only a few prime sponsors responded to the open-endedness of the report format. Most reports reflected merely nominal compliance with another paperwork request. Few of the prime sponsors were able or willing to make qualitative judgments. The instructions from the Office of Youth Programs, which were intended to guide rather than prescribe, were apparently too vague. With the many other paperwork burdens on prime sponsors, it was decided, therefore, that end-of-year plans would not be required in fiscal 1979.

Despite the limited substance in the majority of reports, some prime sponsors made a serious effort to review past experience and to base decisions on these lessons. They provided useful information on local programs and objectives. The concept of local end-of-year review still makes sense, and the analysis suggests ways it can be realized through design changes in the report format. The proposed consolidation of youth programs, with greater emphasis on work and training site review and less

on quantitative planning, and with greater priority on building local institutional delivery capacity and linkages, increases the need for this type of retrospective, quality oriented approach. The end-of-year report is, therefore, a tool that probably should be incorporated into the management framework for the new programs.

This summary assessment is more than an anatomy of the shortcomings of the first attempt at end-of-year reports. Even the least effective reports contain information about local goals and priorities, and are reflective of the "state-of-the-art" in local programs. The accomplishments and problems noted by other case study evaluations are documented in this summary assessment, along with local recommendations concerning how to improve youth programs and policies.

This study is one of "knowledge development" activities mounted in conjunction with research, evaluation and development activities funded under the Youth Employment and Demonstration Projects Act of 1977. The knowledge development effort will result in literally thousands of written products. Each activity has been structured from the outset so that it is self-standing but also interrelated with a host of other activities. The framework is presented in A Knowledge Development Plan for the Youth Employment and Demonstration Projects Act of 1977, A Knowledge Development Plan for the Youth Initiatives Fiscal 1979 and Completing the Youth Agenda: A Plan for Knowledge Development, Dissemination and Application for Fiscal 1980.

Information is available or will be coming available from these various knowledge development efforts to help resolve an almost limitless array of issues. However, policy and practical application will usually require integration and synthesis from a wide range of products, which, in turn, depend on knowledge and availability of these products. A major shortcoming of past research, evaluation and demonstration activities has been the failure to organize and disseminate the products adequately to assure the full exploitation of the findings. The magnitude and structure of the youth knowledge development effort puts a premium on structured analysis and wide dissemination.

As part of its knowledge development mandate, therefore, the Office of Youth Programs of the Department of Labor will organize, publish and disseminate the written products of all major research, evaluation and demonstration activities supported directly by or mounted in conjunction with OYP knowledge development efforts. Some of the same products may also be published and disseminated through other channels, but they will be included in the structured series of Youth Knowledge Development Reports in order to facilitate access and integration.

The Youth Knowledge Development Reports, of which this is one, are divided into twelve broad categories:

1. Knowledge Development Framework: The products in this category are concerned with the structure of knowledge development activities, the assessment methodologies which are employed, the measurement instruments and their validation, the translation of knowledge into policy, and the strategy for dissemination of findings.

2. Research on Youth Employment and Employability Development: The products in this category represent analyses of existing data, presentation of findings from new data sources, special studies of dimensions of youth labor market problems, and policy issue assessments.

3. Program Evaluations: The products in this category include impact, process and benefit-cost evaluations of youth programs including the Summer Youth Employment Program, Job Corps, the Young Adult Conservation Corps, Youth Employment and Training Programs, Youth Community Conservation and Improvement Projects, and the Targeted Jobs Tax Credit.

4. Service and Participant Mix: The evaluations and demonstrations summarized in this category concern the matching of different types of youth with different service combinations. This involves experiments with work vs. work plus remediation vs. straight remediation as treatment options. It also includes attempts to mix disadvantaged and more affluent participants, as well as youth with older workers.

5. Education and Training Approaches: The products in this category present the findings of structured experiments to test the impact and effectiveness of various education and vocational training approaches including specific education methodologies for the disadvantaged, alternative education approaches and advanced career training.

6. Pre-Employment and Transition Services: The products in this category present the findings of structured experiments to test the impact and effectiveness of school-to-work transition activities, vocational exploration, job-search assistance and other efforts to better prepare youth for labor market success.

7. Youth Work Experience: The products in this category address the organization of work activities, their output, productive roles for youth, and the impacts of various employment approaches.

8. Implementation Issues: This category includes cross-cutting analyses of the practical lessons concerning "how-to-do-it." Issues such as learning curves, replication processes and programmatic "batting averages" will be addressed under this category, as well as the comparative advantages of alternative delivery agents.

9. Design and Organizational Alternatives: The products in this category represent assessments of demonstrations of alternative program and delivery arrangements such as consolidation, year-round preparation for summer programs, the use of incentives, and multi-year tracking of individuals.

10. Special Needs Groups: The products in this category present findings on the special problems of and the programmatic adaptations needed for significant segments including minorities, young mothers, troubled youth, Indochinese refugees, and the handicapped.

11. Innovative Approaches: The products in this category present the findings of those activities designed to explore new approaches. The subjects covered include the Youth Incentive Entitlement Pilot Projects,

private sector initiatives, the national youth service experiment, and energy initiatives in weatherization, low-head hydroelectric dam restoration, windpower, and the like.

12. Institutional Linkages: The products in this category include studies of institutional arrangements and linkages as well as assessments of demonstration activities to encourage such linkages with education, volunteer groups, drug abuse, and other youth serving agencies.

In each of these knowledge development categories, there will be a range of discrete demonstration, research and evaluation activities focused on different policy, program and analytical issues. In turn, each discrete knowledge development project may have a series of written products addressed to different dimensions of the issue. For instance, all experimental demonstration projects have both process and impact evaluations, frequently undertaken by different evaluation agents. Findings will be published as they become available so that there will usually be a series of reports as evidence accumulates. To organize these products, each publication is classified in one of the twelve broad knowledge development categories, described in terms of the more specific issue, activity or cluster of activities to which it is addressed, with an identifier of the product and what it represents relative to other products in the demonstrations. Hence, the multiple products under a knowledge development activity are closely interrelated and the activities in each broad cluster have significant interconnections.

This evaluation of the early experience under YEDPA should be read in conjunction with the first two analyses of YETP and YCCIP implementation by the National Council on Employment Policy: Initial Youth Employment and Demonstration Projects Act (YEDPA) Experience at the Local Level and The Unfolding Youth Initiatives. Likewise, Youth Initiatives presents an early summary assessment by the Office of Youth Programs. All of these are in the "program evaluations" category. The volumes in the "design and organizational alternatives" category also present elements to be incorporated into new youth programs and approaches such as planning are analyzed in the "implementation issues" category.

Robert Taggart
Administrator
Office of Youth Programs

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Passage of YEDPA Legislation

The employment problems of teenagers throughout the U.S. were a continuous source of concern to national public policymakers throughout the 1970's. The mean annual average rate of unemployment of 16-19 year olds during the 1970-77 period was approximately 17.0%, ranging from a low of 14.5% in 1973 to a high of 19.9% during the peak recession year of 1975.¹ The unemployment problems of black teens and young persons living in poverty families were extraordinarily severe, with annual average unemployment rates for black teens in the 30-40% range during the decade of the 1970's.² In response to these problems, the Congress of the United States passed legislation during 1977 to provide immediate and long-term solutions to the employment problems of young persons throughout the nation, with particular emphasis placed upon young persons living in economically disadvantaged families. The act known as the Youth Employment and Demonstration Projects Act of 1977 was signed into law by President Carter on August 5, 1977.³

The Youth Employment and Demonstration Projects Act of 1977 (hereafter referred to as YEDPA) provided funding for four new employment and training programs for youth. These four new programs were known as Youth Employment and Training Programs (YETP), Youth Community Conservation and Improvement Projects (YCCIP), the Youth Incentive Entitlement Pilot Projects (YIEPP), and the Young Adult Conservation Corps (YACC). The first three of the above YEDPA-related programs were authorized under amendments to Title III of the Comprehensive Employment and Training Act of 1973 (hereafter referred to as CETA) while the YACC program was established under a separate new title (Title VII) of CETA.⁴

The purposes, structure, and targetting features of these four programs do differ in a number of substantive ways.⁵ The YETP and YCCIP programs were intended to achieve a number of different objectives. According to the rules and regulations governing the operations of these two YEDPA programs, their purpose was:

"to employ and increase the future employability of young persons, to help coordinate and improve existing career development, employment and training programs, and to test different approaches in solving the employment problems of youth."⁶

The programs funded under YEDPA were intended to be viewed in part as "demonstration projects" that would hopefully test the effectiveness and viability of alternative employment and training programs for youth throughout the nation. The Office of Youth Programs of the Employment and Training Administration has attempted to obtain information on the nature, structure, operations, and effectiveness of these youth programs through a variety of different methods.⁷ One source of information on the operations of YETP and YCCIP programs during Fiscal Year 1978 is that of the Year End Reports on YETP and YCCIP programs that were to have been prepared by each of the prime sponsors throughout the nation.⁸ These reports were primarily intended to provide the regional and national offices of ETA with information on the major features and accomplishments of YETP and YCCIP programs in each prime sponsor area during FY 78.⁹ Prime Sponsors were asked to focus primarily upon the more "qualitative aspects" of program performance during FY 78, but were expected to analyze the factors contributing to the successes and failures of their programs in achieving local goals and objectives during FY 78.

This report has primarily been designed to provide a detailed summary and critical assessment of the contents of the FY 78 Year End Reports on YETP and YCCIP programs that were submitted by prime sponsors to the national office of youth programs. The findings are based upon the actual FY 78 End of Year Reports of 57 prime sponsors throughout the nation.¹⁰ The sample of prime sponsors whose End of Year Reports were included in the study was selected by the Office of Youth Programs. The characteristics of these prime sponsors will be described in a latter part of this section of the report. The recommendations of these prime sponsors for changes in either the YEDPA legislation or in the rules and regulations governing YETP and YCCIP programs as well as their plans for improving future program performance at the local level are also described in this report.

The Instructions for Drafting the Year End Reports

During the summer of 1978, the regional offices of the Employment and Training Administration of the U.S. Department of Labor forwarded to CETA prime sponsors in their regions a set of instructions for preparing an End of Year Report (EYR) on YETP and YCCIP programs in their area.¹¹ As noted above, the report was primarily intended to describe and assess major features of the operations and performance of their FY 78 Youth Employment and Training Programs(YETP) and their Youth Community Conservation and Improvement Projects(YCCIP) funded under the 1977 Youth Employment and Demonstration Projects Act.¹² The reports of prime sponsors initially were to be forwarded to the regional office of ETA for their review and then submitted to the national Office of Youth Programs. The instructions for the drafting of these EYR reports indicated quite clearly that the reports were primarily intended to provide the regional and national offices of ETA with information on the overall degree of success achieved by prime sponsors in attaining the program goals and objectives that they established for themselves in their FY 1978 YETP and YCCIP program plans. The instructions also stated quite explicitly that the primary focus of these EYR reports was to be upon the "qualitative aspects" of performance rather than the quantitative and that their contents were expected to be "descriptive" rather than highly analytical in nature. The instructions did note, however, that the prime sponsor was expected to provide some "analysis" of the factors influencing successes as well as failures in achieving local youth program objectives.

The preparation of this Year End Report on YETP and YCCIP programs would ideally prove to be useful not only to the regional offices of ETA and the national Office of Youth Programs, but also to the local prime sponsor itself. In the process of preparing such a report, prime sponsor staff would ideally reflect back upon the goals and objectives that they had established for their local youth programs, assess in a critical fashion the actual strengths and weaknesses of the operations of their youth

programs in achieving those goals and objectives, and give serious consideration to the need for modifying existing strategies, adopting new strategies, or establishing more realistic and feasible objectives. Such self-assessments of program operations would ideally be required of all prime sponsors for programs administered under each major CETA Title, including Titles II-B, C, II-D, VI, and VII under the 1978 CETA legislation.

The instructions provided to prime sponsors for the drafting of the End of Year Report on YETP and YOCIP program operations and accomplishments indicated that the report should begin with a section devoted to an "Overview of YEDPA Operations" in the prime sponsor's planning area during FY 78. This overview section was also expected to provide a comparison of YEDPA program accomplishments with those of Title I youth programs and summer youth programs previously administered by the prime sponsor. YETP and YOCIP programs were to be separately discussed whenever they were believed to have produced different impacts.

The remainder of the report was to have been devoted to discussions of a series of issues related to each of the ten program principles contained in the national Office of Youth Programs' Planning Charter for the Youth Employment and Demonstration Act of 1977.¹³ This planning charter was developed by the Office of Youth Programs during the summer of 1977 and was intended to serve as a general guide to prime sponsors in the planning and administration of their local YEDPA programs during FY 78. The ten guiding principles and assumptions outlined in this planning charter were the following:

1. Knowledge development is a primary aim of the new youth programs.
2. The content and quality of work experience must be improved.
3. Youth participation should be emphasized.
4. Resources should go to those in great need.
5. Substitution must be avoided.
6. Overhead must be minimized.

7. The new youth programs are not the cutting edge for institutional change.
8. Emphasis must be placed on approaches and delivery agents of demonstrated merit.
9. The development of a separate employment and training system for youth is not encouraged.
10. The new youth programs are not permanent.

For each of the above ten principles or assumptions, the prime sponsor was asked to discuss the following four issues:¹⁴

- "1. Local goals established.
2. Success or failures of these goals.
3. Reasons for success or failure.
4. Plans to maintain goals or the establishment of new ones."

In addition to the above four issues, the required discussions of the instructions also outlined a suggested set of topics for each of the ten principles that prime sponsors were to consider addressing in their End of Year Reports. For example, with respect to the charter principle related to knowledge development, prime sponsors were asked to consider discussing such issues as local innovative programs for youth that were being implemented within a research and demonstration framework, evaluation methods employed to assess the effectiveness of such programs, and the findings of such evaluation efforts, including the impacts of programs upon the attitudes and skill acquisition of participants. The results of any mixed income experiments funded by the prime sponsor under YETP were also to be discussed in this section of the report.¹⁵

The final section of the reporting instructions asked prime sponsors to provide a summary of the major findings of their Year End Reports, including the overall strengths and weaknesses of their programs, and to present policy recommendations for enhancing the future capability of the prime sponsor to more effectively deliver employment and training services to youth in their local planning area. It was also suggested that the overall length of the report not be in excess of 25 pages.

Characteristics of the Sample of Prime Sponsors

It was originally anticipated that the review of the findings of the Year End Reports on FY 78 YETP and YCCIP programs would be based upon a sample of 62 CETA prime sponsors throughout the nation. The sample was selected by the Office of Youth Programs and, while including prime sponsors from each type of political jurisdiction (city, consortium, county, and balance of state) and of varying population sizes, did contain an over-representation of the large prime sponsors. The End of Year Reports of the prime sponsors were made available to the Office of Youth Programs throughout the winter and early spring of 1979. By May, the End of Year Reports of 57 of the 62 prime sponsors, included in the initial sample, had been submitted to the national Office of Youth Programs and forwarded to the authors of this study. At that time, a decision was made to base the study on the contents of the EYR reports submitted by these 57 prime sponsors.¹⁶ Appendix A of this report provides an alphabetical listing of these 57 prime sponsors together with information on their type (city, county, consortium, or balance of state) and their population size class.

Table 1 below provides information on the distribution of the 57 prime sponsors included in this study by type of prime sponsor jurisdiction. County prime sponsors (18) accounted for the highest proportion of prime sponsors (31.6%) in the sample and were closely followed by balance of state prime sponsors (29.8%). Thirteen of the 57 prime sponsors (22.8%) were consortia, and the remaining nine (15.8%) were city prime sponsors.

Table: 1

DISTRIBUTION OF PRIME SPONSORS BY
TYPE OF PRIME SPONSOR (N=57)

<u>Type Of</u> <u>Prime Sponsor</u>	(A) <u>Number</u>	(B) <u>Percent</u>
City	9	15.8%
County	18	31.6%
Consortium	13	22.8%
Balance of State	<u>17</u>	<u>29.8%</u>
Total	57	100.0%

Table 2 provides information on the distribution of the 57 prime sponsors by the overall size of their population. Twenty-four or 42.1%, of the prime sponsors in the sample contained populations of less than one million persons, 15 (26.3%) contained populations between 1 and 2 million, and the remaining prime sponsors (31.6%) had populations greater than 2 million persons.

Organization of the Remainder of the Report

The remainder of this report consists of three additional sections. Section Two provides a detailed review and analysis of the contents of the prime sponsors FY 78 Year End Reports on YETP and YCCIP programs. The section begins with an overall assessment of the quality of the contents of these reports, including their overall degree of compliance with the ETA reporting instructions and the usefulness of the information contained therein to regional ETA, national ETA, and national OYP administrators and staff. A summary of the findings of the overview sections of the EMR's is then presented, and this is followed by a detailed discussion of the information contained in the End of Year Reports with respect to ten separate topics related to the planning, targetting, design, administration, monitoring, and evaluation of local YETP and YCCIP programs by prime sponsors. In the aggregate, these ten topics cover practically all of the issues raised in the Youth Planning Charter.

Section Three of the report presents a summary of prime sponsors' recommendations to the national Office of Youth Programs with respect to future changes in youth programs, including suggestions for modifications in eligibility criteria, the rules and regulations governing the operations of YETP and YCCIP programs, and overall funding levels. Prime sponsors' plans for altering the planning, design, administration, and evaluation of their local youth programs during FY 79 are also discussed. This section concludes with a brief overview of prime sponsor's perceived needs for various types of technical assistance from the regional offices of ETA and/or the national Office of Youth Programs.

Table: 2

DISTRIBUTION OF PRIME SPONSORS BY
SIZE OF THEIR POPULATION (N = 57)

<u>Population Size</u>	<u>(A) Number</u>	<u>(B) Percent</u>
Less than 1,000,000	24	42.1%
1,000,000 to 1,999,999	15	26.3%
2,000,000 +	<u>18</u>	<u>31.6%</u>
Total	57	100.0%

The final section of the report will contain a detailed set of recommendations by the authors for improving the quality and usefulness of future YEDPA-related Year End Reports. The suggestions include a revision of the overall purposes of the End of Year Reports and a substantial revision of the nature and structure of the reporting instructions provided by the regional offices of ETA to prime sponsors. An alternative set of specific instructions for drafting the FY 79 Year End Reports on YETP and YCCIP programs will be presented in an Appendix to this report.

Section Two:

Findings of the Prime Sponsors'
Year End Reports on FY 78 YETP and
YCCIP Program Operations and Performance

Overall Quality of the Reports

As noted in the previous section, the Year End Reports were primarily designed to provide public policymakers and employment and training program administrators at the local, regional, and national levels with information on the performance of prime sponsors' YETP and YCCIP programs during FY 78. The usefulness of these End of Year Reports will, thus, be critically dependent upon both the extent to which prime sponsors complied with the requests of ETA for specific information on program performance and upon the details and quality of the information on local youth program performance presented by prime sponsors in these Year End Reports.

The review of the End of Year Reports on FY 78 YETP and YCCIP programs prepared by the 57 prime sponsors in the sample revealed a substantive diversity in the quality of their contents. These reports differed from one another rather sharply in terms of their length, their degree of adherence to the actual reporting instructions, the amount of information that they provided in each of the youth program issues that they were asked to address, and the usefulness of the information reported. The length of the reports varied from a few pages (4-6) to over a hundred pages.¹⁷ While the length of the report submitted by a prime sponsor did not always positively correlate with its overall quality, it was generally found that their length and the usefulness of the information provided therein were strongly correlated in a positive direction. The shortest reports generally provided little, if any, useful information on either the actual nature of the operations or the overall strengths and weaknesses of the YETP and YCCIP programs administered by the prime sponsor during FY 78. In fact, very few of the prime sponsors provided any substantive analysis of

the strengths and weaknesses of their programs in terms of accomplishing the objectives that they set for themselves in their FY 78 plans. This lack of substantive analysis may have been due to the fact that many of these prime sponsors had not established specific objectives for their local youth programs in many of the areas covered by the Youth Planning Charter.¹⁸

Approximately one-third of the prime sponsors whose End of Year Reports were reviewed during the course of this study failed to structure their reports in close accord with the instructions provided to them by the regional office of the Employment and Training Administration. Among those prime sponsors that complied at least in a general way with the instructions, many failed to include a specific discussion of local goals with respect to each principle and a degree of success or failure in achieving those goals, or an analysis of the factors contributing to success or failure. The substantial diversity in the structure and contents of these reports seriously complicated the task of providing a comparative assessment of their findings.¹⁹

While the specific reasons for the failure of many prime sponsors to abide by the reporting instructions in the preparation of their End of Year Reports are not known by the authors of this report, it is quite likely that the following three factors were primarily responsible. First, some of the prime sponsors had likely not substantially addressed many of the issues raised in the Youth Planning Charter in their FY 78 plans and/or had not established specific goals for each of the ten principles appearing in the Charter. As a result, they could not provide any discussion of goal attainment in their End of Year Reports.

Secondly, the ordering of the issues in the instructions for drafting the FY 78 Year End Reports was rather chaotic even though it did follow the structure of the Youth Planning Charter. A report organized precisely in a manner called for by the instructions would have presented material that seemed to have little organization. For example, the information required to address principle number one of the

Youth Planning Charter (local knowledge development) has little direct relationship to principle number two (quality of work experience provided by youth). As a result, some prime sponsors organized the material in their EYR's in a manner far different from that called for in the instructions. In several cases, this led to a more readable and informative report on local YEDPA program operations; however, in other instances, this resulted in a failure to cover a major portion of the topics that were presented in the instructions.

Thirdly, some prime sponsors apparently did not place much of a priority on the drafting of the EYR reports. The limited length and overall poor quality of a sizeable fraction of these reports reflects an unwillingness (or inability) of prime sponsor staff to devote much time or effort to the task. A number of these reports were so poorly written and so unresponsive to the issues raised in the instructions that they should not have been considered acceptable by the regional offices of ETA or by the Office of Youth Programs. A more active monitoring role by regional ETA and national Office of Youth Program staff would seem to be needed to improve the overall quality of future Year End Reports.

The shortcomings of the EYR reports prepared by the 57 prime sponsors included in this study were undoubtedly influenced by a variety of factors, including the lack of specific objectives for many Youth Planning Charter goals in the FY 78 YEDPA plans of prime sponsors as well as by a lack of time, commitment, and expertise of prime sponsor youth program administrators and staff involved in their preparation. It is our view, however, that a number of the shortcomings were likely the result of vagueness and inconsistencies in the reporting instructions provided to prime sponsors by the regional offices of the Employment and Training Administration. The contents of future Year End Reports should be structured in a manner that would reflect careful assessments of local youth program operations and accomplishments by prime

sponsor administrators and staff. By revising somewhat the purposes of the EYR reports and by drastically altering the nature and structure of the reporting instructions, we believe that the Office of Youth Programs will be able to receive a more useful and informative set of reports on youth program operations and accomplishments from prime sponsors. The final section of this report will provide a series of specific recommendations for altering the purposes and formats of these Year End Reports, including a revised set of instructions for their preparation by prime sponsors.²⁰

A simple change in both the purposes of the Year End Reports and the official instructions for preparing them will not automatically lead to a substantive improvement in their quality and usefulness for policymaking purposes at the local, regional, or national level. The actual preparation of such reports has to be given a high priority by the national Office of Youth Programs, the regional offices of the Employment and Training Administration, and by the prime sponsors themselves. In addition, the contents of these reports have to be monitored closely by national OYP staff, regional ETA field representatives, and regional ETA administrators. A more detailed discussion of these monitoring responsibilities will be presented in the concluding section of this report.

Findings of the Overview Section
Of The
End of Year Report

The instructions provided to prime sponsors for the drafting of the End of Year Report on YEDPA program operations noted that the report should contain an introductory section devoted to an "overview of YEDPA operations" in the prime sponsor's planning area during FY 78.²¹ This overview section was also expected to provide a comparison of YEDPA program accomplishments with those of Title I youth programs and summer youth programs (SPEDY) previously administered by the prime sponsor. The instructions did not, however, either suggest specific topics to be covered in this overview section or specific types of comparisons to be made between YETP and YCCIP program accomplishments and those of Title I and summer youth programs.²² As a result of the lack of specificity regarding appropriate contents of this overview section, the material provided by prime sponsors in their End of Year Reports (EYR's) varied considerably in terms of overall length of the overview section, the topics covered in this section, and the substance of their presentations.

Nearly all of the prime sponsors (96%) did include an overview section in their End of Year Report. The overview sections of the EYR reports submitted by the 57 prime sponsors included in the study varied substantially in length, ranging from one paragraph to eleven full pages of text. Only a limited number of the prime sponsors (less than 10%) provided any discussion of either the magnitude or nature of youth employment problems within their local planning jurisdictions.²³ In addition only a few of the prime sponsors provided any discussion of the ways in which their locally designed YEDPA programs would be used in combatting youth employment problems.

Several prime sponsors noted that they had funded an expansion of job placement services for youth to increase their immediate employment prospects, that they had

created subsidized job opportunities for youth to increase their immediate overall employment levels and that they were providing work experience, institutional training, and on-the-job training services to youth to enhance their long-term employability and to reduce their future reliance on public assistance. Other prime sponsors noted that their programs were not primarily intended to lead to unsubsidized employment immediately upon termination from the local YEDPA system, but rather to lead to a return to school or to enrollment in another more advanced educational or job training program. For example, one prime sponsor noted in its overview section that among the primary goals of its YCCIP projects was that of:

"...providing academic and skills training supports (e.g., remedial education), along with work activities...which will lay the foundation for incentive to pursue more formalized study culminating in further vocational training, a return to school and/or GED attainment."

While the instructions for drafting the EYR's did not explicitly suggest that information on local youth employment problems be provided by prime sponsors, an understanding of prime sponsors' perceptions of youth employment problems would have been useful. Future reporting instructions for EYR reports should request prime sponsors to provide a brief background statement on their assessments or perceptions of youth employment problems in their local planning area, both in the aggregate and for particular youth subgroups. Prime sponsors should also be asked to provide a summary of the basic goals and objectives of their YETP and YCCIP programs related to overcoming such problems, both immediately through the provision of subsidized employment and over the long run through the provision of employment and training services.

More than 90% of the prime sponsors did provide some information on the general features and/or specific contents of their YETP and YCCIP programs in the overview section. These presentations ranged from very brief discussions of the major types

of activities in which youth participated under YETP and YCCIP programs to lengthy and detailed discussions of the objectives of YEDPA programs, characteristics of target groups selected, mix of services provided, types of service delivery agents, and expected benefits of programs for both participants and the community at large. The Oakland, California prime sponsor's overview section stands out as one of the most detailed and informative in this regard.

Only slightly more than one-half of the prime sponsors (55%) provided some discussion of the accomplishments of their YEDPA programs relative to those previously produced by their Title I and summer youth programs even though such a discussion was specifically requested of prime sponsors in the instructions. The types of comparisons between YEDPA programs and previous Title I and summer youth programs provided by prime sponsors in the overview section were quite diverse in nature. The most frequently-cited comparisons focused upon types of services provided under the various programs (institutional training, on-the-job training, work experience, transitional services), the quality of the work experience provided to participants, and the numbers and types of terminations, particularly those obtaining unsubsidized employment.²⁴ Other types of comparisons cited by prime sponsors in this overview section included total numbers of youth served, target group selection, degree of involvement by the private sector, union involvement, degree and nature of counseling services, more personalized attention to youth, skill acquisition outcomes, and costs of services.

A number of these prime sponsors claimed that their local YEDPA programs had succeeded in providing either higher quality services to youth or a wider variety of services to youth. Others indicated that their YEDPA programs were more specifically designed to provide unsubsidized employment opportunities for youth than their previous youth programs. Among the remarks offered by prime sponsors with respect to these differential accomplishments of their local YEDPA programs were the following:

"YCCIP has permitted the Consortium to provide a unique service to youth that would probably not have been offered without the program's availability. YCCIP provided participants the opportunity to acquire marketable knowledge and skills for future vocational growth."

"Our YEIP programs provided work experience plus career information and counseling services to all participants...with an added emphasis on training. Prior to YEDPA, youth employment translated into work experience only."

"The cynicism of youth participants that accompanied so much of Title I maintenance programs was seldom evident at YEIP or YCCIP sites."

"The new youth programs under YEDPA have a different emphasis: that of preparing the youth for unsubsidized employment...The earlier Title I program was unsuccessful in providing any marketability in terms of future employment for youths participating in the program."

A few of the prime sponsors also noted that the emphasis on local knowledge development activities in the Youth Planning Charter did provide them an opportunity to begin to undertake systematic evaluations of the performance of their employment and training system. As one prime sponsor remarked,

"For the first time, the prime sponsor has assumed a posture of research and development orientation, consciously building a mix of programs on conceptual constructs related to the youth population and its employment problems."

As revealed above, the prime sponsors' discussions of the relative accomplishments of their YEDPA programs were not only quite diverse, but were more frequently oriented to the "input" side of these programs, i.e., the characteristics of those served by the various youth programs and the types and nature of services provided to participants, rather than to the outcomes of the programs from either the participants' or community's standpoint; i.e., types of skills acquired, changes in work

attitudes, types of terminations. The reporting instructions for future End of Year Reports on YEDPA program operations should be redesigned so that the material provided by prime sponsors is both more useful for youth program comparison purposes at the local level and more informative to policymakers at the regional and national level. To achieve these objectives, the reporting instructions should provide more specific guidelines as to the types of information on youth program accomplishments that are being sought and should allow the prime sponsors more time to submit these reports to the regional offices of the Employment and Training Administration and to the national Office of Youth Programs. The additional time would allow fourth quarter data on participant characteristics and types of program terminations, particularly those entering employment, to be available for use in the Year End Reports for FY 79.²⁵

Finally, the overview sections of the Year End Reports were reviewed to determine whether the prime sponsors had provided any discussion of problems encountered in operating their FY 78 YEDPA programs and of the effects of such problems on the attainment of their FY 78 planned program goals and objectives.²⁶ Approximately 40% of the 57 prime sponsors provided in the overview sections of their End of Year Reports some discussion of problems encountered in operating their FY 78 YEDPA programs. A rather wide range of problems were cited by prime sponsors, with difficulties in obtaining employer cooperation in marketing OJT services for youth, obtaining LEA agreements, implementing experimental programs on time, and placing trainees into unsubsidized employment being mentioned most frequently. Other problems mentioned by prime sponsors in this overview section included difficulties in obtaining YOCIP project proposals from CBO's, delays in recruitment and assessment of eligible participants, turnover among youth in selected programs, and recruitment of women for "non-traditional" job slots in YOCIP projects.²⁷ A number of the above implementation problems will be discussed at greater length in a latter section of this report.

Problems with Preparing Year End Reports for BOS Prime Sponsors

Before continuing with the review of the findings of the prime sponsors' Year End Reports, it should be noted that the preparation of this report would be expected to pose particular difficulties for a Balance of State Prime Sponsor containing a large number of subgrantees. The subgrantees comprising a particular Balance of State Prime Sponsor may be faced with substantially different types of youth employment problems and may have designed a widely varying mix of employment and training services to combat those problems. Providing detailed information on such a diverse set of YETP and YCCIP programs can be a formidable task for a Balance of State prime sponsor. The New York Balance of State Prime Sponsor attempted to deal with this task in an exemplary manner. This particular prime sponsor utilized a 7 page questionnaire developed by central office staff to obtain information on YEDPA program operations from the 32 different counties comprising the Balance of State planning jurisdiction. The prime sponsor felt that such an approach to the preparation of the Year End Report was required since the planning process had allowed the subgrantees to develop programs best suited to the needs of youth in their areas. The questionnaire also enabled these subgrantees to "identify areas of individual county concern."

The questionnaire used by the prime sponsor was well designed and was capable of capturing sufficiently detailed information on YETP and YCCIP program operations to hypothetically allow the prime sponsor to prepare a rich and informative report on YEDPA program operations. The adoption of such an approach to the collection of information on YEDPA program operations in Balance of State prime sponsor areas should be encouraged by the national Office of Youth Programs.

Youth Planning Councils and Youth
Participation in the Planning and
Administration of Local YEDPA Programs

In accord with the principles contained in the Youth Planning Charter, prime sponsors were expected to make substantive efforts to provide youth an opportunity to actively participate in the planning, design, and administration of YEDPA programs at the local level.²⁸ Their role in the planning of YEDPA programs was to be achieved through membership on the Youth Planning Councils that were mandated by the Congress in the YEDPA act itself and by active participation in the deliberations of those councils.²⁹ The Youth Planning Charter also emphasized that the public and private non-profit agencies administering programs under YEDPA should make good faith efforts to hire youth, particularly those who had previously participated in employment and training programs, for administrative positions in their agencies.

As noted above the YEDPA legislation itself contained a series of provisions related to the establishment of Youth Planning Councils by prime sponsors. Section 346 (a) (6) of the Act required prime sponsors to provide assurances to the Secretary of Labor that it would create a "youth council." In accord with Section 346 (b), this youth council was to be given the responsibility of providing "recommendations" to the prime sponsor's planning council with respect to the planning and operations of YETP and YCCIP youth programs.³⁰ The Act also spelled out the desired composition of the membership of this youth council, including representatives from LEA's, local vocational/technical education advisory councils, post-secondary educational institutions, private sector firms, labor unions, the State Employment Security Agency, local youth serving agencies, members of the community at large, and youths themselves.

The rules and regulations governing YETP and YCCIP programs provided further guidance to prime sponsors on the formation, membership, and roles and responsibilities of the youth planning councils.³¹ The rules and regulations noted that prime sponsors were to appoint members to the youth planning council in consultation with the prime sponsor planning council and that the youth members of the council were to include youth who were either participating in, or eligible to participate in, Youth Employment and Training Programs. The rules and regulations also gave prime sponsors the discretion to either establish a separate youth planning council or have the youth council be created as a subcommittee of the existing prime sponsor planning council.³² Finally, the rules and regulations noted that the youth planning councils were expected "at a minimum (to) make recommendations to the planning council" with regard to the planning and operation of all prime sponsor YETP and YCCIP program activities and to review the LEA agreements developed by the prime sponsor.³³

The instructions to prime sponsors for the preparation of the EYR's suggested that the roles of youth on the planning council and their involvement in the administration of YEDPA programs be discussed. It was also suggested that the prime sponsor assess the contributions of the youth planning council to the planning and design of programs and indicate future training necessary for preparing youth for more active participation in the deliberations of the planning council.

In reviewing the prime sponsor's End of Year Reports with respect to their discussions of the composition, roles, and responsibilities of youth planning councils, the authors developed a questionnaire and coding format for coding particular responses of prime sponsors. A copy of the questionnaire and coding format used in conducting this review is presented in Appendix B of this report.

As noted in Table II-1 below, slightly more than 90% of the 57 prime sponsors whose FYR reports were reviewed during the course of the study did mention that they had established a youth planning council during FY 78. The remainder simply failed to provide any mention of the youth planning councils. Of those mentioning the existence of such a council, the vast majority (90% +) did provide some discussion as to whether or not youth were represented on the planning council. In 96% of the cases providing such a discussion (45 of the 47 prime sponsors), youths had been represented on the youth planning council. (See Table II-2).

Table II-1: Did Prime Sponsor Successfully Establish a Youth Planning or Youth Advisory Council for its YEDPA Programs ? (N=57)

	(A)	(B)
<u>Response</u>	<u>Number</u>	<u>Percent</u>
Yes	52	91.2%
No Mention	5	8.8%
Total	57	100.0%

Table II-2: Did Prime Sponsor Have Youth Representatives on its Youth Planning or Advisory Council ? (N=57)

	(A)	(B)
<u>Response</u>	<u>Number</u>	<u>Percent</u>
Primes with youth representatives	45	82.5%
Primes <u>without</u> youth representatives	2	3.5%
No Mention	10	14.0%
Total	57	100.0%

Specific information on the extent of youth participation on the youth planning councils was frequently not provided by prime sponsor. Only 60% of the prime sponsors provided any relevant information in their EYR's on the extent of youth involvement on local youth planning councils, and of those that did do so, the information provided was difficult to interpret.³⁴ This problem seems to have been attributable at least in part to a lack of clarity in the reporting instructions provided by ETA. For example, the prime sponsor was asked to present information on the "ratio of youth council members to Planning Council and to prime sponsor or subcontractor staff." As might be expected, the types of information provided by the prime sponsor on this issue varied to a rather substantial degree. A major part of this variation seemed to be due to the lack of clarity as to the types of information that were actually being sought by the Employment and Training Administration. Did "youth council members" refer to youths on the Youth Planning Council or to the total membership of the Youth Planning Council?"

Some prime sponsors simply provided information on the number of members of the Youth Planning Council, others provided information on the number of members on the Youth Planning Council and the number of members on the Prime Sponsor Planning Council, while still others provided a discussion of the number of "Youth" on the Youth Planning Council, the total membership of the Youth Planning Council, and the role of youth in Youth Planning Council deliberations. Given the intent of principle number three of the Youth Planning Charter ("Youth participation should be emphasized"), the types of information desired from prime sponsors would seem to pertain to the latter types of discussions; i.e., information pertaining to the number of "youths" on the Youth Planning Council and the nature of their role in the planning, design, and monitoring of youth programs at the local level.

A majority of the prime sponsors (72%) did provide some indication of the types of roles, responsibilities, or activities of the Youth Planning Councils during FY 78. (See Table II-3). The discussions, however, were frequently very brief and lacking in detail. For example, one prime sponsor simply stated that "Youth Planning Council participation is that they, along with the Manpower Planning Council, must approve all youth plans." The most frequently mentioned types of activities cited by these prime sponsors were related to the review of YETP and YCCIP project proposals and to the presentation of recommendations for funding such projects to the Prime Sponsor Planning Council. Of the 41 prime sponsors discussing the roles or activities of their Youth Planning Councils, 32 mentioned that they reviewed all YETP and YCCIP program plans, and 29 indicated that they made formal recommendations to the prime sponsor for funding specific YETP and YCCIP program proposals. (See Table II-4). A few of the prime sponsors (5 of 41) mentioned that their Youth Planning Councils had been instrumental in influencing the actual mix of services provided under YETP and YCCIP programs. As one prime sponsor noted,

"With an added emphasis on training, in spite of a long tradition of maximum job slots for the maximum number of youth, the local Youth Advisory Committee recommended the selection of two projects with strong training components."

Table II-3:

Did Prime Sponsor Discuss the Roles, Responsibilities, or Activities of the Youth Planning or Youth Advisory Council ? (N=57)

<u>Response</u>	<u>(A) Number</u>	<u>(B) Percent</u>
Prime Sponsor did discuss the role of the council	41	71.9%
Prime Sponsor <u>did not</u> discuss the role of the council	<u>16</u>	<u>28.1%</u>
Total	57	100.0%

Only a few of the prime sponsors (3) provided any indication that their local Youth Planning Councils had been involved in monitoring or evaluating local YETP and YCCIP programs during FY 78. In addition, very few of the prime sponsors provided any substantive discussions of the actual overall accomplishments of their Youth Planning Councils during FY 78. The City of Chicago Prime Sponsor was one of the few to cite specific accomplishments of its Youth Planning Councils during FY 78. The general lack of substantive discussions of the activities of Youth Planning Councils is likely reflective of the absence of active and meaningful involvement on their part in most prime sponsor areas. Case studies of YEDPA implementation during FY 78 typically found that prime sponsor Youth Planning Councils exerted minimal impacts on the planning, design, and operations of YETP and YCCIP programs. Typical of the findings of such case studies were the following:

"In sum, the youth councils did not appear to carry much weight in the decision making process. Their inclusion in the process was, for the most part, more of an attempt to fulfill DOL regulations than a real attempt to allow agencies and individuals serving youth a greater voice in the planning, reviewing, and selecting of youth employment and training programs."³⁵

"...In some areas...the councils were no more than rubber stamps to CETA staff proposals. Short on experience and overwhelmed with demand, councils... had no time to get on their feet and assert an independent posture the first time around."³⁶

Table II-4:

Types of Responsibilities that
Prime Sponsors Assigned to the
Youth Planning or Youth Advisory Committee * (N=41)

Review YETP and YCCIP program plans	32
Recommend YETP and YCCIP program proposals for funding by the prime sponsor	29
Approve program proposals for funding	9
Influence actual design of YETP & YCCIP programs	5
Determine local priorities for the use of YEDPA resources	4
Meet with members of prime sponsor's planning council to discuss planning, implementation, and performance of YEDPA programs	3
Monitor and/or evaluate YETP & YCCIP	3
Recommend changes in YETP and YCCIP based upon monitoring findings	3
Select significant segments for targetting YEDPA resources	2
Assist in developing prime sponsor policy on youth programs	1
No mention	16

* Multiple Responses Allowed

Approximately one-third of the prime sponsors whose EYR's were reviewed during the study mentioned difficulties in either recruiting youth for membership on the Youth Planning Council or in having them actively participate in council deliberations. (See Table II-5). Poor attendance due to a lack of transportation to council meetings and absence of incentives to participate, a lack of understanding of CETA program rules and regulations, and an inability to contribute substantively to council discussions were among the problems most frequently cited by prime sponsors for the lack of active or meaningful youth participation in Youth Planning Council Activities. (See Table II-6).

Table II-5: Did Prime Sponsor Experience Any
Difficulty in Recruiting Youth to the Council
Or Having Youth Participate in Council Activities? (N=57)

<u>Response</u>	(A) <u>Number Of</u> <u>Prime Sponsors</u>	(B) <u>Percent Of</u> <u>Prime Sponsors</u>
Yes	18	31.6%
No	19	33.3%
No Mention	<u>20</u>	<u>35.1%</u>
Total	57	100.0%

Table II-6:

Types of Problems Experienced by
Prime Sponsors in Recruiting Youth to
Council or Having Youth Actively Participate *
(N=18)

Attendance problem due to a lack of incentive	7
Attendance problem due to a lack of transportation	5
Youth not properly oriented to program goals	6
Youth felt ill-prepared and/or intimidated by members and/or proceedings	5
Council sessions were scheduled at inconvenient time of day	5
Lack of time to properly recruit and select youth for participation	3
Youth offered minimal input to council deliberations	3
High turnover of youth representatives	2
Youth were not representative of target groups for YEDPA programs	2
Inadequate selection process for youth representatives	1

* Multiple Responses Allowed.

A variety of recommended local courses of action for overcoming these problems during FY 79 were outlined by prime sponsors in their Year End Reports. (See Table II-7). The provision of more orientation and technical assistance to youth council members headed the list (11). A few prime sponsors also suggested that the Office of Youth Programs allow local prime sponsors to experiment with methods other than youth planning councils for obtaining youth inputs into the planning and design of future YEDPA programs. Several other prime sponsors revealed a need for technical assistance from OYP or their regional ETA office

in developing methods for involving youth more actively in council activities, cited the need for guidelines in paying youth for participation on such councils, or requested regional or national office assistance in securing youth participants through LEA cooperation in appointing members to the council. (See Table II-8).

Table II-7: Prime Sponsors Recommendations For Overcoming Problems of Youth Participation On Planning Council at the Local Level (N=17)

Provide more orientation and training for youth on council	11
Appoint youth who are more representative of target groups	4
Reconstitute current membership of council to include more youth	3
Hold youth council meetings at times convenient for youth to attend	2
Pay allowances to youth for time spent attending youth council meetings	2
Improve methods for recruiting and selecting youth representatives	1
Pay transportation costs incurred by youth in attending meetings	1
Create a separate advisory council consisting only of youth	1
Encourage other council members to support youth representatives	1

Table II-8:

Number of Prime Sponsors Providing
Recommendations for Overcoming Problems of Youth
Participation On Planning Councils (N=6)

Receive technical assistance from Regional and national office on methods for involving youth in council activities	2
Provide guidelines for allowable payments to youth representatives on planning councils	1
Have regional and national office of ETA encourage LEA's to appoint youth representatives to council	1
Allow prime sponsors to experiment with other mechanisms for obtaining youth participation	3

Only 10% of the prime sponsors presented any discussion of youth involvement in the administration of YEDPA programs. The North Carolina Balance of State Prime Sponsor was one of the few prime sponsors that provided a substantive discussion of this issue. This particular prime sponsor cited the use of college interns and other young adults in administrative and supervisory positions in YETP and SPEDY programs, the use of young adult participants in Title II and VI PSE programs as supervisors on YCCIP projects, and the utilization of YEDPA participants themselves as team leaders on YCCIP projects and as peer counselors and tutors in YETP programs. Details on the extent of such youth involvement, however, were not provided. The prime sponsor simply noted that:

"Accomplishment of this goal has been successful with regard to all Title III CETA youth programs."

In order to obtain more uniform, complete, and detailed information on youth participation in the planning, design, and implementation of YEDPA programs, the instructions for drafting the Year End Report should be substantially revised. Prime sponsors should be required to report specific information on the structure and composition of their youth planning councils, including the number of youth members of the planning council. In addition, the prime sponsors should be required to discuss the actual role and responsibilities of the youth planning council, the number of meetings held during the year, the actual accomplishments of the youth council as a whole, and the specific contributions, if any, of the youth members of the council. A discussion of the actual role of youth ("young adults") in administering YETP and YCCIP programs at the local level should also be required of prime sponsors in future Year End Reports on YEDPA program operations.

Targetting Youth Resources

Youth Planning Charter Goals and End of Year Reporting Instructions

Eligibility criteria for participation in YETP and YCCIP programs were spelled out by the Congress within the YEDPA legislation.³⁷ To have been eligible for participation in YETP programs, an individual must have been 16-21 years old inclusive and either unemployed, underemployed, or in school, and a member of a family whose annualized current gross annual income was not in excess of 85% of the appropriate BLS lower living standard income level for the prime sponsor area.³⁸ Eligibility for participation in YCCIP programs was restricted to unemployed 16-19 year olds. While the family incomes of participants were not part of the criteria for participation in YCCIP, the rules and regulations for YCCIP noted that prime sponsors should give a preference in the selection of participants to youth from economically disadvantaged families and required them to identify in their programs the specific procedures that they would utilize to guarantee that such preference was given.³⁹

The fourth principle of the Youth Planning Charter stated that "Resources should go to those in greatest need."⁴⁰ The charter emphasized the need for prime sponsors to make special efforts to serve those most in need within the eligible population and suggested that community based organizations be used by prime sponsors in administering YEDPA programs, given the belief by the Congress that they have a comparative advantage⁴¹ in reaching the more economically disadvantaged.

The instructions for drafting the EYR's suggested that prime sponsors focus on such topics as the target groups selected for participation, the types of methods used by the prime sponsor to guarantee that YEDPA-related employment and training services were provided to those youth "most in need", and the effectiveness of such methods. The instructions for completing this section of the EYR were somewhat vague, particularly the reference to the "percentage of major groups targetted for assistance to total participants". It would seem to have been more appropriate for the instructions to have simply requested prime sponsors to briefly describe the groups selected as significant

segments, to identify the planned number of enrollments from each significant segment, and to critically assess the extent to which the characteristics of actual participants were in conformity with the planned characteristics of participants. Prime sponsors would then be requested to provide an explanation of any substantial deviations in the planned vs. actual enrollment data on significant segments. Required use of data appearing in the prime sponsor's 4th quarter 1978 Youth Program Status Summary and the Quarterly Summary of Youth Characteristics (QSYC) would also have likely been helpful in providing more useful information with respect to the targetting issue.⁴²

Upon comparing the EYR instructions on targetting provided to prime sponsors with the Youth Planning Charter principle of "Resources should go to those in greatest need", one readily observes sharp differences between the types of information needed to provide insights into whether the prime sponsor complied with this Youth Planning Charter principle and the actual information that ETA suggested prime sponsors provide in their EYR reports. The Youth Planning Charter stressed that within eligible populations "Every effort must be made to avoid the tendency for 'creaming' participants who are most responsive and most likely to succeed."⁴³ In contrast, ETA instructions for preparing the EYR seemed to focus upon planned participation vs. actual participation of target groups and methods used to guarantee delivery of services to those most in need. As a result of this disparity, very few prime sponsors discussed either "creaming" avoidance or the targetting of resources upon those "most in need" in their end-of-year reports.

The frequent absence of discussions by prime sponsors on the methods that they employed to guarantee the delivery of YETP and YCCIP services to those youth "most in need" may very well have been due to the lack of specific local mechanisms for doing so. Previous reviews of prime sponsor FY'78 YETP and YCCIP plans revealed a frequent lack of discussions of specific planned efforts to avoid "creaming" of applicants.⁴⁴

Prime Sponsor Discussions of the Identification and Selection of Local Target Groups for Participation in YETP and YCCIP Programs

Nearly all of the prime sponsor End of Year Reports contained a separate section that focused upon issues related to targetting YEDPA resources to significant segments. Wide variations, however, were observed in both the nature and quality of information found in this section of the report. While more than half of the EYR's provided at least some indication of which significant segments were chosen to receive YETP or YCCIP services, little additional detail was provided. (See Table II-9.) Only a small fraction (15%) of the EYR's presented any information on the socio-economic or labor force status of youth in their planning area upon which the choice of significant segments could be made. Case studies of local YEDPA program operations have revealed that most prime sponsors report such data in their plans to the Employment and Training Administration solely for compliance purposes rather than using them for local decision-making purposes. In the absence of such data, however, one has no basis for determining whether the selection of significant segments or the planned level of service to such significant segments represents an equitable distribution of services.⁴⁵

Less than 40% of the EYR's indicated the absolute level or relative share of services that each significant segment was targetted to receive during FY'78.⁴⁶ None of the prime sponsors described the specific criteria that they employed in selecting these significant segments, and only one prime sponsor provided a discussion of the manner in which the level of service was decided upon for each target group.

In short, the bulk of the EYR's reviewed during the course of this study failed to provide sufficiently detailed information that could provide useful insights into the prime sponsor's YEDPA targetting process. As noted above, however, this paucity of information may not be primarily due to a deficiency within the EYR, but rather reflective of the prime sponsors' failure to adhere to what Gregory Wurzburg has termed the Department of Labor planning model.⁴⁷ The DOL planning model anticipates that prime sponsors will conduct a detailed review and analysis of the "universe of need" for youth employment and training services and target their youth resources in a manner based upon the

Table II-9: Types of Issues Discussed in the Targetting Section of the End of Year Reports (N=57)

	(A) <u>YETP Only</u>	(B) <u>YCCIP Only</u>	(C) <u>YETP & YCCIP Combined</u>
EYR Reference to FY'78 YEDPA planning Grant Application	1	0	1
EYR contained data on socio-economic or L.F. characteristics of local youth population	3	5	5
EYR specified target groups for delivery of services	26	21	12
EYR indicated criteria employed in selecting target groups	0	0	0
EYR indicated how the level of service for each target group was determined	1	1	0
EYR indicated total number or percent of planned participants	10	8	5
EYR indicated number or percent of planned participants for each target group	15	8	7
EYR provided data on total number or percent of participants actually served	13	9	6
EYR provided information on the number or percent of participants in <u>each significant segment</u> actually served in FY'78	3	2	3
EYR provided an explanation of substantial differences between <u>total</u> planned and <u>total</u> actually served	5	7	3
EYR provided explanation of substantial differences between planned vs. actual numbers served by <u>significant segment</u>	3	2	2

Note: Multiple responses are allowed for each prime sponsor. Thus, column totals may well exceed total number of prime sponsors.

insights provided by such a study. A number of the EYR's, however, revealed a much less rigorous targetting process. Some of the year end reports indicated that the types of data required to target resources on an objective empirical basis were simply lacking.⁴⁸ Several of the other EYR's simply stated that significant segments were selected based upon proposals provided by local service providers.⁴⁹ In some cases, the EYR's indicated that Youth Planning Councils selected target groups and determined the level of service to be provided based upon little more than "value judgements".⁵⁰

Information pertaining to the extent to which prime sponsors were able to meet their significant segment recruitment goals was provided in approximately only 10% of the EYR reports submitted by prime sponsors. Only one-fifth of the prime sponsors provided any comparisons of the planned and actual level of services to significant segments. Those EYR's that provided such comparisons generally also included a statement as to why the prime sponsor did or did not achieve their planned levels of service (see Table II-9).

As noted earlier, the Youth Planning Charter included as one of its ten major principles the goal of serving those youth "most in need" of employment and training services. Yet, the findings of our review of the EYR's reveal that only a small fraction of prime sponsors provided information about the nature of their outreach, intake, and assessment processes. (See Table II-10). In the absence of information about how young persons were recruited and selected for participation in the program, it is not possible to determine if those youth in greatest need were served under YEDPA programs. Even within those EYR's in which a discussion of methods for the selection of youth for participation in local YEDPA programs was included, such discussions did not always focus upon the issue of serving those youth most in need. For example, one report stated "... When situations exist in which economics, education, work history, and other applicable factors used in determining needs are similar, participants are selected based on a first come first serve basis". Another prime sponsor included in its EYR the

Table II-10: Types of Prime Sponsor EYR Discussions of
Issues Related to Serving Those Most
in Need and Creaming Avoidance

	(A)	(B)	(C)
	<u>YETP</u>	<u>YCCIP</u>	<u>YETP & YCCIP</u> <u>Combined</u>
EYR described recruit- ment or outreach process	5	3	3
EYR described intake and assessment process	4	2	4
EYR discussed criteria employed by the prime sponsor to identify those most in need	2	1	3
EYR provided some other discussion of methods used in identifying those most in need	1	1	0
EYR indicated that CBO's were used for outreach purposes	0	0	5
EYR indicated that planned participation goals were met	3	1	2

statements that ... "pre-testing of applicants was not permitted to avoid creaming" and "all hiring decisions were made on the basis of eligibility criteria and personal interviews". The above prime sponsor seemed to be indicating that once an applicant met a particular set of eligibility criteria youth were selected to participate in YETP and YCCIP programs in a relatively arbitrary way. In short, it seems that at least several prime sponsors did not base their decisions on selection for youth for YEDPA programs on the Youth Planning Charter notion that "within any socioeconomic group, there is wide variance in potential and need for assistance" and that "creaming should be avoided". This does not imply that those youth actually selected to participate were not "deserving" of such an opportunity, but rather that they may not have been "more in need" of such services than other youth program applicants.

Several other Year End Reports provided some type of discussion within the targetting section of their report that was related to the issue of serving youth most in need. These discussions, however, were quite general in nature. For example, one Prime Sponsor wrote "Utilizing the outreach facilities of youth serving agencies and school guidance offices throughout the county in addition to its own staff outreach/intake efforts, the (prime sponsor) has persisted in enrolling the neediest in its YEDPA programs". While somewhat more informative than the discussions contained in the other EYR's reviewed, reports that contained statements similar to that above still did not provide a sufficient amount of information to indicate the extent to which the neediest youth within significant segments were served by local YEDPA programs.

Information on Significant Segments within the Targetting Section of the End of Year Reports

In a majority of cases, the EYR's included a review of at least the types of significant segments that were to be served under their YETP and YCCIP programs. Table II-11 presents data on the distribution of significant segments targetted for YEDPA services as reported in the year end reports. The findings appearing in this table indicate that prime sponsors tended to concentrate their efforts upon the economically disadvantaged, high-school drop-outs, and racial/ethnic minorities as suggested by the Congress in the YEDPA Act and by the U.S. Department of Labor in the rules and regulations for such programs. As noted earlier, however, only one-tenth of the prime sponsors compared the planned and actual levels of services to significant segments. Those EYR's that indicated a substantial shortfall in the total level of service actually provided generally explained that their planned levels of enrollments were not met because of particular administrative problems. Usually such problems focused upon short lead times for program planning and implementation. Among prime sponsors that met their total planned level of service, several indicated a shortfall in recruiting selected significant segments. Young veterans seemed especially difficult to recruit. In addition, shortfalls existed in the number of women that were planned to participate in selected YCCIP programs. Generally, the prime sponsors attributed differences in planned vs. actual enrollments for significant segments to the failures of their outreach efforts to locate a sufficient number of youth within the significant segment. In other cases, particularly with respect to shortfalls of female enrollments in YCCIP, prime sponsors indicated in their EYR's a lack of interest on the part of local women within the eligible population to participate in projects that were characterized by traditionally male worksites.

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The Youth Planning Charter stated that "Congress has emphasized the use of community based organizations under the youth programs in the belief that they reach individuals not likely to be served by more traditional approaches." Only two prime

sponsors discussed the specific role of CBO's in the participant recruitment and selection process. Among the EYR's that discussed participant recruitment and selection, Local Education Agencies or prime sponsors' centralized intake units were primarily relied upon to recruit and select youth to receive YEDPA services. To rigorously examine the issue of CBO involvement in the recruitment process and their relative degree of effectiveness in the recruitment of those youth "most in need", prime sponsors would have had to provide information (quantitative) on the sources of recruitment of YETP and YCCIP participants and the characteristics (demographic, socioeconomic) of participants by recruitment source (prime sponsor, SESA, LEA, CBO, etc.). To secure such information, the instructions for drafting the Year End Reports on YETP and YCCIP for FY '79 would have to be designed in a manner substantially different than those used in preparing the FY '78 reports. Such revisions will be discussed in greater detail in Section Four of this report.

Table II-11: Types of Target Groups of Significant Segments Identified by Prime Sponsors Within EYR's

	(A) YETP Only	(B) YCCIP Only	(C) YETP and YCCIP Combined
Those Most In Need	5	5	3
Economically Disadvantaged Only	6	8	1
Economically Disadvantaged	12	10	7
High School Dropouts	11	7	9
Minorities	16	10	4
Offenders	7	5	5
Veterans	4	2	1
Women	7	6	3
Unemployed	4	0	0
Underemployed	3	0	1
Handicapped	11	6	3

Types of Services Provided to YETP
and YCCIP Program Participants

Prime sponsors receiving funds under the Youth Employment and Demonstration Projects Act of 1977 were expected to test out a variety of alternative approaches to solving the employment problems of youth.⁵² To facilitate their efforts in testing out such alternative approaches, prime sponsors were given a rather substantial degree of discretion in planning the mix of services under their YETP programs. Knowledge of the relative degree of effectiveness of these alternative strategies in solving local youth employment problems would be useful in determining appropriate future directions for the nation's youth employment and training system.

The act authorized prime sponsors to use their YETP monies to provide a wide variety of employment and training services to youth, including subsidized work experience opportunities for youth in a number of community improvement and social service areas, institutional and on the job training services (including both general literacy as well as specific occupational training), and a wide range of transition services, including career counseling, occupational information, job development and job placement services.⁵³ The concept of "career employment experience" for in-school youth was further developed in the rules and regulations for YETP and YCCIP programs.⁵⁴ Career employment experience was intended to consist of a combination of employment (work experience or on the job training) and a required number of transition services for in-school youth, including career information, counseling, and skills training.⁵⁵

YCCIP programs were expected to consist of labor intensive projects for youth designed to provide benefits to the community at large. These YCCIP projects were to include neighborhood improvement, public facility maintenance and restoration, low-income housing rehabilitation and weatherization energy conservation,

and public land conservation projects.⁵⁶ The work experience sites under both YETP and YCCIP programs were expected to be well supervised and to provide good work habits and vocational skills to participants.⁵⁷ The provision of high quality worksites was itself a major guiding principle under the Youth Planning Charter.⁵⁸ Findings of the end of year reports with respect to the quality of work experience under YETP and YCCIP will be reviewed in more detailed in the following pages.

In our review of the prime sponsored FY 78 Year End Reports, an attempt was made to identify the types of services provided to participants in YETP programs and the types of projects that prime sponsors funded with their YCCIP monies. Efforts were also made to identify problems encountered by prime sponsors in providing OJT services to YETP participants and problems that surfaced in implementing YCCIP projects during FY 78. A copy of the questionnaire and coding format that was used in conducting this review of the Year End Reports is presented in Appendix C of this study.

Table II-12 presents information on the types of employment and training services provided by prime sponsors to YETP participants during FY 78. Employment and training services were classified into the following four categories: work experience, institutional training (general literacy and occupational specific), on-the-job training, and other transition services.⁵⁹ Career employment experience was not treated as a separate services category for purposes of this analysis, but instead was regarded as a combination of work experience and transition services for in-school youth.⁶⁰ This more limited classification scheme was necessitated by the fact that prime sponsors frequently only made reference to their "work experience" activities under YETP. It was not always possible to determine whether

these work experience activities were part of a career employment experience program for in-school youth or whether they were more traditional work experience activities for out of school youth.

Table II-12: Types of Services Provided
by Prime Sponsors to
YETP Program Participants (N=57)

<u>Types of Service</u>	(A) <u>Number Of</u> <u>Prime Sponsors *</u>	(B) <u>Percent Of</u> <u>Prime Sponsors</u>
Work Experience	56	98.2%
Institutional Training	39	68.4%
On-the-job Training	26	45.6%
Other Transition Services	56	98.2%
No Mention	1	1.8%

*Note: Multiple responses were allowed since prime sponsors could have opted to provide services in each of the above areas. Thus, the column totals will be in excess of the total number of prime sponsors included in the study.

As revealed in Table II-12, some information on the types of employment and training services provided to YETP participants was provided by 56 of the 57 prime sponsors (98.2%) whose Year End Reports were reviewed during the course of this study. All of these 56 prime sponsors provided work experience opportunities and some types of transition services to YETP participants. Slightly more than two-thirds of the prime sponsors offered some type of institutional training services

to YETP participants, including both general literacy, GED preparation, and specific occupational training. Details on the specific types of occupational training services provided to YETP participants were, however, frequently not provided by prime sponsors in their FY 78 Year End Reports. Finally, slightly less than one-half of the prime sponsors (45.6%) offered on-the-job training services in the private sector to YETP participants. Included in this category were Vocational Exploration in the Private Sector Programs offered by prime sponsors.

The Year End Reports of prime sponsors were further examined to obtain information on the types of transition services offered to YETP participants. As noted in Table II-13, information on the specific types of transition services provided to YETP participants was provided by only 31 of the 57 prime sponsors (54.4%). The most frequently mentioned type of transition service was that of career/guidance counseling (See Table II-14). This transition service was cited by 90.3% of the 31 prime sponsors that provided some information on their transition services. Between 35% and 42% of these prime sponsors, also indicated that they provided personal counseling services, job placement services, and labor market and occupational information to their YETP participants. Training in job search skills and GED preparation/remedial education services were provided by 25.8% and 22.6%, respectively, of the prime sponsors.

Table II-13: Did Prime Sponsor Provide Any Information on the Types of Transition Services Provided to YETP Participants? (N=57)

<u>Response</u>	(A) <u>Number Of Prime Sponsors</u>	(B) <u>Percent Of Prime Sponsors</u>
Yes	31	54.4%
No	26	45.6%
Total	57	100.0%

Table II-14: Types of Transition Services Provided by Prime Sponsors to YETP Program Participants (N=31)

<u>Type Of Transition Service</u>	(A) <u>Number Of Prime Sponsors *</u>	(B) <u>Percent Of Prime Sponsors</u>
Personal Counseling	13	41.9%
Career/Guidance Counseling	28	90.3%
Labor Market and Occupational Information	11	35.5%
GED Preparation/ Remedial Education	7	22.6%
Job Search Skills	8	25.8%
Job Placement Services	12	38.7%

*Note: Multiple responses were allowed since a prime sponsors may well have opted to provide an array of transitional services. Thus, the column totals will be in excess of the total number of prime sponsors providing information on their transition services.

The above findings should be interpreted with a degree of caution. They are not meant to represent a comprehensive measure of the actual range of transition services provided by prime sponsors under their YETP programs. Some of the prime sponsors included in this study may actually have provided transition services to YETP participants, but failed to cite these services in their Year End Reports. The above listing was simply intended to provide illustrations of the types of transition services that prime sponsors mentioned they had delivered to YETP participants in their Year End Reports on YEDPA program operations.

The relatively limited amount of information contained in the EYR's on the general mix of services under YETP should not be automatically considered as a reporting deficiency on the part of the prime sponsors. The instructions for preparing the End of Year Reports did not specifically request prime sponsors to provide information on either the planned or actual mix of YETP services during FY 78.⁶¹ As a result of the absence of such specific requests, most prime sponsors provided only a cursory discussion of their actual mix of services. This particular shortcoming is most unfortunate given the intended "demonstration" nature of YEDPA programs. Knowledge of the prime sponsors actual and planned mix of services under YETP, problems in delivering the planned mix of services, and accomplishments of various components of the mix would have been desirable.

The Year End Reports on YEDPA program operations for FY 79 should be designed in a manner that would capture such information. The ready availability of planned and actual data on enrollments in YETP programs by major program activity (i.e., career employment experience, transition services, work experience, etc.) should facilitate the undertaking of this task by prime sponsors.⁶² Prime sponsors are required to report such data to the regional offices on a quarterly basis on their Youth Program Status Summary (YPSS). They YPSS report for the fourth quarter of

FY 79 should serve as the basis for the quantitative portion of the analysis on program mix under YETP.

Problems in Developing OJT Slots for YETP Participants

Among the types of services that prime sponsors could have provided to YETP participants was that of on-the-job training.⁶³ These types of services have the potentially unique advantaged of providing not only immediate employment opportunities for youth, but also of serving as direct avenues to unsubsidized employment for participants upon their termination from these programs. As noted earlier, the placement of youth into unsubsidized jobs was one of the basic objectives of YETP programs.⁶⁴

During our review of the FY 78 Year End Reports on YEDPA programs, an attempt was made to identify problems encountered by prime sponsors in developing OJT slots for participants in YETP programs. The findings of this review are presented in Tables II-15 and II-16 below. Of the 57 prime sponsors whose End of Year Reports were reviewed during the course of this study, only 12 (or 21%) mentioned that they had encountered problems in developing OJT positions for their YETP participants. Information on the magnitude of these difficulties was not available in the End of Year Reports. A direct measure of the overall impact of these difficulties upon the delivery of OJT services to YETP participants could have been obtained through a comparison of the planned and actual number of participants in OJT activities during FY 78. The data necessary for making such comparisons would have been available on the 4th quarter FY 78 Youth Program Status Summary forms. As noted previously, however, only a few prime sponsors either attached these forms to their Year End Reports or discussed the findings of such reports in any substantive way in their End of Year Reports.

Table II-15:

Did Prime Sponsor Experience
Any Problems in Obtaining OJT
Services for YETP Participants? (N=57)

<u>Response</u>	(A) <u>Number OF Prime Sponsors</u>	(B) <u>Percent Of Prime Sponsors</u>
Yes	12	21.0%
No/No Mention	45	79.0%
Total	57	100.0%

Only 7 of the 12 prime sponsors noting problems in developing OJT positions for YETP participants provided descriptions of the specific types of problems that they had actually encountered. The types of problems cited by these prime sponsors are noted in Table II-16. One of the two most frequently cited problems was the young age of many program participants (16 and under) and the general lack of prior work experience of these youth, factors apparently inhibiting the prime sponsor's ability to negotiate OJT contracts with private sector firms. The other frequently-cited problem involved a lack of prime sponsor staff experienced in developing OJT contracts with private sector firms. Other problems cited by these prime sponsors were the lack of interest of youth in OJT positions, transportation problems of youth, a lack of incentive for private sector firms to participate in OJT programs, and a lack of "high quality" OJT slots in local firms.

Table II-16: Types of Problems Encountered In
Obtaining OJT Services for YETP Participants
(N=12)

<u>Type of Problem</u>	<u>(A)</u> <u>Number Of</u> <u>Prime Sponsors *</u>	<u>(B)</u> <u>Percent Of</u> <u>Prime Sponsor</u>
Limited previous work experience of youth	3	25.0%
Lack of motivation on part of youth	2	17.0%
Transportation problems	1	8.3%
Lack of OJT development capability on part of prime sponsors staff	3	25.0%
Limited incentive for private sector involvement	1	8.3%
Difficulty in obtaining high quality OJT slots	1	8.3%
No specific problem mentioned	5	41.6%

*Note: Multiple responses were allowed to this question. As a result, the total number of responses exceeds the number of prime sponsors citing problems in negotiating OJT slots for YETP participants.

It was not possible to obtain information from the End of Year Reports on the actual extent of prime sponsor efforts to negotiate OJT contracts with private sector firms. For example, one could not determine whether substantive marketing efforts had actually been undertaken by prime sponsors or gain insights into the factors influencing the relative success or failure of these efforts. The problems in negotiating OJT slots were apparently perceived by several prime sponsors as being particularly burdensome since they revealed that they had dropped OJT activities altogether in their FY 79 YETP programs. It would seem desirable for prime sponsors to provide more specific information on the nature and extent of their OJT activities under YETP in their FY 79 Year End Reports. Included in such a review should be a brief statement of the linkages, if any, between the OJT efforts under YETP and their Title II B programs and the extent of transfers of YETP participants into OJT activities under Title II B, particularly transfers of out of school youth.

Implementation of YCCIP Projects During FY 78

YCCIP program monies were intended to be used by prime sponsors to create subsidized employment opportunities for unemployed 16-19 year olds in a variety of community and neighborhood improvement projects.⁶⁵ These projects were expected to be labor intensive in nature; however, prime sponsors were also required to design these projects in a manner that would provide well supervised work experience opportunities for participants.⁶⁶ During our review of the FY 78 Year End Reports of prime sponsors, an effort was made to identify the types of projects that prime sponsors had funded with their YCCIP monies and to note problems that prime sponsors encountered in implementing their YCCIP projects during the first year of YEDPA operations. The findings of this review are presented in Table II-17 through II-20 below.

Table II-17: Did the Prime Sponsor Provide Any Information on the Types of YCCIP Projects That It Funded During FY 78? (N=57)

<u>Response</u>	(A) <u>Number Of Prime Sponsors</u>	(B) <u>Percent Of Prime Sponsors</u>
Yes	43	75.4%
No/Not Applicable	14	25.6%
Total	57	100.0%

As revealed by the data appearing in Table II-17, 43 of the 57 prime sponsors whose Year End Reports were received during the course of this study provided some information on the types of YCCIP projects that they had funded during FY 78.⁶⁷ Information on the types of YCCIP projects funded by these 43 prime sponsors is presented in Table II-18. The type of YCCIP project administered most frequently by these prime sponsors during FY 78 was that of weatherization and repair of low-income housing. Thirty-three of the 47 prime sponsors for whom YCCIP project information was available administered projects in this area. Neighborhood improvement projects (e.g., remodeling community halls, neighborhood park cleanup) represented the second most frequently administered category of YCCIP projects. Projects of this type were operated in approximately 42% of the prime sponsor areas. Projects involving the restoration and conservation of public lands (e.g., bicycle path construction, waterway clean-up, public park restoration) were funded in slightly more than one-third of the prime sponsor areas while public facility improvement and arts recreation projects were administered by 27.9% and 23.3% of the prime sponsors, respectively. Only 1 out of 7 prime sponsors (14.0%) indicated that they had funded projects in the energy conservation area, and fewer than 10%

Table II-18:

Types of YCCIP Projects Funded
By Prime Sponsors During FY 78 (N=43)

<u>Type of Project</u>	(A) <u>Number Of Prime Sponsors *</u>	(B) <u>Percent Of Prime Sponsors</u>
Improvement of Public Facilities	12	27.9%
Maintenance of Public Buildings	4	9.3%
Neighborhood Improvement	18	41.9%
Weatherization and Repair of Low-Income Housing	33	76.7%
Energy Conservation	6	14.0%
Restoration and Conservation of Public Lands	15	34.9%
Recreation and Arts	10	23.3%

*Note: Multiple responses were allowed since prime sponsors may have funded YCCIP projects in more than one public service area. As a result, column totals will be in excess of the total number of prime sponsors (43) that provided information on their YCCIP projects.

of the prime sponsors mentioned that they had administered YCCIP projects involving the maintenance of public buildings.

Information on the share of YCCIP funding devoted to each of the above project areas was not available in the Year End Reports.⁶⁸ Thus, one cannot determine whether the frequency with which a project was administered by these prime sponsors was strongly correlated with the share of overall YCCIP funding accounted for by that project type. The information on YCCIP project type presented in Table II-18 does, however, appear to provide some support for the notion that YCCIP program participants were employed on projects that differed in substantive ways from those previously administered under Title I youth work experience and summer youth programs. The greater diversity of YCCIP projects, thus, should have provided youth participants with exposure to a more diversified set of job opportunities involving a broader range of skills than heretofore available under CETA youth work experience programs.⁶⁹ It should be noted, however, that this diversification did not occur in all prime sponsor areas to the same degree. A few prime sponsors were quite dissatisfied with the work experience slots on their YCCIP projects.

As noted above, the Year End Reports of prime sponsors were also reviewed to determine whether they had encountered particular types of problems in implementing their YCCIP projects. As revealed in Table II-19 below, 34 of the 57 prime sponsors (nearly 60%) did mention one or more problems in getting their YCCIP projects off the ground. The specific types of problems that they had encountered in doing so are presented in Table II-20 on the following page.

Table II-19: Did Prime Sponsor Mention Any
Problems in Implementing its YCCIP Projects?
(N=57)

<u>Response</u>	<u>Prime Sponsors</u>	<u>Prime Sponsors</u>
Yes	34	59.6%
No	23	40.4%
Total	57	100.0%

A lack of sufficient lead time for planning YCCIP programs was cited most frequently by prime sponsors. Twenty-one of the 34 prime sponsors (or 61.8%) citing YCCIP implementation problems mentioned the lack of adequate time for planning as the chief obstacle to speedy implementation. The lack of sufficient lead time also adversely affected the quality of YCCIP projects administered in several prime sponsor areas. Delays in obtaining YCCIP plan approval and weather problems were each cited by 1 out of 6 prime sponsors. Weather problems in northern states, particularly during the winter of 1978, delayed the introduction of projects involving outside construction work. Other problems cited by two or more prime sponsors were inadequate technical assistance from the regional office of ETA, difficulties in recruiting eligible youth, failure of cooperating agencies to provide materials needed by the projects and the limited presence of community-based organizations in the prime sponsor's planning area with a capability of administering YCCIP projects.⁷⁰ The latter problem required additional time to be devoted to securing acceptable project proposals from other agencies and delayed the implementation of YCCIP program activities several months into calendar year 1978.

Table II-20:

Problems Encountered by Prime Sponsors in Implementing YCCIP Projects during FY 78 (N=34)

<u>Type of Problem</u>	(A) <u>Number of Prime Sponsors*</u>	(B) <u>% of Prime Sponsors Citing Problem</u>
Insufficient Lead Time for Planning	21	61.8%
Inadequate technical assistance	3	8.8%
Limited Availability of CBO's and neighborhood organizations	2	5.9%
Delays in obtaining YCCIP plan approval	6	17.6%
Weather problems	6	17.6%
Difficulties in recruiting qualified staff	1	2.9%
Difficulties in recruiting eligible youth	3	8.8%
Transportation Problems	1	2.9%
Limited material availability from cooperating agencies	2	5.9%

*Note: Multiple responses were allowed; thus, the column totals will exceed the number of prime sponsors citing problems in implementing their YCCIP projects.

Given the relative uniqueness of a number of the YCCIP projects administered by prime sponsors during FY 78, it would have been desirable for them to have discussed their views of the relative advantages and disadvantages of this program approach, particularly with respect to resolving the employment problems of out of school youth.⁷¹ A number of these projects appeared to have succeeded in providing participants with both a range of crafts-related skills and effective supervision by experienced craftsmen in the field. A more substantive discussion of prime sponsors' comparative experiences with YCCIP and YETP programs could possibly have provided greater insights into proper directions for future youth employment and training policy at the national level.⁷² The instructions for preparing the FY 79 Year End Reports on YEDPA programs should be structured in a manner that would more readily capture information on these issues of relative program effectiveness.

The Quality of Work Experience for Participants in YETP and YCCIP Programs

The YETP and YCCIP programs administered by CETA prime sponsors during the first year of operations under YEDPA were expected to contain substantial work experience components. Prime sponsors were, however, requested to undertake efforts to develop work experience opportunities for YEDPA participants that would be of "higher quality" than those previously provided to youth under Title I and SPEDY work experience programs. The Youth Planning Charter placed major emphasis on the need for improving the quality of work experience opportunities for YEDPA participants. The second principle of the Charter noted that "The content and quality of work experience must be improved."⁷³

The YEDPA legislation also contained a number of provisions related to work experience activities of prime sponsors under YCCIP and YETP programs. For example, Section 335 (b) (3) of the Act required YCCIP project applicants to

provide assurances that their YCCIP projects would contain an "adequate number of supervisors who would possess the skills required on the project and be able to provide skills instruction to youth enrolled in such projects. More specific criteria as to what constituted an "adequate" number of supervisors were spelled out in the rules and regulations for YCCIP programs.⁷ In accord with Section 336 (b) (2), the prime sponsor's YCCIP proposal was to contain a description of the types of training and skill development services that would be provided to enrollees and to indicate how the YCCIP activities would be tied to school programs, including procedures for awarding academic credit to YCCIP participants. Section 346 (a) (7) required prime sponsors to provide assurances in their YETP plans that they would develop appropriate mechanisms to allow youth participants to acquire job skills and basic educational services while enrolled in YETP activities. Finally, Section 346 (c) (1) required the LEA agreements developed by prime sponsors to contain assurances that youth served under the agreement would be provided "meaningful work experience" that would enhance their capabilities to make future career choices and equip them with the skills necessary to obtain unsubsidized employment upon termination from the program.

The instructions for preparing the Year End Reports suggested that prime sponsors provide a discussion of the effects of their efforts to increase the overall quality of work experience opportunities, including improved supervision, the awarding of academic credit, increased counseling, the provision of occupational information, and job restructuring. A summary of the findings of our review of the Year End Reports with respect to the issue of work experience quality is presented below.⁷⁵

Nearly all of the 57 prime sponsors (85-90%) whose Year End Reports were reviewed during the course of the study provided some discussion of the "work experience quality" issue.⁷⁶ As was true of most other issues, the length and quality of these discussions varied rather substantially. The sections of the Year End Report related to work experience quality ranged in length from seven lines of text to nine full pages, with a median length of one to two pages. Some of these discussions were quite informative. The City of Chicago Prime Sponsor provided one of the most detailed and informative discussions of its efforts to provide YETP and YCCIP participants with high quality work experience opportunities in well supervised and structured work settings.

The discussions indicated that a wide variety of efforts were undertaken by prime sponsors during FY 78 to up-grade the quality of their youth work experience activities. Among the efforts most frequently mentioned by prime sponsors in their EYR's were those related to the provision of high quality and more effective supervision, the greater availability of personalized vocational and guidance counseling, the provision of occupational information to youth, greater diversity in types of worksites made available to youth, the development of job sites more directly related to the career or educational interests of participants, the design of more effective skill acquisition components for their work experience activities, and the awarding of academic credit for work experience under these programs. Several of the prime sponsors also noted that the systems which they had developed for rating YETP and YCCIP program proposals placed major emphasis upon the management capability of service delivery agents, the quality and experience of the supervisors that would be assigned to youth enrolled in such projects, and the ability of such agencies to provide effective

counseling and occupational information to participants. Among the other efforts undertaken by prime sponsors to upgrade the quality of work experience were experimentation with job restructuring in selected agencies, development of formal procedures for the training of jobsite supervisors, and obtaining more direct involvement of the private sector, including their participation in Vocational Exploration Programs under YETP.

A few of the prime sponsors noted that changes in the nature of work experience activities under YEDPA were needed to produce desirable short-term outcomes for participants. Effective supervision, particularly on YCCIP projects, was felt to be essential for the development of good work habits by project enrollees. Tangible skills needed to be taught to participants to have them feel that they were learning something useful. Several prime sponsors noted that the YCCIP project approach was particularly useful in developing meaningful work experience opportunities. These prime sponsors developed specific "identifiable outcomes" for their projects and then provided specific tasks for youth to undertake to produce those outcomes. When skills training occurred on the job site and when tasks were related to observable program outcomes (weatherization of a home, restoration of a community facility), youth felt that they were learning something useful and truly contributing to community improvement. The skills content and task orientation of the work experience jobs also appeared to influence the commitment of youth to the program. As one prime sponsor commented,

"When our work experience projects were content oriented and training was skill specific, youth tended to stay on the job longer."

While not all of the efforts to increase the quality and meaningfulness of work experience opportunities were equally successful, the vast majority of the prime sponsors commenting on this issue claimed that work experience activities under YEDPA were strengthened as a result of their efforts. The "effects" of

of such efforts were asserted to exist in a rather wide variety of forms. Prime Sponsors cited such favorable developments as increased private sector involvement in the provision of work experience opportunities (Vocational Exploration in the Private Sector), increased diversity in worksites, improved punctuality and attendance of participants, overall improvement in participant work habits, the awarding of academic credit for work experience, the existence of low participant/supervisor ratios, increased provision of counseling, and increases in either the positive termination rate or the number of terminces entering unsubsidized employment upon termination.⁷⁷ Overall, the prime sponsors argued that substantive improvements in the quality of work experience for youth had taken place under YEDPA during its first year of operations. Among the comments made by prime sponsors on the success of their efforts to upgrade the quality of work experience were the following:

"YETP provided more meaningful, career oriented work experience opportunities to youth. It completely avoided the purely menial types of work experience previously available, such as janitorial services."

"The content and quality of work experience has improved. Prior to YETP, slots were in clerical, janitorial, and other common areas. Since YETP's implementation, slots are now available in a wide variety of areas."

"The prevalent cynicism that accompanied so much of Title I 'maintenance' programs in the past was seldom evident at YETP or YCCIP work sites."

The assertions of the prime sponsors with respect to the success of their efforts in increasing the quality of work experience did suffer from an absence of supporting evidence. Most of the prime sponsors failed to provide any discussion of the steps that they had taken to monitor or evaluate the quality of their work sites in order to obtain evidence of such qualitative improvements. Approximately only 40% of the prime sponsors mentioned some type of activity

that they had undertaken to obtain information on work site quality. The remainder simply stated that the quality of their work experience activities had improved without providing any documentation for such assertions. For example, a number of the prime sponsors would simply make the following types of statements:

"The goals stated above were successful. The prime sponsor's youth work experience programs were the most successful of all activities."

"Generally, our goals with respect to work experience were achieved."

"The prime sponsor feels these efforts in developing new and meaningful work experience were successful."

"We have considered the program to be a success."

"We have found that increased counseling and career information worked well."

Those prime sponsors mentioning one or more efforts to monitor work site quality engaged in a variety of activities. The bulk of these activities consisted of interviews by prime sponsor staff with YETP and YCCIP program participants and job site supervisors although a few prime sponsors also hired outside contractors to conduct such interviews.⁷⁸ Other methods used by prime sponsors to monitor work experience quality included an analysis of monitoring reports compiled by youth coordinators, reviews of the tardiness and absenteeism behavior of participants, and an examination of the termination status of participants, particularly whether they had or had not obtained unsubsidized employment.

As noted above, a number of prime sponsors did admit that they had experienced problems in improving the quality of work experience opportunities. Among the problems cited most frequently by prime sponsors were those related to diversifying the work experience opportunities available to youth, developing work sites for participants that were closely related to their career interests or school programs, obtaining qualified supervisors from subcontracting agencies, and obtaining

academic credit for the work experiences of YETP and YCCIP program participants. Prime sponsors in rural areas frequently experienced difficulties in developing worksites for youth that were within reasonable commuting distances from their schools and homes and that contained any substantive skill component. To overcome such problems, a few prime sponsors developed in-school work experience programs with LEA's that attempted to simulate job settings that students would encounter in the private sector.

Finally, only a small fraction of the prime sponsors (approximately 20%) provided any comparisons of the quality and effectiveness of YEDPA work experience activities with those previously provided under Title I or SPEDY. More detailed comparisons of this type would have been helpful in assessing the comparative advantages of YETP programs. Most of the prime sponsors providing comparisons of the quality of their YEDPA work experience activities with those under previous Title I youth programs claimed that the YEDPA-related work experience activities were of higher overall quality.⁷⁹ Typical of such comments were the following:

"Our Title I in-school and SPEDY programs were low skill/no skill programs that provided limited work experience and had no long term effect on youth employability. Our YEDPA work experience opportunities were more challenging to participants and developed marketable skills."

"YETP provided the potential for a higher quality work experience than CETA youth programs in the past because of the encouragement to provide training and career information, guidance and counseling services."

The instructions for the preparation of the FY 79 Year End Reports on YEDPA program operations should emphasize the need for more substantive analysis of the work experience quality issues by prime sponsors in order to appropriately assess the overall performance of YEDPA programs at the local as well as the national level. The instructions should be designed to capture information on prime sponsors' continuing efforts to upgrade the quality of local work experience opportunities for YETP and YCCIP participants.⁸⁰ Prime sponsors should also be

asked to describe their efforts to monitor the quality of their work experience job sites and to summarize the finding of those monitoring efforts. Comparisons of the quality of work experience activities under YETP, YCCIP, and Title II B programs should also be presented in the Year End Report. Finally, it would seem desirable for prime sponsors to provide information on the extent to which their experiences under YETP and YCCIP programs have been used to alter the nature or mix of their services to youth under Title II B and summer youth programs (SYEP).

Service Delivery Agents
For Prime Sponsors' YETP Programs

This section of the report is focused on the selection of service delivery agents for YETP programs of prime sponsors during FY 78. Particular emphasis is placed on the role of CBO's and private for profit firms in delivering YETP services.⁸¹ The role of local educational agencies in delivering employment and training services to youth will be discussed at greater length in a later section of the report devoted to institutional linkages.

The eighth principle of the Youth Planning Charter was related to the issues of the selection of service delivery agents for prime sponsors' YEDPA programs. The principle stated that "Emphasis must be placed on approaches and delivery agents of demonstrated merit."⁸² The Charter noted that the ultimate success of YEDPA programs would be influenced to a substantial degree by the effectiveness of the agencies selected to deliver YEDPA services.

The Charter also indicated that "Community-based organizations can and should⁸³ be funded where they can do the job." The need for prime sponsors to undertake substantive monitoring and evaluation activities to determine the actual effectiveness of programs operated by various local service delivery agents was also emphasized in the Youth Planning Charter.

The YEDPA Act also contained several provisions related to the selection of service delivery agents at the local level. Section 342 (b) of the Act indicated that prime sponsors were expected to seek out community-based organizations (CBO's) and private non-profit agencies to administer YETP programs before deciding to administer such programs by themselves. Section 343 (e) of the Act required prime sponsors to give "special consideration" in the selection of YETP delivery agents to CBO's. It should be noted that CBO's as defined in the Act constituted a rather broad grouping of organizations, including not only such traditional community-based organizations as the Urban League, OIC, and SER, but also union-related organizations and non-profit employer-based organizations, such as local Chambers of Commerce. The rules and regulations for YEDPA noted that YCCIP projects were also expected to be administered in large part by neighborhood and community-based organizations.⁸⁴ Prime sponsors were supposed to establish formal criteria for the ranking of project applicants. The proposals of CBO's were to be given first consideration in the review process. Only after all CBO proposals had been reviewed were YCCIP proposals of other agencies to be entertained by the prime sponsor.

The instructions for preparing the section of the End of Year Report on service delivery agents were rather abbreviated. Prime sponsors were not specifically asked to describe either the methods that they had used to solicit proposals from CBO's or the criteria that they had established for reviewing YETP or YCCIP project proposals. Nor were prime sponsors asked to provide specific information on the actual extent of involvement of CBO's in the delivery of employment and training services to youth under YETP or YCCIP. Instead, prime sponsors were simply asked to discuss the impact that CBO's had on the ability of the prime sponsor to successfully serve target groups and to describe the role of other services delivery agents and their "impact" on local YEDPA "goals."⁸⁵ The instructions were

not clear as to which "goals" these other service delivery agents were expected to contribute. This particular omission is significant given that local goals may have existed for each of the ten principles contained in the Youth Planning Charter.

During our review of the Year End Reports, an attempt was made to identify the service delivery agents for each prime sponsor's YETP programs. Service delivery agents were classified into one of the following five mutually exclusive categories: community and neighborhood based organizations, LEA's, prime sponsors, other state or local government agencies, and private for-profit companies. The definitions of neighborhood and community-based organizations appearing in the rules and regulations for YETP and YCCIP programs were utilized in classifying YETP service delivery agents. The findings of this review are summarized in Tables II-21 and II-22 below.

As revealed in Table II-21, of the 57 prime sponsors whose EYR reports were examined during the course of the study, 56 provided some information on the service delivery agents that they had selected to operate their FY 78 YETP programs. The information provided by prime sponsors was of uneven quality. Approximately only one-fourth of the Year End Reports provided a detailed description of their service delivery agents under YETP.

Table II-21:

Did Prime Sponsor's End of Year Report Provide Any Information on the Operations of YETP Programs? (N=57)

<u>Response</u>	(A)	(B)
	<u>Number Of Prime Sponsors</u>	<u>Percent Of Prime Sponsors</u>
Yes	56	98.2%
No	1	1.8%
Total	57	100.0%

Findings on the types of agencies operating prime sponsors' YETP programs during FY 78 are presented in Table II-22 on the following page. Local educational agencies (LEA's) were most frequently involved in the delivery of employment and training services to youth under prime sponsors' YETP programs. LEA's operated YETP programs in 48 of the 56 prime sponsor areas (85.7%) for whom information on program operators was available. While all prime sponsors administering YETP programs were required to negotiate an agreement with a Local Educational Agency during FY 78, not all of these prime sponsors had succeeded in doing so. In addition, a few prime sponsors negotiated LEA agreements of a non-financial nature. Under these non-financial agreements, LEA's are not actively involved in the operation of YETP program activities, such as career employment experience or institutional training.

Prime sponsors appear to have succeeded fairly well in obtaining CBO involvement in the delivery of employment and training services to youth under YETP programs. Community-based organizations (CBO's) were involved to some extent in the delivery of YETP employment and training services to youths in approximately three-fourths of the prime sponsors (75%). In addition, in a few of the remaining prime sponsors, CBO's were involved in administering YCCIP projects. Several prime sponsors allocated all of their YETP monies to LEA's for the delivery of service to in-school youth while funding CBO's for the development of YCCIP projects to serve out-of-school youth.

The degree of CBO involvement in the delivery of YETP services to youths proved to be far more difficult to ascertain during the review of the EYR's. An attempt was made to determine the actual share (other than zero) of a prime sponsor's YETP budget that was allocated to CBO's; however, sufficient data were available in only six cases to do so. Among these six prime sponsors, the share of YETP funds accounted for by CBO's ranged from 33% to 100%. Thus, while the information appearing in the prime sponsors' EYR's did reveal a frequent

Table II-22 :

Types of Agencies Operating
FY 78 YETP Programs (N=56)

<u>Type of Agency</u>	(A) <u>Number of</u> <u>Prime Sponsors*</u>	(B) <u>% of</u> <u>Prime Sponsors</u>
Community Based Organization	42	75.0%
Local Educational Agency	48	85.7%
Private Sector for Profit Firm	16	28.6%
Prime Sponsor	8	14.3%
Other Government Agency	26	46.4%

*Note: Multiple responses were allowed since a prime sponsor may have selected a number of different agencies to deliver services under its YETP program. Thus, column totals can well be expected to exceed the total number of prime sponsors.

involvement by CBO's in the delivery of YETP services, the actual degree of such involvement was not capable of being estimated in the vast majority of cases. The inability to estimate the degree of CBO involvement was primarily due to a lack of specificity in the prime sponsors' descriptions of their YETP service deliverers. For example, prime sponsors often described the nature of CBO involvement in the following manner:

"Several community organizations have conducted projects under the YETP program."

"A CBO was rated number one on the funding list and was given the largest share of YETP funding."

Nearly one third of the 57 prime sponsors indicated within their year end reports problems in obtaining CBO or private for profit sector involvement in their YETP programs (Table II-23). Findings provided in Table II-24 reveal that the limited number of CBO's within the local prime sponsor planning area was the major barrier to those prime sponsors that indicated a problem in obtaining CBO involvement. Only one prime sponsor indicated that poor performance by local CBO's in previously operated CETA programs was an obstacle to obtaining CBO involvement in it's YETP program.

The major problem in obtaining private for profit sector involvement in local YETP efforts centered upon either a lack of staff to develop such linkages or staff that were inexperienced in dealing with private sector business establishments on such issues as contract development, monitoring, etc.. Three prime sponsors reported a reluctance on the part of the local private for profit sector to become involved in YETP programs. Limited pre-YEDPA work experience of local youth as well as a limited availability of OJT slots with substantive skill content were also problematic in involving private sector firms in the YETP program.

Finally, three prime sponsors indicated that insufficient planning time hindered their efforts to involve CBO's as well as the private sector in local YETP efforts.

Table II-23:

Did Prime Sponsor Cite Problems in
Obtaining CBO or Private for Profit Sector
Involvement in its YETP Programs? (N=57)

<u>Response</u>	(A) <u>Number Of Prime Sponsors</u>	(B) <u>Percent Of Prime Sponsors</u>
Yes	18	31.6%
No/No mention	39	68.9%
Total	57	100.0%

As noted above, the instructions for drafting the Year End Report asked prime sponsors to discuss the effects of CBO's on the recruitment of various target groups. Less than one-half of the prime sponsors, however, discussed the effects of CBO involvement in either YETP or YCCIP programs upon the recruitment of target groups. Those that provided such a discussion typically did so in a very general way, indicating that CBO's assisted in the determination of target groups for the delivery of services, helped assess the needs of youth from economically disadvantaged backgrounds, and successfully recruited youths in specific significant segments, such as members of racial/ethnic minority groups, offenders, high school dropouts and low achievers. For example, prime sponsors tended to describe the effects of CBO's on target group recruitment in the following general manner:

"The utilization of the above named CBO's and other organizations proved effective as delivery agents."

"Community-based organizations proved to have a positive impact on YETP programs in providing transitional services and employment and training to target groups."

The prime sponsors generally failed to relate their discussions to previous sections of the EYR focused upon the designation of target groups or to present data from the Youth Program Status Summary on planned and actual enrollments of significant segments. The instructions for future EYR reports should request prime sponsors to discuss their success in a quantitative manner in recruiting

Table II-24: Types of Problems Encountered by Prime Sponsors in Obtaining CBO or Private Sector Involvement in its YETP Programs (N=17)

<u>Type of Problem</u>	(A) <u>Number of Prime Sponsors*</u>	(B) <u>% of Prime Sponsors</u>
Insufficient Planning Time	3	17.6%
Limited Number of CBO's in Local Planning Area	5	29.4%
Lack of Previous Experience of CBO's	1	5.9%
Inadequate Number or Inexperience of Prime Sponsor Staff in Dealing with Private Sector	5	29.4%
Reluctance of Private Sector to Become Involved with YETP	3	17.6%
Limited Work Experience of Youth	1	5.9%
Limited Availability of OJT Slots with Substantive Skill Content	1	5.9%

***Note:** Multiple responses were allowed; thus, the column totals will exceed the total number of prime sponsors citing problems in obtaining CBO or private sector involvement with YETP programs.

those target groups for participation in YETP and YCCIP programs during FY 79.

Among the other types of service delivery agents discussed in this section of the EYR were LEA's, private for-profit companies, and other state and local government agencies, including State Employment Security Agencies. In only 30% of the EYR's did prime sponsors provide any discussion of the specific advantages of involving such agencies in the delivery of YETP and YCCIP services. Among the types of advantages mentioned by prime sponsors were the ability of public sector agencies to assist in the attainment of minimum overhead cost objectives and to successfully recruit selected target groups, such as the handicapped and youth offenders. The role of the private sector in contributing to higher numbers of unsubsidized placements was also noted by several prime sponsors.⁸⁷

To obtain greater insights into the roles of various service delivery agents in achieving local YEDPA goals, the instructions for FY 79 Year End Reports should request prime sponsors to describe in more detail the types of service delivery agencies that they selected to administer their YETP and YCCIP programs, to provide a brief rationale for their original selection (perceived ability to contribute to specific local YEDPA goals"), and to assess in a qualitative manner their actual performance in achieving those goals during FY 79.

KNOWLEDGE DEVELOPMENT ACTIVITIES OF PRIME SPONSORS:

INNOVATIVE OR EXEMPLARY PROGRAM DESIGN

The Youth Employment and Demonstration Projects Act of 1977 was primarily intended to be a nationwide "demonstration projects" act that would provide funding for a variety of alternative employment and training programs for youths particularly economically disadvantaged youths.⁸⁸ Findings of the relative effectiveness of these alternative strategies in combatting the employment problems of youth would be used in part to guide the future direction of the nation's youth employment and training system. To guarantee that findings on the effectiveness of these alternative program approaches were made available to local and national policy makers, the programs administered under YEDPA would have to be carefully evaluated at the local and national level.⁸⁹

The Planning Charter for the Youth Employment and Demonstration Projects Act stated unequivocally in its first general principle that "knowledge development is a primary aim of the new youth programs."⁹⁰ The Charter went on to explain that the primary thrust behind this principle was that of assessing the performance of innovative programming efforts "as rigorously as possible" through the use of pre-determined "hypotheses and questions" and an accompanying appropriate "evaluation methodology."⁹¹ This mandate was couched in terms that generally characterize the broad field of evaluative social science research.⁹² The Charter, thus, strongly suggested that prime sponsors give serious consideration to undertaking knowledge development activities. These activities could broadly be viewed as systematic inquiries into the nature and causes of the employment problems of local CETA eligible youth as well as the effectiveness of particular youth program activities or program components in improving the immediate and longer-term employability of economically disadvantaged youth.

The instructions from the ETA Regional Offices to prime sponsors for completion of the knowledge development section provided a rather minimal amount of direction for systematically recounting what was initially intended to be an orderly and rigorous process of inquiry. The instructions suggested that the prime sponsor "consider" and "discuss" the following three general topics:

- "unique and effective program designs developed under YEDPA";
- "evaluation methodology used";
- "analysis of findings."⁹³

In our review of the prime sponsors' Year End Reports, an attempt was made to identify the specific types of local knowledge development activities undertaken by prime sponsors during FY 78.⁹⁴ The End of Year Reports were first reviewed to determine whether the prime sponsor mentioned any exemplary or innovative programs that they had implemented during the first year of YEDPA operations. These programs were then recorded as a type of knowledge development activity whether or not they were accompanied by a formal evaluation effort to assess their actual performance. Secondly, problems encountered by prime sponsors in designing exemplary or innovative programs were also identified. Thirdly, the End of Year Report was reviewed to determine whether the prime sponsor had undertaken any evaluation activities during FY 78 and, if it had done so, to list the specific types of evaluation activities in which it had engaged.

The remainder of this sub-section of the report will be devoted to a discussion of both the types of innovative or exemplary program activities that prime sponsors had undertaken during FY 78 and the problems that they experienced in trying to undertake any type of knowledge development activity during that year. The findings of the review of the Year End Reports, with respect to

formal evaluation efforts of prime sponsors, will be presented in a later sub-section of this report on monitoring and evaluation activities.

Table II-25 summarizes the findings of our review of the prime sponsors' Year End Reports with respect to their undertaking exemplary or innovative YEDPA program activities during FY 78. The findings reveal that only 26 of the 57 prime sponsors (or 45.6%) indicated that they had designed and implemented some type of exemplary or innovative YEDPA program activity during that year. It should again, however, be emphasized that the classification of an activity as being exemplary or innovative in nature was made by the prime sponsor, not by the authors of this study.

Table II-25: Did Prime Sponsor Mention Any Exemplary or Innovative YEDPA Program Activities Undertaken as Part of Its Local Knowledge Development Effort?
(N=57)

<u>Response</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>Percent of Prime Sponsors</u>
Yes	26	45.6%
No/No Mention of Any K.D. Activities	<u>31</u>	<u>54.4%</u>
Total	57	100.0%

Information on the types of exemplary or innovative youth program activities undertaken by prime sponsors is presented in Table II-26 on the following page. The most frequently mentioned type of innovative or exemplary youth program activity was that of mixed-income experiments under YETP. Twelve of the twenty-six prime sponsors undertaking some type of innovative YEDPA activity were involved in conducting such mixed income experiments.⁹⁵ Section 345(a) of the YEDPA Act allowed prime sponsors to use up to 10% of their YETP

Table II-26: Types of Exemplary or Innovative
YEDPA Program Activities
(N=26)

<u>Type of Activity</u>	(A) <u>Number Of</u> <u>Prime Sponsors*</u>	(B) <u>Percent Of</u> <u>Prime Sponsors</u>
Centralized Intake and Assessment	2	7.7%
Career Employment Experience/ Newly-Designed Work Experience Activities	10	38.5%
Exemplary Institutional Training	4	15.4%
Vocational Exploration/ OJT in the Private Sector	6	23.1%
OJT/Institutional Training Combinations	3	11.6%
YETP Mixed Income Experiments	12	46.1%
LEA Linkages	3	11.6%
Centralized Placement	1	3.8%

*Note: Multiple responses to this question were allowed; thus, the number of exemplary or innovative activities will exceed the total number of prime sponsors citing such activities.

monies to administer programs to serve youth from a variety of family income backgrounds. The primary purpose of such experiments was to test whether or not economically disadvantaged youth would receive net benefits from participating in programs with youth from other socioeconomic backgrounds.

Ten of the twenty-six prime sponsors (38.5%) mentioned career employment experience or newly-designed work experience activities as their innovative or exemplary program activities during FY 78. Other "exemplary" or "innovative" programs cited by prime sponsors included Vocational Exploration Programs linked to the private sector (6), unique classroom training programs (4), and combined classroom/OJT programs (3). The other types of innovative or exemplary program activities were LEA linkages (3), centralized intake and assessment (2), and centralized job placement services (1). It should be noted that in many instances, prime sponsors did not design and implement an evaluation study to assess the effectiveness of these exemplary or innovative program activities.

Table II-27, below, provides information on the reasons cited by prime sponsors for their failure to design and implement any innovative or exemplary programs during FY 78. Only 12 of the 31 prime sponsors failing to undertake any innovative or exemplary activities provided an explanation for the absence of such efforts in their Year End Report. The most-frequently cited reason for their failure to undertake such activities was a lack of adequate planning time and the perceived need on their part to get their YEDPA programs operating as quickly as possible. The need to devote substantial staff time to the Title VI PSE buildup in their areas was included in these responses. The other factors influencing the absence of unique or experimental programs designs under YEDPA were a limited understanding of knowledge development in general (3), limited staff experience in designing innovative youth employment and

Table II-27: Types of Reasons Cited by Prime Sponsors
for the Absence of Exemplary Program Design*
During FY 78
(N=12)

<u>Reason</u>	<u>Number Of</u> <u>Prime Sponsors*</u>
Lack of Planning Time/ Need for Rapid Start-Up	9
Primary Focus On Improving Existing Program Operations	2
Limited Experience in Innovative Program Development and Design	2
Limited Understanding of Knowledge Development	3

*Note: Multiple Responses were allowed; thus, the number of reasons for the absence of exemplary program design will exceed the number of individual prime sponsors citing at least one reason.

training programs (2), and the desire of the prime sponsor to focus its initial YEDPA efforts on improving the quality of existing youth program operations (2). Similar types of problems in undertaking knowledge development activities have been cited in other studies of prime sponsors' youth knowledge development efforts. For example, a recent report prepared for the National Office of Youth Programs concluded that:

"Many primes did not initially take kindly to KD. In part, this attitude reflected a general lack of understanding of KD and a shortage of time for implementing KD plans."⁹⁶

As revealed above, the preliminary review of the EYR's revealed that relatively few "unique and effective" programs were undertaken by prime sponsors as part of their FY 78 knowledge development efforts. As a result, the authors decided to broaden their approach to this issue and attempted to determine the degree to which prime sponsors appeared to understand the basic inquiry oriented premise of the knowledge development mandate outlined in the Youth Planning Charter. It should be noted that a positive response was recorded for the prime sponsor if it even hinted at an understanding of this basic premise in its Year End Report. In other words, regardless of the actual substance of the knowledge development activity or the EYR discussion of the activity, a prime sponsor was assumed to possess this basic understanding if the knowledge development activity was designed (or implied a design) to "test", "prove", "demonstrate", "compare", "contrast", and/or "evaluate".

The findings presented in Table II-28 below indicate that, even using the most lenient and inclusive classification system, one-third of the prime sponsors did not summarize their FY 78 YEDPA knowledge development activities in a way that reflected an understanding of this essential and basic inquiry perspective.

Table II-28: Did the Prime Sponsor Exhibit a Basic Understanding of the Inquiry Orientation of the Knowledge Development Process?
(N=57)

<u>Response</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>Percent of Prime Sponsors</u>
Yes	38	66.7%
No	<u>19</u>	<u>33.3%</u>
Total	57	100.0%

The 19 prime sponsors whose EYRs did not appear to exhibit this basic understanding provided discussions of knowledge development activities that were characterized by one or more of the following features:

- i) A discussion designed to indicate the absence of any knowledge development, e.g.: "knowledge development as described was not a part of the FY 78 YEDPA program";
- ii) A discussion designed to indicate a reason for the absence of a knowledge development component, e.g.: "this activity could not be completed due to implementation problems"; "by utilizing the relatively stable type of program format that is used in Title I programs, a more limited risk was assumed by the prime sponsor. This format will permit defunding much more readily than a program designed around a truly experimental approach to youth unemployment";
- iii) A discussion of what appeared to be a legitimate knowledge development activity, but which was not classified as such by the prime sponsor, e.g.: "While no specific K.D. programs were planned, the sponsor did investigate several issues, including the effect of private sector involvement on the assimilation of youth into unsubsidized employment";

- iv) A discussion of a totally unrelated matter presented under a knowledge development guise. For example, prime sponsors would list the following types of activities as part of their "knowledge development" effort:

"develop a community resource inventory to improve the network of communication with supportive services agencies";

"to involve our youth advisory council in all aspects of YEDPA and the operations of CETA";

"to develop and implement a viable residential recycling program which was to be absorbed by either local government or a private profit-making firm on a full-scale, permanent basis."

- v) A discussion of traditional youth program activities under the knowledge development section, e.g., the provision of subsidized work experience opportunities for economically disadvantaged youth.

The above discussions that were contained in the EYRs of prime sponsors may reflect either or both of the following two situations. First, they appear in many instances to reflect an inability to understand the basic underpinnings of knowledge development. Secondly, they seem to indicate the absence of a local priority for the knowledge development mandate of the Youth Planning Charter. In some instances, the prime sponsor seemed to understand the basic KD premises, but did not give serious consideration to that particular YEDPA activity.⁹⁷ Those prime sponsors' EYR discussions that were classified as possessing some ostensible understanding of the knowledge development mandate, were characterized by wide differences in both the nature of such activities as well as report quality.⁹⁸ The following general types of discussions were provided in these EYR:

- i) Discussions of well-planned program innovations, based on a perceived problem or an unanswered question on potential solutions to those problems;

- i) Discussion of an evaluation component designed to assess the effectiveness of an on-going or past program;⁹⁹
- iii) Discussions of actual or proposed activities that represented a rudimentary understanding of the KD process, but lacked the necessary specificity, creativity in design, and/or feasibility of being accomplished, e.g.: "compare the relative merits of different training approaches", "explore the value of supervision", "explore the value of the LEA agreement."

This latter characteristic may be reflective of either of the following two general sets of problems. First, it may reflect an inability on the part of the prime sponsor to understand the K.D. mandate at any but the most fundamental level. In other words, it represents a limited capacity to take that general understanding and translate it into a specific, well-defined process of inquiry. Secondly, the prime sponsor may possess a more complete understanding of the essence of the K.D. mandate, but not have sufficient resources, time, staff, expertise, and/or technical assistance to undertake a comprehensive local knowledge development effort. The extent to which prime sponsors were able to go beyond an understanding of the fundamentals of knowledge development will be explored in a later sub-section of this report. That section will examine prime sponsors' compliance with the EYR instructions with respect to including a discussion of the evaluation methodology utilized to assess local research and demonstration projects and the findings of such evaluations.

THE PROGRAM SUBSTITUTION ISSUES

EYR Instructions and Youth Planning Charter Goals

The YEDPA legislation authorizing the YETP and YCCIP programs contained a policy statement in which Congress clearly indicated its intent that funds provided under YEDPA were to be used to add to, rather than substitute for, existing efforts to serve youth under existing CETA programs.¹⁰⁰ Reflecting this Congressional mandate, the Youth Planning Charter emphasized that CETA services provided to youth, especially under Title I (now Title II B, C), would not be reduced because of the availability of additional funds for youth under YEDPA. The Youth Planning Charter discussed the need to prevent the diversion of existing youth resources away from youth since total YEDPA funding was only capable of expanding overall youth employment and training resources by a small fraction.

It appears, however, that a major problem in meeting this mandate as well as others occurred because ETA did not immediately provide an objective measure to Prime Sponsors by which their performance in meeting YEDPA goals related to substitution could be evaluated. This behavior, according to several outside observers, "adds to the suspicion of the prime sponsors as to the real objectives of the legislation".¹⁰¹ Although limited evidence exists, it appears that at least some prime sponsors "view(ed) YEDPA as an add-on to current youth activities although the details of what would constitute "substitution" or how it would be measured remained unclear".¹⁰²

In light of this ambiguity it appears likely that during the planning, implementation and operations of the YETP and YCCIP programs, prime sponsors did not possess a detailed understanding of what "substitution" was, how to measure it, or how to avoid it. With respect to the Prime Sponsors End of Year Reports, discussions of the program substitution issue were in many cases further confused by the instructions that ETA provided to them on this issue.

The instructions for the section of the EYR related to YEDPA monies possibly being substituted for Title I funds devoted to youth were found under the general rubric of "Program Supplementation". These instructions suggested that Prime Sponsors consider including the following information in their EYR reports:

- "1. Percentage of planned level of services;
2. Provision of services from other agencies (i.e. administration, materials, equipment, supplies from CSA, LEA or other);
3. Increases in YEDPA staffing necessitated by new agreements with other agencies such as LEA".

The suggested information cited above deals primarily with the "Overhead must be minimized" provision of the Youth Planning Charter and would provide little insight into the "substitution must be avoided" provision of the Youth Planning Charter. As a result, prime sponsors were likely further confused about the meaning of program substitution.

In short, the combination of continuous uncertainty over the precise meaning of program substitution and the extraordinarily poor reporting instructions provided to prime sponsors resulted in EYR discussions based on a number of various interpretations of the "substitution avoidance" principle of the Youth Planning Charter.

Alternative Interpretations of the Substitution Avoidance Issue in the EYR

Prime Sponsors' interpretations of the meaning of the "substitution avoidance" principle proved to be quite difficult to classify since the brief discussions of the issue frequently appeared to be fraught with various shades of meaning. At times conflicting statements as to whether or not substitution occurred were included in the same EYR. Issues of fiscal substitution and services mix substitution (discussed below) were also included by prime sponsors. In addition, there were a number of prime sponsors who simply followed the EYR instructions and did not deal with the program substitution issue at all. As a result, the data provided in the tables of this report may be subject to errors associated with the authors' interpretations.

of what frequently proved to be terse and awkwardly phrased discussions of program substitution by the prime sponsors.

A total of 71 different discussions of program substitution were included in the 57 EYR's reviewed during this study. This disparity occurred since some prime sponsors chose to separately discuss substitution issues related to YETP and YCCIP programs. YETP substitution avoidance was discussed independently of YCCIP 19 times, and YCCIP program substitution was discussed separately 16 times. Combined discussions of YETP and YCCIP substitution avoidance were found in 36 EYR's. Tabulations of the interpretations of program substitution provided by prime sponsors in their EYR's are found in Table II-29. The findings reveal that more than one-half of the combined YETP-YCCIP discussions of program substitution contained in the EYR's were based on substitution avoidance as discussed in the Youth Planning Charter. Only about one-third of the separate discussions of either YEDPA program were based upon the YPC substitution avoidance principle. This is not to say that one-half of the combined and one-third of the separate discussions of program substitution were adequate, but instead only indicates the number of cases in which the discussion of substitution occurred within the appropriate context.

The primary source of error in Prime Sponsor discussions of program substitution seems to have been their adherence to the actual EYR instructions. About one-third of the combined YETP-YCCIP discussions of "substitution" precisely followed the instructions for completion of the EYR provided by ETA. As such, the discussions dealt almost exclusively with the "overhead must be minimized" principle of the Youth Planning Charter. Over one-half of the separate YETP and YCCIP discussions provided in the EYR's were also written within the context of the program supplementation outline provided in the ETA instructions. A relatively small number of the EYR's contained discussions of the substitution avoidance issue that were not based on either the Youth

Table II-29: Alternative Types of Discussions of Substitution Provided
by Prime Sponsors Within Their EYR Reports

	(A)	(B)	(C)
	<u>YETP Discussion ONLY</u>	<u>YCCIP Discussion ONLY</u>	<u>Combined YETP-YCCIP Discussion</u>
Youth Planning Charter	7	5	19
Program Supplementation	10	8	14
Other	<u>2</u> 19	<u>3</u> 16	<u>3</u> 36

Planning Charter or the ETA instructions. Two EYR's discussed actions that the Prime Sponsor would take to avoid substitution in the future, while providing no discussion of the substitution issue in the past. Four other discussions of substitution focused upon the services mix of Title I youth programs vis-a-vis services provided under YEDPA. Staff in these prime sponsors apparently believed that substitution could be avoided by ensuring that the services provided under YEDPA did not overlap with the types of services provided to youth under Title I. One EYR interpreted the substitution principle to mean that a sort of fiscal substitution should be avoided. This prime sponsor stated that all of the staff hired to operate the program had been unemployed and were net new additions to the staff. Finally, one of the EYR's reviewed simply avoided the substitution issue entirely.

The Substance of the Prime Sponsor Discussions of the Substitution Issue

Data provided in Table II-30 summarize the substance of the substitution avoidance discussions provided by prime sponsors in the EYR's. Of the 36 combined YETP-YCCIP substitution discussions, 12 of the 36 reports reviewed indicated in some fashion that program substitution as defined in the YPC did not occur. Similarly, 12 of the 35 separate YETP-YCCIP discussions of substitution indicated that substitution of YEDPA for Title I youth efforts had been avoided. These low proportions of prime sponsors reporting compliance with substitution avoidance, however, should not be interpreted to imply that the remainder of the Prime Sponsors frequently substituted YEDPA for Title I resources in serving youth. Indeed, only three of the EYR's indicated that substitution had occurred between the two CETA Titles. The bulk of the EYR's reviewed during this study simply failed to reveal whether or not substitution had occurred or to discuss the degree of such substitution.

Table II- 3Q: Types of Substitution Issue Responses

<u>Response</u>	(A) YETP <u>Discussion</u>	(B) YCCIP <u>Discussion</u>	(C) YETP-YCCIP <u>Discussion</u>
EYR indicated <u>no</u> substitution occurred	7	5	12
EYR indicated that substitution had occurred	0	0	3
Did not indicate if substitution occurred	12	11	21
EYR indicated amount of substitution	0	0	1
EYR indicated why substitution occurred	0	0	3
EYR provided recommendations about the substitution goal	0	0	1

Evidence Provided in Prime Sponsor End of Year Reports to Support the View that Substitution was Avoided

Data provided in Table II-31 illustrate the types of evidence provided by Prime Sponsors to support their contention that YEDPA resources were not used in place of Title I resources to serve youth. In general, Prime Sponsor staff relied on one of the following two types of documentation to support their contentions:

1. The EYR included a statement that no substitution occurred (9 EYR's)

or

The EYR included a statement that FY'77 Title I efforts for youth were maintained in FY'78 (8 EYR's)

2. The EYR provided a comparison between FY 77 and FY 78 proportions of youth served under Title I. (5 EYR's)

One additional EYR provided comparisons of FY 77 and FY 78 Title I youth expenditure levels while another report compared the number of youth served in FY 77 and FY 78 under Title I programs.

Problems in Interpreting the Information Related to the Substitution Issue Provided by Prime Sponsors in Their End of Year Reports

Three major problems existed that substantially reduced the usefulness of insights into the program substitution issue that were provided by prime sponsors in their End of Year reports. First, at the inception of the YEDPA programs, the "substitution avoidance" issue was not rigorously defined. In a number of case studies on YEDPA implementation conducted for the National Council on Employment Policy, prime sponsors repeatedly indicated an uneasiness with YEDPA because they were unsure of the measures that OYP and the regional offices of ETA would employ in evaluating their performance with respect to this issue. The issue of a lack of a specific performance measure for gauging compliance with substitution avoidance was identified by a number of prime sponsors as a major area of concern. It is conceivable, therefore, that at least some prime sponsors paid little attention to the substitution avoidance issue since they may have been uncertain themselves as to the extent of their compliance. Because of the vagueness

Table II-31: Type of Documentation Supplied by Prime Sponsors with Respect to the Substitution Issue

<u>Type of Documentation</u>	(A) <u>YETP Discussion</u>	(B) <u>YCCIP Discussion</u>	(C) <u>Combination YETP-YCCIP Discussion</u>
Simple statement that no substitution occurred	4	3	2
Statement that FY77 Title I efforts were maintained in FY78	1	2	5
Provided comparisons of FY77 and FY78 youth expenditure levels	1	0	0
Provided comparisons between FY77 and FY78 shares of Title I expenditures on youth	0	0	0
Provided comparisons between FY77 and FY78 numbers of youth served	0	0	1
Provided comparisons between FY77 and FY78 shares of youth served with Title I	1	0	4
Discussed EYR substitution	10	8	14
None	2	3	6
Other	0	0	4

surrounding the concept of substitution avoidance and the possibility of certain costs being disallowed as a result of non-compliance with this provision of the YPC, some prime sponsors may have deliberately neglected to discuss the substitution avoidance issue in a substantive way in their EYR's.¹⁰⁴

A second major problem in interpreting the substitution avoidance discussions presented within the EYR's occurred as a result of the confusing instructions received by prime sponsors with respect to the substitution issue. More than half of the EYR's in which the Prime Sponsor failed to indicate if substitution had been avoided explicitly followed the reporting instructions. None of the EYR's in which the ETA instructions were used as a framework for discussion indicated whether or not substitution had occurred. In short, the ETA instructions related to the program substitution issue likely substantially reduced the amount of useful information provided by prime sponsors with respect to the substitution issue.

The third and perhaps most important problem associated with interpretations of the substitution avoidance issue is related to the lack of a specific performance measure for substitution avoidance at the time of the drafting of these reports. A number of the EYR reports did discuss the substitution issue within the context of the Youth Planning Charter. The set of EYR reports providing such a discussion can be classified into four broad groupings on the basis of the manner in which they discussed the program substitution issue.

1. Those prime sponsors submitting EYR reports that included only a generalized statement that "no substitution occurred". No other discussion of this issue was included nor were any data presented in support of such an assertion.
2. Those prime sponsors whose EYR reports stated that FY 77 Title I employment and training efforts for youth were maintained during FY'78. No other discussion was included, nor were any data provided to justify the claim.

3. Those prime sponsors whose EYR reports provided comparisons of either the level or percentage share of 'FY 77 and FY '78 Title I expenditures devoted to youth activities to indicate that substitution had occurred.
4. Those prime sponsors whose EYR reports provided a comparison of the total number of youth participants or the percentage share of all participants represented by youth in FY '77 with FY '78 Title I youth participant levels or shares to indicate that no substitution had occurred.

Unfortunately, because of the lack of a specific performance measure, it is not possible to discern whether or not substitution had occurred among those prime sponsors that provided documentation of this sort.

At least four alternative measures were available to prime sponsors for use in assessing their compliance with the substitution avoidance objective. These four measures are briefly discussed below to shed some insights into the difficulties in interpreting data related to the substitution avoidance issue.

Measure I: Compare FY'77 Title I expenditure levels on youth with FY'78 Title I expenditure levels on youth.

$$\frac{\text{Title I FY'78 Youth Expenditure Level}}{\text{Title I FY'77 Youth Expenditure Level}} = \text{Youth Expenditure Level Substitution Ratio}$$

Measure II: Compare FY'77 percentage share of Title I expenditures on youth to FY'78 percentage share of Title I expenditures on youth.

$$\frac{\text{FY'78 Title I Youth Share of Expenditures}}{\text{FY'77 Title I Youth Share of Expenditures}} = \text{Youth Share Substitution Ratio}$$

Measure III: Compare the total number of youth served under Title I programs in FY'77 with the total number of youth served under Title I in FY'78.

$$\frac{\text{Number of Youth Served Under Title I in FY'78}}{\text{Number of Youth Served Under Title I in FY'77}} = \text{Youth Participant Level Substitution Ratio}$$

Measure IV: Compare the share of total participants accounted for by youth that were served under Title I in FY'77 with the youth share of total persons served under Title I in FY'78.

$$\frac{\text{Youth Share of Participants Served Under Title I in FY'78}}{\text{Youth Share of Participants Served Under Title I in FY'77}} = \text{Youth Participant Share Substitution Ratio}$$

For each of the above four measures, a ratio greater than or equal to one would indicate that "no substitution" had taken place between the two fiscal years. A value of less than one for any of the above four ratios would indicate that some degree of substitution had occurred. The specific value of this ratio by itself is not capable of revealing the precise degree of substitution for reasons that will be noted below.

The above four different measures were presented since under specific circumstances it is quite possible that different findings as to whether or not substitution had actually occurred could be obtained for each measure.

Sharp differences between the values of expenditure and participant served substitution ratios (based on either levels or shares) could occur if program costs rise or fall between two years while the number of participants served rises or falls in the opposite direction from program costs. For instance, a relatively large year to year change in the types of services provided to youth under Title I could have affected program expenditures for youth in one way while the number of youth served by that prime sponsor could have moved in an opposite direction.

Differences among the various substitution ratios can also exist depending upon whether levels or shares are used in their calculation. For example, if an expansion in a prime sponsor's total Title I budget took place between two years while the prime sponsor maintained its same level of expenditures on youth or served the same total number of youth, then a comparison of the absolute levels of expenditures on youth or the total number of youth served in both of these two years would reveal no substitution. A comparison of the relative shares of resources devoted to youth

would, however, reveal that substitution had occurred since the base upon which the constant level of expenditures or enrollments was calculated increased between the two years.

To illustrate this possibility, the following hypothetical example has been prepared. Suppose that in FY'77 a prime sponsor served 10 youths at a total cost of \$20,000 by providing in-school youth with part-time work experience. In the following year, the prime sponsor changed its program mix for youth, with the result that it served only 5 out-of-school youth in a relatively long-term work experience program at a cost of \$20,000. Further, assume that the total number of individuals served under all Title I programs of this prime sponsor increased from 100 to 200 while total Title I expenditures remained constant at a level of \$300,000 due to a shift in the services mix between these two years away from long-term classroom skill training programs toward relatively short-term work experience for adults. These latter programs have lower average costs per participant. On the basis of the above information, one can calculate values for each substitution measure and observe the differences that would occur among each of these four measures.

Number of youth served under Title I in FY'77	=	10
Total number of individuals served under Title I in FY'77	=	100
Level of expenditures for youth under Title I in FY'77	=	\$ 20,000
Total level of expenditures under Title I in FY'77	=	\$300,000
Number of youth served under Title I in FY'78	=	5
Total number of individuals served under Title I in FY'78	=	200
Level of expenditures for youth under Title I in FY'78	=	\$ 20,000
Total level of expenditures under Title I in FY'78	=	\$300,000

Value of Measure I:

$$\frac{\text{Title I FY'78 Youth Expenditure Level}}{\text{Title I FY'77 Youth Expenditure Level}} = \frac{\$20,000}{\$20,000} = 1.00$$

The value of this measure would indicate that no substitution had occurred.

Value of Measure II:

$$\frac{\text{FY'78 Title I Youth Share of Expenditures}}{\text{FY'77 Title I Youth Share of Expenditures}} = \frac{20,000 - 300,000}{20,000 - 300,000} = \frac{.067}{.067} = 1.00$$

Again, the value of the measure indicates that no substitution had occurred.

Value of Measure III:

$$\frac{\text{Number of Youth Served Under Title I FY'78}}{\text{Number of Youth Served Under Title I FY'77}} = \frac{5}{10} = .50$$

The value of this measure indicates that substantial substitution adverse to youth took place in this prime sponsor's planning area.

Value of Measure IV:

$$\frac{\text{Youth Share of Participants Served Under Title I in FY'78}}{\text{Youth Share of Participants Served Under Title I in FY'77}} = \frac{5 - 200}{10 - 100} = \frac{.025}{.10} = .25$$

As above, the value of this measure indicates that substantial substitution adverse to youth took place in this prime sponsor's planning area between these two years.

The findings presented above clearly indicate that, even for those prime sponsors whose EYR reports provided comparisons between their FY'77 and FY'78 Title I programs with respect to either expenditures on youth or youth participants served, it is not possible to precisely discern whether program substitution had actually occurred.

In short, it is not clear by which of the above four standards prime sponsor practices in this area should be judged.

The discussion up to this point has primarily been concerned with avoidance of substitution of YETP and YCCIP efforts for youth for those employment and training services previously provided to youth under Title I of CETA. The YEDPA legislation as well as the Youth Planning Charter, however, did not limit their discussion of substitution avoidance solely to maintenance of effort under Title I. Rather, YEDPA was described

in both documents as a program designed to provide a total net increase in employment and training services provided to youth under CETA. While it is likely that substitution between Title I and YEDPA would only occur for youth 18 years of age or below, a possibility does exist that YEDPA funds could be used in place of funds from other Titles of the CETA Act for young adults aged 18-21, particularly counter-cyclical and structural PSE programs as well as several categorical programs such as STIP. Therefore, in addition to the need for the development of a specific substitution avoidance measure or set of measures, the programmatic scope of such a measure needs also to be more clearly delineated by ETA.

It should be noted, however, that for FY'79 Year End Reports the confusion among prime sponsors over the substitution avoidance issue should be substantially mitigated by the recent publication of a substitution avoidance measure by ETA. While not designed to address the qualitative aspects of the substitution issue, the new ETA directive should provide a more detailed understanding of quantitative aspects of substitution avoidance to prime sponsor staff.

Prime Sponsor Recommendations Regarding Substitution Avoidance

Only one prime sponsor provided a set of recommendations with respect to the substitution avoidance principle of the Youth Planning Charter. The Balance of State Massachusetts prime sponsor in a well articulated statement argued the identical quantity of services to youth in FY'79 as in FY'78 "...will require a larger proportion of Title I monies due to smaller allocations...(and) fewer resources will be available for adults". BOS Massachusetts indicated that, while 7.6% of all economically disadvantaged individuals in the state were youth under the age of 20, such youth constituted 51.4% of the prime sponsor's FY'78 total number of Title I enrollments. This resulted from a large in-school program. Disproportionate shares of enrollment in Title I also existed for youth aged 20-21, but the disparity was of a substantially lower magnitude. The Massachusetts BOS prime sponsor questioned the inequities to specific demographic groups (those 22 and over) of maintaining the FY'77 level of service to youth under Title I programs.

Institutional Linkages

The seventh principle of the Youth Planning Charter stated that "The new youth programs are not the cutting edge for institutional change."¹⁰⁵ The Charter noted that there was a need for more information on the effectiveness of alternative youth programs before the Congress could determine either the types of youth program approaches to emphasize on a national basis or the total amount of monies to be allocated to youth programs. As a result of the absence of such specific information, the Charter noted that "We do not intend, therefore, to try to force or buy reforms with the YEDPA."¹⁰⁶ A priority would be placed, however, on efforts to facilitate linkages between youth programs under YEDPA and other key actors in the employment and training system, including local schools, community-based organizations, labor unions, and the private sector. A number of the linkages between prime sponsors and both CBO's and private for profit firms in delivering YETP services were discussed in a previous section of this report devoted to service delivery agents under YETP.

The YEDPA Act attempted to influence the nature and extent of linkages between YEDPA programs and other institutions in several different ways. First of all, Section 346(b) of the Act stated that the Youth Planning Council established by the prime sponsor must contain representatives of local educational agencies, local vocational education advisory councils, business, labor unions, and community organizations responsible for providing special services to youth. Secondly, Section 343(d)(1) of the Act contained provisions requiring prime sponsors to develop an agreement with Local Educational Agencies (LEA's) for the delivery of services to in-school youth under YETP. Thirdly, Section 346(a)(3) of the Act required prime sponsors to coordinate their YETP programs with local educational agencies, community-based organizations, businesses, labor unions, and other job training programs. Finally, Section 353(d) of the Act required prime sponsors to notify local labor organizations of plans to fund YEDPA projects

if such unions represented workers in occupational areas similar to those in proposed YEDPA projects, e.g., carpenters, bricklayers, etc. Such labor organizations were to be given the opportunity to comment on the program application of the prime sponsor prior to its submission to the regional office of ETA.¹⁰⁷

The instructions for preparing the End of Year Report on FY 78 YEDPA programs suggested that the prime sponsors discuss their linkages with Local Educational Agencies (LEA's), unions, and the private sector.¹⁰⁸ A review of the findings of the Year End Reports with respect to prime sponsor linkages with each of these three sets of actors is presented below.

LEA Agreements

The funds provided to prime sponsors under YEDPA were expected to be viewed by them as "glue money" to tie together existing employment and training services for youth.¹⁰⁹ As noted above, the YEDPA legislation did attempt in a number of different ways to influence the nature and extent of linkages between prime sponsors YEDPA programs and other educational and training institutions in the local area, particularly Local Educational Agencies (LEA's). Section 343(d)(1) of the Act contained provisions requiring prime sponsors to develop an agreement with LEA's for not less than 22% of their total YETP allocation to provide services to in-school youth. The rules and regulations for YEDPA noted, however, that such LEA agreements could be either financial or non-financial in nature.¹¹⁰

The instructions for preparing the End of Year Report on FY 78 YEDPA programs suggested that prime sponsors discuss features of the linkages that they had developed with LEA's. Among the suggested topics of discussion were the coverage of their agreements with LEA's, progress in obtaining academic credit for YETP and YCCIP program participants, and the degree of support they had received from state and federal agencies in developing their LEA agreements.¹¹¹ The review of the 57 EYR's included in this study revealed that nearly 95% of the prime sponsors included some discussion of their efforts to secure LEA agreements (See Table II-32).¹¹² A number of these

Table II-32: Did Prime Sponsor Secure LEA Agreements During FY 78?
(N=57)

<u>Response</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>% of all Prime Sponsors</u>
Secured an LEA agreement	53	93.0%
Failed to secure an LEA Agreement	1	1.8%
Did not discuss LEA Agreements	3	5.2%
	<hr/> 57	<hr/> 100.0%

Table II-33: Number of Prime Sponsors Experiencing Some Difficulty In Securing an LEA Agreement (N=57)

<u>Response</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>% of Prime Sponsors</u>
Experienced some difficulty in obtaining LEA Agreement	16	28.1%
Experienced no difficulty in obtaining LEA Agreement	32	56.1%
Did not discuss experiences in securing an LEA Agreement	9	15.8%
	<hr/> 57	<hr/> 100.0%

prime sponsors, however, did not discuss this topic under Principle Number Seven of their report as suggested by the instructions. Rather, they generally provided only brief discussions of their relationships with LEA's in the section of the report devoted to the quality of work experience for youth.

Of the 54 prime sponsors that included some discussion of the LEA agreement, 53 indicated at least partial success in securing an agreement with at least some of the LEA's in their jurisdiction. Only 70% of the prime sponsors negotiating such agreements provided information on the proportion of LEA's in their planning jurisdiction that were covered by such agreements. As expected, such information was more readily available from the city and consortium prime sponsors than from Balance of State prime sponsors who had to deal in some instances with more than 100 individual LEA's. The EYR's did reveal, however, that prime sponsors frequently experienced some difficulty in securing agreements with LEA's. Over one-quarter of the prime sponsors indicated that they had encountered some difficulty in securing LEA agreements (See Table II-33). Generally, these Prime Sponsors discovered that LEA's were initially reluctant to become involved in a formal relationship with CETA. Such reluctance was based in part upon LEA's perceptions that substantial "red tape" would be involved in developing such an agreement. Conflicts between LEA and CETA planning and funding cycles also complicated the task of securing such agreements.¹¹³ In addition, problems in reaching agreement upon an academic credit policy for youth participating in YETP and YCCIP programs¹¹⁴ and a reluctance on the part of LEA's to target resources to only a select set of in-school youth also served as barriers to the development of agreements between local schools and CETA.¹¹⁵ (See Table II-34).

Only one-third of the prime sponsors mentioned any assistance from federal or state educational agencies in developing agreements with LEA's. In all instances, this assistance was provided by a state rather than a federal educational agency. This aid primarily took the form of a liaison from a state department of education to help the prime sponsor secure LEA agreements, particularly in Balance of State

prime sponsor areas. Several prime sponsors also noted the cooperation of state education superintendents or commissioners in promoting LEA- prime sponsor linkages at the local level. For example, one prime sponsor commented,

"The conclusion of LEA agreements was made easier than would otherwise have been the case because our state's Superintendent of Public Instruction advised secondary school administrators of the coming of YETP. . . . About 60% of the FY'78 YETP allocation was committed to serve in-school youth in in-school programs in the Balance of State."

In spite of the above problems, a substantial number of the prime sponsors indicated that the LEA agreements did represent a step forward for their local CETA systems.¹¹⁶ In some instances, the degree of progress was quite substantial. Among the comments made by these prime sponsors were the following:

"Educational institutions have never been so heavily involved within the Balance of State planning area."

"The Local Educational Agency Agreement presented an accomplishment in providing employment and training opportunities to eligible young persons in suburban school districts previously unserved by CETA youth programs. It also established a direct linkage within the school system between the work experience program and the Guidance and Counseling Department."

". . . The prime sponsor was able to increase the quality of work experience through a liaison agreement with the Local Education Agency which necessitated a more structured program of related education to augment such work experience."

Generally, it was not possible to discern from the information provided in prime sponsors' EYR's whether the LEA agreement was financial or non-financial in nature. Rarely did prime sponsors indicate in their Year End Reports either the absolute dollar value of the LEA agreement or the percentage share of the YETP budget devoted to the LEA agreement.

Slightly more than 70% of the prime sponsors indicated that they had developed arrangements with LEA's for the awarding of academic credit to at least a portion of the participants in their YETP and YCCIP programs. (See Table II-35) It was not possible, however, to discern from the Year End Reports the actual number or percentage of YETP and YCCIP participants that received academic credit as a result of program participation. Most prime sponsors who indicated that academic credit had been pro-

Table II-34: Sources of LEA Reluctance to Participate in YEDPA Programs

<u>Reasons</u>	<u>Number</u>
LEA's generally reluctant to deal with CETA at all	8
Conflict between CETA and school planning and funding cycles	3
LEA and Prime Sponsor unable to agree upon an academic credit policy	3
Schools were reluctant to serve particular target groups	2
Schools were unwilling to pay youth to attend classes (remedial ed.)	1

Table II-35: Did Prime Sponsor Reach an Agreement for Awarding Academic Credit to YETP and/or YCCIP Participants? (N = 57)

<u>Response</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>Percentage of Prime Sponsors</u>
Yes	40	70.2%
No	9	15.8%
No Mention	8	14.0%
TOTAL	57	100%

vided did so by making such statements as the following: "In a few in-school programs academic credit was successfully awarded for career work experience participation." Another 16% of the prime sponsors included in the study stated that they had been totally unsuccessful in obtaining academic credit for the youths participating in their YEDPA programs. Unfortunately, the prime sponsors falling into this category often failed to explain in a detailed fashion the reasons why academic credit was not granted by LEA's to participants in their YETP and YCCIP programs. The remainder of the prime sponsors (14%) failed to discuss the issue of academic credit in their Year End Reports.

It should not have been difficult for prime sponsors to report specific data on the number of YETP and YCCIP participants awarded academic credit since they are required to report such data on the Youth Program Status Summary submitted quarterly to the regional offices of ETA.¹¹⁷ While the absence of such data does not by itself constitute a major deficiency of these reports, the lack of information on the number of YETP and YCCIP participants receiving credit is reflective of the limited perspective that most prime sponsors adopted in discussing LEA agreements in their Year End Reports.

Prime sponsor discussions of LEA agreements were focused almost exclusively upon the process of development of the agreements. Few prime sponsors discussed the specific structure of the LEA agreement, with the exception of academic credit. The roles of the schools with respect to YEDPA program operations, management responsibility, monitoring, etc. were not included within the EYR discussions. Case studies of local YEDPA program operations conducted by the National Council on Employment Policy discussed a wide variety of issues involving the implementation and operation of YETP and YCCIP programs that were related to LEA agreements.¹¹⁸ As these case studies progressed, the early optimism existing among prime sponsors with respect to the likely success of LEA agreements was discovered to have diminished substantially. Incongruities between CETA prime sponsors and LEA's became apparent

as the programs got underway. Unfortunately, the EYR's reviewed in this study almost universally failed to include discussions of the objectives and content of LEA agreements; of problems encountered in initiating programs funded under the LEA agreement; or of problems encountered in the continuing operations of such youth programs. The case studies noted above found that the new linkages between CETA and educational agencies posed serious problems for both CETA and LEA administrators. These case studies identified problems in the following areas:

1. Ambiguous goals in LEA agreements, such as whether programs should find unsubsidized employment for youth or encourage youth to stay in school. At times CETA prime sponsors and LEA's disagreed as to appropriate goals.
2. Conflicting views as to whether CETA or LEA staff should monitor programs and certify participants for academic credit.
3. Conflicts between CETA and LEA planning and funding cycles.
4. Problems in identifying individuals within an LEA who would be willing to cooperate in a joint program with CETA.
5. Resentment of LEA's toward targeting funds to a specific subset of in-school youth.
6. Nature of the institutions with whom LEA agreements were reached, i.e. whether they were developed with Vocational Education or Non-Vocational Education LEA's, and the impact that such alternative linkages had upon program content and client characteristics.

Unfortunately, few of the EYR's reviewed in this study touched upon any of the above issues. Consequently, the EYR's typically failed to provide any substantive insights into the implementation and operation of a major component, as well as a major innovative feature, of the YEDPA effort. In the future, EYR's should be structured to provide more detailed information both of a qualitative and, where

appropriate, quantitative nature with respect to linkages with LEA's. In particular, the following types of issues should be discussed within this section of the EYR:

- (i) the development of the LEA agreement, including a discussion of its goals and objectives;
- (ii) the financial nature of the LEA agreement, including dollar amounts and explanations of differences between actual dollar amounts and the mandated 22% of YETP funding;
- (iii) a discussion of the planned roles of the CETA prime sponsors and LEA's in operating the programs;
- (iv) a brief description of policies related to the awarding of academic credit, including information on the planned number of participants for whom academic credit would be awarded;
- (v) implementation of programs operated under LEA agreements, including a discussion of annual start-up problem and an identification of factors that may have created these problems such as conflicting planning/funding cycles; and
- (vi) the types of programs funded under LEA agreements, including the provision of services to participants by both LEA's and CETA and the extent to which each party met its commitments under the LEA agreement. This discussion would also provide a comparison of the planned and actual number of participants receiving academic credit.

In addition to the above issues, prime sponsors should also describe the manner in which LEA agreements have changed pre-YEDPA relationships between themselves and LEA's. Such a discussion would desirably include a brief description of pre-YEDPA linkages followed by a discussion of the manner in which LEA agreements did succeed

in changing the nature or extent of such relationships. The prime sponsor's views as to whether these changes had generated improvements in the level and quality of services provided to in-school youths would also prove useful.

Linkages with Labor Unions

As noted earlier, prime sponsors were also expected to link their YETP and YCCIP Program activities with local labor unions. The Youth Planning Councils mandated by the YEDPA Act were to include representatives of labor unions¹¹⁹, the YETP plans of prime sponsors coordinated with labor union programs¹²⁰, and the YETP and YCCIP plans of prime sponsors were to be reviewed by labor organizations prior to their submission to the regional office of the Employment and Training Administration.¹²¹

The instructions for preparing the Year End Report suggested that prime sponsors discuss the role unions played in planning YEDPA programs and in assisting in the job restructuring efforts of the prime sponsor.¹²² In addition, prime sponsors were asked to discuss the "effect" that the plan review process had upon generating local union support for YEDPA programs. The instructions failed, however, to provide specific examples of such possible types of union "support", e.g., union involvement in the training of youth, or prime sponsor/union agreements with respect to the referral and placement of selected trainees in union apprenticeship programs.

During our review of the prime sponsors' Year End Reports, an attempt was made to determine whether the prime sponsor had succeeded in establishing linkages with unions, to identify problems that prime sponsors had encountered in developing such linkages, and to list their recommendations, if any, for improving such linkages during FY 79.¹³³ Table II-36 below provides information on the number of prime sponsors developing some type of linkage with local labor unions during FY 78. Thirty-five of the fifty-seven prime sponsors (61.5%) did indicate in their Year End Reports that they had developed some linkage with local labor organizations during the first year of YEDPA operations. The remaining 22 prime sponsors were approximately evenly divided between those who failed to provide any discussion of the role of labor unions (12) and those who admitted that they had not successfully developed any linkages during FY 78.

TABLE II- 36:

Did Prime Sponsor Succeed in Developing Linkages with Labor Unions during FY 78?

<u>Response</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>Percentage of Prime Sponsors</u>
Yes	35	61.5%
No	10	17.5%
No Mention	12	21.1%
TOTAL	57	100%

TABLE II- 37:

Types of Problems Experienced by Prime Sponsors in Dealing with Labor Unions (N = 12)

<u>Type of Problem</u>	<u>Number of Prime Sponsors Citing Problem</u>
Little or no response to request for their involvement on youth planning council or for providing services to youth	3
Limited number or absence of labor unions in prime sponsor planning area	4
Lack of agreement for obtaining access into union apprenticeship programs for YCCIP) terminees	2
Too expensive to work with	2
Unions were unwilling to serve females	1

A major portion of those prime sponsors who claimed to have forged some type of linkage with labor unions admitted that union involvement was rather minimal, primarily consisting of reviews of YETP and YCCIP plans and membership on the Youth Planning Council. In only one of the 57 prime sponsor planning jurisdictions was a labor union organization actually involved in operating a YEDPA project. In several other prime sponsor areas, union workers had been hired as training supervisors for youth enrolled in selected YETP and YCCIP programs. Very few of the Year End Reports provided any discussion of labor union involvement in job restructuring activities of the prime sponsor. This particular finding appears to have been primarily influenced not by union opposition or disinterest, but rather by the general absence of formal job restructuring activities among prime sponsors during FY 78.

During the review of the Year End Reports, an attempt was made to identify problems that prime sponsors encountered in developing linkages with labor unions during FY 78. Only 12 of the prime sponsors cited specific problems in involving local unions with YEDPA program activities. A listing of the types of problems encountered by prime sponsors is presented in Table II-37 above.

The problem most frequently cited by prime sponsors was that of a reluctance of labor unions to be actively involved in the planning or delivery of employment and training services to youth. Eight of the twelve prime sponsors cited this type of problem. Four other prime sponsors claimed that the absence of linkages with labor unions in their area was primarily attributable to the complete absence or limited presence of labor unions in their planning area. This was particularly true of Balance of State prime sponsors serving a largely rural constituency.

The remaining problems cited by prime sponsors were inability to develop formal agreements with labor unions regarding access of YCCIP program termines into union-sponsored apprenticeship programs, the high cost of obtaining union-related training services, and an unwillingness of one particular labor union to provide training services to women. A number of the prime sponsors cited the need for

technical assistance from the regional offices of ETA and the National Office of Youth Programs in developing closer linkages with labor organizations, particularly in the operations of YCCIP projects.

To improve our understanding of the role of labor unions in the planning, design, and administration of YEDPA programs, the FY 79 Year End Report should be designed to secure additional information from prime sponsors on progress that they have made in obtaining linkages with labor organizations during the past year. More details on the specific nature of union involvement should also be obtained, including their roles in operating programs, providing instructors for YETP and YCCIP programs, and coordinating their own apprenticeship and training programs with the YEDPA-related programs of the prime sponsor. The nature of continuing barriers to more active union involvement in local YEDPA programs should also be spelled out in the FY 79 Year End Reports. Such information could be used to determine the potential need for technical assistance from the regional offices of
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ETA or the National Office of Youth Programs.

Linkages with the Private Sector

The instructions for drafting the Year-End Report also suggested that prime sponsors discuss their efforts to involve the business community in their FY '78 YEDPA program activities. Linkages with the private sector were to be described, including information on the "dollar amount" of their involvement in local YEDPA operations and their impact on the design of programs and the attainment of "higher quality" jobs.¹²⁵ The instructions did not, however, provide specific guidance as to how "dollar amounts" of private sector involvement were to be measured, nor did they indicate whether the "higher quality" jobs referred to subsidized employment opportunities obtained by youths during their participation in the program or to the unsubsidized jobs into which they were placed at the time of termination. Information on the latter types of jobs would seem more appropriate, given the basic goal of YEDPA programs "of enhancing the job prospects and career opportunities of youths" over the long run.¹²⁶

During our review of the Year End Reports, we attempted to determine whether the prime sponsor had successfully developed linkages with the local business community during FY '78, to identify specific problems that it had experienced in developing such linkages, and to list its plans, if any, to improve those linkages during FY '79. A copy of the questionnaire and coding format used in conducting this review can be found in Appendix D of this report.

Table II-38 summarizes the findings of the review of prime sponsors' Year End Reports with respect to the development of linkages with the business community during the first year of YEDPA program operations. The data presented in that table reveal that approximately 70% of the prime sponsors provided some discussion of their

Table II- 38: Did Prime Sponsor Succeed in Developing
Linkages with the Business Community
During FY '78? (N=57)

<u>Response</u>	(A) <u>Number of</u> <u>Prime Sponsors</u>	(B) <u>Percentage of</u> <u>Prime Sponsors</u>
Yes	31	54.4%
No	8	14.0%
No Mention	18	31.6%
TOTAL	57	100.0%

success in developing linkages with the business community. Of the 39 prime sponsors in this group, 31 (or 80%) had succeeded in forging some linkage with the local business community.

Similar to the findings with respect to labor union involvement in local YEDPA programs, the major portion of private sector linkages consisted simply of membership on the prime sponsors' Youth Planning Council. As noted in the previous discussion of YETP service delivery agents, less than 30% of the prime sponsors had developed relationships with the business community involving either on-the-job training or participation in a Vocational Exploration Program (VEP).¹²⁷ Data on the dollar amount of such private sector involvement were only provided by a few sponsors. The data that were presented typically pertained to the total dollar allocation for OJT activities under YETP. Whether these expenditures represented the entire extent of business involvement in YEDPA program activities could not typically be determined on the basis of the information provided by prime sponsors in their Year-End Reports.¹²⁸

Only eleven prime sponsors cited specific problems that they had encountered in establishing effective relationships with the business community. A listing of the specific types of problems cited by these prime sponsors is presented in Table II-39 below. The most frequently mentioned problem (cited by 7 of the 11 prime sponsors) was related to a general lack of responsiveness on the part of the business community to requests for participation on the Youth Planning Council or for involvement in OJT activities. Two of the prime sponsors indicated that the major problem in developing such linkages was attributable to their inability to provide sufficient or qualified staff to develop meaningful relationships with the private sector. The other problems

Table II-39: Types of Problems Experienced by Prime Sponsors Developing Linkages with the Business Community (N=11)

<u>Problem</u>	<u>Number of Prime Sponsors Citing Problem</u>
Little or no response to request for involvement on the Youth Planning Council or for providing OJT slots	7
Businesses were discouraged by CETA "red tape"	2
Attempts by the prime sponsor to establish communication were inadequate	2
Private sector was reluctant to negotiate OJT contracts for 16-17 year old youths	1
Available OJT slots were inappropriate since they were mainly low-skilled and seasonal in nature	1

Note: Multiple problems may have been mentioned by a prime sponsor; thus, the number of responses will exceed somewhat the number of prime sponsors.

were related to business' reluctance to get involved in YEDPA activities due to the "red tape" (paperwork) associated with such involvement and to specific difficulties in developing OJT slots. These problems sometimes involved obtaining OJT slots for selected subgroups of participants (16-17 year olds) and in generating OJT slots that offered the participant a chance to acquire skills and a stable job upon termination from the program.

A relatively high proportion of the prime sponsors did indicate in their Year End Reports that they expected to work more closely with the business community during FY '79. In addition, a few prime sponsors outlined their strategies for securing more active participation of the business community in OJT activities under YETP. One prime sponsor revealed that it would adopt a strategy of linking its YEDPA work experience and OJT activities more closely during FY '79:

"It was generally felt that if OJT is to be successful, it should be preceded by a long-term work experience component. If properly implemented, the enrollment in work experience should provide the participant with the basic work habits necessary to successfully complete OJT."

The impact of private sector linkages upon increasing the "quality" of jobs obtained by YEDPA program participants was typically not discussed by prime sponsors. The city of Chicago prime sponsor was one of the few that did attempt to address this issue within its End of Year Report. This prime sponsor claimed that its Vocational Exploration Program (VEP) was successful not only in improving the work habits and attitudes of participants, but also in significantly increasing the likelihood of YETP participants being placed into unsubsidized employment upon their termination from the program. The EYR did not, however, provide any quantitative comparisons of placements resulting from its VEP program with those from its other youth programs, including Title I work experience.

Only a few prime sponsors provided any discussion of the number or proportion of YETP and YCCIP participants who were placed into unsubsidized jobs upon termination. The general absence of information on the short-term outcomes of YETP and YCCIP programs constituted a serious shortcoming of the Year End Reports. In fairness to the prime sponsors, the instructions for preparing the EYR's never explicitly referred to the need for presenting data on the termination status of YETP and YCCIP participants. In the absence of such information, the issue of private sector influence on the quantity or quality of jobs obtained by YEDPA terminees cannot be meaningfully addressed. The instructions for drafting the FY '79 Year End Report must address this issue in a more direct and forthright manner. Further discussions of this issue will be presented in a section of this report on the immediate and short-term outcomes of YETP and YCCIP programs.

Youth Program Supplementation

The sixth principle of the Youth Planning Charter was related to issues of overhead costs of YEDPA programs and the provision of supplementary services to YEDPA program operators by other local employment and training-related agencies. The sixth principle of the Youth Planning Charter stated that "Overhead must be minimized."¹²⁹ While recognizing the need for quality administrative and supervisory staff and the availability of materials and equipment to operate effective YEDPA programs, the Charter emphasized that prime sponsors should attempt to utilize administrative staff, supervisors, materials and equipment of existing employment and training programs, including CETA Title II and VI programs, in operating their local YETP and YCCIP programs. Given the purpose of YEDPA "to serve youth," the Youth Charter noted that "It is vital that every reasonable economy and coordination be achieved."¹³⁰

The YEDPA act itself referred several time to the desirability of prime sponsors selecting YETP and YCCIP projects that would utilize materials and supplies of existing programs without cost.¹³¹ The rules and regulations for YCCIP programs emphasized the fact that project applicants should attempt to secure their supplies and materials elsewhere and placed a maximum limit of 5% of project funds for administrative costs.¹³²

As noted earlier, the instructions for preparing the End of Year Reports, were quite confusing with respect to the issues of substitution and supplementation. The two issues though quite distinct from one another in both substance and the types of information needed to shed insights into them were combined into one overall issue in the instructions format. The instructions did, however, suggest to prime sponsors that they discuss the extent to which their YEDPA programs were provided with services from other agencies, including staff, materials, and equipment, and to note additional staffing required to carry out new agreements with other employment and training agencies under YEDPA, particularly the LEA agreements.¹³³

Approximately two-thirds of the prime sponsors whose EYR's were reviewed during the course of this study provided some information on the provision of services from other agencies. The quality of this information tended, however, to vary substantially. The remainder either provided no discussion of issues related to principle number six of the Youth Planning Charter or simply mentioned the fact that they made efforts to minimize overhead without providing any information on the nature or magnitude of services that they may have received from other agencies.¹³⁴ Of those prime sponsors providing a more substantive discussion of the program supplementation issue, between 80% and 90% mentioned that they had received some type of assistance without cost from other agencies in operating their local YEDPA programs. Several of those prime sponsors revealing that they had not received such services during FY 78 indicated that their FY 79 YCCIP and YETP programs would be receiving some types of supplementation from other local employment and training agencies. For example, one prime sponsor remarked that:

"In 1978 all material, supplies, and staff costs were budgeted under YCCIP...Planning and operations cooperation with city departments, county departments and on-going non-profit agency rehabilitation projects will be sought during FY 79 to increase the likelihood that administrative, supervisory, and equipment resources can be secured in exchange for provision of YCCIP youth workers."

A wide variety of services from other agencies were utilized by prime sponsors in operating their FY 78 YETP and YCCIP programs. The four most frequently mentioned types of contributions were materials and supplies (including weatherization materials from the Community Services Administration and various State Energy Departments), office space and equipment (including those provided by LEA's), participants in Title II and VI Public Service Employment programs to act as supervisors for youth participating in YETP and YCCIP projects, and administrative staff, including counselors, teachers, and clerical employees from LEA's. Other types of

services cited by prime sponsors included the use of unsubsidized public sector employees as supervisors for YETP and YCCIP projects, private sector employees as supervisors for VEP program participants, and legal and other consulting services from state and local government agencies. Several prime sponsors indicated that the selection of CBO's as delivery agents for their YETP and YCCIP programs assisted them in minimizing overhead costs. As one prime sponsor remarked, "CBO's are utilized to minimize overhead in that many are already serving the disadvantaged so it is only a matter of adding services for disadvantaged youth." A few prime sponsors also indicated that they would alter their administrative structure for youth programs during FY 79 to help reduce overhead costs. One prime sponsor remarked that:

"The success of this (minimization of overhead) was not complete in that a dual administrative structure existed for the majority of the CETA youth programs in the Prime Sponsor's area. This was caused by extremely large Title I programs already in existence...

...The prime sponsor intends to keep attempting to minimize its overhead by linking its subgrants to funds provided from other sources, and at the same time go to a single administrative structure within each subgrantee for all youth programs."

Several prime sponsors claimed that the in-kind services provided by other agencies were crucial to the operations of their YEDPA programs. For example, one prime sponsor stated that "The program could not have survived without the in-kind contributions." For the most part, however, only a few prime sponsors provided any estimate of the monetary value of the in-kind contributions received from other agencies. The New York Balance of State Prime Sponsor asked its subgrantees to provide estimates of the cost savings from such services. Only 5 of the 32 counties surveyed provided estimates of the value of such contributions,

and they ranged in size from \$2500 to \$20,000. To obtain more detailed insights into the nature and role of such in-kind contributions, the instructions for the FY 79 Year End Report should be redesigned to require prime sponsors to report more specific information on the types of services received, the types of agencies providing such service, and estimates (however rough) of their monetary value. Trends in the quantity and nature of such supplementary services should also be described.

Approximately two-thirds of the prime sponsors included in this study failed to provide any discussion of the issue regarding additional staff requirements to carry out new agreements with other agencies, including LEA's. The bulk of the remaining prime sponsors (80%) did indicate that some new staffing was required as a result of such agreements. Among the staff hired for such purposes were coordinators for programs offering specialized educational services to in-school youth under YETP, counselors in LEA's, assistant directors to link with local schools under the LEA agreement, and project specialists to work with unsubsidized vocational education teachers in administering in-school YETP programs. A number of other prime sponsors indicated that they utilized Title II and Title VI PSE employees to assist in the administration of their LEA agreements. The costs of these additional staff in either an absolute dollar amount or as a share of the total YETP and YCCIP budget were never described by prime sponsors in their End of Year Reports.

The Youth Planning Charter noted that the basic goals of youth programs are to some extent in competition with one another. This seems to be particularly true of the basic YEDPA goals of providing immediate employment opportunities for youth and enhancing their long-run employability through the provision of intensive and extensive educational and training services. The Charter emphasized the fact that,

"It is necessary to strike a balance between immediate employment and longer-term employability development."¹³⁵

Given the importance of obtaining knowledge of the nature of the tradeoffs between the above two youth program goals, it would have been desirable for prime sponsors to have provided a discussion of this issue in their Year End Reports.¹³⁶ The instructions for the FY 79 Year End Reports should request prime sponsors to discuss their views on the extent to which existing rules and regulations on administrative costs (and maximum durations of program participation) for YETP and YCCIP programs may have hindered their ability to enhance the longer-term employability of disadvantaged youth.¹³⁷ Prime sponsors' recommendations for changes in these rules and regulations should also be solicited to help guide the future design of legislation for the nation's youth employment and training system.

Youth Program Coordination

The ninth principle of the Youth Planning Charter stated that "The development of a separate employment and training delivery system for youth is not encouraged."¹³⁸ The Charter suggested that prime sponsors should make efforts to coordinate their YEDPA-related programs with other local CETA activities for youth, particularly those under Title I, and should attempt to tie their YEDPA-related activities into those offered by other local youth service delivery agents.¹³⁹ As noted earlier, YEDPA funds were to be viewed by prime sponsors as "glue money" to tie together existing pieces of the local employment and training system and to fill in existing gaps in services.¹⁴⁰

The YEDPA Act contained a number of provisions calling for the coordination of YEDPA activities with both other CETA programs for youth and the programs of other local employment and training agencies serving youth. Section 346 (a)(2) of the Act stated that the grant applicant should "include assurances that the application will be coordinated to the maximum extent feasible with the plans submitted under Title I." In accord with Section 346 (a)(3), prime sponsors were also to provide assurances that their YETP programs would be conducted in close cooperation with LEA's, post-secondary educational institutions, community-based organizations, private businesses, unions, job training programs, other youth programs, and the apprenticeship system. In addition, Section 346 (c)(5) of the Act noted that in-school youth enrolled in a work experience activity were to be informed of the existence of other CETA-related employment and training services and the availability of other non-CETA resources in the community that could potentially be of assistance to them in securing unsubsidized jobs.

The rules and regulations noted that YETP and YCCIP programs were designed in part to "help coordinate and improve existing career development, employment and training programs."¹⁴¹ The coordination of YEDPA resources with other locally available services for youth was believed to be necessary to achieve the goal of

delivering high quality services to youth under the act, given the limited additional resources made available for serving youth under the Act.

The instructions for drafting the End of Year Reports were quite brief on the issue of youth program coordination. The instructions suggested that prime sponsors include a discussion of the nature and extent of coordination between their YEDPA programs and their CETA Title I programs. Relationships between YEDPA and "other programs" serving youth, including federal, state, and local programs, were also to be discussed in the EYR's.¹⁴² The instructions were, however, not specific as to whether these "other programs" were to include only employment and training programs, or education programs, economic development programs, juvenile justice programs, social welfare programs, etc.

Approximately 80% of the prime sponsors whose Year End Reports were reviewed during the course of this study provided some discussion of the nature and/or degree of coordination that existed between their YETP and YCCIP programs and their Title I employment and training programs. These discussions were, however, frequently quite limited in scope, with the typical Year End Report providing less than one-half page of material on this topic. The most frequently cited types of coordination (in order of their relative frequency) were referrals of YEDPA program terminees to Title I activities, referrals of Title I program participants to YEDPA programs, the existence of joint intake and eligibility determination functions for both programs, and the referral of YEDPA program terminees to the Summer Program for Economically Disadvantaged Youth (SPEDY). Very few (less than 10%) of the End of Year Reports provided any substantive quantitative or qualitative details on the magnitude or nature of such linkages or their effects on the delivery of quality services to youth. Data on the number of inter-title transfers between YEDPA and other CETA Titles as well as information on the

nature of such transfers would have been helpful in gauging the extent of coordination between local YETP and YCCIP programs and other CETA-related employment and training programs, particularly Title I. The data on inter-title transfers from the fourth quarter FY 78 Youth Program Status Summary could have been used to shed greater insights into the coordination issue.

Several prime sponsors did admit that they experienced problems in coordinating their YEDPA programs with their CETA Title I programs due to the lack of sufficient planning time and the need for rapid program start-up. A few other prime sponsors also indicated that their planned levels of youth enrollments in Title I programs fell short of expectations due to competition from YEDPA and other youth programs. For example, one prime sponsor noted that:

"Recruitment of youth was not as effective as planned due to increased activity in other programs (Job Corps, YACC) for out of school youth."

Approximately one-third of the prime sponsors did indicate that they intended to increase their program coordination efforts in FY 79, including more transfers between YEDPA and Title I programs, increased referrals of YEDPA terminees to SPEDY and Job Corps Programs, and joint sharing of staff administering YEDPA and Title I programs. One prime sponsor, while noting its limited success in achieving such coordination during FY 78, stated that it was "retaining its goal of integrating youth programs with the YETP and YCCIP structure, thereby making YETP and YCCIP a coordinating activity for all of its youth programs."

Only 60% of the prime sponsors discussed the existence of linkages between their YEDPA programs and other youth serving agencies in their local area. The types of agencies with whom such linkages existed (in order of their relative frequency) included State Employment Security Agencies (SESA's), community-based organizations, and local educational agencies.¹⁴³ The types of linkages included referrals of youth by such agencies to YEDPA programs, eligibility determination services, and the provision of job placement information and assistance

for YEDPA program terminees. Several of the prime sponsors claimed that substantial progress had been achieved in coordinating YEDPA program operations with those of other local youth serving agencies. As one prime sponsor noted,

"Success was realized in having virtually all area youth-serving agencies participating in some way in the operation of local programs."

A number of the prime sponsors also stated that they would attempt to increase linkages with other youth-serving agencies in their area during FY 79. Among the planned types of coordination mentioned were the increased use of the referral and job placement services of State Employment Security Agencies, closer linkages with local community colleges and community-based organizations, and increased referrals of YEDPA terminees to Job Corps Programs.

In order to improve knowledge of the magnitude and nature of linkages between YEDPA programs and both other CETA employment and training programs (particularly Title II B) and programs offered by other local youth service agencies, the End of Year Reports for FY 79 should provide a more substantive and detailed discussion of coordination issues. The reporting instructions should request prime sponsors to provide information on the types of linkages that existed between their YETP and YCCIP programs and their other CETA programs, such as common intake, eligibility determination, and assessment services; sharing of program staff, including counselors, teachers, and job development staff; numbers of terminees from Title II B programs entering YETP or YCCIP programs and enrollments of terminees from YETP & YCCIP programs into programs under other CETA Titles.

As noted earlier, data from the September 30, 1979 Youth Program Status Summary for YETP and YCCIP programs should be used by the prime sponsor to indicate the extent of linkages between YEDPA programs and other CETA titles in the form of transfers into and out of YETP and YCCIP programs from other CETA titles.

The "Enrollment and Termination Summary" section of the Youth Program Status Summary does provide data on both the number of enrollees who transferred into YETP and YCCIP programs from "other Titles" and the number of terminees from YETP and YCCIP programs who transferred to "other Titles". Information is not, however, provided on either the specific CETA Title from which such enrollees entered YETP and YCCIP programs or the specific CETA Title into which they transferred upon terminating from YETP and YCCIP programs.¹⁴⁴

Such quantitative information would provide more useful insights to both regional and national policymakers on the degree of coordination between YEDPA and other CETA employment and training programs. Comparisons between the planned and actual numbers of such transfers should also be provided by the prime sponsors in their End of Year Reports for FY 79.¹⁴⁵ Substantial variations between the planned and actual numbers of transfers ($\pm 15\%$) should be accompanied by an explanation of the factors responsible for such gaps between planned and actual performance.

The reporting instructions for the FY 79 Year End Reports should also request the prime sponsors to provide a more detailed description of the specific types of linkages that they had developed with other local employment and training and youth service agencies. These agencies should also be specifically identified, such as local SESA offices, welfare departments, juvenile courts, CBO's, etc. While prime sponsors are not required to report data on transfers into or out of YETP and YCCIP programs from such non-CETA programs or agencies, they should provide some information on the relative importance of the involvement of these other local agencies in the overall operations of their local YETP and YCCIP programs.

Implementation Issues

The last set of topics that prime sponsors were asked to address in their Year End Reports for FY 78 YETP and YCCIP programs fell under the general heading of "Implementation Issues." The following four different issues were included under this heading: areas of youth program operations that were hindered by the need for rapid implementation during FY 78 and that would likely be improved during FY 79; the continuation and bolstering of "institutional change" efforts during FY 79; the need for technical assistance and guidance from the regional ETA offices and the national Office of Youth Programs to strengthen program performance; and the ability of the prime sponsor to expand its youth program operations in the future.¹⁴⁶

The issue of "institutional change" was itself previously addressed in the Youth Planning Charter under principle number seven. That principle stated that "The new youth programs are not the cutting edge for institutional change."¹⁴⁷ The Charter noted that the YEDPA legislation was not intended to "force or buy reforms" in institutions currently providing services to youth, but simultaneously indicated a hope that the availability of YEDPA monies at the local level would increase the possibility of achieving desirable institutional changes, particularly with local school systems. The instructions did not, however, provide any specific indication of the types of "institutional changes" that prime sponsors were expected to discuss in their FY 78 Year End Reports. Institutional change may have been sought by the prime sponsors not only with local educational agencies, but also with private sector firms, labor unions, post-secondary educational institutions, the State Employment Security Agencies, and the juvenile court system. By providing more specific examples of "institutional change" in the EYR instructions, the Office of Youth Programs may have succeeded in obtaining more detailed and insightful discussions of such issues. Such specific examples should be incorporated in the instructions for the preparation of the FY 79 Year End Reports.

The issue of "capacity to further expand youth programs" is a potentially critical one, given the current national debates over youth program reauthorization and the future funding levels for such programs. It would, however, have been desirable if the instructions had spelled out in somewhat more detail the types of information being sought on prime sponsors' capacities for expanding their youth programs. For example, information should have been sought not only on the perceived ability of prime sponsors to serve additional numbers of youth, but also on the conditions under which such an expansion would be facilitated, including changes in program eligibility criteria, consolidation of youth programs at the local level, changes in allowable activities under existing youth programs, and relationships between CETA prime sponsors and local educational agencies. Prime sponsor views on the above issues would likely have provided valuable inputs into the current national debate regarding the future magnitude, direction, and nature of youth employment and training programs.

Approximately 90% of the prime sponsors did admit that they had encountered one or more types of problems in implementing their FY 78 YETP and YCCIP programs. A wide variety of implementation problems were cited by prime sponsors in their Year End Reports. The types of problems cited most frequently by prime sponsors were difficulties in developing effective programs with Local Educational Agencies for in-school youth at a time halfway through the academic year, recruiting eligible youth for participation in YETP and YCCIP programs, properly assessing youth, hiring qualified staff to administer the programs, and developing appropriate worksites for youth, particularly for career employment experience programs under YETP. Among the other types of implementation problems mentioned by prime sponsors were delays in obtaining approval of contracts, the need to provide training to contractor staff with respect to the rules and regulations governing YETP and

YCCIP programs, the necessity of developing an effective reporting capability for contractors, particularly local educational agencies, arranging transportation for program participants, bad weather delaying the onset of hindering the continuity of YCCIP projects, and difficulties in developing OJT slots for YETP participants. A more detailed discussion of these latter two problems was previously presented in prior sections of this report, see pp. 49-58.

Most of the prime sponsors claimed in their Year End Report that they either had successfully resolved or had begun to resolve the above implementation problems. As a result, they were not expected to adversely affect program performance during FY 79.

Typical of the remarks made by prime sponsors on this issue were the following:

"Actual operation did not begin until February, 1978. Many bugs had to be worked out, but by September 1978 most systems seemed to be functioning smoothly."

"Although these problems hampered initial success in both YETP and YCCIP, most of them have been or are being resolved. Foundations laid in solving these problems should provide a beginning for new program relationships and more effective services for youth."

"The first of these problems (new staff for administering YEDPA programs) is being solved by staff gaining more experience, and the second (lack of planning time) can be solved by a serious commitment by the Department of Labor."

"The prime sponsor had difficulties in meeting the goals described in the Annual Plan due to a late start-up and internal problems created by administrative reorganization. The Prime Sponsor has gained experience in operating these programs and will do more realistic planning as well as implement more stringent administrative controls in Fiscal Year 1979."

It should be noted, however, that not all of the implementation problems cited by prime sponsors were successfully resolved during FY 78, particularly those related to the creation of quality worksites for career employment experience program participants or the development of OJT slots in the private sector for YETP participants. As a result of continuing difficulties, some of the prime sponsors intended to alter their program services mix during FY 79, including the reduction or elimination of particular activities, such as OJT. In addition, several prime sponsors made radical changes in their service delivery agents during FY 79 in order to enhance the effectiveness of their employment and training delivery system.

Less than one-half of the prime sponsors provided any discussion of "institutional change" activities that they intended to continue or strengthen during FY 79. The remainder of the prime sponsors failed to address this issue in their Year End Report. Almost all of these discussions, however, tended to be quite brief, with most prime sponsors simply mentioning an activity (developing working relationships with an LEA) without adequately describing the objectives of these "institutional change" efforts or the outcomes of such efforts during FY 78. Among the types of "institutional change" efforts cited in this section of the Year End Report were the development of close working relationships with local educational agencies for the first time since the inception of CETA, changes in the enrollment policies of selected local high schools and post-secondary educational and training institutions, the more active involvement of CBO's in the delivery of employment and training services to in-school and out-of-school youth, the establishment of satellite SESA job placement offices in local high schools, the provision of academic credit for work experience, and labor union cooperation in obtaining access into apprenticeable trades for selected trainees from YCCIP projects.

Given the lack of any detailed discussion of the nature, scope, or success of these various institutional change efforts, the information presented by prime sponsors in their Year End Reports was quite limited in its usefulness for understanding prime sponsors' performance in this area during FY 78. These types of activities may, however, be among the more valuable long-lasting contributions of YEDPA programs. Such institutional change processes may well yield a long-term influence on the delivery of employment and training services to economically disadvantaged youth. For example, in a recent study of YEDPA program operations in Texas and New Mexico, Vernon Briggs concluded that:

"Clearly the most important accomplishment of YEDPA to date has been its efforts to alter local institutional arrangements. YEDPA has brought the school systems into the CETA system in more than simply a service capacity. The schools have had the opportunity to use their YEDPA funds to enrich some things they were already doing; to undertake innovative programs that they could not do in its absence; and to involve themselves in CETA in a year round manner that was largely limited before to a summer time commitment."¹⁴⁸

Given the potential significance of such "institutional change" efforts, we would recommend that the Office of Youth Programs include a separate section on "institutional change" activities in the FY 79 Year End Reports on YEDPA programs. Prime sponsors should be asked to provide specific information on the scope and nature of their "institutional change" activities, the objectives of these institutional change efforts, outcomes of these efforts during FY 79, and their plans for continuing or strengthening such efforts during FY 80. The existence of any relationships between the knowledge development activities of the prime sponsor and these "institutional change" efforts should also be described. Formal reports on the findings of such knowledge development activities should be forwarded together with the Year End Report to the regional office of ETA and to the national Office of Youth Programs.

Fewer than one-fourth of the prime sponsors provided any discussion of their need for technical assistance from either regional ETA offices or the national Office of Youth Programs. This finding should not necessarily be interpreted as indicating no need for technical assistance by the vast majority of the 57 prime sponsors whose Year End Reports were reviewed during the course of this study.¹⁴⁹ The technical assistance issue was simply not addressed by the remaining three-fourths of the prime sponsors.

Practically all of the prime sponsors providing some discussion of the technical assistance issue did indicate a need for some form of technical assistance. These technical assistance needs were, however, quite varied in nature, including assistance in the areas of youth program planning techniques, methods for developing agreements with local educational agencies regarding the awarding of academic credit for work experience, methods for developing appropriate OJT slots for youth in the private for-profit sector, model youth programs for rural prime sponsors, procedures for obtaining active union involvement in the planning and design of youth programs, techniques for monitoring and evaluating youth program performance, and techniques for designing and implementing local knowledge development activities. Several of these prime sponsors also expressed a desire for a forum to share their experiences in planning and operating youth programs with other prime sponsors in their region and other regions of the nation.

The instructions for drafting the FY 79 Year End Reports on YETP and YCCIP programs should be structured in a manner that would elicit additional information from prime sponsors on their technical assistance needs. Prime sponsors should be asked to identify those areas in which some form of technical assistance is needed, to provide brief descriptions of the type of technical assistance needed, and to note whether any previous assistance had been provided to them in these

areas, including the source of such assistance (regional office, national office, other prime sponsors, etc.) It may well be that prime sponsors are reluctant to openly express a need for technical assistance in their End of Year Reports, fearing that such a request may be interpreted as a sign of weak or ineffective management. Further requests for such information on current technical assistance needs should be accompanied by a statement indicating that the findings will be used by the regional and national offices solely to determine priorities for funding future prime sponsor technical assistance activities. This section of the Year End Report should be reviewed by the regional ETA offices' Management Assistance Units to provide them with guidance in their efforts to bolster prime sponsor management capability.

Less than 40% of the 57 prime sponsors whose Year End Reports were reviewed during the course of this study provided some discussion of their "capacity" to expand their youth program activities. Of those prime sponsors that did provide some discussion of this issue, approximately 90% indicated a capability of expanding their current youth program operations. These discussions were typically quite brief, often consisting of a statement of the prime sponsor's general ability and willingness to expand the scope of its youth program operations. The prime sponsors generally failed to provide specific information on the desired magnitude or nature of such an expansion. Typical of the comments made by prime sponsors on the issue of expansion capability were the following:

"We could support a substantial increase in participant activity with the provision of increased funds, particularly for YCCIP."

"The prime sponsor has the capability of greatly increasing the size of the programs. Funds for YEDPA programs should be greatly increased."

"As for the future, the capacity for further expansion is limited only by the funds available."

Those prime sponsors indicating the need for and desirability of expanding youth program activities frequently suggested that such an expansion should be accompanied by changes in the planning and operations of youth programs. Several prime sponsors pointed out the need for more lead time in planning any expansion of YEDPA programs. Other prime sponsors were concerned about the constraints placed upon expansion by existing eligibility criteria, (e.g., the more limited age range under YCCIP), the potential difficulties of developing additional appropriate work experience and training slots for youth, and the need for additional time to evaluate the programs they now had in place before future expansion occurred. Only a few prime sponsors outlined the directions in which they would expand existing employment and training services for youth. Those providing such information cited the need for greater resources to be devoted to YCCIP programs, improved counseling services to in-school youth, more job development staff located within the schools, and job search training for youth. One prime sponsor expressed the following view with respect to desired expansion:

"The prime sponsor staff also feels that additional funding for YCCIP should be made available. In terms of providing out-of-school youth with exposure to the 'world of work' and development of job skills which will lead to unsubsidized employment, YCCIP was much more valuable."

To improve existing knowledge of prime sponsors' views regarding the desirability of future expansion of youth programs, the reporting instructions for the FY 79 Year End Reports should request more specific information on these issues. Prime sponsors should be asked to not only discuss their views on the desirability of an expansion of existing YEDPA-related programs in their area, but also to assess their capability for expanding current activities under existing program rules and regulations, to describe the types of rules and regulation changes that would facilitate an expansion of services to economically disadvantaged youth in

their area, and to outline the directions in which they would move (both in terms of target groups and mix of services) if additional YEDPA monies were made available to them. Such information would likely prove to be highly useful to public policymakers and youth program officials engaged in the current youth program reauthorization process.

Short-Term Outcomes of YETP and YCCIP Programs

Programs funded by prime sponsors under the Youth Employment and Demonstration Projects Act of 1977 were expected to provide immediate employment opportunities for youth and to enhance their long-term employability through the provision of a wide range of employment and training services to participants.¹⁵⁰ One may, however, not expect the employability effects of these services to be felt by participants immediately upon termination from a local YETP or YCCIP program. The primary immediate objectives of a prime sponsor's youth employment and training programs may be more closely related to the return to school or the continuation in school by program terminees.¹⁵¹ Information on the numbers and types of terminations from YETP and YCCIP programs, particularly those entering unsubsidized employment during FY '78, would, however, have been a useful addition to the Year End Reports of prime sponsors.

Nowhere in the instructions for drafting the Year End Reports on FY '78 YETP and YCCIP programs was any reference made to the numbers and types of terminations from those programs. This omission may have been deliberate, given the emphasis of the Year End Reports on the "qualitative" aspects of performance and the availability of enrollment and termination data for such programs on the fourth quarter FY '78 Youth Program Summary and Quarterly Summary of Youth Characteristics. Nevertheless, we feel that the absence of a section of the EYR being devoted to the short-term outcomes of FY '78 programs constituted a serious shortcoming of the Year End Reports. The absence of discussions of short-term outcomes deprived the regional offices of ETA and the National Office of Youth Programs of an additional source of key information on prime sponsor YETP and YCCIP program performance during FY '78.

As a result of the absence of any specific requests for information on the numbers and types of terminations from YETP and YCCIP programs, the bulk of the prime sponsors failed to provide any qualitative or quantitative information on the numbers and types of terminations. Only one-third of the prime sponsors presented any data on the numbers of YETP program terminees entering unsubsidized employment during FY '78. (See Table II-40) A few of the other prime sponsors made passing remarks on their placement performance, but failed to provide any data to support their contentions. For example, one prime sponsor simply stated:

"We did manage to serve a considerable number of youths with an excellent placement result."

Only 13 of the 57 prime sponsors provided data on both the total number of YETP terminations and the number of such terminees entering unsubsidized employment. The proportion of terminees entering unsubsidized employment in these thirteen prime sponsor planning areas varied quite considerably (Table II-41), ranging from a low of 9.0% to a high of 62.0% with a median of approximately 26.0%.

Only nine prime sponsors provided information about the nature of problems which they experienced in placing YETP participants into unsubsidized employment. Most of those prime sponsors providing such information experienced problems related to either job placement staff or the youths themselves. Eight of the problems cited by prime sponsors in placing YETP terminees were related to the nature of their programs or to problems with job development staff. One half of this group attributed poor job development efforts by YETP staff as a major obstacle to the placement of youths upon completion of the program. Two prime sponsors mentioned that poor placement was due to the absence of close ties between YETP training and work experience and available local job

Table II-40:

Number of Prime Sponsors Providing
Data on the Number of Unsubsidized
Placements from FY 78 YETP Programs (N=57)

<u>Placement Data Status</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>Percent Of Total</u>
Did provide placement data	19	33.3%
Did not provide placement data	38	66.7%
Total	57	100.0%

Table II-41:

Distribution of Prime Sponsors by
Entering Employment Rate for FY 78
YETP Programs (N=13)

<u>Entering Employment Rate</u>	(A) <u>Number Of Prime Sponsors</u>	(B) <u>Percent Of Total</u>
0 - 10%	1	7.7%
11 - 20%	4	30.8%
21 - 30%	5	38.4%
31 - 50%	2	15.4%
51% +	1	7.7%
Total	13	100.0%

Range = 9% to 62%

Median = 26%

Table II-42:

Problems Encountered by Prime Sponsors in Placing YETP Participants into Unsubsidized Jobs (N=9)

<u>Type of Problem</u>	(A) <u>Number of Prime Sponsors*</u>	(B) <u>% of Prime Sponsors</u>
Late Start-up of Program	1	11.1%
Training not Relevant to Existing Employment Opportunities	2	22.2%
Poor Job Development by YETP Staff	4	44.4%
Lack of Coordination with Local SESA Offices	2	22.2%
Limited Previous Work Experience of Youth	4	44.4%
Migration of YETP Youth out of Local Area	1	11.1%
Limited Youth Interest in Occupational Areas in which Jobs were Available/Poor Screening of Applicants for Skills Training Participation	3	33.3%

*Note: Multiple responses were allowed; thus, the column totals will exceed the number of prime sponsors citing problems in placing YETP participants into unsubsidized employment.

opportunities. In addition, eight other problems cited by prime sponsors involved the youths themselves. Four of these prime sponsors indicated that the limited pre-YETP work experience of participating youths adversely influenced the ability of prime sponsor staff successfully to place youth into non-subsidized employment (See Table II-42).

Prime sponsors' discussions of YCCIP program placement performance were similar to those observed for YETP. Again only one-third of the Year-End Reports provided data on the number of YCCIP program terminees entering unsubsidized employment during FY '78 (See Table II-43). In only 12 of the 57 Year-End Reports prepared by prime sponsors was information provided about both the total number of terminations and the number of terminees entering unsubsidized employment from the local YCCIP program. Entering employment rates for these 12 prime sponsors ranged from a low of 0% to a high of 58% with a mean of about 23% (See Table II-44).

As with YETP, nine prime sponsors provided information about problems encountered in placing YCCIP participants into unsubsidized jobs. The reasons provided by prime sponsors for placement difficulties under YCCIP, however, were more varied than those supplied for YETP. Four prime sponsors focused their discussion on the YCCIP worksite, with two indicating that YCCIP worksite tasks were not closely related to existing job opportunities and an additional two prime sponsors indicating that poor worksite supervision hindered participants' ability to enter unsubsidized employment (See Table II-45).

Remaining problems in placement for YCCIP included a high early non-positive termination rate, limited placement experience of service delivery, coordination problems with local SESA offices, and the limited pre-YCCIP work experience of participating youth (See Table II-45).

Year-End Reports prepared by prime sponsor staff in the future

Table II-43:

Number of Prime Sponsors Providing
Data on the Number of Unsubsidized
Placements from FY 78 YCCIP Programs (N=57)

<u>Placement Data Status</u>	(A) <u>Number Of Prime Sponsors</u>	(B) <u>Percent Of Total</u>
Did provide placement data	19	33.3%
Did not provide placement data	38	66.7%
Total	57	100.0%

Table II-44:

Distribution of Prime Sponsors by
Entering Employment Rate for FY 78
YCCIP Programs (N=12)

<u>Entering Employment Rate</u>	(A) <u>Number Of Prime Sponsors</u>	(B) <u>Percent Of Total</u>
0 - 10%	4	33.3%
11 - 20%	1	8.3%
21 - 30%	5	41.7%
31 - 50%	1	8.3%
51% +	1	8.3%
Total	12	100.0%

Range = 0% to 58%

Median = 23%

Table II-45: Problems Encountered by Prime Sponsors
in Placing YCCIP Participants into
Unsubsidized Jobs (N=7)

<u>Type of Problem</u>	(A) <u>Number of Prime Sponsors*</u>	(B) <u>% of Prime Sponsors</u>
YCCIP Work Sites not Closely Related to Existing Job Oppor- tunities	2	28.6%
Lack of Adequate Work Site Supervision	2	28.6%
High Early Non-Positive Terminations	1	14.3%
Limited Job Placement Experience of Service Deliverers	1	14.3%
Lack of Coordination Between Program Opera- tors and Local SESA Offices	1	14.3%
Difficulties in Placing YCCIP Terminees into Local Union Apprentice- ship	1	14.3%
Limited Previous Work Experience of Youth	1	14.3%

*Note: Multiple responses were allowed, thus, the totals appearing under the columns will exceed the number of prime sponsors citing problems in placing YCCIP terminees into unsubsidized jobs.

should include a discussion of the nature of job development and placement activities as well as problems encountered in placing youth into unsubsidized jobs. In addition, a discussion of the previous year's (FY '79) placement problems should be included together with a focus upon remedies employed in the current year's program (FY '80) to overcome the specific placement problem(s) outlined in the report. Data on the planned number of terminations and the planned number of unsubsidized placements were seldom presented by prime sponsors in their EYR's; thus comparisons of planned versus actual numbers of placements could not be made. It should be noted, however, that several prime sponsors mentioned that the placement data available to them at the time of the drafting of their EYR's (prior to the availability of fourth quarter FY '78 data) were not "meaningful" since many of the youths participating in employment-oriented training programs were still enrolled in those programs. The nature of the timing of these EYR's may, therefore, have adversely affected the extent of the reporting of termination and job placement data by prime sponsors.

We strongly recommend to the National Office of Youth Programs that the guidelines for the drafting of the FY '79 Year-End Reports on YETP and YCCIP programs include a request for specific information on the numbers and types of terminations from YETP and YCCIP programs. The data provided by prime sponsors should include both the planned and actual numbers of terminees and the planned and actual total numbers of positive terminations, with further breakouts of those entering unsubsidized employment. The data so provided should be based upon the fourth quarter FY '79 Youth Program Status Summary and the Quarterly Summar¹⁵² of Youth Characteristics. The existence of any substantial gaps ($\pm 10\%$) between planned and actual numbers of total positive terminations and unsubsidized placements should be ex-

plained by the prime sponsor, including a discussion of the actions that will be undertaken during FY '80 to improve the overall entering employment rate.

Inclusion of information on the planned vs. actual entering employment rate, as well as explanation of substantial differences in such rates, would aid not only national and regional office analysts, but would likely prove useful to individuals planning youth programs at the local level. The CETA planning process at the local level takes place well before information from the current year's youth programs becomes available. Consequently, if data on planned vs. actual entering employment rates by program were included within the previous year's EYR, together with a description of problems encountered in meeting those planned rates, local CETA planners would be able to base their future youth programs on previous operating experiences. Such information would prove particularly valuable in developing realistic entering employment rate goals as well as examining the strengths and weaknesses of job development and placement efforts at the local level.

The prime sponsor should also be required to provide a brief overview of the nature and scope of the job placement services that were available to YETP and YCCIP terminees, including formal linkages with local offices of the State Employment Security Agencies. A discussion of the types of placements (direct, indirect, and obtained employment) together with information on the characteristics of jobs obtained by terminees, such as occupations of employment, hourly wages, and hours of work, would also be desirable. Finally, the prime sponsor should indicate whether or not it conducts formal follow-up of its terminees and, if so, should provide a brief overview of the nature of the follow-up survey, e.g., types of information collected, frequency,

and timing of the survey.¹⁵³

The potential usefulness of the qualitative and quantitative information on the job placement performance of YETP and YCCIP programs should not be underestimated. As noted earlier, these programs were intended not only to provide immediate subsidized employment opportunities for participants, but also to enhance their longer-term employment prospects. The YEDPA legislation itself stated, "... its (YEDPA's) purpose is to provide youth, particularly economically disadvantaged youth, with opportunities to learn and earn that will lead to meaningful employment opportunities after they have completed the program."¹⁵⁴ Knowledge of the ability of such programs to successfully transition trainees into unsubsidized employment would serve as one indicator of at least their short-term effectiveness in enhancing the employability of participants. In addition, a number of the prime sponsors claimed in their EYR's that placement into unsubsidized employment was a primary objective of their programs. As one prime sponsor noted,

"The new youth programs under YEDPA have a different emphasis: that of preparing the youth for unsubsidized employment."

FY 78 YEDPA Program Evaluation Activities
of Prime Sponsors

In a previous subsection of this report (see pp. 74-93), the FY 78 knowledge development activities of prime sponsors were briefly described, including problems that they encountered in developing a substantive knowledge development strategy. This section of the report is designed to describe the nature and extent of the FY 78 program evaluation activities of prime sponsors and to assess the factors limiting their ability to undertake more comprehensive evaluations of their local YEDPA programs.

The Year End Reports of the 57 prime sponsors were reviewed to determine whether "any mention" of an evaluation activity had been made.¹⁵⁵ The findings of this review are summarized in Table II-46 below. The findings reveal that only 20 of the 57 prime sponsors, or 35.1%, indicated that they had undertaken some type of evaluation of their FY 78 YEDPA programs. The remainder either admitted that they had not undertaken any evaluation activity or entirely failed to discuss this issue in their Year End Reports.

Table II -46: Did Prime Sponsor Conduct Any
Evaluations of its FY 78 YEDPA
Programs? (N = 57)

<u>Response</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>Percent Of Prime Sponsors</u>
Yes	20	35.1%
No/No Mention	37	64.9%
Total	57	100.0%

The specific types of program evaluation activities undertaken by prime sponsors are listed in Table II-47. The most frequently mentioned type of

evaluation activity (cited by 9 of the 20 prime sponsors) was that of measuring and analyzing immediate outcomes of YEDPA programs, including the numbers of positive terminations and the number entering unsubsidized employment. Planned versus actual comparisons of immediate outcomes were also conducted, including some analysis of the relative effectiveness of alternative YEDPA programs in producing positive terminations; e.g., YCCIP vs. YETP program performance in obtaining unsubsidized jobs for trainees. Three other prime sponsors indicated that their evaluation efforts entailed a comparison of the immediate outcomes of YEDPA programs with those of Title I youth programs to determine whether the new program approaches adopted under YEDPA were more effective in producing positive terminations and unsubsidized employment opportunities for participants.

A number of prime sponsors concentrated their FY 78 evaluation efforts on selected pre-post test score comparisons. Three prime sponsors indicated that their evaluation efforts included pre-post testing of selected YEDPA participants to determine changes in educational abilities, particularly reading comprehension and general math ability.¹⁵⁶ Three prime sponsors conducted pre-post tests of participants' personality traits and attitudes, including self-confidence, locus of control, and attitudes toward work. Three additional prime sponsors conducted pre-post tests of participants' knowledge of the world of work, including knowledge of particular jobs (job duties, hiring requirements, wages) and jobseeking skills.

Finally, six prime sponsors claimed to have been involved in conducting follow-up surveys of YEDPA program participants to determine their post-program labor force, employment, and educational experiences. Detailed information on either the nature and structure of the questionnaires or the timing and frequency of the surveys was seldom provided by prime sponsors in their Year End Reports.

Table II - 47: Type of Program Evaluation Activity
Undertaken by Prime Sponsors (N = 20)

<u>Type of</u> <u>Evaluation</u> <u>Activity</u>	(A) Number of <u>Prime Sponsors</u>
Measure and Analyze Immediate Outcomes; Planned vs. Actual Comparisons of Immediate Outcomes	9
Compare YEDPA Programs' Immediate Outcomes with those of CETA Title I Youth Programs	3
Pre-Post Comparisons of Educational Test Scores	3
Pre-Post Comparisons of Personality and Attitudinal Test Scores	3
Pre-Post Comparisons of Occupational Information/World of Work Test Scores	3
Follow-up Surveys of YEDPA Program Participants	6

* Note: Multiple responses were allowed; thus, numbers appearing under Column A will exceed the total number of prime sponsors (20) undertaking an evaluation activity.

The discussions of evaluation methodologies presented by prime sponsors in their Year End Reports were characterized by substantial differences in length, content, and utility. In some instances, the discussion simply consisted of a few sentences of text while in other instances the prime sponsor devoted several pages to the issue of evaluation methodologies.

More specifically, the discussions of evaluation methodologies could be classified into one or more of the following categories:

- (i) A relatively complete informative discussion of the evaluation methodology including justification for its use, a description of how it was implemented, and a review of types of data collected. Very few prime sponsors fell into this category;
- (ii) Brief mention of the general type of evaluation that was conducted, with no further discussion as to why or how it was to be done; e.g., "pre-post comparisons";
- (iii) Brief mention of a type of measurement technique that was to be used in conducting the evaluation, with little or no explanation of what it entailed; e.g., "holistic personality scaling";
- (iv) Discussion at varying levels of specificity of an evaluation activity that would take place at sometime in the future;
- (v) Discussion of an intention to develop new techniques for measuring program success, e.g., "develop techniques for measuring the advancement of an individual participant toward job readiness and employer acceptability".

The frequently limited and often times confusing discussions of evaluation methodologies combined with the failure of nearly two-thirds of the prime sponsors to include any mention of an evaluation methodology revealed quite strongly that

The vast majority of prime sponsors experienced substantial difficulty with respect to designing, implementing, operating and/or reporting on an evaluation methodology. These deficiencies seem to be reflective of several different types of problems encountered by prime sponsors in the knowledge development area. Among these problems are the following:

- (i) The inability of a prime sponsor to turn an initially well thought-out inquiry into a practical learning activity due to a lack of knowledge or incomplete understanding of appropriate program evaluation techniques.
- (ii) The prime sponsor may have had a more complete understanding of appropriate evaluation techniques, but lacked sufficient resources in terms of time, money, staff availability, or staff technical expertise to successfully undertake an inquiry process.
- (iii) The lack of specificity and direction provided by the EYR reporting instructions. Some prime sponsors may have been confused by the instructions for reporting knowledge development activities and, thus, failed to report properly on their actual evaluation activities during FY 78.

Analysis of Evaluation Findings

The final knowledge development related issue which prime sponsors were asked to address in their End of Year Reports was an analysis of the findings of their evaluation efforts. A preliminary analysis of the material presented by prime sponsors revealed that this discussion of findings could not be limited only to those prime sponsors who had previously described an evaluation methodology. The review of the Year End Reports revealed that several prime

sponsors made statements about overall program success without ever discussing the use of an evaluation methodology to produce those findings.¹⁵⁷

Table II-48 reveals that of the 38 prime sponsors who were identified as ostensibly understanding the K.D. mandate only 13 (34%) mentioned any preliminary results or findings.¹⁵⁸ The remaining 25 prime sponsors (66%) either reported no findings or indicated that it was too early to include them as part of the knowledge development discussion.

Table II - 48:

Number of Prime Sponsors Reporting Preliminary Findings or Final Evaluation Results in the K.D. Section of the Year End Report (N = 37)

<u>Did Prime Sponsor Report Findings?</u>	<u>(A) Number</u>	<u>(B) Percent</u>
Yes	13	34.2%
No (no explanation) *4	12	31.6%
No (Too early to include)	13	34.2%
Total	38	

The discussions provided by the 12 prime sponsors who did report results or preliminary findings generally were characterized by one or more of the following features:

- (i) Reporting of findings that appeared to be based upon an analysis of the findings of the prime sponsors' evaluation effort, e.g., "The 'work crew' concept was successful although some problems were encountered due to the ineffective supervision of youth." "Non-positive terminations and absenteeism were found to be more frequent than hoped." These findings were frequently focused on the qualitative rather than quantitative aspects of the programs' performance;

- (ii) Blanket judgements of program success based on evaluation efforts that had not been previously discussed by the prime sponsor; e.g. "After research and evaluation of the programs... (the prime sponsor) concludes that this type of program, which offers youth meaningful subsidized employment while providing the community with new or improved conservation programs, is needed".
- (iii) Blanket judgement of program success without any explanation of the basis for the judgement, e.g., "Sufficient accomplishments were made in providing effective training and services to area youth.."; "In a word, despite failures, we reached the unreachable, taught the unteachable, and learned what we needed to do to reach and teach more"; "The prime sponsor...was able to draw vital information from programs which were operated during FY 78".

The above discussion has attempted to summarize the types of information on evaluation methods and findings provided by prime sponsors in their Year End Reports. The review of the Year End Reports revealed a substantial amount of poorly-focused discussion and a rather high overall degree of non-compliance with the instructions. It must be stressed, however, that these findings appear to be symptomatic of a problem much greater than prime sponsors' inability to comply with a set of instructions. They seem in fact to be largely reflective of systemic organizational/institutional obstacles which make it virtually impossible for prime sponsor staff to properly carry out substantive knowledge development activities, which could then in turn provide a basis for an adequate discussion of the issues required in the EYR instructions. To briefly summarize, the above discussion combined with that in the previous knowledge development section identified the following problems faced by prime sponsors in the knowledge development area:

- (i) Failure to understand the basic underpinnings of knowledge development;
- (ii) Limited capacity to take a general understanding of the knowledge development issue and translate it into a well-defined process of inquiry;
- (iii) Possessing a relatively complete understanding of the essence of KD, but lacking sufficient resources to undertake a rigorous knowledge development effort;
- (iv) The inability of a prime sponsor to turn an initially well thought-out inquiry into a learning activity due to incomplete understanding of appropriate program evaluation techniques;
- (v) A more complete understanding of appropriate evaluation techniques, but insufficient resources to fully undertake this part of the inquiry process;
- (vi) The Department of Labor's unrealistic expectations of a prime sponsor's capacity to generate meaningful results and findings during the first year of an experimental program.

Clearly, not all prime sponsors experienced the above problems to the same extent as witnessed by several of the exemplary efforts that were undertaken.¹⁵⁹ At present, however, only a relatively small select group of prime sponsors are capable of meaningful participation in the local YEDPA knowledge development effort. This circumstance most assuredly is not within the spirit of a national demonstration projects act, such as YEDPA was designed to be.

The key to maximizing meaningful prime sponsor participation in knowledge development activities and ultimately the utility of such KD efforts lies in developing local evaluative systems' capabilities coupled with the establishment

of the necessary external support mechanisms. Specifically, if meaningful participation in knowledge development is to take place, the prime sponsor must first be capable of internally handling the many facets of the KD process in a manner that minimizes the burdens and disruption upon existing program design, planning and evaluation staffs. Secondly, the prime sponsor must have access to capable evaluative staff either internally or from an outside contractor to assist in the design and development of KD activities. Considerable time must be spent in carefully designing and implementing knowledge development studies. As R.C. Smith pointed out in his assessment of initial YEDPA experiences, "evaluation ordinarily yields learning proportionate to the amount of time in preparation before programs start."¹⁶⁰

Local Internal Systems Development

Traditionally, local prime sponsors have had to focus the bulk of their program management attention on short-term operations oriented issues such as grant applications, grant modifications, regulations compliance, and federal reporting requirements. The above demands coupled with in-house resource constraints have posed obstacles to the development of a capability for examining program performance from a longer-term research oriented perspective.

The passage of YEDPA with its accompanying KD mandate, thus, created additional burdens for most prime sponsors. Most prime sponsors desiring to undertake a serious process of inquiry into youth program effectiveness not only lacked systems in place at the local level to accommodate these types of activities, but also faced serious obstacles that prevented their establishment.

Several key issues require immediate attention if this KD process is to successfully take place at the local level. Among them are the following:

1) Commitment. The realization must be made at all levels of the prime sponsor's service delivery system that the ability to answer key long-run management questions with respect to what works best, for whom, and under what conditions, must be an integral component of any well managed CETA program. In other words, the notion of knowledge development must be understood as a crucial element of all program efforts of the prime sponsor.

2) Staff Time, Flexibility and Expertise. If the KD process is to be successfully undertaken at the prime sponsor level, the above noted commitment must be translated into certain staff capabilities and resources. Staff charged with the KD function must not be saddled with day to day responsibilities that have traditionally prevented the development of a program management perspective beyond a daily operations level. Staff must possess a basic understanding of the systematic inquiry process underlying knowledge development. Individual expertise as well as organizational flexibility must exist to take the findings of the inquiry process and begin to utilize them to influence the planning and design of future YEDPA programs.

3) MIS Capabilities. All sound evaluation efforts are dependent upon a comprehensive, complete and accurate set of client administrative records. Of particular importance to the evaluation effort are the demographic and socioeconomic characteristics of YEDPA participants, their pre-program labor market histories, information on their program participation, and their termination statuses. These data are critical in that they allow the prime sponsor to examine immediate program outcomes on a continuous basis. In addition, this information can also act as a benchmark with which to compare participants' post-program experiences. The extent to

which a prime sponsor experiences problems in the establishment of a functioning MIS will adversely influence its capacity to undertake viable and useful KD activities.

External Support Mechanisms: Role of DOL Technical Assistance

It is critical that prime sponsors have access to technical assistance from the regional office and outside sources to assist them in the development of legitimate knowledge development activities that are reflective of both local YEDPA program goals and prime sponsor organizational capabilities. Specifically, the following technical assistance functions should be provided by the regional offices of ETA and OYP.

- 1) Continued development of technical assistance manuals and sponsoring of Regional KD workshops for prime sponsor staff charged with knowledge development responsibilities;
- 2) Establishment of a well-defined set of general KD goals for prime sponsors;
- 3) Establishment of a minimum set of acceptable KD activities that would be required of all prime sponsors;
- 4) Establishment of a subset of acceptable KD activities (similar to the YETP mixed income experiments) that prime sponsors can engage in if they are unable to design a local KD component of their own;
- 5) Publication of exemplary KD activities of prime sponsors;
- 6) A strict interactive grant review process that will insure adherence to a predetermined acceptable level of KD activities;
- 7) Provision of technical assistance to prime sponsors engaging in the building of local evaluative systems capabilities, especially in the critical areas of staff training and organization, MIS development and/or follow-up evaluation systems development.

The above discussion has examined the serious obstacles faced by local prime sponsors in their efforts to undertake meaningful KD activities. In addition, the discussion has outlined the critical need for both internal systems development efforts by prime sponsors as well as external support mechanisms.¹⁶ It is clearly unrealistic to expect many prime sponsors to engage in serious knowledge development efforts without previously addressing the internal and external constraints to substantive program evaluation that they currently face. Not only will neglect of such systems development needs breed frustration and resentment on the part of prime sponsors, it will also not result in developing the knowledge and understanding of local youth program effectiveness that is so critically needed.

General Recommendations for the Preparation, Dissemination, and Use
Of the FY 79 Year End Reports on YETP and YCCIP Programs

As previously noted in the introductory section of this report, we believe that the End of Year Reports on YETP and YCCIP programs could potentially fulfill a variety of needs and effectively serve as a model assessment and reporting device for programs operated under other CETA Titles.¹⁶² If properly prepared, the Year End Reports should be highly useful to prime sponsors in their own efforts to undertake substantive self-assessments of their YETP and YCCIP programs' performances, provide useful information to State Employment and Training Councils on the structure, operations, and accomplishments of statewide youth employment and training programs, assist the regional offices of ETA in gaining insights into the youth programs being operated in their regions, and enable the national Office of Youth Programs to obtain an additional source of potentially valuable information on the implementation and operation of YEDPA programs throughout the nation. These "inside" reports on the implementation and operation of YETP and YCCIP programs would serve as a useful supplement to the "outside" assessments of local YEDPA program implementation conducted under the auspices of the National Council on Employment Policy for ETA's Office of Program Evaluation.¹⁶³

At the same time, throughout this section of the report, we have described and analyzed a series of deficiencies within the actual FY 78 End of Year Reports submitted by 57 prime sponsors throughout the nation. A number of the deficiencies in these reports were believed to be attributable to shortcomings in the instructions for drafting the reports that were provided to prime sponsors by the regional offices of ETA. Other problems were associated with the failure of many prime sponsors to abide by the instructions and with the frequently brief and primarily

descriptive information that they provided in their Year End Reports on policy and program issues that required substantive analysis as well as detailed narrative to be useful for regional and national policymakers. To resolve many of the problems associated with the inadequacies of the reporting instructions for the FY 78 Year End Reports, we have developed a new set of instructions for consideration by the Office of Youth Programs. These revised instructions appear in Section Four of this report.

To substantially improve the overall quality and usefulness of the FY 79 Year End Reports on YETP and YCCIP programs, more than just a new set of instructions will likely be required. In particular, a serious effort on the part of prime sponsors to comply with the spirit as well as the letter of the instructions and purposes of the End of Year Reports will be required. To guarantee prime sponsor compliance with the instructions for completing the Year End Reports, a more effective set of monitoring procedures is needed. Our recommendations for monitoring the contents of these reports and for increasing their usefulness for future policymaking and program operations purposes at the local, state, regional, and national levels are summarized below.

First, the Year End Reports for FY 79 should be completed by prime sponsor staff responsible for the planning and administration of YEDPA programs of the prime sponsor and signed off by the Prime Sponsor Director. The Year End Report should be submitted to the appropriate Youth Planning Council or Youth Subcommittee for their review and comments prior to being forwarded to the regional office of the Employment and Training Administration. The Chairperson of the Youth Planning Council or appropriate Youth Subcommittee of the Prime Sponsor Planning Council should be required to sign off on the document, verifying that an appropriate review of the Year End Report has taken place by the Council. Formal written

comments of Youth Planning Council members on the contents of the document should be attached to the Year End Report. Such actions would guarantee that the local Youth Planning Councils mandated by the youth legislation are given an opportunity to participate in the assessment of YETP and YCCIP program performance. The inclusion of their formal written comments on the contents of the Year End Reports would seem to be in accord with their official monitoring and evaluation responsibilities under the CETA act. The report should also be made available to the entire membership of the Prime Sponsor Planning Council.

Second, the End of Year Report of each prime sponsor should be carefully reviewed by the federal ETA field representative assigned to that prime sponsor planning area. This review should consist of an examination of the accuracy of the information (particularly regarding quantitative measures of program performance) presented in the report and an assessment of its overall compliance with the actual reporting instructions. Reports failing to provide the information requested in the guidelines would be returned by the regional office to the prime sponsor for appropriate corrective action. The federal representative would also be required to sign off on the report prior to its submission to the Regional ETA Administrator for further review.

Third, each Regional ETA office would prepare a formal report summarizing the findings of the Year End Reports submitted by the prime sponsors in its region. This report would highlight the accomplishments of FY 79 YETP and YCCIP programs in the region and indicate program areas in need of strengthening during FY 80. ¹⁶⁴ The YEDPA-related technical assistance activities of the regional office for the remainder of FY 80 would be based in part upon the findings of this report.

Fourth, the individual prime sponsor Year End Reports and the regional office summary reports on FY 79 YETP and YCCIP programs would be forwarded to the national Office of Youth Programs for further review. A summary report

would be prepared by OYP, highlighting the achievements of YETP and YCCIP programs throughout the nation, outlining the directions in which the youth employment and training system under YEDPA had shifted during its second year of operations, and indicating areas in which technical assistance can be provided to enhance program performance during FY 80. The findings of these reports together with the recommendations of prime sponsors regarding the desired future scope and nature of youth employment and training programs could then provide additional inputs into the decisionmaking processes of those public policymakers currently involved in the reauthorization of national youth employment and training legislation.

Section Three: Prime Sponsors' Plans for Improving
FY 79 YEDPA Program Performance;
Recommendations for ETA and the
National Office of Youth Programs

The instructions for preparing the FY 78 Year End Reports suggested that prime sponsors conclude their report with a brief summary of the major strengths and weaknesses of their FY 78 YEDPA programs. In addition, prime sponsors were asked to provide a set of recommendations for improving "future programming of YEDPA". During our review of the prime sponsors' Year End Reports, an attempt was made to identify the specific types of program changes that prime sponsors expected to implement during FY 79 to improve the overall performance of their local YEDPA programs. In addition, this review also documented prime sponsors' recommendations for various changes in YEDPA program planning, legislation, rules and regulations, and funding levels as well as specific requests for technical assistance from the regional offices of ETA or the national Office of Youth Programs. This final review was based on a sample of 32 of the 57 prime sponsors' Year End Reports that were made available to the authors of this study. The key findings are summarized in Tables III-1 and III-2 below.

Twenty-nine of the thirty-two prime sponsors included in the review provided some information on the types of changes that they expected to implement during FY 79 to enhance the effectiveness of their YEDPA-related employment and training programs. These planned changes cut across a wide variety of program planning, design, operations, monitoring, and evaluation areas. These planned changes were classified into nine general categories, and the results are presented in Table III-1. As can be readily seen, many of these prime sponsors mentioned multiple areas in which FY 79 program performance was to be improved.¹⁶⁶

Of the 29 prime sponsors citing one or more areas for future program improvement, thirteen, or 44.8%, mentioned changes in the referral and assessment

of YEDPA participants. The majority of these planned improvements were expected to occur in the area of increased coordination between Title II B and YEDPA programs, including increased referrals of YETP and YCCIP trainees to Title II B institutional and OJT training programs. Other planned activities in this general area of recruitment and assessment included efforts to develop a larger pool of eligible applicants, increased recruitment of women and high school dropouts, and more comprehensive assessments of youth before their enrollment in specific YEDPA program activities. Several prime sponsors argued that more effective assessment of applicants was needed to reduce the number of non-positive terminations that had occurred in FY 78, particularly in YCCIP projects.

More than 40% of the prime sponsors indicated that they would be engaged in efforts to upgrade the quality of their YEDPA-related work experience and transition service activities during FY 79. The most-frequent planned improvement in the work experience/transition service area involved increasing the amount and quality of career information and career counseling for participants. Other planned improvements (in order of their relative frequency) were an upgraded quality of work experience sites under both YETP and YCCIP programs, an expanded variety of occupational areas in which work experience would be provided, and increased training of job site supervisors.* Several of the prime sponsors argued that their work experience sites had to contain more substantive skill components in order for the participants to feel that they were learning something valuable enough to warrant their retention on the job site.

Approximately 45% of the prime sponsors indicated that they were planning to increase the quantity and/or quality of their training services during FY 79. The majority of these efforts were to be focused upon expanding the number and/or

the quality of private sector OJT slots for YETP participants. Other planned efforts in the training area included offering more GED and ABE training to YCCIP participants, lengthening the durations of existing training for out-of-school youth, linking classroom training and OJT activities more closely, and diversifying the range of occupational areas in which training would be provided during FY 79.

Another 31.0% of the prime sponsors planned to either initiate or expand Vocational Exploration Programs during FY 79. A number of these prime sponsors felt that participation in such programs substantially increased youth awareness of occupations in the private sector and encouraged youth to think more rigorously about their personal career goals. In addition, it was also argued that youth participating in Vocational Exploration Programs in private for-profit firms were more likely to be offered an unsubsidized job upon termination than were youth enrolled in work experience or career employment experience activities in public or private non-profit agencies.

Improved linkages with CBO's, private sector firms and unions, and local educational agencies were planned for FY 79 by 13.8%, 48.3%, and 44.8% of the prime sponsors, respectively. Several prime sponsors stated their intentions of obtaining more active involvement of CBO's in the delivery of services under YETP and YCCIP programs. Increased technical assistance to CBO's involved in the operation of YCCIP projects was also planned by a few prime sponsors. Nearly one-half of the prime sponsors planned to work more closely with businesses and labor unions in the planning, design, and implementation of their YETP and YCCIP projects. Several of these prime sponsors had been totally unsuccessful in securing labor union involvement in their FY 78 YEDFA programs. Prime Sponsors seeking to bolster their working relationships with LEA's primarily planned to do so by expanding the geographic coverage of their existing LEA agreements and

Table III - 1: Program Areas in Which Prime Sponsors
Planned to Improve Performance During
FY 79 (N= 29*)

<u>Program Area</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>% of Prime Sponsors</u>
Referral and Assessment of Participants	13	44.8%
Quality of Work Experience; Quality of Transitional Services	12	41.4%
Quality or Amount of Training	13	44.8%
Vocational Exploration Activities	9	31.0%
Involvement of CBO's in Delivery of Services	4	13.8%
Involvement of Private Sector and Unions in Planning and Delivery of Services	14	48.3%
Linkages with LEA's	13	44.8%
Placement of terminees into Unsubsidized Employment	10	34.5%
Monitoring and Evaluation Capability	11	37.9%

* Note: Multiple responses were allowed; thus, the numbers appearing under column A will exceed the number of prime sponsors providing responses (29).

by obtaining academic credit for a higher proportion of the participants in their YETP and YCCIP programs. Other planned prime sponsor activities involving LEA's included efforts to bolster the quality of career employment experience work sites, to expand relationships with area vocational centers, and to encourage LEA's to work more closely with out-of-school youth.

Slightly more than one-third of the prime sponsors planned to undertake activities to improve the placement of YEDPA program terminees into unsubsidized employment. The bulk of these planned activities were related to improving the coordination of the prime sponsor's own job placement activities, particularly for Title II B and YEDPA programs, expanding the overall job development efforts of the prime sponsor, and obtaining job placement services from local offices of the State Employment Security Agency. A few prime sponsors also noted their intentions to improve the overall quality of the unsubsidized jobs obtained by YETP and YCCIP program terminees.

Nearly forty percent of the prime sponsors expected to improve their monitoring and program evaluation capabilities during FY 79. The bulk of these efforts were planned to be focused upon increased monitoring of work sites, particularly those developed as part of the LEA agreement, and an expansion of overall youth program evaluation efforts, including the hiring of additional full-time staff and the development of a follow-up capability. Several prime sponsors commented that the availability of such a follow-up system would allow them to more fully address their knowledge development goals. Among the other planned evaluation activities of prime sponsors were efforts to measure the outputs of YCCIP community improvement projects, to analyze the determinants of successful job placement of YETP and YCCIP terminees, and to conduct evaluations of the comparative effectiveness of local Title II B youth and YEDPA programs.* Details on the nature of such comparative evaluations were frequently not provided in the Year End Reports of prime sponsors.

Table III - 2: Prime Sponsors' Recommendations
for ETA and OYP (N = 26)

<u>Recommendation</u>	(A) <u>Number of Prime Sponsors</u>	(B) <u>Percent Of Prime Sponsors</u>
More advance notice of rules and regulations and program policy changes	6	23.1%
Increased time for planning; changes in the planning process	13	50.0%
Introduction of forward funding; two-year funding cycles	5	19.2%
Changes in overall funding or mix of funding	6	23.1%
Changes in YEDPA legislation, rules, and regulations	7	26.9%
Technical assistance in program design	4	15.4%
Technical assistance in increasing private sector and union involvement	2	7.7%
Technical assistance in evaluation and knowledge development activities	3	11.5%

* Note: Multiple responses were allowed; thus, the total number of responses under column A will exceed the total number of prime sponsors from whom responses were received (26).

Prime Sponsors' Recommendations
for ETA and OYP

During the final review of the Year End Reports of prime sponsors, an effort was made to identify recommendations that they had for the regional offices of ETA and the national Office of Youth Programs. These recommendations were related to desired changes in the planning of YEDPA programs, the law itself, and the rules and regulations governing YEDPA program operations. Specific requests for technical assistance were also noted. The findings of this review are again based on the Year End Reports of 32 prime sponsors and are summarized in Table III-2 on the following page.

Only 26 of the 32 prime sponsors included in this final review offered one or more recommendations for changes in the planning of YEDPA programs, provisions of the Act itself, or the rules and regulations. Approximately one-fourth of the prime sponsors pointed out a critical need for the regional offices of ETA and the national office of OYP to provide more advance notice of changes in youth program policy and rules and regulations. One-half of the prime sponsors recommended that increased time be made available for planning YEDPA programs, particularly give the substantial time involved in selecting operators for YCCIP projects and getting these projects off the ground. Among the recommended changes for the planning process were a simplification of the grant application requirements and the desirability of tying in SPEDY program planning more closely with that of YETP and YCCIP programs.

Approximately one-fifth of the prime sponsors recommended that the national offices of ETA and OYP consider the adoption of forward funding practices or two-year funding cycles. Forward funding of YEDPA program monies was felt desirable to facilitate prime sponsor involvement with LEA's. The official school

year in most prime sponsor planning areas begins four to five weeks before the onset of the new federal fiscal year (October 1). Several prime sponsors recommended a two-year planning cycle for YEDPA programs to allow for increased time to develop the necessary working relationships with LEA's, CBO's, businesses, and unions. Such lengthier planning cycles were also believed desirable to facilitate the undertaking and completion of substantive local knowledge development activities.

Nearly one-fourth of the prime sponsors recommended changes in the overall level or mix of YEDPA funding. About half of this group expressed a desire for a substantial increase in overall funding, given the fact that available YEDPA monies allowed them to only serve a fraction of the eligible youth population in their planning areas. Several prime sponsors recommended that funding for YCCIP programs be increased, even at the expense of YETP programs, since YCCIP project activities were felt to be more useful in developing job skills of economically disadvantaged youths. Other funding recommendations included the consolidation of all youth programs under one CETA Title and the ability to transfer funding from SPEDY to YETP programs to allow more year-round youth programs to be developed at the local level.

Seven of the twenty-six prime sponsors (26.9%) recommended changes in the provisions of the YEDPA Act itself or in the rules and regulations for YEDPA programs. These recommendations were rather wide-ranging and included the following:

- i) Elimination of the participant eligibility criteria differences between YETP and YCCIP programs;
- ii) Increasing the maximum duration of participation beyond the one-year period;
- iii) Requiring all out-of-school youth to receive ABE and/or GED services while enrolled in a YETP or YCCIP program activity;

- iv) Facilitating prime sponsor involvement with the private sector through more liberal OJT allowances and the authority to create work experience slots in for-profit firms;
- v) Allowing a larger share of YETP monies to be used for income-mixing of participants, particularly in rural areas;
- vi) Allowing prime sponsors to have allowances for VEP Program participants be paid by private sector employers rather than by the prime sponsors;
- vii) Raising existing limits on overhead and administrative costs in YCCIP programs.

The number of specific requests for technical assistance from the regional offices of ETA and OYP was quite limited and rather diverse. The requests for technical assistance covered such areas as program design, linkages with the private sector and unions, and program monitoring and evaluation. Technical assistance in the program design area included such requests as methods for developing YCCIP projects with substantive skill offerings, models of exemplary service delivery strategies for youths in rural areas, and methods for reducing overhead costs of programs. Other types of technical assistance requests included methods for involving labor unions more closely in the planning and design of YCCIP projects, procedures for conducting performance based contracting, and techniques for monitoring work site quality.

Section Four: Presentation of A Revised Set of Instructions
for Preparing the FY 79 Year End Reports

In the introductory section of this report, we noted the fact that we were strongly supportive of the concept of a Prime Sponsor Year End Report on YEDPA Programs. We believe that such a critical self-assessment of program accomplishments, strengths, and weaknesses should be required of prime sponsors for all CETA Titles. As noted in Section Two of this report, the FY 78 Year End Reports of prime sponsors were characterized at times by a number of serious deficiencies that limited their usefulness for local, regional, or national policymaking purposes. To overcome a number of such deficiencies, a substantial reworking of the instructions for drafting the Year End Report seems to be in order. This final section of the report presents such a revised set of instructions for consideration by the national Office of Youth Programs in the preparation of the FY 79 YEDPA Year End Reports.

Overview of the Instructions for the FY 79 YEDPA Year End Report

The instructions for preparing the FY 79 Year End Report are somewhat similar to the FY 78 instructions in that they are designed to capture key information on the planning, design, administration, operations, outcomes, and impact of local YEDPA programs. There are, however, a number of key differences between the two sets of instructions. The three major sets of differences are the following. First, the FY 79 Year End Report is designed to obtain a quantitative as well as a qualitative assessment of YEDPA program performance during FY 79. Secondly, the bulk of the report is organized along functional lines rather than the rather artificial ordering of topics in accord with the ten principles contained in the Youth Planning Charter. Thirdly, the instructions are substantially more detailed and specific than they were in the FY 78 report.

An outline of the suggested Year End Report together with the relationship of sections of that report to the principles contained in the original Youth Planning Charter is presented below.

<u>Section Title</u>	<u>Any Relationship to Youth Planning Charter</u>
(I) Overview Section	
(II) Youth Program Planning	Principle #3
(III) Target Group Selection and Participation in YETP and YCCIP Programs	Principle #4
(IV) Mix of Services; Quality of Work Experience	Principle #2
(V) Service Delivery Agents	Principle #7, #8
(VI) Exemplary or Innovative Program Design	Principle #1
(VII) Institutional Linkages and the LEA Agreement	Principle #7
(VIII) Program Supplementation	Principle #6
(IX) Program Coordination	Principle #9
(X) Substitution	Principle #5
(XI) Immediate and Short-Term Outcomes	Basic YEDPA Goals
(XII) Evaluations of Program Effectiveness	Principle #1
(XIII) Summary of Program Accomplishments	
(XIV) Recommendations for Future Youth Programming at the Local and National Level	

Overview Section

This section of the Year End Report is designed to provide an overview of the local environment in which YEDPA programs operated during FY 79, the basic goals and objectives of local YETP and YCCIP programs, and the overall structure

and features of the YEDPA delivery system, including comparisons with Title II B Youth and SPEDY programs.

This section should include, but not be limited to, discussions of the following types of issues:

- a) A brief description of the magnitude and nature of youth employment problems in the local area, with particular emphasis on the employment and training problems of economically disadvantaged youths;
- b) A summary of the basic goals and objectives of local YETP and YCCIP programs, including their role in combatting the types of employment problems noted in (a) above. The discussion should distinguish between short-term goals and objectives, such as the provision of immediate subsidized employment opportunities, and longer-term objectives, e.g., enhancing the long-run employability of economically disadvantaged youth;
- c) An overview of the basic structure and features of the local YEDPA delivery system, including a general discussion of the types of YETP and YCCIP services provided to participants and the nature of the local service delivery system. The services provided to YEDPA participants should be compared and contrasted with those provided to youth under local Title II B and SPEDY programs.

Youth Program Planning

This section of the Year End Report is intended to provide an overview of the structure and composition of the Youth Planning Council and their roles and responsibilities in planning, designing, monitoring, and evaluating local YEDPA programs during FY 79.

This section should include, but not be limited to, a discussion of the following types of issues:

- a) The structure and composition of the Youth Planning Council. Is the Youth Planning Council a separate council or a subcommittee of the Prime Sponsor Planning Council? How many members are represented on the Council? What are their agency affiliations? Include a membership list in a separate appendix of this report.
- b) How many "youths" are represented on the Youth Planning Council? What types of problems, if any, has the Prime Sponsor encountered in recruiting youths to the council and in keeping them actively involved in council deliberations? What types of actions, if any, has the Prime Sponsor undertaken to overcome these problems?
- c) What roles and responsibilities did the Youth Planning Council undertake during FY 79 (e.g., development of a prime sponsor youth policy, review of YETP and YCCIP proposals, recommendations of program proposals for prime sponsor funding, selection of target groups, monitoring ongoing program performance, evaluating the outcomes of local YEDPA programs)?
- d) The accomplishments of the Youth Planning Council during FY 79. Prime Sponsor plans for increasing the involvement and effectiveness of the Youth Planning Council during FY 80.

Selection and Delivery of Services to Youth Target Groups

This section of the Year End Report is intended to provide information on the selection of target groups for the delivery of YEDPA services, success in recruiting and serving target groups, and methods used to guarantee the delivery

of YEDPA services to those youths "most in need" in the local planning area. This section should include, but not be limited to, a discussion of the following types of issues.

- a) The selection of target groups for the delivery of YEDPA services during FY 79. A brief discussion of the rationale for the selection of these groups. The FY 79 planned number of enrollments in each of these target groups, including their share of total planned enrollments during the year;
- b) Using data from the fourth quarter FY 79 Youth Program Status Summary, compare the planned and actual number of enrollments in each of the target groups during FY 79. Explain, if applicable, significant discrepancies (+ 10%) between the planned and actual number of enrollments in each target group.
- c) Using data from the fourth quarter FY 79 Quarterly Summary of Youth Characteristics, describe the number of enrollments who were women, members of racial/ethnic minority groups, members of economically disadvantaged families (incomes less than 70% of the BLS lower living standard), member of families receiving AFDC and other public assistance benefits, out-of-school youth, and the handicapped.
- d) Describe the methods including outreach, intake, and assessment used by the prime sponsor to guarantee that YEDPA services are delivered to youths "most in need" of them.
- e) What role did CBO's play in ensuring that youths "most in need" of services are successfully recruited for YEDPA program participation?
- f) Has the prime sponsor made any substantial changes in the selection of target groups for FY 80? If so, provide a brief discussion of the factors influencing changes in target group selection.

Design of the Services Mix

This section of the Year End Report is intended to provide a summary of the types of employment and training services made available to youth under FY 79 YETP and YCCIP programs. Emphasis should be placed on the quality of work experience activities and involvement of the private sector in the training of youth.

- a) Using data from the FY 79 Youth Program Status Summary, describe the planned mix of services to YETP participants (i.e., institutional training, OJT, work experience, career employment experience, transition services). Provide a brief description of the rationale for the selection of this services mix.
- b) Using data from the fourth quarter FY 79 Youth Program Status Summary, compare the planned and actual mix of services provided to YETP participants. Provide explanations of any substantial discrepancies (+ 10%) between the planned and actual mix of services to YETP participants during the year.
- c) Describe the types of YCCIP projects implemented during FY 79, including the services provided to YCCIP participants. Discuss problems encountered in implementing these projects, including recruitment of women, provision of materials, supervision, and substantive skills training opportunities for participants.
- d) Describe the prime sponsor's efforts to upgrade the quality of work experience opportunities for YETP and YCCIP participants. Include in this review the role of the LEA agreement, academic credit for work experience, and transition services. Describe prime sponsor efforts

to monitor the quality of work experience job sites. Compare and contrast YETP and YCCIP work experience opportunities with those available to youth under Title II B programs in your area.

- e) Describe the nature and overall role of training activities, both institutional and OJT, for youth under YETP programs. Include discussion of the role of the private sector and labor unions in the design and operations of these training activities and the coordination between YETP and Title II B training activities, particularly OJT. Do any of the existing rules and regulations for YEDFA hinder closer linkages with private sector and labor unions. Be specific.
- f) Does the planned FY 80 services mix for YETP and YCCIP programs differ in any substantive way from that of FY 79? If so, please provide an explanation for the actual shift in the services mix.

Service Delivery Agents

This section of the Year End Report is intended to provide a description of the local agencies involved in delivering employment and training services to youth under YETP and YCCIP programs during FY 79, with particular emphasis on the role of CBO and NBO organizations.

- a) Briefly describe the methods, including rating criteria, used to select service delivery agents for your FY 79 YETP and YCCIP programs. What role did the Youth Planning Council play in the selection of these delivery agents?
- b) Describe the nature and relative role (share of enrollments or dollars) of the service delivery agents for your FY 79 YETP and YCCIP programs. How, if at all, did these agencies differ from your FY 78 service delivery agents?

- c) Describe the overall role played by CBO and NBO organizations in delivering YETP and YCCIP services to youths during FY 79. What types of problems, if any, were encountered in obtaining CBO involvement in the delivery of such services.?
- d) Assess in a qualitative fashion the performance of the various service delivery agents in achieving the goals and objectives of your local YEDPA system.
- e) Do the service delivery agents for your FY 80 programs differ in any substantive way from those used to deliver services during FY 79? If so, provide a brief explanation for changes in the selection of service delivery agents.

Exemplary or Innovative YETP and YCCIP Programs

This section of the Year End Report is intended to provide a description and assessment of exemplary or innovative YETP and YCCIP programs administered by the prime sponsor during FY 79 as part of its local knowledge development activities. The discussion should address, but not be limited to, the following types of issues:

- a) Did the prime sponsor design and implement any exemplary or innovative YETP and YCCIP programs, including mixed income experiments during FY 79 as part of its local knowledge development activities? If so, describe the types of programs so designed and administered.
- b) Was a formal evaluation study designed by the prime sponsor to assess the effectiveness of the exemplary or innovative program(s)? If so, briefly describe the nature of the evaluation study, including the overall objectives of the study and the formal hypotheses being

examined, if any. Attach a copy of the findings of the study to the Year End Report.

- c) Have the experiences from the operations of any exemplary or innovative YETP and YCCIP programs been used in any manner to shape the structure and nature of the prime sponsor's FY 80 YEDPA or Title II B youth programs? If so, describe the types of impacts that such programs had upon the design of the current YEDPA and Title II B delivery system.

Institutional Linkages and the LEA Agreement

This section of the Year End Report is intended to provide a description and assessment of the linkages between the prime sponsor's YEDPA programs and local educational agencies, the private sector, and labor unions. Major emphasis is placed on the scope, nature, and operations of YETP programs under the LEA agreement.

- a) Describe the nature and scope of the FY 79 LEA agreement. Include in this discussion information on the proportion of local LEA's covered by the agreement, the financial/non-financial nature of the agreement, the proportion of total YETP monies devoted to the LEA agreement, and the types of services provided to youth under the agreement.
- b) Describe the nature of the agreements reached with LEA's on the awarding of academic credit to YETP and YCCIP participants for work experience. Using data from the fourth quarter FY 79 Youth Program Status Summary, compare the planned and actual number of YETP and YCCIP participants receiving academic credit. Provide an explanation for any substantial differences (± 10%) between the planned and actual figures.

- c) Provide a brief critical assessment of the current nature of prime sponsor/LEA relationships in your area. What types of changes, if any, have occurred in these relationships since the inception of YEDPA?
- d) Describe the nature of the linkages between the prime sponsor's YEDPA programs and the private sector during FY 79. Include in this discussion the role of local businesses in planning, designing, and operating YETP and YCCIP programs (VEP, OJT, classroom training) during FY 79. How has private business involvement influenced the ability of the prime sponsor to achieve the goals and objectives of the local YEDPA system? What plans does the prime sponsor have to increase business sector involvement with local YEDPA programs during FY 80?
- e) Describe the nature of the linkages between the prime sponsor's YEDPA programs and local labor unions during FY 79. Have labor unions been involved in operating any YETP or YCCIP programs or providing instructors for any programs? What types of problems, if any, has the prime sponsor encountered in obtaining the active involvement of local labor unions? Does the prime sponsor have any plans to increase labor union involvement in YEDPA program planning or operations during FY 80? If so, describe such plans and their objectives.

Program Supplementation

This section of the Year End Report is designed to provide information on the types of resources obtained from other local agencies and other CETA program to assist in the operation of local YEDPA programs. This section should address, but not be limited to, the following issues:

- a) Describe the types of resources (materials, supplies, supervisors, office space, other services) provided by local agencies and other CETA programs. Identify both the types of agencies donating such services and the nature of the services provided.
- b) Assess in both a quantitative and qualitative sense the contributions of these program supplements to the effectiveness of the operations of local YEDPA programs.
- c) Do the existing rules and regulations on maximum administrative costs hinder to any substantive degree the ability of the prime sponsor to provide services to program participants that would enhance their long-term employability? If so, describe the types of additional services that would be provided to YETP and YCCIP participants with these added administrative costs?
- d) What plans, if any, does the prime sponsor have to continue or expand upon the YEDPA program supplements that it received during FY 79?

Program Coordination

This section of the Year End Report is designed to provide information on the nature and degree of coordination between the prime sponsor's YEDPA programs, its other CETA programs, particularly Title II B, and the employment and training programs of other local agencies. This section should address, but not be limited to, the following issues:

- a) How were the YETP and YCCIP programs of the prime sponsor coordinated with the prime sponsor's other CETA programs, particularly those administered under Title II B and EDY? Include in particular a discussion of coordination in the outreach, intake, and assessment activities of the prime sponsor.

- b) Using the intertitle transfer data from the fourth quarter FY 79 Youth Program Status Summary, describe the number and nature of transfers into and out of YETP and YCCIP programs. How were these intertitle transfers related to the employability development of YEDPA participants?
- c) What other types of coordination existed between the prime sponsor's YEDPA programs and those of other local agencies? Include in this discussion the nature and degree of prime sponsor coordination with local SESA offices, public vocational education and community college programs, local labor unions, and OJT programs of private businesses.
- d) What plans, if any, does the prime sponsor have to improve such coordination during FY 80?

Program Substitution

This section of the Year End Report is primarily intended to assess the prime sponsor's compliance with the ETA maintenance of effort goals for youth.

- a) Describe the local prime sponsor's FY 79 goals regarding maintenance of effort for youth under its Title II B programs.
- b) Using fourth quarter FY 79 data, compare the proportion of youth served under the prime sponsor's Title II B and C programs with the % of youth served under its Title I program as of March 31, 1979. Explain, if applicable, the reasons for any differences between these two proportions. Were the types of services provided to youth under Title II B & C programs during FY 80 different in any substantive ways from those they received under Title I programs in previous years?

- c) Does the prime sponsor believe that the maintenance of effort policy for youth hinders in any substantive way its ability to achieve other desirable goals for its economically disadvantaged population under Title II B and C programs? If so, describe the nature of the problems created by the current maintenance of effort policy.

Immediate and Short-Term Outcomes of FY 79 YEDPA Programs

This section of the Year End Report is primarily designed to provide information on the numbers and types of terminations from YETP and YCCIP programs during FY 79, with particular emphasis on the numbers and characteristics of participants entering unsubsidized employment during that year.

- a) Using data from the fourth quarter FY 79 Youth Program Status Summary, describe and compare the planned and actual numbers of total terminations, positive terminations, and numbers of terminees entering unsubsidized employment. Explain any substantial discrepancies (+10%) between the planned and actual totals for this year.
- b) Using data from the fourth quarter FY 79 Quarterly Summary of Youth Characteristics, describe the entering employment rates for particular youth subgroups, including women, members of racial/ethnic minority groups, the handicapped, members of economically disadvantaged families, and members of families receiving AFDC or other forms of public assistance. Discuss the difficulties in obtaining unsubsidized employment for those youth subgroups with below average entering employment rates during FY 79.

- c) Provide a description of the job placement services available to YETP and YCCIP program participants during FY 79. How are these job placement services coordinated with those under Title II B programs and with the local job placement offices of the State Employment Security Agencies?
- d) What role, if any, has the Targeted Job Tax Credit played in persuading local employers to hire YEDPA trainees? Does the prime sponsor expect the Targeted Jobs Tax Credit to be used in placing youths into unsubsidized jobs more frequently during FY 80?

Evaluations of Program Effectiveness

This section of the Year End Report is intended to provide information on YEDPA-related program evaluation activities of the prime sponsor during FY 79, including those evaluation activities that were part of its local FY 79 knowledge development activities.

- a) What types of formal program evaluation activities, if any, did the prime sponsor undertake during FY 79? Were any of these activities part of the FY 79 knowledge development activities of the prime sponsor?
- b) Describe the types of techniques used in conducting local program evaluations during FY 79. Attach copies of evaluation instruments, including tests administered to participants and follow-up survey forms, in an appendix to this report.
- c) Provide a brief summary of the major findings of these evaluation studies. Attach a copy of the formal report in an appendix to this report.

- d) How have the findings of these evaluation activities impacted upon the planning, design, and/or operation of the prime sponsor's FY 80 YEDPA programs?

Summary of Program Accomplishments

Provide an overall assessment of the major strengths and weaknesses of the prime sponsor's FY 79 YETP and YCCIP programs. Include in this assessment a discussion of target group recruitment, quality of services provided to participants, influence of services received upon the educational and skill attainment of participants, development of linkages with LEA's, businesses, and labor unions, and placement of youth into unsubsidized employment or their continuation in school or training. Summarize the major accomplishments of these FY 79 programs and compare them to the accomplishments of Title II B youth and SPEDY programs. What plans does the prime sponsor have to improve upon these accomplishments during FY 80?

Recommendations for Future Youth Programming

Outline the prime sponsor's recommendations for changes in the provisions of the YEDPA legislation or in the rules and regulations governing YEDPA programs that would enable the prime sponsor to more effectively serve the employment needs of economically disadvantaged youth. Include in this discussion recommendations for changes in such areas as overall funding levels and formulas, eligibility criteria, income mixing, consolidation of youth programs, program design issues, required linkages with LEA's, overhead costs, and program evaluation activities.

Finally, outline the needs of the prime sponsor for future technical assistance from the regional offices of ETA and the national Office of Youth Programs. Describe the specific program area(s) in which such assistance is needed.

FOOTNOTES

1. See: U.S. Department of Labor and U.S. Department of Health, Education, and Welfare, Employment and Training Report of the President: 1978, U.S. Government Printing Office, Washington, D.C., 1978, "Table A-6," pp. 191-192.

For a more detailed review of youth unemployment problems in the U.S., See:

- i) Congressional Budget Office, Congress of the United States, The Teenage Unemployment Problem: What Are the Options?, U.S. Government Printing Office, Washington, D.C., 1976;
 - ii) Congressional Budget Office, Congress of the United States, Youth Unemployment: The Outlook and Some Policy Strategies, U.S. Government Printing Office, Washington, D.C., April, 1978;
 - iii) Adams, Arvil V. and Mangum, Garth L., The Lingering Crisis of Youth Unemployment, W.E. Upjohn Institute for Employment Research, Kalamazoo, Michigan, 1978;
 - iv) U.S. Department of Labor, Conference Report on Youth Unemployment: Its Measurement and Meaning, U.S. Government Printing Office, Washington, D.C., 1978.
 - v) Bowers, Norman, "Young and Marginal: An Overview of Youth Employment," Monthly Labor Review, October 1979, pp. 4-18;
2. The annual average unemployment rate of black teenagers fell below 30.0% only once during the 1970-77 period. This occurred during 1970 when the annual average unemployment rate for black teens (16-19, both sexes combined) was 29.1%. During the 1975-77 period, the annual average unemployment rate for black teens ranged from 36.9% to 38.3%. See: U.S. Department of Labor and U.S. Department of Health, Education, and Welfare, Op. Cit., "Table A-5," pp. 189-190.

For a recent review of trends in employment and unemployment developments among black teens throughout the nation, See:

- i) Bowers, Norman, Op. Cit.;
 - ii) Newman, Morris J., "The Labor Market Experience of Black Youth, 1954-78," Monthly Labor Review, October 1979, pp. 19-27.
3. See: 95th U.S. Congress, Public Law 95-93: Youth Employment and Demonstration Projects Act of 1977, Washington, D.C., 1977.
 4. Funding for the YETP, YOCIP, and YIEPP programs was initially authorized for only one fiscal year, i.e., FY 78. During the 1978 reauthorization of CETA, the Congress extended funding for YETP, YOCIP, and YIEPP programs for an additional two years. These three youth-related employment and training programs are now authorized under Title IV of the 1978 CETA legislation. See: 95th U.S. Congress, Public Law 95-524: Comprehensive Employment and Training Act Amendments of 1978, Washington, D.C., October 1978.

Funding for the Young Adult Conservation Corps was authorized for three years under the original YEDPA legislation. Funding is thus available for this program through September 30, 1980. See: 95th U.S. Congress, Public Law 95-93: Youth Employment and Demonstration Projects Act of 1977, "Sec. 810."

5. For a more detailed review of the purposes of these programs, See:
 - i) U.S. Department of Labor and U.S. Department of Health, Education, and Welfare, Employment and Training Report of the President: 1978, "Youth Unemployment and Public Policy," pp. 69-81;
 - ii) U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, Putting America's Future To Work, U.S. Government Printing Office, Washington, D.C., 1978.
6. See: U.S. Department of Labor, Office of the Secretary, "Youth Programs under the Comprehensive Employment and Training Act," Federal Register, Vol. 42, No. 180, September 16, 1977, p. 46728.
7. Knowledge development at the national, state, and local levels was viewed as a key objective of the YEDPA programs, given their demonstration nature. To achieve this objective, the Office of Youth Programs has funded an ambitious set of knowledge development projects to be undertaken throughout the nation. See:
 - i) U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Knowledge Development Plan for the Youth Employment and Demonstration Projects Act of 1977, U.S. Government Printing Office, Washington, D.C., 1977;
 - ii) U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Knowledge Development Plan for Youth Initiatives, Fiscal 1979, U.S. Government Printing Office, Washington, D.C., 1978.
8. A number of general reviews and local case studies of YEDPA program operations during FY 78 and FY 79 have also been conducted. For example, See:
 - i) U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, Youth Initiatives, U.S. Government Printing Office, Washington, D.C., 1978;
 - ii) National Council on Employment Policy, The Local Focus on Youth: A Review of Prime Sponsor Experience in Implementing the Youth Employment and Demonstration Projects Act, (Report No. 3 in a Series), Washington, D.C., March 1979.
9. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No. 257-78: Submittal of Year End Prime Sponsor Reports on Youth Programs, Boston, August 25, 1978.
10. The initial sample included 62 prime sponsors. By May 1979, the national Office of Youth Programs had received Year End Reports from only 57 of these 62 prime sponsors. As a result, it was decided to base the study on the Year End Reports of these 57 prime sponsors.
11. See: U.S. Department of Labor, Employment and Training Administration, Region One, Op. Cit.
12. The prime sponsors were also asked to pay particular attention to those aspects of their programs that were "experimental and innovative" in nature.

13. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter for the Youth Employment and Demonstration Projects Act of 1977, U.S. Government Printing Office, Washington, D.C., August 1977.
14. See: U.S. Department of Labor, Employment and Training Administration, Region One, Op. Cit., p. 3.
15. Section 345 (a) of YEDPA contained provisions allowing prime sponsors to use 10% of their YETP allocations to administer employment and training programs for all youth in their planning jurisdiction. The objective of such provisions was to allow prime sponsors to conduct "mixed income" programs to determine whether economically disadvantaged youth would benefit from participating in programs with youth from other socio-economic backgrounds. For a review of the findings of a well designed evaluation study of mixed income programs, See: Embry-Riddle Aeronautical University, Final-Report: Experimental Training Project (Youth of Varying Economic Background), Volusia County, Florida, 1978.
16. The five prime sponsors included in the initial sample who had not submitted their End of Year Reports by the end of April 1979 were Atlanta, Houston, Phoenix, Rochester, and Stockton.
17. A number of the shortest reports also failed to comply with the bulk of the reporting instructions developed by ETA. These reports should not have been deemed acceptable by the regional offices of ETA to which they were submitted

The longest report (approximately several hundred pages) was prepared by the Pennsylvania Balance of State Prime Sponsor. This particular prime sponsor apparently requested each of its subgrantees to prepare its own individual End of Year Report. The prime sponsor then simply stapled these individual End of Year Reports together and forwarded them to the Philadelphia regional office. No summary of the findings of these individual Year End Reports was prepared by the prime sponsor.

18. The actual FY 78 YETP and YOCIP plans of these 57 prime sponsors were not made available to the authors for their review in conducting this study. Given the failure of most prime sponsors to discuss their FY 78 program objectives, it was not possible for the authors to determine the type and specificity of the YETP and YOCIP program objectives that they had established in their plans.
19. Other complications arose as a result of the fact that some prime sponsors submitted one report covering both YOCIP and YETP programs combined while others submitted separate reports for their YETP and YOCIP programs. The reporting instructions did indicate that, whenever differences in program impact between YETP and YOCIP programs occurred, the findings should be reported separately; however, it seemed that this request for separate discussions applied only to the overview section of the Year End Report. In addition, many of those prime sponsors providing separate reports for their YETP and YOCIP programs failed to provide any information on the type or extent of differences in impact between these two youth programs.

20. A detailed assessment of the actual instructions for preparing the FY 78 Year End Reports on local YEDPA programs, including recommendations for change, has been previously prepared by the authors. See: Sum, Andrew; Harrington, Paul; and Schneider, Glen; An Assessment of the Instructions for Preparation of the Prime Sponsor Year End Reports on YEDPA Programs: Recommendations for Future Improvement, Center for Labor Market Studies, Northeastern University, Boston, 1979.
21. See: U.S. Department of Labor, Employment and Training Administration, Region One, Op. Cit., P. 3.
22. The instructions also noted that comparisons of such accomplishments should be reported separately for YETP and YCCIP programs whenever they were characterized by differential performance.
23. The absence of such a discussion may have been influenced by the general lack of recent comprehensive data on the employment problems of youth in prime sponsor areas. A few of the prime sponsors cited the existence of high youth unemployment nationally as a factor influencing the passage of the YEDPA legislation; however, they typically failed to discuss the issue any further, particularly with respect to the unemployment situation for youth in their own planning area. Those prime sponsors that did discuss the employment problems of youth in their area cited both low labor force participation rates and high unemployment rates of low income youth as major problems, but did not present any data to support such assertions or relate how their YEDPA programs were structured to combat such problems. For further insights into this issue, see the EYR submitted by the Erie, Pennsylvania prime sponsor.
24. Some of these comparisons were quite brief and provided little insight into the actual extent or nature of differences between YEDPA and previous Title I or summer youth programs. For example, one prime sponsor simply noted that:

"The Youth Employment and Demonstration Projects Act (YEDPA) has significantly impacted on the services provided to the Consortium's youth. YEDPA has permitted both more extensive and intensive services to be available for youth."
25. The instructions for drafting the FY 78 Year End Reports requested prime sponsors in New England to submit their completed reports to the regional office of the Employment and Training Administration by October 20, 1978. Adherence to this time deadline would not have allowed them an opportunity to obtain and review planned versus actual data from their fourth quarter FY 78 reports to the regional office on expenditures, enrollments, terminations, and unsubsidized job placements. Such information would have been available in the fourth quarter FY 78 Youth Program Status Summary and the Quarterly Survey of Youth Characteristics (QSYC), but these reports are typically not prepared by the MIS units of prime sponsors until a month following the end of the quarter closing date, which in this case would have been September 30, 1978.
26. Prime sponsors also discussed a number of other topics in the overview section. Among such topics were the role of the Youth Planning Council, the process used by the prime sponsor in soliciting YCCIP projects, the design and operation of innovative or experimental youth programs, coordination between YEDPA programs and Title I programs, benefits of YCCIP programs to the community at large, and the accomplishments of individual YETP or YCCIP projects.

27. Case studies of local YEDPA programs administered during FY 78 and FY 79 have revealed that most prime sponsors encountered difficulties in recruiting women for participation in YCCIP projects that contained worksites in traditionally male occupations. For a review of such studies, See: National Council on Employment Policy, The Local Focus on Youth: A Review of Prime Sponsor Experience in Implementing the Youth Employment and Demonstration Projects Act (Report No. 3 in a series), Washington, D.C., March 1979. A summary of the findings of the case studies was prepared by Gregory Wurzburg, the Director of the project, and appears as the first article of the volume.
 28. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter..., pp. 5-6.
 29. See: 95th U.S. Congress, Youth Employment and Demonstration Projects Act of 1977, "Section 346 (a) 6, (b)."
 30. Section 336 (c) (1) of the Act required prime sponsors to submit their YCCIP project proposals to their prime sponsor planning councils and their youth planning councils for their review and comments prior to selecting proposals for funding and submitting them to the U.S. Department of Labor.
 31. See: U.S. Department of Labor, Office of the Secretary, "Youth Programs Under the Comprehensive Employment and Training Act," Federal Register, September 16, 1977, Part VI, p. 46735.
 32. In either case, the youth planning council was required to report directly to the Prime Sponsor Planning Council.
 33. See: U.S. Department of Labor, Office of the Secretary, Op.Cit., p. 46735.
 34. For example, a number of the other prime sponsors simply provided general statements about youth representation on the planning council, success in getting youth to participate and to provide ideas about and feedback on YEIP."
- Others mentioned the number of youths on the youth planning council, but failed to cite any information on the total membership of the council. For example,
- "The Youth Programs Committee presently has one youth member who is a non-CETA enrollee and plans to include one participant youth as a committee member in FY 79."
- "The Prime Sponsor's Youth Council consists of two youths who have the same rights and responsibilities as the other members."
35. See: Dimola, Jennifer and Ashby, Deborah, The Planning, Implementation, and Performance of FY 78 YEIP Programs in Massachusetts, Policy and Evaluation Division, Massachusetts Department of Manpower Development, 1979.

36. See: Wurzburg, Gregory, "An Overview" in Initial Youth Employment... Report No. 1, p. 18.

Comments similar to this were also provided within the individual case studies included in this volume. For example one author wrote:

"The council is largely inexperienced with CETA and thus to date has played a very minor role in planning."

See: MacLachan, Gretchen, "First Report to the National Council on Employment Policy..." in Initial Youth Employment... Report No. 1, p. D-9.

Another author included the following comment:

"...the advisory committee members do have full time jobs, a question is raised as to exactly how much you can ask of such people...especially in a short and compacted period of time. It would seem that despite good intentions by all parties concerned, the reality of the short time frame and the complexity of the issues greatly restricted the youth advisory committees from having much meaningful input.."

See: Briggs, Vernon, "The Youth Employment and Demonstration Projects Act in the Southwest" in Initial Youth Employment... p. B-1.

37. See: 95th U.S. Congress, Youth Employment and Demonstration Projects Act of 1977, "Sec. 345," "Sec. 332."
38. The gross annual income figure was exclusive of income received from unemployment insurance benefits and all forms of public assistance income whether federal, state, or local. Fourteen and fifteen year olds were also eligible for participation in YETP if the prime sponsor developed a plan for their participation that was approved by the Secretary of Labor.
39. See: U.S. Department of Labor, Office of the Secretary, "Youth Programs Under The Comprehensive Employment and Training Act", Federal Register, September 16, 1977, Part VI, p. 46728.

In Section 354(a) of the YEDPA Act, the Congress had noted that prime sponsors operating YETP and YCCIP programs should make substantive efforts to serve those youth encountering the more severe barriers to employment. Among the groups cited in this section were high school dropouts, women, minorities, the veterans, and the handicapped.

40. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter for....., p. 6.
41. The Charter's discussion of this issue is not clear as to whether CBO's should simply be used for outreach and assessment purposes or whether they should also operate YETP and YCCIP programs. The notion that CBO's can "reach" those youth most in need of employment and training services does not automatically imply that they can also more effectively serve such groups.
42. The prime sponsors were supposed to list specific locally determined significant segments in section III of the Youth Programs Status Summary and to provide information on actual and planned enrollments for each of those significant segments. The QSYC provides information on the demographic, socioeconomic, and labor force characteristics of actual participants and terminations.
43. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter for the....., p. 6.
44. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, Youth Initiatives, pp. 28-29.
45. See: (i) Wurzburg, Gregory, "YEDPA Program Experience in Fiscal Year 1978," The Local Focus on Youth....., pp. 22-23; (ii) Barth, Peter S., "Third Interim Report: YEDPA - Connecticut," The Local Focus on Youth, pp. A-10, A-11.
46. Fifteen of the prime sponsors separately discussed planned levels of services to YETP participants, and an additional seven prime sponsors discussed this issue for YETP and YCCIP together. Thus 22 of the 57 prime sponsors (or 38.6%) provided some discussion of this issue.
47. See: Wurzburg, Gregory, "An Overview," in Initial Youth Employment and Demonstration Projects Act (YEDPA) Experience at the Local Level, (Report No.1), National Council on Employment Policy, Washington, D.C., February, 1978.

48. See: Barth, Peter S. "First Interim Report: Youth Employment and Demonstration Projects Act Connecticut" and
Walsh, John "Implementation of Programs Under Subparts 2 and 3 of Title III of the Youth Employment and Demonstration Projects Act of 1977 by Five San Francisco Bay Area (California) Prime Sponsors," in Initial Youth Employment.....
49. For other evidence of this,
See: Barth, Peter S., "First Interim Report: Youth Employment and Demonstration Projects Act - Connecticut," and
Ripley, Randall B. "Youth Evaluation Project, First Interim Report" in Initial Youth Employment.....
50. For other evidence of this,
See: Ripley, Randall B., op. cit., and
MacLachan, Gretchen E. "First Report to the National Council on Employment Policy on the Implementation of the Youth Employment and Demonstration Projects Act of 1977 (YEDPA) by Four Georgia Prime Sponsors." in Initial Youth Employment.....
51. The case studies of local YEDPA programs conducted under the auspices of the National Council on Employment Policy also revealed difficulties of prime sponsors in recruiting women for YCCIP projects involving work sites traditionally occupied by males despite intensive outreach and counseling efforts. Within YCCIP programs, males accounted for 3/4 of all participants while they represented approximately only 1/2 of all participants in YETP programs.
See: National Council on Employment Policy, The Local Focus on Youth....., particularly pp. 9-12.
52. Prime sponsors were also expected to design and implement local knowledge development activities that would critically assess the actual performance of these alternative approaches to solving youth employment problems. A more detailed discussion of these knowledge development activities of prime sponsors will be presented in a later section of this report.
See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter..., p.5.
53. See: 95th U.S. Congress, Public Law 95-93: Youth Employment and Demonstration Projects Act of 1977, Section 342 (a).
54. See: U.S. Department of Labor, Office of the Secretary, "Youth Programs Under the Comprehensive Employment and Training Act." Federal Register, Friday, September 16, 1977, p.46737.

55. The rules and regulations noted that these transition services under career employment experience activities were to include "at a minimum, career information, adequate supervision, skills training, counseling, and guidance." In addition, if the career employment experience program was offered under the prime sponsor's LEA agreement, then the transition services provided to YETP participants were also to include job placement services.

Ibid, p.46737.

56. See: 95th U.S. Congress, Public Law 95-93: Youth Employment and Demonstration Projects Act of 1977, Section 332 (4).

57. Section 335 of the Act required assurances from each YCCIP project application that adequate supervision will exist, including an ability on the part of such supervisors to instruct participating youth in the skill areas required by the project. The rules and regulations for YCCIP programs imposed more specific supervisory requirements. Each YCCIP project was to contain at least one full-time supervisor for every twelve youths employed on the project.

See: U.S. Department of Labor, Office of the Secretary, Op. Cit., p.46729.

58. As noted in the introductory section of this report, the second principle of the Youth Planning Charter stated that "The content and quality of work experience must be improved."

See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter...p.5.

59. In the rules and regulations for YETP programs, "transition services" were defined in an extraordinarily broad manner, including literacy and bilingual training, institutional and on-the-job training, and job restructuring. Since we made specific efforts to separately identify institutional training and on-the-job training activities, the category "other transition services" was developed to represent all other types of such services, including counseling, childcare, and job placement services.

See: U.S. Department of Labor, Office of the Secretary, Op. Cit., p.46737.

60. This treatment is in close accord with the official ETA usage of the term. As noted in the rules and regulations, "career employment experience" is "a combination of employment (work experience or on-the-job training) and certain transition services including, at a minimum, career information, adequate supervision, skills training, counseling, and guidance."

See: U.S. Department of Labor, Office of the Secretary, Op.Cit., p.46737.

61. The instructions for preparing the "overview section" of the Year End Report suggested that prime sponsors provide a review of their "YEDPA operations." As previously noted, some prime sponsors did present a detailed outline of their YETP and YCCIP programs in this section. While others only briefly described the general nature of their YEDPA activities. A few of the prime sponsors also provided a relatively substantive discussion of their YETP activities under the section of the Year End Report related to the quality of work experience activities.

62. The quality of the prime sponsors' FY 78 planned data on enrollments by major program activity appears to have suffered from a lack of clarity on the precise definitions of these activities, particularly that of career employment experience and transition services. Interviews with youth program coordinators in Massachusetts prime sponsor and subgrantee areas revealed a divergence in opinions as to what constituted a career employment experience and a transition service. For a more detailed discussion of this issue,

See: Ashby, Deborah and DiMola, Jennifer, An Inventory of Fiscal Year 1978 Youth Programs Funded in Massachusetts Under the Youth Employment and Demonstration Projects Act (YEDPA), Research and Program Development Division, Massachusetts Department of Manpower Development, Boston, 1979 particularly pp. 1-32.

Guidelines on the preparation of the youth reports, including specific instructions for reporting enrollment data by major program activity, were submitted to prime sponsors during February of 1978. The FY 1979 quarterly reports of several prime sponsors in Massachusetts do, however, appear to contain reporting errors, particularly double counts of enrollment in career employment experience and transition services.

See: i) U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No: 391-77, Youth Program Reporting and Participant Recordkeeping Requirements for FY 1978, Boston, February 1978;

ii) DiMola, Jennifer; Ashby, Deborah; and Winkeller, Rachel; An Analysis of FY 1978 YETP and YCCIP Programs in Massachusetts, Research and Program Development Division, Massachusetts Department of Manpower Development, Boston, November, 1979.

63. On-the-job training services could be provided to both out of school youth and in-school youth. The latter group would, however, receive such services as part of a Career Employment Experience Program.
64. The Statement of Purpose for YETP programs noted that, "training and employment opportunities afforded under this subpart will be interrelated and mutually reinforcing so as to achieve the goal of enhancing the job prospects and career opportunities of youths served under this subpart."

See: 95th U.S. Congress, Public Law 95-93: The Youth Employment and Demonstration Projects Act of 1977, Section 341, Washington, D.C., 1977.

65. The YEDPA legislation provided a listing of the types of projects that would meet the criteria of being a 'community improvement project.'

See: 95th U.S. Congress, Public Law 95-93: The Youth Employment and Demonstration Projects Act of 1977, "Section 332 (4)".

66. Section 335 (b) (6) of the YEDPA Act mandated prime sponsors to establish labor intensive projects with their YCCIP monies. The rules and regulations required prime sponsors to allocate a minimum of 65% of their YCCIP monies to wages and fringe benefits for program participants.

See: U.S.Department of Labor, Office of the Secretary, op. cit., p. 46728.

67. It should be noted that the instructions for preparing the Year End Reports did not specifically request prime sponsors to describe their YCCIP projects. The failure of approximately one-fourth of the prime sponsors to provide such information, thus, does not imply a lack of adherence to the reporting instructions. In addition, several prime sponsors did not administer any YCCIP projects during FY 78.

68. Information on the planned levels of expenditures for individual YCCIP projects administered by Massachusetts prime sponsors during FY 78 is available in a report prepared by the Research and Program Development Division of the Massachusetts Department of Manpower Development.

See: Ashby, Deborah and DiMola, Jennifer, Inventory of Fiscal Year 1978 Youth Programs Funded in Massachusetts under the Youth Employment and Demonstration Projects Act, (YEDPA), Research and Program Development Division, Massachusetts Department of Manpower Development, Boston, May 1979.

69. For example, the projects related to the weatherization and rehabilitation of low-income housing involve work experience opportunities in a number of crafts-related occupational areas. These jobs are substantially different in their skills content than those previously available to youth under Title I work experience and SPEDY, many of which involved basic laborer, maintenance and low-level clerical skills.

70. The rules and regulations governing YCCIP program operations mandated prime sponsors to develop appropriate procedures for informing community-based organizations of the grant application process. Project applications of other agencies were to be considered for funding only after those submitted by CBO's and NBO's had been reviewed.

See: U.S.Department of Labor, Office of the Secretary, op. cit., p. 46728

Definitions of neighborhood-based and community-based organizations were also presented in the rules and regulations on pp. 46731 and 46733.

71. As noted in the introductory section of this report, the instructions to prime sponsors for preparing the Year End Report did indicate that separate discussions of YETP and YCCIP program operations should be presented "where variations in impact occurred." As noted earlier, a number of prime sponsors did provide separate Year End Reports for their YETP and YCCIP programs; however, those prime sponsors doing so seldom discussed the nature or extent of the differences in the impacts of these two types of programs at the local level.

72. A few of the prime sponsors did indicate that they were undertaking knowledge development activities to test the relative effectiveness of YETP and YCCIP activities in meeting the needs of particular target groups. For example, the Indiana Balance-of-State Prime Sponsor indicated that it had undertaken efforts to compare the effects of YETP and YCCIP programs in solving the unemployment problems of 16-17 year old high school dropouts.
73. U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter for the Youth Employment and Demonstration Projects Act of 1977, . . . , P. 5
74. The rules and regulations imposed the requirement that YCCIP projects contain at a minimum one full-time supervisor for every twelve youth participants.

See: U.S. Department of Labor, Office of the Secretary, Op. Cit., p. 46729
75. The section of the Year End Report devoted to a discussion of the quality of work experience activities seemed to be out of place, following the discussion of knowledge development activities and immediately preceding the section on youth participation in the planning, design and administration of youth programs. The material on work experience activities would have more appropriately fit into an overall section on the planning and design of YFDPA programs that tied together the program planning, program coordination, interagency linkages, program supplementation, and institutional change elements of the Youth Planning Charter. An alternative set of instructions for the preparation of the FY 79 Year End Reports that ties these elements together in a more organized fashion will be presented in the concluding section of this report.
76. A few of the other prime sponsors discussed their local goals for work experience, but defined them in a manner that totally excluded the issue of the "quality" of the work experience opportunities provided to youth. Their local goals for work experience were related solely to the number and characteristics of participants who would be enrolled in work experience activities under YETP and YCCIP.
77. Other types of effects cited by prime sponsors were increased participant satisfaction with the services received, increased skill acquisition by participants, and an increase in their ability to make career choices.
78. One of the more comprehensive efforts to obtain participants' assessments of the services they received under YETP programs was that of the Philadelphia prime sponsor. This prime sponsor contracted with a private non-profit research organization known as Research for Better Schools, Inc., to conduct a process and outcomes evaluation of its YETP programs. The two-year study's findings have been published in three separate volumes which are available from the prime sponsor.

79. Several prime sponsors admitted that the results of their efforts to upgrade the quality of work experience opportunities for youth under YEDPA were mixed. In some instances, prime sponsors felt that their YCCIP projects had been more successful than their YETP programs in increasing work experience quality while in other areas the opposite situation held true. In commenting on the shortcomings of its YETP work experience programs, one prime sponsor remarked that, "Most positions are of the traditional social service aide-type jobs which in the past were available during the summer (under SPEDY)."
80. A major shortcoming of the instructions for drafting the FY 78 Year End Report was that it asked prime sponsors to discuss the "effects" of efforts to increase the quality of work experience without providing specific examples of the types of effects that prime sponsors should discuss; e.g., reduced numbers of early non-positive terminations, lower absenteeism, greater skill development, high entering employment rates, etc. Partly as a result of this lack of clarity, the discussions provided by prime sponsors were not well focused. A lack of specific local objectives for increasing the quality of work experience was also a contributing factor. As one prime sponsor noted, "There were no specific local goals for work experience under YCCIP. The federal regulations provided the goals - improved quality through a 1 to 12 supervisor/participant ratio and semi-skilled and skilled work tasks."
81. The questionnaire developed by the authors for reviewing prime sponsors' Year End Reports did not collect information on the service delivery agents for YCCIP programs. Instead, information was collected on the types of YCCIP projects administered by prime sponsors during FY 78 and the problems that they encountered in getting these programs off the ground.
See: Appendix C of this report for further details on this issue.
82. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter... p.8.
83. Ibid., p.8.
84. See: U.S. Department of Labor, Office of the Secretary, "Youth Programs Under the Comprehensive Employment and Training Act," Federal Register, Sept. 16, 1977, Part VI, p. 46728.
85. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No: 257-78... , p.6.
86. The information provided by balance of state prime sponsors tended to be rather sketchy, particularly for the service delivery agents under YETP. As a result, the Year End Reports may not have fully identified all types of service delivery agents.
87. Several prime sponsors also noted that the use of the job placement services of the SESA's also contributed to higher rates of unsubsidized job placements and the number of youth placed through the offices of the SESA's were, however, not provided in the EYR's.

88. The Statement of Purpose for the Youth Employment Demonstration Program notes that:
"It is the purpose of this part to establish a variety of employment, training and demonstration programs to explore methods of dealing with the structural unemployment problems of the Nation's youth. The basic purpose of the demonstration programs shall be to test the relative efficacy of different ways of dealing with these problems in different local contexts."
- See: 95th U.S. Congress, Public Law 95-93: Youth Employment and Demonstration Projects Act, "Section 321."
89. For further details on the knowledge development activities of the Office of Youth Programs for FY 78 and FY 79, see: (i) U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Knowledge Development Plan for the Youth Employment and Demonstration Projects Act of 1977, U.S. Government Printing Office, Washington, D.C., 1977; (ii) U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Knowledge Development Plan for Youth Initiatives Fiscal 1979, U.S. Government Printing Office, Washington, D.C., 1978.
90. U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter for the Youth Employment and Demonstration Projects Act of 1977, p. 5.
91. Ibid., p. 5.
92. For a more complete discussion of evaluative research in a knowledge development context, see: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Guide to Knowledge Development, 1979, pp. 103-129.
93. U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series: Number 257-78, Submittal, p. 4.
94. The interview questionnaire and coding format used in conducting this review can be found in Appendix C of this report.
95. A description of most of these mixed-income experiments together with a summary of the evaluation methodologies used in assessing their effectiveness, can be found in the following publication: Sum, Andrew; Zornitsky, Jeff; Schneider, Glen; Exemplary Youth Knowledge Development Activities of Prime Sponsors During FY 78, A Report Prepared for the National Office of Youth Programs, Boston, June 1979.
96. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Guide to Knowledge Development, Washington, D.C., 1979.
97. In fairness to some of these prime sponsors, it should be noted that the YEDPA Act noted that prime sponsors would not be prevented from operating programs of a non-demonstration nature to meet the immediate employment needs of youth. As stated in Section 321 of the Act, "this basic purpose (demonstration programs) shall not preclude the funding of programs dealing with the immediate difficulties faced by youths who are in need of, and unable to find, jobs."

98. The enormous differences in prime sponsor KD activities, as well as differences in their descriptions of these activities, made it virtually impossible to categorize these activities in any rigorous way. As a result, the discussion will present a spectrum of the general characteristics of such discussions without any accompanying frequency distributions.
99. Descriptions of the well-planned program innovations or evaluation activities are detailed in: Sum, Andrew; Zornitsky, Jeffrey; Schneider, Glen; Exemplary Youth Knowledge Development Activities of Prime Sponsors During FY 78.
100. U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter for...
101. Briggs, Vernon, "The Youth Employment and Demonstration Projects Act of 1977 in the Southwest" in Initial Youth Employment and Demonstration Projects Act (YEDPA) Experience at the Local Level. (Report No. 1), National Council on Employment Policy, Washington, D.C., February, 1978.
102. Kobrak, Peter, "An Evaluation of the Planning and Grant Application Process for the Youth Employment and Demonstration Projects Act of 1977 in Michigan" in Initial Youth Employment...
103. U.S. Department of Labor, Employment and Training Administration, Region One, Region One Letter Series No. 257-78: Submittal of Year End Prime Sponsor Reports on Youth Programs, Boston, August 25, 1978.
104. A similar perspective was held in a case study of the implementation of YEDPA in Illinois,

See: Roomkin, Murray, "Case Studies of the Youth Employment and Demonstration Act: The Early Experience of Chicago, Cook County and the Rockford Consortium" in Initial Youth Employment...
105. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter..., pp. 7-8.
106. Ibid., p.7.
107. The rules and regulations for YEDPA provided labor organizations a 15 day period to comment on the YETP and YCCIP plans of prime sponsors prior to their submission to the regional offices of ETA.

See: U.S. Department of Labor, Office of the Secretary, Op.Cit., p.46728.
108. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No. 257-78: Submittal of Prime Sponsor Reports on Youth Programs, pp. 5-6.

109. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, Youth Initiatives, U.S. Government Printing Office, Washington, D.C., 1978, p.48.
110. See: U.S. Department of Labor, Office of the Secretary, "Youth Programs Under the Comprehensive Employment and Training Act," Federal Register, September 16, 1977, pp. 47629.
111. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No. 257-78: Submittal....,p.5.
112. A copy of the questionnaire and coding format used in reviewing prime sponsors' Year End Reports to obtain information on LEA agreements is available in Appendix D of this report.
113. National Council On Employment Policy, The Unfolding Youth Initiatives: Prime Sponsor Experience in Implementing the Youth Employment and Demonstration Projects Act (YEDPA), Report No. 2, August 1978, "Overview" by Gregory Wurzburg, p.45.
114. Ibid.,
and
Kobrak, Peter "An Evaluation of the Planning and Grant Application Process for the Youth Employment and Demonstration Projects Act of 1977 in Michigan," pp 53-55 in Initial Youth Employment...
and
National Council on Employment Policy, The Local Focus on Youth: A Review of Prime Sponsor Experience in Implementing the Youth Employment and Demonstration Projects Act, Report No. 3, March 1979, "Summary of Findings and Recommendations" by Gregory Wurzburg, p.7.
115. National Council on Employment Policy, The Local Focus on Youth...,pp.7-8.
116. A few prime sponsors argued that the "mandatory" nature of the agreements with LEA's actually obstructed rather than facilitated institutional change between the local CETA and school systems. One prime sponsor remarked that
"Where a funding mandate was imposed on the prime sponsor, as in the case of the School District of our city, the prime sponsor found itself in a bargainless, inferior position to the deliverer. Our capacity to implement institutional change was minimal in that instance."
117. Ideally data from the fourth quarter Youth Program Status Summary should be included in End of Year Reports. In this way information on the total number as well as proportion of youth actually receiving academic credit over the year could be included in the EYR. Such data in combination with information about the planned level or proportion of participants to receive academic credit could provide the framework for discussion of the academic credit issue within the EYR.

Under Column E of the first section of the Youth Program Status Summary, the prime sponsor is supposed to report data on the actual number of participants who received academic credit, the planned number of participants who were expected to receive academic credit, and actual as a % of the planned total.

118. A summary of these issues can be found in:
- (i) The Unfolding Youth Initiatives... pp.41-45;
 - (ii) The Local Focus on Youth... pp.5-9.
119. See: 95th U.S. Congress, Public Law 95-93: Youth Employment and Demonstration Projects Act of 1977, Section 346 (b).
120. Ibid., Section 346 (a) (3).
121. Ibid., Section 353 (d). The Act stated that local labor unions who represented workers employed in occupational areas similar to the proposed work sites for youth under YETP and YCCIP programs were to be informed of the application and to be given a "reasonable period of time" to review and comment on the application. The rules and regulations defined "reasonable period of time" to be 15 days. Labor organizations were to submit their comments in writing to the prime sponsor, who was then required to consider such comments prior to forwarding its application to the regional office.
- See: U.S. Department of Labor, Office of the Secretary, Op.Cit., p. 46728.
122. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No. 257-78, Submittal..., p.6.
123. The questionnaire and coding format used by the authors in conducting this review can be found in Appendix D of this report.
124. It should be evident that not all of the barriers to union involvement in YEDPA programs can be resolved through the provision of technical assistance to prime sponsors. For example, the general absence of labor unions in the more rural prime sponsor areas and the limited nature of union representation in many of the occupational areas in which YETP and YCCIP participants are enrolled jointly place severe restrictions on active union involvement.
125. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No. 257-78: Submittal...., pp. 5-6.
126. The goal quoted in the text appears in the Statement of Purpose for the Youth Employment and Training Program (YETP).
- See: 95th U.S. Congress, Public Law 95-93: Youth Employment and Demonstration Projects Act of 1977, Section 341.
127. The discussion of service delivery agents for prime sponsors' YETP programs appears in pages 65-73 of this report.
128. Business may have been involved in classroom training activities of prime sponsors, including the provision of equipment, instructors, and training materials.

129. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter for the Youth..., p.7
130. Ibid., p.7.
131. For example, Section 342 (a) (1) of the Act noted that, in designing YETP work experience activities for youth, prime sponsors should give consideration to those community improvement projects "utilizing materials and supplies available without costs." Section 332 (4) of the Act stated that in selecting YCCIP projects prime sponsors should give special emphasis to "those utilizing materials and supplies available without cost."
132. See: U.S. Department of Labor, Office of the Secretary, Op.Cit., p.46735.
133. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series Number 257-78: Submittal..., p.5.
134. DiMola, Jennifer and Ashby, Deborah, The Planning, Implementation and Performance of FY 78 YETP Programs in Massachusetts, Policy and Evaluation Division, Massachusetts, Department of Manpower Development, 1979.
135. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter..., p.1.
136. The National Commission for Employment Policy has recently concluded that such tradeoffs between immediate job generation and long-term employability gains are quite real and pose tough choices for youth program policymakers and operators.
- See: "Youth Education and Employment Goals May Be at Odds, Report Indicates," Employment and Training Reporter, January 23, 1980, Volume II, Number 19, pp. 550-551.
137. A few prime sponsors did comment on the problems caused by strict limitations on administrative costs, but typically did so in a very general way. For example, two prime sponsors noted that
- "YCCIP is a difficult program to administer, both here (central office) and at the program operator level, within the administration limitations. This is due to no 'economy of scale.'"
- "Another contractor had minimal overhead but too few staff to effectively service the number of participants in their program. As a result, their operation ran like an assembly line with the necessary supportive services lacking in some instances. Problem participants, for the most part, were the only ones provided with counseling, which leads to a less than quality program."

138. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter..., p.8.
139. To assist themselves in these efforts, prime sponsors were requested to develop an inventory of youth service agencies in their local planning areas, including the types of programs and services they provided to youth.
140. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, Youth Initiatives, U.S. Government Printing Office, Washington, D.C., 1978, p.48.
141. See: U.S. Department of Labor, Office of the Secretary, "Youth Programs Under the Comprehensive Employment and Training Act," Federal Register, September 16, 1977, p.6728.
142. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series, No. 257-78: Submittal of..., p.6.
143. Approximately one-fifth of the prime sponsors mentioned the existence of coordination between YEDPA programs and "other youth service agencies," but did not provide any specific information to allow for an identification of these agencies. For example, one prime sponsor simply stated that "YCCIP is working in conjunction with many other social service and education bodies."
144. During FY 78, YETP and YCCIP program terminees who transferred into the prime sponsor's Summer Program for Economically Disadvantaged Youth (SPEDY) were not regarded as "transfers to other Titles." Thus, the data appearing in the Youth Program Status Summary for FY 78 will tend to underestimate the extent of linkages between YETP and YCCIP and other CETA programs in those prime sponsor areas in which YETP and YCCIP terminees were transferred into the SPEDY program.
145. Many of the prime sponsors apparently did not provide estimates of the "planned" numbers of transfers into or out of YETP and YCCIP programs from other CETA titles during FY 78. As a result, comparisons of planned versus actual transfers were not feasible for FY 78 YETP and YCCIP program operations. The data on planned transfers should be more readily available for FY 79 YEDPA programs.
146. See: U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No. 257-78: Submittal of..., p.6.
147. See: U.S. Department of Labor, Employment and Training Administration, Office of Youth Programs, A Planning Charter..., p.7.

148. See: Briggs, Vernon M., "The Youth Employment and Demonstration Projects Act of 1977: Albuquerque, New Mexico; Coastal Bend Area, Texas; and El Paso,, Texas, " The Local Focus on Youth: A Review of Prime Sponsor Experience in Implementing the Youth Employment and Demonstration Projects Act, National Council on Employment Policy, Washington, D.C., March 1979.

149. Studies of YEDPA implementation at the local level have revealed that many prime sponsors do not believe that the regional office is capable of providing useful technical assistance on "strategic policy issues." Such feelings may have influenced the low rate of response on the technical assistance issue by prime sponsors.

See: Wurzburg, Gregory, "Summary of Findings and Recommendations," The Local Focus on Youth: A Review of Prime Sponsor..., pp.40-42.

150. In the rules and regulations governing FY '78 YETP and YCCIP programs, it was noted that "the purpose of these new programs is to employ and increase the future employability of young persons..."

See: U.S. Department of Labor, Office of the Secretary, "Youth Programs Under the Comprehensive Employment and Training Act," Federal Register, September 16, 1977, p. 46728.

151. In the concluding section of his report on YEDPA program implementation in Texas and New Mexico, Vernon Briggs argued that "some well-established manpower goals (e.g., job placement per se) may be misdirected."

See: Briggs, Vernon M., Op. Cit., pp. 13-18.

152. The data appearing in the QSYC can be used to calculate "entering employment rates" for various subgroups of terminees, including women, members of racial and ethnic groups, high school dropouts, members of families receiving AFDC or some other form of public assistance, and the economically disadvantaged. For those prime sponsor areas in which the total number of YETP terminees is relatively large, a brief discussion of the differences in entering employment rates among the various subgroups of participants should be presented in the Year End Report.

153. The Policy and Evaluation Division of the Massachusetts Department of Manpower Development has recently developed follow-up questionnaires for Title II-B youth work experience and Title IV YETP programs. These questionnaires are currently utilized by those 15 prime sponsors in New England that are tied into the CETA follow-up system.

See: (i) Schneider, Glen and Zornitsky, Jeffrey, Data Collection Materials for Follow-Up Evaluations of Title II-B and YETP Youth Programs, Policy and Evaluation Division, Massachusetts Department of Manpower Development, Boston, September 1979.

(ii) Sum, Andrew, Follow-Up Evaluation Efforts of New England Prime Sponsors, a paper prepared for the U.S. Department of Labor Conference on Performance Indicators, Washington, D.C., February, 1980.

154. See: 95th U.S. Congress, Youth Employment and Demonstration Projects Act of 1977, Section 345.

155. The interview questionnaire and coding format used in conducting this particular review of the prime sponsors' Year End Reports can be found in Appendix C of this report.
156. One of the more comprehensive attempts to measure changes in pre-post test sources on attitudes toward self and work and knowledge of the world of work was undertaken by the city of Philadelphia Prime Sponsor. The prime sponsor contracted with a local private non-profit research group known as Research for Better Schools to conduct this study for all of its YETP Programs. For a review of the findings of the outcomes side of the analysis,
- See: Research for Better Schools, Inc., Evaluation of Philadelphia AMPC Youth Employment and Training Programs; Volume Three: Outcomes Evaluation Results, Philadelphia, 1979.
157. Five to six prime sponsors fell into this particular category.
158. A discuss of the methods used in selecting these 37 prime sponsors was previously presented in pp.78-81 of this report.
159. For a review of the more exemplary knowledge development activities,
- See: Sum, Andrew; Zornitsky, Jeffrey; Schneider, Glen; Exemplary Youth Knowledge Development...
160. See: Smith, R.C., "Youth Evaluation Project First Interim Report: January 20, 1978," in Initial Youth Employment and Demonstration Projects Act (YEDPA) Experience at the Local Level,(Report No. 1)...
161. Several prime sponsors also noted the need for such internal systems development to support local knowledge development activities. One prime sponsor remarked that:

"More intensive efforts need to be made in the area of Knowledge Development. This goal should be realized through a recent reorganization of administrative responsibility and a committed working relationship among the Planning, Operations, and Management Information and Analyses Units, of the Employment and Training Division".

162. For a review of our views on this issue, See: pp. 3-4 of this report.
163. See: (i) Wurzburg, Gregory (Editor), Initial Youth Employment and Demonstration Projects Act (YEDPA) Experience at the Local Level, (Report No. 1), National Council on Employment Policy, Washington, D.C., February 1978;
- (ii) Wurzburg, Gregory (Editor), The Local Focus on Youth: A Review of Prime Sponsor Experience in Implementing the Youth Employment and Demonstration Projects Act (Report No.3 in a Series), National Council on Employment Policy, Washington D.C., March 1979.
164. The development of such a report by the regional offices of ETA may well assist them in clarifying their own thinking on an appropriate "regional youth policy." The existence of such a regional policy appears to be a prerequisite for the development of a regional office capability on strategic planning for youth programs. As noted in the case studies of YEDPA program implementation, regional office staff were frequently viewed by prime sponsors as being unable to provide assistance in the strategic planning and program design areas.
- See: Wurzburg, Gregory, "Summary of Findings and Recommendations," The Local Focus on Youth..., pp.40-42.
165. U.S. Department of Labor, Employment and Training Administration, Region One, Region I Letter Series No. 257-78: Submittal of...,p.7.
166. These 29 prime sponsors mentioned 99 program areas in which improvements were expected to occur. A degree of overlap did of course exist.
167. The training of supervisors in methods for resolving job-related problems of participants, including absenteeism and punctuality problems, was stressed by several prime sponsors. Strong effective supervision was felt to be particularly critical to YCCIP projects success.
168. A few prime sponsors expressed the view that the development of an in-house evaluation capability must be viewed as a long-term proposition requiring several years of investment in staff and resources.

APPENDIX A

Alphabetical Listing of the 57 Prime Sponsors
Included in the Review of the End-of-Year
Youth Program Reports for FY 78

Alphabetical Listing of the 57 Prime Sponsors
Included in the Review of the End-of-Year
Youth Program Reports for FY 78

<u>Prime Sponsor Area</u>	<u>Type of Prime Sponsor</u>	<u>Population, Size Class¹</u>
Akron/Summit/ Medina, Ohio	Consortium	#1
Alabama Balance of State	Balance of State	#3
Birmingham, Alabama	Consortium	#2
California Balance of State	Balance of State	#3
Chattanooga, Tennessee	City	#1
Chicago, Illinois	City	#3
Delaware, Pennsylvania	County	#2
Erie County, Pennsylvania	County	#1
Fort Wayne, Indiana	Consortium	#1
Georgia Balance of State	Balance of State	#3
Hidalgo, Texas	Consortium	#1
Humboldt County, California	Consortium	#1
Independence, Missouri	City	#1
Indiana Balance of State	Balance of State	#3
Jackson, Mississippi	Consortium	#1
Kansas City, Missouri	Consortium	#2
Kentucky Balance of State	Balance of State	#3
Leon/ Gadsden, Florida	Consortium	#1

<u>Prime Sponsor Area</u>	<u>Type of Prime Sponsor</u>	<u>Population Size Class¹</u>
Los Angeles County, California	County	#3
Louisiana Balance of State	Balance of State	#3
Maine Balance of State	Balance of State	#2
Maricopa County, Arizona	County	#2
Maryland Balance of State	Balance of State	#2
Massachusetts Balance of State	Balance of State	#3
McHenry County, Illinois	County	#1
Mercer County, Pennsylvania	Consortium	#1
Middlesex County, New Jersey	County	#1
Milwaukee County, Wisconsin	County	#3
Minnesota Balance of State	Balance of State	#2
Monmouth County, New Jersey	County	#2
Monroe County, New York	County	#1
Multnomah/Washington, Oregon	Consortium	#1
Nevada Balance of State	Balance of State	#1
New York Balance of State	Balance of State	#3
New York City, N.Y.	City	#3

<u>Prime Sponsor Area</u>	<u>Type of Prime Sponsor</u>	<u>Population, Size Class¹</u>
North Carolina Balance of State	Balance of State	#3
Oakland, California	City	#1
Oakland County, Michigan	County	#2
Oklahoma Balance of State	Balance of State	#3
Orange County, N.Y.	County	#1
Oregon Balance of State	Balance of State	#2
Oswego County, New York	County	#1
Palm Beach County, Florida	County	#2
Pennsylvania Balance of State	Balance of State	#3
Philadelphia City	City	#3
Phoenix, Arizona	City	#2
Portage County, Ohio	County	#1
St. Claire, Illinois	Consortium	#1
St. Joseph's County, Indiana	County	#1
San Diego, California	Consortium	#3
South Carolina Balance of State	Balance of State	#3
Springfield, Missouri	City	#1
Stanislaus County, California	County	#2
Suffolk, New York	Consortium	#3
Toledo, Ohio	Consortium	#2
Volusia, Florida	County	#1
Yakima County, Washington	County	#1

NOTES:

- 1) The prime sponsor population size classes are based upon the following criteria:

<u>Size Class</u>	<u>Population</u>
1	<1,000,000
2	1,000,000 to 1,999,999
3	2,000,000 +

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