

# **Performance Partnership Pilots for Disconnected Youth: First Annual Report to Congress**

**June 2017**

The report (S. Rept. 114-74) accompanying S.1695 (titled “Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act, 2016”), passed by the Senate Committee on Appropriations, requested annual reports containing information about the Performance Partnership Pilots for Disconnected Youth (P3) program. Specifically, the Senate report requested “annual reports containing the following information: a detailed summary of all involved pilot programs, an overview of how pilots were selected, a summary of findings from the various pilots, and recommendations for Congress on how to apply best practices more broadly.”

Because the pilots are still in the early stages of implementation, we have limited information regarding findings from individual pilots or recommendations regarding best practices and opportunities for broader application. This annual report, the first prepared in response to this request, provides detailed information about the P3 program, including descriptions of the individual pilots and how they were selected, and identifies questions and considerations that highlight preliminary lessons from the P3 program. Additional detail is included as appendices. As implementation of the pilots continues and the evaluation findings become available, we will gain a more complete understanding of the P3 program, including the outcomes achieved by individual pilots, and the strengths and limitations of the P3 program model, which we intend to continue sharing with Congress and the public.

## **Overview**

P3 offers a unique opportunity to test innovative, cost-effective, and outcome-focused strategies for improving results for disconnected youth, and may also offer broader lessons regarding ways in which various federal grant programs can enable improved outcomes by allowing greater flexibility for grantees. According to the U.S. Census Bureau, more than 5 million 14-to-24-year olds in the United States are not on a clear path to postsecondary education or training and a rewarding career. They are neither working nor in school and, in many cases, face the additional challenges of being homeless, in foster care, or involved in the justice system. Often disconnected from their families and valuable social networks, these young people struggle to make successful transitions to adulthood and to reach the educational and employment milestones critical to escaping a lifetime of poverty. The P3 authority provides States and local and tribal governments greater freedom to innovate in order to serve these youth, providing an opportunity to request waivers of programmatic requirements that appear to impede effective service delivery.

Congress authorized the inclusion of funds from fiscal years 2014, 2015, and 2016, and authorized the selection of up to 10 pilots for each of those years. Federal agencies solicited applications for these three rounds of pilots and received 45 eligible applications across the 3 years. Applications were assessed and scored by peer reviewers using selection criteria published in the notices inviting applications. To date, nine pilots (Round 1) have been authorized, while another seven entities (Rounds 2 and 3) have been designated pilot finalists

with which the Federal agencies are currently negotiating performance agreements. Descriptions of the pilots' and pilot finalists' projects appear in Appendix A.

### **Implementation of the Fiscal Year 2014 Authority (Round 1)**

Enacted on January 17, 2014, the Consolidated Appropriations Act, 2014 (Public Law 113-76) (the 2014 Act) authorized the Departments of Education (ED), Labor (DOL), and Health and Human Services (HHS), along with the Corporation for National and Community Service (CNCS) and the Institute of Museum and Library Services (IMLS) (the Agencies), to enter into performance partnership agreements that give State, local, and tribal governments greater flexibility in using funds awarded under two or more discretionary programs administered by the Agencies. The 2014 Act authorized the Agencies to enter into up to 10 performance partnership agreements.

States, localities, and tribes that entered into P3 agreements were authorized to request waivers for requirements related to certain discretionary funds, including both formula and competitive grant funds, from the Agencies in order to implement strategies to improve outcomes for disconnected youth. The 2014 Act states that “[t]o improve outcomes for disconnected youth’ means to increase the rate at which individuals between the ages of 14 and 24 (who are low-income and either homeless, in foster care, involved in the juvenile justice system, unemployed, or not enrolled in or at risk of dropping out of an educational institution) achieve success in meeting educational, employment, or other key goals.” This waiver authority provided the authority to blend discretionary funding.

The 2014 Act states that heads of the Agencies may not only exercise any existing waiver authority but also may waive any statutory, regulatory, or administrative requirement that they are otherwise not authorized to waive, as long as the waiver is in keeping with important safeguards. Some of these safeguards include that waivers must be consistent with the statutory purposes of the respective Federal programs contributing funds to the pilot and necessary to achieve the pilot’s outcomes. In addition, the heads of the Agencies must determine that the waivers and the proposed use of program funds: (1) will not result in denying or restricting individual eligibility for services funded by those programs, and (2) will not adversely affect vulnerable populations that are the recipients of those services. Moreover, the Agencies may not waive requirements related to nondiscrimination, wage and labor standards, or allocation of funds to State and substate levels.

### **Consultation with the Field**

The Agencies have considered public input critical to both the development and the effective implementation of the P3 authority. Anticipating P3 authority, in June 2012, ED published a [Request for Information on Disconnected Youth](#) in the *Federal Register* (77 FR 32959) (RFI) seeking public input regarding the implementation of the potential P3 statutory authority, which was first proposed by in the FY 2013 budget request. The 171 comments ED received in response to the RFI emphasized the need for greater flexibility, highlighted promising initiatives, and offered recommendations for effectively serving disconnected youth and administering P3. The responses informed the Agencies’ thinking about how best to implement the P3 authority when it was enacted into law in FY 2014.

On April 28, 2014, the Agencies issued a consultation paper, [\*Changing the Odds for Disconnected Youth: Initial Design Considerations for Performance Partnership Pilots\*](#), that provided background information about the pilot authority and described the Agencies' initial thinking about the implementation of the authority.<sup>1</sup> The paper also encouraged stakeholders to respond by email to key questions about implementing P3 pilots. The Agencies used their research and analysis for the paper to guide two joint national webinars hosted by HHS on April 21 and 30, 2014, that provided information to the field and solicited feedback about the implementation of the authority.

In addition, on July 31, 2014, ED published a [notice](#) in the *Federal Register* that invited public comment on the application process for P3 (79 FR 44436). ED sought comments on the following three questions:

- What information, in addition to the information required by the Act, should entities be required to submit in their applications?
- What criteria should the Agencies use to evaluate applications?
- What technical assistance would be helpful to entities in preparing their applications?

ED received eight responses to the notice that made various recommendations with respect to the pilot application requirements and process. These recommendations informed the Agencies' development of the application process. For example, one respondent recommended that applicants provide a logic model, while another recommended that the Agencies give priority to projects that are likely to achieve significant improvements in the outcomes of disconnected youth and projects that will replicate evidence-based approaches.

#### Round 1 Notice Inviting Applications (FY 2014)

The Office of Management and Budget (OMB) designated ED as the lead Federal agency responsible in FY 2014 for soliciting applications and managing the P3 initiative on behalf of the Agencies.

ED published a [notice inviting applications](#) in the *Federal Register* on November 24, 2014 (79 FR 70033) (Round 1 notice) that described how pilots would be selected for the first P3 competition. The notice included three absolute priorities, which, for the purposes of the first round P3 competition, created separate categories for scoring and considering applications. The Agencies included these absolute priorities to test the theory of action underlying the P3 authority in a variety of settings. These absolute priorities were:

- Absolute Priority 1—Improving Outcomes for Disconnected Youth. Under this priority, we considered applications that proposed pilots that were designed to improve outcomes for disconnected youth who resided in communities that were not included in Absolute Priorities 2 and 3.

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<sup>1</sup> Available at: [http://youth.gov/docs/P3\\_Consultation\\_Paper\\_508.pdf](http://youth.gov/docs/P3_Consultation_Paper_508.pdf).

- Absolute Priority 2—Improving Outcomes for Disconnected Youth in Rural Communities. Under this priority, we considered applications that proposed to improve outcomes for disconnected youth in one or more rural communities only.
- Absolute Priority 3—Improving Outcomes for Disconnected Youth in Tribal Communities. Under this priority, we considered applications from a partnership that included one or more Indian tribes that proposed to improve outcomes for disconnected youth in one or more Indian tribes.

The Round 1 notice also included three competitive preference priorities that awarded additional points to applications that met certain requirements. The first two priorities awarded additional points to applicants that proposed to implement an independent evaluation of their projects, while the third awarded additional points linked to select local communities. Under Competitive Preference Priority 1, up to 5 additional points were available for applicants that proposed to carry out an independent evaluation that used a quasi-experimental design, while 10 additional points were available under Competitive Preference Priority 2 to applicants that proposed to carry out an independent evaluation that was a randomized controlled trial. Applicants' evaluation proposals were scored based on the clarity and feasibility of the proposed evaluation design and the applicants' demonstrated expertise in planning and conducting a study that used a quasi-experimental design or that was a randomized controlled trial. The third competitive preference priority awarded two points to projects that were designed to serve and coordinate with a Federally designated Promise Zone.

Additionally, the Agencies made available to the FY 2014 P3 pilots start-up grants of up to \$700,000 each to support ongoing planning, streamlined governance, strengthened data infrastructure, improved coordination, and related activities to help pilots improve outcomes for disconnected youth.

Applicants were given 100 days to submit applications. To promote the opportunity and provide technical assistance to prospective applicants, the Agencies held two webinars that were hosted by DOL. The first webinar focused on the notice inviting applications, and the second provided technical assistance to prospective applicants that were considering proposing independent evaluations. These webinars were viewed collectively by 777 individuals. The Agencies also published answers to frequently asked questions about the notice and the pilot authority at [www.youth.gov/P3](http://www.youth.gov/P3) and updated the guidance as needed throughout the application period.

ED received 27 eligible applications in response to the Round 1 notice. Using the selection criteria published in the notice, Federal staff from the Agencies, as well as from the U.S. Department of Agriculture and the U.S. Department of Housing and Urban Development, with expertise in areas relevant to P3, such as dropout prevention, intervention, and re-engagement and improving employment outcomes for vulnerable youth and young adult populations, reviewed and scored these 27 applications. The selection criteria addressed: (1) the need for the project (up to 5 points); (2) the need for requested flexibility, including blending of funds and other waivers (up to 10 points); (3) project design (up to 25 points); (4) work plan and project management (up to 10 points); (5) partnership capacity (up to 15 points); (6) data capacity (up to 30 points); and (7) budget and budget narrative (up to 5 points). In addition, reviewers who had

expertise in research and evaluation scored Competitive Preference Priorities 1 and 2, the two priorities for independent evaluations.

Following this review, the Agencies reviewed the top-ranked applications and the waivers they sought to determine whether they could be granted under the P3 authority or existing waiver authority, whether the inclusion of a program or particular waiver would be consistent with other significant legal or policy considerations, and whether the waiver was needed. To clarify their waiver requests, the top-ranked applicants were asked to respond in writing to Agency questions and to participate in one or more telephone conference calls. The Agencies selected nine applicants to be finalists for Round 1 pilots. On September 30, 2015, ED awarded \$6,154,998 in start-up funds to these nine applicants, but conditioned their access to these funds on their signing a final performance agreement with the Agencies that administered programs included in the project. Abstracts of the nine projects appear in Appendix A.

The Agencies then proceeded to negotiate performance agreements with the nine entities. Section 526(c)(2) of Division H of the 2014 Act specifies the contents of these agreements. The 2014 Act indicated that each agreement must include:

- The length of the agreement, which could extend to September 30, 2018;
- The Federal programs and Federally funded services that are involved in the pilot;
- The Federal discretionary funds that are being used in the pilot and the period of availability for the obligation of such funds;
- The non-Federal funds that are involved in the pilot, by source (which may include private funds as well as governmental funds) and by amount;
- The State, local, or tribal programs that are involved in the pilot;
- The populations to be served by the pilot;
- The cost-effective Federal oversight procedures that will be used for the purpose of maintaining the necessary level of accountability for the use of the Federal discretionary funds;
- The cost-effective State, local, or tribal oversight procedures that will be used for the purpose of maintaining the necessary level of accountability for the use of the Federal discretionary funds;
- The outcome (or outcomes) that the pilot is designed to achieve;
- The appropriate, reliable, and objective outcome-measurement methodology that will be used to determine whether the pilot is achieving, and has achieved, specified outcomes;
- The statutory, regulatory, or administrative requirements related to Federal mandatory programs that are barriers to achieving improved outcomes of the pilot; and
- Criteria for determining when a pilot is not achieving the specified outcomes that it is designed to achieve and subsequent steps, including: (1) the consequences that will result; and (2) the corrective actions that will be taken in order to increase the likelihood that the pilot will achieve such specified outcomes.

### **Implementation of the Fiscal Year 2015 Authority (Round 2)**

ED continued to be the lead Federal agency responsible in FY 2015 for soliciting applications and managing the P3 initiative on behalf of the Agencies.

## Notice of Proposed Priorities

The Consolidated and Further Continuing Appropriations Act, 2015 (Public Law 113-235) (the 2015 Act) extended the P3 authority to provide for up to 10 additional pilots and allow for the inclusion of certain funds from the Department of Justice. To implement this authority and solicit public comment, on October 22, 2015, ED published on behalf of the Agencies [a notice of proposed priorities, requirements, definitions, and selection criteria](#) (NPP) in the *Federal Register* (80 FR 63975). The priorities, requirements, definitions, and selection criteria proposed in this notice were based largely on the priorities, requirements, definitions, and selection criteria that were used in the November 2014 notice inviting applications for Round 1. For example, as in the November 2014 notice, the NPP proposed priorities for projects that serve disconnected youth in rural, tribal, and other communities. One of the lessons learned in Round 1 was that the use of absolute priorities promoted greater diversity in pilot settings than might otherwise have been achieved. In Round 1, the Agencies selected one project that proposed to serve a rural community (Eastern Kentucky Concentrated Employment Programs) and one project submitted by a partnership led by an Indian tribe that proposed to serve disconnected youth in an Indian tribe (Ysleta del Sur Pueblo). However, the Round 1 notice and the NPP documents differed in several other important respects:

- *Additional Priorities for High-Need Subpopulations.* The NPP also proposed additional priorities that focused on high-need subpopulations of disconnected youth, including priorities for disconnected youth who are unemployed and not enrolled in education, English learners, individuals with disabilities, homeless, in foster care, involved with the justice system, and refugees or other immigrants. In Round 1, the Agencies learned that State, local, and tribal governments may need additional incentives to focus their P3 projects on a variety of high-need subpopulations of youth. Most of the 27 applications that were submitted in Round 1 focused on disconnected youth who were at risk of dropping out of an educational institution. As a result, the Agencies proposed these additional priorities to create a means of providing incentives to applicants to serve the most vulnerable populations of disconnected youth.
- *Priority for Work-Based Learning.* In addition, the NPP proposed a priority for projects that provide paid work-based learning opportunities, including opportunities that are offered during the summer months, which are integrated with academic and technical instruction. As indicated in the NPP, the Agencies proposed this priority because the employment rate among youth has declined precipitously over the last decade, and addressing the employment needs of disconnected youth is critical to improving their well-being and preparation for lives as productive adults.
- *A Single Priority for Evaluation.* The NPP proposed to establish a single priority for projects that would support evaluations that use either a randomized controlled trial or a quasi-experimental design, rather than two separate priorities for these two kinds of evaluations as the notice inviting applications for the first Round of P3 had done. Applicants' proposed evaluation plans would be evaluated based on the quality of the proposed evaluation's design, appropriateness of the design to best capture key pilot outcomes, the scale of the contribution the evaluation will make to the evidence base, and the applicant's expertise in planning and conducting comparable studies.

- *Streamlined Application Requirements.* To reduce burden on applicants and facilitate the review process, the NPP proposed to eliminate or streamline several of the application requirements. During their review of the applications in Round 1, the Agencies determined that some of the information applicants were required to submit could be streamlined or simplified to reduce burden on applicants, as well as to facilitate the timely review of applications by reviewers. Additionally, the NPP proposed to collect some of this information in table form to make clearer to applicants all of the data they must provide in their applications and to simplify how applicants provide these data.
- *Simplified Selection Criteria.* The NPP also proposed streamlined and simplified selection criteria to reduce burden on applicants, as well as to improve their focus on the factors that the Agencies consider to be most critical to the successful implementation of pilots.

Eleven parties submitted comments in response to the NPP. A key theme of the comments was concern that the FY 2014 selection process for pilots was too complicated. Generally, respondents encouraged the Agencies to streamline further the application requirements and simplify the review process. Some respondents encouraged the Agencies to direct or encourage applicants to focus on youth with the greatest needs and recommended additional priorities (e.g., applicants proposing to serve disconnected youth who are parents, applicants proposing to serve urban communities that have experienced violent protests) and supported additional priorities that were proposed (e.g., immigrant or refugees, English learners, homeless youth).

Other commenters were concerned that introducing new priorities in the competition under the FY 2015 authority would further complicate the process.

#### Notice of Final Priorities

On behalf of the Agencies, ED published [a notice of final priorities, requirements, definitions, and selection criteria](#) (NFP) in the *Federal Register* on April 28, 2016 (81 FR 25339). In response to public comment, the NFP reduced burden on applicants by removing several application requirements that had been proposed in the NPP. The NFP also revised the priority for disconnected youth who are unemployed and out-of-school to limit it to those youth who face significant barriers to accessing education and employment. Additionally, the NFP revised the priorities for projects designed to improve outcomes for subpopulations of high-need disconnected youth (i.e., youth who are unemployed and out of school, youth who are English Learners (ELs), youth with a disability, homeless youth, youth in foster care, youth involved in the justice system, and youth who are immigrants or refugees) to specify that, in order to meet the priority, a project must serve the particular subpopulation identified in the priority and also be likely to result in significantly better educational or employment outcomes for the subpopulation. Finally, in response to a public comment, the NFP established an additional priority for projects that serve youth who are pregnant or parenting and that are likely to result in significantly better educational or employment outcomes for such youth.

## Round 2 Notice Inviting Applications (FY 2015)

On behalf of the Agencies, ED published a [notice inviting applications](#) (NIA) in the *Federal Register* on April 26, 2016, (81 FR 24573) for FY 2015 (Round 2 notice).

The Round 2 notice included four absolute priorities, which, for the purposes of the second round of P3 competition, created separate categories for scoring and considering applications:

- Absolute Priority 1—Improving Outcomes for Disconnected Youth. Under this priority, the Agencies considered applications that were designed to improve the outcomes of disconnected youth who reside in communities that are not included in Absolute Priorities 2, 3, or 4.
- Absolute Priority 2—Improving Outcomes for Disconnected Youth in Rural Communities. Under this priority, the Agencies considered applications that were designed to improve the outcomes of disconnected youth in one or more rural communities only.
- Absolute Priority 3—Improving Outcomes for Disconnected Youth in Tribal Communities. Under this priority, the Agencies considered applications from a partnership that included one or more Indian tribes that were designed to improve the outcomes of disconnected youth in one or more Indian tribes.
- Absolute Priority 4—Improving Outcomes for Disconnected Youth in Communities that Have Recently Experienced Civil Unrest. Consistent with language that Congress added in the Consolidated Appropriations Act, 2016 (Public Law 114-113) (the 2016 Act), under this priority, the Agencies considered applications that were designed to improve outcomes for disconnected youth in one or more communities that have recently experienced civil unrest. The notice indicated that, though the economy has recovered strongly in many places, many communities continue to struggle with high youth unemployment, low graduation rates, and crime. The notice stated that these and other continuing challenges can manifest in different instances of civil unrest, such as large protests or instances of civil disobedience, increases in self-directed or interpersonal violence in concentrated areas, or civic disorder prompted by a public health emergency.

The Round 2 notice also included four competitive preference priorities that allowed applicants to receive extra points for satisfying certain criteria:

- Competitive Preference Priority 1 awarded up to five additional points for projects that proposed to serve those disconnected youth who are neither employed nor enrolled in education and who also face significant barriers to accessing education and employment and that are likely to result in significantly better educational or employment outcomes for such youth.
- Competitive Preference Priority 2 awarded three additional points to projects that proposed to provide all disconnected youth it serves with paid work-based learning opportunities.

- Competitive Preference Priority 3 awarded two additional points to projects that were designed to serve and coordinate with a Federally designated Promise Zone.
- Competitive Preference Priority 4 awarded up to an additional 10 points to applications that proposed to conduct an independent evaluation of the impacts on disconnected youth of its overall program or specific components of its program that is a randomized controlled trial or a quasi-experimental design study.

Additionally, the Agencies announced that they would make available to the FY 2015 P3 pilots start-up grants of up to \$350,000 to support ongoing planning, streamlined governance, strengthened data infrastructure, improved coordination, and related activities to help pilots improve outcomes for disconnected youth. The amount of the start-up grants was reduced based on competing priorities for agency funds and on the fact that one of the purposes of P3 is to focus on flexibility rather than new funding for the pilot sites. However, maintaining start-up grants was important based on feedback from the field in responses to the NPP that indicated that the start-up funding plays a critical role in launching and evaluating pilots.

Applicants were given 60 days to submit applications so that pilot finalists could be selected by the end of the fiscal year. To promote the opportunity and provide technical assistance to prospective applicants, the Agencies held a webinar on May 9, 2016, that was hosted by HHS. The webinar was viewed over 400 times during the first broadcast, and was available online for later viewing. The Agencies also published answers to frequently asked questions about the notice and the pilot authority at [www.youth.gov/P3](http://www.youth.gov/P3).

A number of applications received in response to the round 2 notice were not eligible because they did not meet all of the requirements in the notice, including the deadline for the submission of applications. To allow applicants additional time to prepare and submit their applications, ED reopened the competition on July 12, 2016, for one week to invite and accept additional applications. If applicants had submitted ineligible applications, they had time to address the issues that made their application ineligible and to submit a revised application.

In response to the notice reopening the competition, ED received three potentially eligible applications. Using the selection criteria published in the first notice, individuals with expertise in areas relevant to P3, such as dropout prevention, intervention, and re-engagement and improving employment outcomes for vulnerable youth and young adult populations, reviewed and scored these three applications. In addition, reviewers who had expertise in research and evaluation scored Competitive Preference Priority 4, the priority for independent evaluations.

The Agencies selected one applicant to be a finalist for designation as a Round 2 pilot, Maricopa County Education Service Agency in Phoenix, Arizona. On September 30, 2016, ED awarded \$350,000 in start-up funds to this applicant but conditioned its access to these funds on its meeting certain conditions that would allow the agencies to grant the necessary waivers and its signing a final performance agreement with ED and DOL, the two agencies that administer programs that would be included in the project. An abstract that describes the proposed pilot appears in Appendix A.

## **Implementation of the Fiscal Year 2016 Authority (Round 3)**

### Round 3 Notice Inviting Applications (FY 2016)

The 2016 Act reauthorized P3, allowing for the creation of up to 10 additional pilots, as well as allowing for the inclusion of FY 2016 Homeless Assistance Grants administered by the Department of Housing and Urban Development (HUD). On behalf of the Agencies, ED published an [NIA](#) in the *Federal Register* on August 15, 2016, (81 FR 54056) for FY 2016 (Round 3 notice). This notice differed from the Round 2 notice in three respects:

- *Homeless Assistance Programs.* Consistent with section 242 of Division L of the 2016 Act, the Round 3 notice permitted applicants to include FY 2016 Homeless Assistance Grant programs administered by HUD. These are the Continuum of Care Program and the Emergency Solutions Grants Program.
- *Deferred Application Requirements.* The Round 2 notice required all applicants to include with their applications a memorandum of understanding or letter of commitment from each partner that described the terms and conditions of its participation in the pilot. All applicants for Round 2 also were required to include in their initial application an assurance that the State, local, or tribal government(s) with authority to grant any needed non-Federal flexibility, including waivers, has approved or will approve such flexibility within 60 days of an applicant's designation as a pilot finalist; or include an assurance that non-Federal flexibility, including waivers, is not needed in order to successfully implement the pilot. To reduce burden on applicants, the Round 3 notice did not require applicants to include these documents in their applications. Instead, these documents were requested only from top-scoring applicants following the peer review of applications. Top-scoring applicants had 21 days after their notification by ED to submit these documents.
- *Longer Application Period.* The application period for Round 3 was 75 days, 15 days longer than the application period in the Round 2 notice. The deadline for applications was October 31, 2016.

As in Round 2, HHS hosted a webinar for prospective applicants on August 25, 2016. DOL, ED, and HHS staff participated in delivering the briefing. Eighty people viewed the live webinar, and a recording was viewed almost 600 times.

In response to the third notice inviting applications, ED received 15 potentially eligible applications. (An application is potentially eligible when the applicant meets the basic eligibility criteria but the application has not yet been reviewed for meeting all application requirements.) Using the selection criteria published in the first notice, individuals with expertise in areas relevant to P3, such as dropout prevention, intervention, and re-engagement and improving employment outcomes for vulnerable youth and young adult populations, reviewed and scored these applications. In addition, reviewers who had expertise in research and evaluation scored Competitive Preference Priority 4, the priority for independent evaluations.

The Agencies selected six applicants to be finalists for designation as Round 3 pilots. On January 19, 2017, ED awarded \$1,498,172 in start-up funds to these six finalists but conditioned their access to these funds on their meeting certain conditions that would allow the agencies to grant the necessary waivers and their signing a final performance agreement with the applicable agencies. Abstracts that describe the proposed pilots appear in Appendix A.

### **National and Site Evaluations**

The primary purpose of a demonstration such as P3 is to learn about new program models. To this end, in addition to giving priority to applicants that proposed a rigorous evaluation (described above) certain participating agencies were able to allocate resources to support a national evaluation. The national evaluation will document the extent to which P3 led to increased coordination across agencies and programs in support of greater flexibility for selected communities to improve outcomes for disconnected youth. The national evaluation also will synthesize individual site evaluations and, in doing so, highlight effective and promising practices for improving outcomes for disconnected youth. The national evaluation includes:

- *Evaluation Technical Assistance:* Rounds 1, 2, and 3 sites and their independent evaluators will receive assistance in designing and conducting P3 site evaluations.
- *Systems and Process Analysis:* Analysis of P3 implementation and processes and national program and service delivery systems changes that have resulted from P3. Analysis will be based on site visits, interviews, and partner surveys with Round 1 sites, and interviews with Federal staff.
- *Collection of Participant Data:* Cross-site synthesis of site data and reports to describe Round 1 pilots and participant characteristics and outcomes, based on data collected by sites.
- *Synthesis of Local Evaluation Reports:* Cross-site aggregation and (to the extent possible) comparison of Round 1 sites based on sites' final evaluation reports and data.

The final report will be available in 2020, with interim findings available in 2019. Due to the absence of dedicated resources, the national evaluation activity for Rounds 2 and 3 may have to be limited to technical assistance to support evaluations conducted by individual sites. The national evaluation is being managed by the Department of Labor, and conducted under contract by Mathematica Policy Research.

### **Conclusion: Questions and Considerations**

The P3 pilot sites and national evaluations for Round 1 will not have interim findings until 2019 and final findings until 2020. Given this, it is premature to provide recommendations regarding scaling P3 or applying best practices more broadly. Nevertheless, the experiences to date of Federal agencies and feedback from pilot sites and applicants suggest a number of questions and considerations that may warrant attention. As P3 evolves, new lessons may emerge, and the national evaluation will provide a more rigorous assessment of P3 implementation and the

success of individual pilots. The below questions and considerations highlight preliminary lessons of P3 that may inform Congress when considering future P3 authorization.

- *How can application and appropriations cycles best align?* The year-to-year authority to conduct P3 makes it difficult for potential applicants to have sufficient time to plan and prepare applications while still allowing adequate time for Federal agency review. The timing under P3 thus far can present difficulties, as applicants need to reserve funding early in the fiscal year to support a potential pilot but do not know whether they have been selected as a pilot until late in the fiscal year, or even the following fiscal year. Multi-year authority, or an authority that is not dependent on the appropriations cycles, would facilitate applications and allow agencies to better plan and implement the program, including improvements to the application process requested by applicants. Congress may want to consider including such authority in any future P3 authorization.
- *How should the application process be structured?* A staged application process may better serve applicants, allowing them to submit shorter, preliminary proposals for consideration and feedback, including technical assistance discussed below, and allowing discussion of whether Federal waivers are required for potential projects. A staged process could reduce the burden of applying for P3. Such an application process would not necessarily require a modification of statutory language authorizing P3. However, because such a process would require a longer application period, the staged process would be most feasible if P3 were authorized on a multi-year basis or through an authority that is not dependent on the appropriations cycles.
- *What resources and capacity are needed to administer P3?* P3 lacks dedicated resources, which has limited funding available to support grantee start-up, technical assistance, and evaluation. Adequate federal staffing to administer P3 remains a challenge, given the complexity of the initiative. A recent Government Accountability Office (GAO) report recommended that agencies determine the resources needed to administer P3 in order to better plan for completing the current rounds of pilots and identifying the capacity and resource implications of scaling P3.
- *At what stage is technical assistance most valuable?* The pilot selection process has demonstrated that many applicants would benefit from Federal engagement and technical assistance during demonstration planning and prior to application, regarding concept and service model, evaluation design, and identifying current barriers and the need for potential waivers. Technical assistance has been a cornerstone of pilot progress but has occurred during implementation only. It appears that greater technical assistance upfront could reduce the need for ongoing technical assistance after pilot selection, and potentially result in greater efficiency and stronger pilots. Shifting technical assistance in this manner would not necessarily require a modification of the statutory language authorizing P3, but the extent to which Federal agencies could provide greater upfront technical assistance would be limited by capacity and available resources.
- *How might agencies support applicants not needing P3 waivers in pursuing program improvements?* Some P3 applicants with promising proposals to improve outcomes have been denied because the proposed projects do not require Federal waivers. Some of these

projects may benefit from technical assistance, peer learning, and evaluation. Given this, it may make sense to consider how projects that do not require Federal waivers could contribute to P3's broader agenda for improving outcomes. The extent to which Federal agencies could do this would be limited by capacity and available resources, but would not necessarily require a modification of the statutory language authorizing P3.

**APPENDIX A: Pilot Summaries**

**FY 2014 (Round 1) Pilot Summaries**

**Pilot Lead: City of Los Angeles (CA)**

The City of Los Angeles and core partners including the County of Los Angeles, the Los Angeles Unified School District (LAUSD), and the Los Angeles Community College District will enhance service systems for disconnected youth. By building on its infrastructure of 16 YouthSource Centers (YSCs) strategically located in neighborhoods with high dropout rates, as well as within the Los Angeles Promise Zone, LA P3 will target youth who are ages 16 through 24, high school drop-outs, in foster care, homeless, or on probation. Funded with local education dollars, funds provided under the youth program authorized by Title I of the Workforce Innovation and Opportunity Act (WIOA) and a Workforce Innovation Fund (WIF) grant, the YSCs conduct outreach to, and principally serve, disconnected youth. The LAUSD co-locates a school counselor at each YSC to provide youth with school re-enrollment assistance and to make referrals to school system resources, such as mental health services, and other support services. Through LA P3, the City will expand the employment and education services available to youth through the YSCs and extend the YSC partnership to include regional areas throughout Los Angeles County. The enhanced service model will include Los Angeles County Departments such as the Department of Community and Senior Services, Department of Health Services, Department of Children and Family Services, Probation Department, Department of Public Social Services, the State Employment Development Department, local Cal State Universities (CSU5), the Los Angeles LGBT Center, the LA Chamber and many others. The pilot will braid the following Federal and Non-Federal funding sources to support services for the disconnected youth target population: WIOA Title I Youth and Title I Adult programs, Runaway and Homeless Youth Act Transitional Living Program, Promise Neighborhoods, local funding, and My Brother’s Keeper (private philanthropy). The project will seek to serve 8,000 youth.

The chart below identifies the waivers the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
Transitional Living Program (TLP)	Authorize the Los Angeles LGBT Center to increase the eligibility age from 21 to 24 for homeless youth in the TLP. The Los Angeles LGBT Center is required to submit a report that outlines the number of youth participants by age to demonstrate that the number of younger youth (ages 16-21) served is not decreased as a result of broader eligibility for older youth.	Runaway and Homeless Youth Program Authorizing Legislation Part B—Transitional Living Grant Program Sec. 322 Eligibility and Sec. 387 Definitions

Program	Waiver	Citation
Workforce Innovation and Opportunity Act (WIOA) Title I Youth	For funds used as part of the P3 pilot, consider foster, homeless, and runaway youth who are in school to be counted in the 75 percent out-of-school youth service category for fiscal accounting purposes only. The DOL, Employment and Training Administration, approved this waiver only for the youth participating in the pilot. The waiver addresses a fiscal accounting reporting and documentation burden. The applicant believes that even if this waiver were not granted, it would still meet the 75 percent out of school service requirement in WIOA Section 129(a)(4)(A).	WIOA Sec. 129 (a)(1)(B)

Consulting Agency<sup>2</sup>: U.S. Department of Labor  
Participating Agency<sup>3</sup>: U.S. Department of Health and Human Services

**Pilot Lead: Children’s Services Council of Broward County (FL)**

The Children’s Services Council of Broward County will blend funding under the Workforce Innovation and Opportunity Act (WIOA) Title I Youth program with funds from the 21st Century Community Learning Centers (21st Century CLC) program to deliver a comprehensive program for at-risk youth that will utilize a tiered case management service approach. The Best Opportunities to Shine and Succeed (BOSS) program will serve 420 at-risk youth enrolled at six Broward County high schools who are credit deficient, failed an End of Course (EOC) exam, or have documented behavioral problems. Case managers will work with participants to create and carry out individualized service strategies that identify the academic supports and services they need to complete high school. Each site will offer daily homework help and tutoring to prepare student participants for EOC exams that will be supervised by a certified teacher. Credit recovery will be offered online two days a week, allowing students to earn high school credit for classes they failed during the regular school day. Career and technical education will be offered bi-weekly. BOSS also will support career exploration and employability skills development and provide entrepreneurial education and work experience opportunities. BOSS will offer the Teen Outreach Program®, YMCA Youth In Government Program® and goLEAD youth development and service-learning program bi-weekly at each site. The project also will braid funding provided under the Library Services and Technology Act to deliver support for researching and pursuing postsecondary educational opportunities.

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<sup>2</sup> The Consulting Agency is the Federal agency that leads monitoring of the individual pilot on behalf of the Federal agencies.

<sup>3</sup> A Participating Agency is the Federal agency that provides support to the Consulting Agency, as appropriate. For each pilot, any agency whose program or funds are involved in the particular pilot is a Participating Agency for that pilot.

The chart below identifies the waivers the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
WIOA Title I Youth	<p>Negotiate minimum out-of-school youth expenditure amount. For Program Year (PY) 2015 funds, the applicant is required to meet the expectations set forth in DOL’s Training and Employment Guidance Letter (TEGL) 23-14. Those requirements include spending no less than 50 percent of the local area’s total youth expenditures on out-of-school youth (OSY) using PY 2015 funds not counting the expenditures for this pilot project. Local areas have two years to spend their local youth funds therefore the 50% OSY expenditure rate for PY 2015 funds must be met by June 30, 2017.</p> <p>For PY 2016 funds, the applicant is required to spend no less than 60% of the local area’s total youth expenditures on OSY not counting the expenditures for this pilot project. Local areas have two years to spend their local youth funds therefore the 60 percent OSY expenditure rate for PY 2016 funds must be met by June 30, 2018. For the following years, DOL will negotiate the local area’s expenditure requirement based on a baseline from the local area’s expenditures with PY 2014 and PY 2015 funds, taking into account expenditures used for this pilot.</p>	WIOA Sec. 129(a)(4)(A)
WIOA Title I Youth	Waive WIOA’s eligibility requirements. Approved only for the youth participating in the pilot. This is not intended to broaden eligibility for WIOA. The intent is to address a reporting and documentation burden. To lessen the administrative burden, the applicant will establish eligibility based on a school-wide income designation and student risk factors. The applicant asserts all or substantially all of the youth in this program would be eligible for WIOA under section 129. The applicant asserts that analysis of income designation and risk factors would result in a substantial overlap with the youth eligible for services under section 129 of WIOA.	WIOA Sec. 129 (a)(1)(c)

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
WIOA Title I Youth	Waive Workforce Investment Act (WIA)/WIOA performance measures and use proposed alternative measures instead. Conditional. The State must submit a letter acknowledging the applicant's request for performance flexibility.	WIOA Sec. 116(B)(2)(A)(ii)(I – III)
21 <sup>st</sup> Century CLC	Allow 21st Century CLC funds to be used to support authorized activities during the school day. Conditional on the written assurance that the funds will be used to supplement, and not supplant, other Federal, State, and local public funds expended to provide programs and activities authorized under the 21st Century CLC program and other similar programs.	Secs. 4201(b)(1)(A) and 4204(a) of the Elementary and Secondary Education Act (ESEA)
Department of Education General Administrative Regulations (EDGAR)	Waive the prohibition against subgranting U.S. Department of Education funds unless authorized by statute or by 34 CFR §75.708 (b) in order to enable the Pilot Lead to subgrant 21st Century CLC funds to Hispanic Unity of Florida and the YMCA of Broward County to carry out the activities described in the approved application.	34 CFR §75.708 (a)

Consulting Agency: U.S. Department of Education

Participating Agencies: U.S. Department of Labor, Institute of Museum and Library Services

**Pilot Lead: Chicago Department of Family and Support Services (IL)**

The Chicago Department of Family and Support Services will braid Head Start funds and Workforce Innovation and Opportunity Act Title I Youth funds from the Chicago-Cook Workforce Partnership to provide comprehensive services for young mothers and their children through a two generational model that addresses the education, employment, and developmental needs of parents and their children. The Chicago Young Parents Program (CYPP) will serve 210 young mothers between the ages of 14 and 24 who have children under age 6 and who have dropped out of high school, postsecondary education, and/or the workforce or who are at risk of dropping out. Children will be enrolled in Head Start or Early Head Start depending on their age, and will remain eligible for the program through the duration of the parent's participation in CYPP. Each CYPP participant will be assigned a mentor who will lead weekly enrichment sessions for participants that will include social-emotional learning and cognitive behavioral therapy, conduct biweekly home visits using the Parents as Teachers curriculum, and provide other individualized support to participants throughout their participation in the program. CYPP also will provide participants with a paid, part-time work experience at a Head Start center and job training to prepare them to join the early learning workforce. Additionally, participants and their children will be brought together once a month for age-appropriate developmental activities.

The chart below identifies the waivers the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
Head Start	Waive the requirement for the redetermination of income eligibility for all children transitioning from Early Head Start to Head Start to allow all participants to remain eligible for the CYPP for the two years of the program. The waiver request is granted for the children participating in this Pilot.	Head Start Regulation 45 CFR 1305.4 (i)(4)
Head Start	Waive income eligibility requirements. Household income is the income assessed to determine child eligibility. Waiver allows youth living with parents/relatives or guardians, regardless of parent/relative/guardian income, to be determined eligible for enrollment in CYPP and their children to be determined to be eligible for Head Start or Early Head Start. This request is approved for the children participating in this pilot.	Head Start Regulation 45 CFR 1305.4(c)
Workforce Innovation and Opportunity Act (WIOA) Title I Youth	Waive WIA/WIOA performance measures and use proposed alternative measures instead for the youth participating in this Pilot. This request is conditionally approved. The State must submit a letter acknowledging the applicant's request for performance flexibility.	WIOA Sec. 116. (b)(2)(A)(ii)(I-III)
WIOA Title I Youth	Waive WIOA eligibility requirements and permit in-school youth (ISY) to be counted as OSY only for youth participating in this project, and for fiscal accounting purposes only. This request is approved only for the youth participating in the pilot. The Chicago Cook Workforce Partnership anticipates that without the waiver it would meet the requirements of WIOA Sec. 129(a)(1). The waiver addresses the fiscal accounting reporting and documentation burden of separately keeping track of ISY and OSY.	WIOA Sec. 129(a)(1)
Department of Education General Administrative Regulations (EDGAR)	Waive the prohibition against subgranting U.S. Department of Education funds unless authorized by statute or by 34 CFR §75.708 (b) in order to enable the Pilot Lead to subgrant P3 start-up grant funds to Chapin Hall and SGA Youth and Family Services to carry out the activities described in the approved application.	34 CFR §75.708 (a)

Consulting Agency: U.S. Department of Health and Human Services

Participating Agency: U.S. Department of Labor

**Pilot Lead: City of Indianapolis (IN)**

The City of Indianapolis will provide comprehensive, concentrated, and coordinated services to low-income, disconnected youth ages 14 through 24 who reside within two public housing communities that are located in the city’s Opportunity Zone, a collective impact initiative modeled on the Northside Achievement Zone in Minneapolis, MN. Indiana Black Expo, a project partner, will provide two “connectors” who will each assist approximately 40 youth at a time develop individual service/success plans and access services from 40-50 public and private nonprofit partners such as EmployIndy, the local workforce development board, and HealthNet, a health care provider. EmployIndy will blend funds from YouthBuild and the youth program authorized by Title I of WIOA to provide employment and training services to participants. The project will braid funds from the adult program authorized by Title I of WIOA.

The pilot was granted the flexibility to blend funds from YouthBuild and the WIOA Title I Youth program.

Consulting Agency: U.S. Department of Labor

**Pilot Lead: Eastern Kentucky Concentrated Employment Programs (KY)**

The Eastern Kentucky Concentrated Employment Program (EKCEP), Inc., a local workforce development board, will work with Partners for Education at Berea College and the Kentucky Highlands Promise Zone to provide services and activities to address the needs of 1,000 disconnected youth in the rural Southeastern Kentucky Promise Zone. The project will primarily serve: (1) at-risk youth ages 16 through 18 who are enrolled in school, with a particular focus those youth who are returning to school because the state’s compulsory school age increases this year to age 18 and those in-school youth that are disengaged; (2) young parents with career or educational needs; and (3) youth ages 19 through 24 who are neither enrolled in school nor working. The project will implement career focused programs in the high schools, an early warning system to identify youth who are at-risk of dropping out, a Families and Schools Together program for youth parents, individual career coaching and advising, and work-based career learning opportunities (including internships and on-the-job training). EKCEP will blend funds from Workforce Innovation and Opportunity Act Title I Youth, GEAR UP, and Promise Neighborhoods and braid funds from Full Service Community Schools.

The chart below identifies the waivers the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
GEAR-UP	Waive the GEAR-UP requirement that grant funds be used to serve a certain grade-level/cohort:  (a) Each cohort to be served by a Partnership or State must be from a participating school—(1) That has a 7th grade; and (2) In which at least 50 percent of the students are eligible for free or reduced-price lunch.	34 CFR 694.3(a); HEA sec. 404B(d)

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
GEAR-UP	Waive the GEAR-UP requirement that grant funds be used to serve schools that meet certain requirements:  (a) In general. Each cohort to be served by a Partnership or State must be from a participating school—(1) That has a 7th grade; and (2) In which at least 50 percent of the students are eligible for free or reduced-price lunch under the National School Lunch Act.	34 CFR 694.3(a); HEA sec. 404B(d)
GEAR-UP	Waive GEAR UP requirement that:  The Secretary may award a grant under this division to an eligible entity described in paragraphs (1) and (2) of subsection (c) for—  (A) six years; or  (B) in the case of an eligible entity that applies for a grant under this division for seven years to enable the eligible entity to provide services to a student through the student’s first year of attendance at an institution of higher education, seven years.	HEA Sec. 404A(b)(2)
GEAR-UP	Waive the GEAR-UP matching requirement for the portion of GEAR-UP grant funds that are blended in the Pilot.	HEA Sec. 404C(b)
WIOA Title I Youth	Negotiate Minimum OSY Expenditure requirement. For the 1st year of the pilot, the applicant would be required to meet the expectations set forth in TEGE 23-14. For the following years, DOL will negotiate the local area’s expenditure requirement based on a baseline from the local area’s expenditures in 2014, taking into account expenditures used for this pilot, and requiring no less than 50% of the local area’s total youth allocation be spent on OSY. The local grantee will need to demonstrate notable progress toward the WIOA requirement of spending 75% of the youth funds for OSY.	WIOA Sec. 129(a) (4) (A)
WIOA Title I Youth	Waive WIOA eligibility requirement that OSY and ISY have “specific barriers” to be served. Approved only for the youth participating in the pilot.	WIOA Sec. 129(a) (1) (B) and (C)
WIOA Title I Youth	Waive WIA/WIOA performance measures and use proposed alternative measures instead. Approved with the condition that the State must submit a letter acknowledging the applicant’s request for performance flexibility.	WIOA Sec. 116. (b)(2)(A)(ii)(I-III)

Consulting Agency: U.S. Department of Education

Participating Agency: U.S. Department of Labor

**Pilot Lead: City of Baton Rouge/Parish of East Baton Rouge (LA)**

Baton Rouge will establish a coordinated infrastructure that will target 84 disconnected youth ages 14 through 24 who attend specialized schools serving youth who are two or more years behind for their grade in the local public school system. Using a random control treatment study design, the pilot will serve a randomly stratified sample of youth and has two objectives: (1) to facilitate and strengthen cross-sector partnerships among provider agencies, industry/employers, elementary and secondary schools, post-secondary institutions, juvenile justice providers, and local government; and (2) to create intensive and individualized pathways to success in education and careers for disconnected youth. All students enrolled in the targets schools will participate in alternative education focused on accelerated learning with individualized instruction, as well as career and technical education, flexible scheduling, service learning, and low student-teacher ratios. Those randomly selected into the treatment group will receive additional individualized and tailored services and supports. The pilot treatment group will be guided into a career pathway by a school-based career coach. The performance partnership pilot will be steered by the Baton Rouge Partnership Advisory Council that will provide specialized knowledge and community advocacy in order to empower a partnership to reconnect youth for positive life outcomes.

The chart below identifies the waivers the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
Carl D. Perkins Career and Technical Education Act of 2006	Waive grade eligibility requirement and allow provision of services starting in the 6th grade.	Section 315 of the Carl D. Perkins Career and Technical Education Act of 2006 (Public Law 109-270 )
WIOA Title I Youth Program	Waive WIA/WIOA performance measures and allow the use of proposed measures instead, with the condition that the State must submit a letter acknowledging the applicant's request for performance flexibility by January 31, 2015.	WIOA Sec. 116. (b)(2)(A)(ii)(I- III)

Consulting Agency: U.S. Department of Education

Participating Agency: U.S. Department of Labor

**Pilot Lead: Oklahoma Department of Human Services (OK)**

The Oklahoma Department of Human Services will implement a project to help youth in foster care complete educational requirements for high school graduation, postsecondary education, and employment. Career academies, Communities in Schools, and Check & Connect are the evidence-based and promising practices in education that will be used in the project. The project will target youth in local public schools who are ages 14 to 18 and provide transition services after graduation for postsecondary education and employment services. An estimated 150 youth

will be served by the project. The Department will braid funds from Workforce Innovation and Opportunity Act Title I Youth and Adult programs, Now Is the Time Healthy Transitions, Carl D. Perkins Career and Technical Education Act, AmeriCorps, and Chafee Education and Training Vouchers.

The chart below identifies the waivers the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
WIOA Title I Youth	<p>Negotiate minimum OSY expenditure amount. For Program Year (PY) 2015 funds, the applicant is required to meet the expectations set forth in DOL’s TEGL 23-14. Those requirements include spending no less than 50 percent of the local area’s total youth expenditures on OSY using PY 2015 funds not counting the expenditures for this pilot project. Local areas have two years to spend their local youth funds therefore the 50% OSY expenditure rate for PY 2015 funds must be met by June 30, 2017.</p> <p>For the following years, the U.S. Department of Labor will negotiate the local area’s expenditure requirement based on a baseline from the local area’s expenditures in 2014, taking into account expenditures used for this pilot, and requiring no less than 50% of the local area’s total youth allocation be spent on OSY. The local area plans to use around 10% of their local area funds for this project and all funds will be used for ISY (about 50 youth per year). The local grantee will need to demonstrate notable progress toward the WIOA requirement of spending 75% of the youth funds for OSY.</p>	WIOA Sec. 129(a)(4)(A)
WIOA Title I Youth	Waive Workforce Investment Act (WIA)/WIOA performance measures and use proposed alternative measures instead. Conditional. The State must submit a letter acknowledging the applicant’s request for performance flexibility.	WIOA Sec. 116(B)(2)(A)(ii) (I – III)

Consulting Agency: U.S. Department of Labor

**Pilot Lead: Ysleta del Sur Pueblo (TX)**

Ysleta del Sur Pueblo, a Federally recognized Indian tribe, will use P3 authority to establish the Tigua Institute of Academic and Career Development Excellence to provide counseling and educational services to 85 youth between the ages of 14 and 24. A Wraparound Counselor will work with each youth to develop an Individualized Service Plan (ISP) of education and training

services and supports, as well as coordinate the implementation of the plan. Youth also will participate in the Tigua Leadership Curriculum that will build the youths’ skills and help them successfully navigate through various systems to improve their chances of completing high school and pursuing career and technical training, postsecondary education, or employment. To carry out the pilot, Ysleta del Sur Pueblo will blend AmeriCorps funding from the Corporation for National and Community Service with funding from a Library Enhancement grant awarded by the Institute for Museum and Library Services.

The chart below identifies the waiver the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
AmeriCorps	Waive matching requirements.	42 U.S.C. § 12571; Pub. L. 113-76, Title IV, § 402; 45 C.F.R. §§ 2521.35, .45, .60, .70

Consulting Agency: Corporation for National and Community Service

Participating Agency: Institute of Museum and Library Services

**Pilot Lead: Workforce Development Council of Seattle - King County (WA)**

The Workforce Development Council of Seattle - King County (Council) will implement an innovative re-engagement strategy to achieve better educational and employment outcomes for 200 disconnected youth ages 16 to 24 who are neither enrolled in school nor employed. The pilot will include three key components: (1) strategic coordination of workforce development services with the state’s unique Open Doors policy, which provides K-12 funding for reengagement programs; (2) utilizing AmeriCorps members to develop a regional outreach strategy aimed at placing the hardest to serve youth in the region in programs that best reflect their interests and needs; and (3) advancing efforts toward a shared data system and common intake process that will enhance the coordination and targeting of services across the county. The Council will braid State basic education funding with Workforce Innovation and Opportunity Act Title I Youth program funds and funding from a Reentry Employment Opportunities grant.

The chart below identifies the waiver the pilot was granted.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
Reentry Employment Opportunities (REO)	Consider foster care and homeless youth to be eligible participants under the 10% exemption in REO. Approved only for the youth participating in the pilot.	Second Chance Act Sec. 212(a)(2)

Consulting Agency: U.S. Department of Labor

**FY 2015 (Round 2) Pilot Finalist  
Summary of Proposed Project**

**Pilot Lead: Maricopa County Education Service Agency (AZ)**

Maricopa County Education Service Agency (MCESA), Maricopa County Workforce Department, Maricopa County Regional School District, and the Arizona Manufacturing Apprenticeship seek to create an “earn and learn” apprenticeship program for up to 610 out-of-school youth ages 16 to 24 that will prepare them for skilled jobs in the local manufacturing industry. To support the program, MCESA would blend funds from the Workforce Innovation and Opportunity Act Title I youth program, Title I, Part A of the Elementary and Secondary Education Act (ESEA), and the P3 start-up grant. An independent evaluator would carry out a randomized controlled trial to evaluate the impact of the program on the outcomes of participating youth.

The chart below identifies the waivers the Agencies are considering granting under P3 or other waiver authority.

<b>Program</b>	<b>Waiver</b>	<b>Citation</b>
WIOA Title I Youth	Waive requirements of WIOA performance measures for youth participating in the pilot and instead use the project’s proposed outcome measures	WIOA Section. 116(b)(2)(A)(ii)
Title I, Part A of the Elementary and Secondary Education Act	Waive the limitation on serving individuals older than age 21	ESEA Section 1115(c)(1)(A)(i)
Title I, Part A of the Elementary and Secondary Education Act	Waive the Tydings Amendment to extend to September 30, 2018, the period of availability of \$60,000 of fiscal year 2015 Title I, Part A funds being used to support the Pilot .	General Education Provisions Act (GEPA) Section 421(b)

Consulting Agency: U.S. Department of Education

Participating Agency: U.S. Department of Labor

**FY 2016 (Round 3) Pilot Finalists  
Summaries of Proposed Projects**

**Pilot Lead: New York State Department of Education**

Working with school district partners in Albany and Rochester, the New York State Education Department (NYSED) will test the effectiveness of integrated case management in identifying and serving up to 120 disconnected youth who face significant barriers on their path to the future, with a particular focus on youth who have dropped out of school or who have been released from the juvenile justice system within the previous six months. A transition coordinator at each site will receive referrals of disconnected youth from school districts, child welfare agencies, and the juvenile justice system. The transition coordinator will provide intensive case management for youth based on jointly developed individual service plans. Youth will be linked with existing educational and employment services, and the transition coordinator will continue to follow up and track progress for up to four months. The project also will carry out a randomized controlled trial that will examine the impact of pilot services on youth educational and employment outcomes. Pilot funding includes 21st Century Community Learning Centers funds awarded to NYSED and Juvenile Justice and Delinquency Prevention Act Title II funds available from the New York State Division of Criminal Justice Services.

The chart below identifies the waivers the Agencies are considering granting under P3 or other waiver authority.

<b>Program</b>	<b>Possible Waiver</b>	<b>Citation</b>
21st Century Community Learning Centers	Waive the requirement in 34 CFR 76.50(b) that the authorizing statute determines the extent to which a State may use grant funds directly and make subgrants to eligible applicants, in order to permit the grantee to subgrant \$150,000 of the State’s FY 2016 21st CCLC program funds reserved for “State activities” under section 4202(c)(3) of the ESEA to two local educational agencies to carry out various authorized activities, as described in the grantee’s P3 application.	34 CFR 76.50(b)
21st Century Community Learning Centers	Waive the requirement in section 4201(b)(1)(A) of the ESEA that community learning centers assist “students” so that the two local educational agencies to which subgrants will be awarded may use 21st Century Community Learning Centers funds to support transition coordinators who work with youth who are not enrolled in school to help them resume their educations by re-enrolling in elementary or secondary school, or participating in State-approved high school equivalency and Learn-to-Work programs, as described in the grantee’s P3 application.	Section 4201(b)(1)(A) of the ESEA

<b>Program</b>	<b>Possible Waiver</b>	<b>Citation</b>
21st Century Community Learning Centers	Waive the requirement in section 4201(b)(1)(A) of the ESEA that 21st CCLC program activities be carried out during non-school hours or periods when school is not in session to enable transition coordinators to provide services during the school day to youth who have re-enrolled in elementary or secondary school.	Section 4203(b)(1)(A) of the ESEA

Consulting Agency: U.S. Department of Education

Participating Agency: U.S. Department of Justice

**Pilot Lead: Sacramento (CA) Housing and Redevelopment Agency**

The Sacramento Housing and Redevelopment Agency proposes to launch a pilot that will take a multi-disciplinary approach to serving 100 disconnected youth ages 16 to 24 who reside in a Promise Zone and who are homeless or at risk of becoming homeless, aging out of foster care, or on probation. The pilot will implement a housing first strategy that addresses the housing needs of participants before they are referred for other services. Once youth are stabilized in a safe environment, the program partners will work with the youth to attain education and employment goals. Collaboration among the partners will be enhanced by the development of an integrated data management system. Additionally, all front-line staff will be trained to deliver “youth mental health first aid” to help an adolescent who is experiencing a mental health or addictions challenge or is in crisis. The pilot will utilize funds from the Street Outreach Program, YouthBuild, and the WIOA Title I Youth program.

The chart below identifies the waivers the Agencies are considering granting under P3 or other waiver authority.

<b>Program</b>	<b>Possible Waiver</b>	<b>Citation</b>
WIOA Title I Youth	Waiver to allow youth (who participate in this pilot) who attend a high school equivalency program funded by public K-12 to be considered “out of school” for the purposes of WIOA eligibility.	20 CFR § 681.230
WIOA Title I Youth	Waiver to exclude only those WIOA Title I Youth funds allocated to P3 from the calculation of the local area’s 75% minimum out-of-school youth expenditure requirement.	WIOA Sec. 129(a) (4) (A)

Consulting Agency: U.S. Department of Health and Human Services

Participating Agency: U.S. Department of Labor

**Pilot Lead: Los Angeles (CA) County Community and Senior Services**

Los Angeles County Community and Senior Services proposes a pilot that will coordinate, expand, and evaluate career mentoring programs that will serve up to 225 disconnected youth ages 18 through 24 from the foster care system, the probation system, and Temporary Assistance for Needy Families. The pilot will provide youth with short-term exposure to public service careers through on-the-job training and guidance and support provided by public service employees who have been trained as career mentors. The pilot will include funds from the Workforce Innovation and Opportunity Act Title I youth program and Social Innovation Fund. An independent evaluator will collect data on participant experiences and outcomes and develop a “blueprint guide” to replicating the program.

The chart below identifies the waivers the Agencies are considering granting under P3 or other waiver authority.

<b>Program</b>	<b>Possible Waiver</b>	<b>Citation</b>
WIOA Title I Youth	Waive WIOA performance measures and use proposed measures instead.	WIOA Sec. 116(b)(2)(A)(ii)(I-III)

Consulting Agency: U.S. Department of Labor

Participating Agency: Corporation for National and Community Service

**Pilot Lead: City of Hartford (CT)**

The City of Hartford, in partnership with the State of Connecticut, Capital Workforce Partners, Connecticut Center for Advanced Technology, and two employer partnerships—Metro Hartford Alliance for Careers in Health Care and Advanced Manufacturing Employer Partnership—will engage 100 disconnected, justice-involved youth ages 14 through 24 who reside in the North Hartford Promise Zone in career pathways that offer career exploration, the opportunity to develop career competencies, and paid work-based learning. Throughout the pilot, each youth will be assigned a case manager who will help them navigate the educational, employment, health, service, mentorship, and supportive systems they need to succeed. Additional support will be provided by peer mentors who will be recruited from among youth leaders who have successfully completed one of the city’s Workforce Innovation and Opportunity Act (WIOA) Title I Youth programs. The pilot also will better integrate data systems used by the city’s youth-serving programs to aid case managers in identifying service gaps, matching youth to needed services and programs, and tracking their progress. The pilot will braid funds from the WIOA Title I Youth program, a Career Pathways for Youth grant, a Social Innovation Fund subgrant, and a Teenage Pregnancy Prevention Program grant.

The chart below identifies the waivers the Agencies are considering granting under P3 or other waiver authority.

<b>Program</b>	<b>Possible Waiver</b>	<b>Citation</b>
WIOA Title I Youth	Waiver of enrollment cap that precludes a local area from determining that more than 5% of in-school youth newly enrolled in a program year are eligible based on the “requires additional assistance to complete an educational program or to secure or hold employment” criterion.	20 CFR 681.310(b)
WIOA Title I Youth	Waiver of the definition of “low-income” individual applicable to youth served by the P3 program.	20 CFR 681.250(d)
WIOA Title I Youth	Waiver to allow youth who dropped out of school to keep their designation as an out-of-school youth (OSY) after entering a re-engagement program, recovery program, overage/under-credited program, or adult education, when such youth would not already keep their designation as OSY per the regulations.	20 CFR 681.230
WIOA Title I Youth	Waiver to allow applicant to serve youth who are identified as at-risk of becoming justice involved by the criminal justice system, or by a juvenile diversion program; youth who are at risk of becoming justice involve could include, but are not limited to, youth who are victims of crimes or youth who are members of gangs.	20 CFR 681.210(c)(4) and 20 CFR 681.220(d)(3)
WIOA Title I Youth	Waiver of out-of-school priority to permit less than 75 percent of funds available to the local area to be used to provide youth workforce investment services for out-of-school youth.	WIOA sec. 129(a)(4)
Teen Pregnancy Prevention Program	Waiver to use alternate performance measures.	HHS Announcement Number AH-TP-1-15-002. Funding Opportunity Announcement.

Consulting Agency: U.S. Department of Labor

Participating Agency: U.S. Department of Health and Human Services

**Pilot Lead: New York City (NYC) Department of Youth and Community Development**

The New York City Department of Youth and Community Development (DYCD), the New York City Administration for Children’s Services (ACS), and nonprofit partner Opportunities for a Better Tomorrow will provide services for 50 vulnerable young parents aged 17 to 24 and their children through a two-generational model that addresses the education, employment and developmental needs of parents and their children. The pilot will improve participants’ access to

multiple career pathways through activities that will include guaranteed childcare through ACS, high school equivalency preparation, work readiness and occupational skills training, paid work experiences, supportive services, and parenting support. The pilot also will provide personalized enrichment and support plans for participants through a Child Care Navigator. DYCD and its partners will support the pilot by braiding funds from the Workforce Innovation and Opportunity Act (WIOA) Title I Youth program, the Community Service Block Grant, and the Child Care and Development Block Grant. A quasi-experimental evaluation will examine whether: (1) providing child care and supportive parenting services for young parents increases their enrollment and attendance in education and employment training; (2) providing parenting workshops and supports to young parents increases their parenting skills; and (3) facilitated enrollment in child care increases children’s enrollment and attendance in quality child care programs.

The chart below identifies the waivers the Agencies are considering granting under P3 or other waiver authority.

<b>Program</b>	<b>Possible Waiver</b>	<b>Citation</b>
WIOA Title I Youth program	Waive WIOA performance measures relating to median earnings, credential attainment, and skill gains and use proposed alternative measures instead.	WIOA Sec. 116 (b)(2)(A)(ii)(I- III)

Consulting Agency: U.S. Department of Health and Human Services

Participating Agency: U.S. Department of Labor

**Pilot Lead: Sandoval County – Juvenile Services**

In partnership with Bernalillo Public Schools, the Santo Domingo Pueblo, and others, Sandoval County – Juvenile Services will establish within the Santo Domingo Pueblo a Reception Assessment Center (RAC) and Learning Lab, a detention diversion program designed to provide law enforcement an alternative to incarceration for youth. The RAC and Learning Lab will provide tutoring and credit recovery, preparation for a high school equivalency credential, life skills instruction, as well as case management services. Up to 482 disconnected youth from the Santo Domingo, San Felipe and Cochiti Pueblos and surrounding communities are expected to be served. The pilot will use funds from the Indian and Native American Program authorized by Section 166 of Workforce Innovation and Opportunity Act and the Santo Domingo Pueblo will provide child care through Head Start for participants who are parents.

The chart below identifies the waivers the Agencies are considering granting under P3 or other waiver authority.

<b>Program</b>	<b>Possible Waiver</b>	<b>Citation</b>
WIOA, Comprehensive Services Program, Section 166	Waive the requirement of a low-income individual as defined in section 3 (36) of WIOA for the Comprehensive Services Program.	20 CFR § 684.300(b)(3)
WIOA, Comprehensive Services Program, Section 166	Waive §684.430 of the Youth allotment. (3) A low-income individual as defined at WIOA sec. 3(36) except up to 5% of the participants during a program year in an INA youth program may not be low-income individuals provided they meet the eligibility requirements of paragraphs (a)(1) and (2) of this section.	20 CFR § 684.430(a)(3)

Consulting Agency: U.S. Department of Labor

Participating Agency: U.S. Department of Health and Human Services