



Performance Partnership Pilots

Key Points in Response to Request for Information

Forum for Youth Investment, July 2011

Tips on Submitting Comments

- **Be Redundant.** While we don't know exactly how responses to this particular RFI will be processed, when federal agencies receive comments, instead of reading each letter they receive from the beginning to end, they often cut and paste the information they receive to create a master list of all responses to each particular question. This means that if you address a point in response to one question, it will not be extrapolated as a response to other questions to which it might also apply. Play it safe and list your response under each and every question that it applies to.
- **Two Letters are Better than One.** While we don't know exactly how responses to this particular RFI will be processed, oftentimes when federal agencies process comments they receive, they note how many different letters made similar points. This means that if you have a letter cosigned by 10 organizations, it might just get counted as one response. It's best to have each organization send its own response, even if the answers they provide are mostly or completely the same.

Key Points to Consider Including in Your Response

- **Pilot Sites Need Grants in Addition to Flexibility.** Pilots should be awarded grants to cover the time it takes to design and implement the deep, system-wide changes envisioned through these pilots. Waivers on federal policy barriers are a critical component, but states and localities are going to need funding to ensure they have the capacity to use this flexibility in optimal ways. Federal interagency efforts – such as the Interagency Forum on Disconnected Youth, the Interagency Working Group on Youth Programs and the Coordinating Council on Juvenile Justice and Delinquency Prevention – should identify funding sources to provide funding to the pilot sites. Foundations should provide these funds if the federal government cannot.
- **Pilot Sites Need Training and Technical Assistance in Addition to Flexibility.** Pilots should receive significant training and technical assistance from national nonprofits. Pilots should not have to reinvent the wheel; they should receive support from an organization working with a network of all sites to cull and disseminate best practices. Federal interagency efforts – such as the Interagency Forum on Disconnected Youth, the Interagency Working Group on Youth Programs and the Coordinating Council on Juvenile Justice and Delinquency Prevention – should identify funding sources to contract with nonprofit organizations to provide training and technical assistance to the pilot sites. Foundations should provide these funds if the federal government cannot.
- **Provide Preference for Pre-Existing, Highly Effective Partnerships.** Preference should be given to sites that have an effective partnership in place. To take full advantage of federal flexibility, sites will need a sophisticated, high quality network of partners spanning multiple agencies and systems. Starting from scratch in a place that does not have a high quality partnership in place would strain capacity beyond what is reasonable to expect. Pilots should be awarded to communities with a demonstrated track record of working across multiple funding streams and systems to serve youth in a coordinated way. Stakeholders critical to this kind of partnership might include the local workforce agency, local education agency, local post-secondary institution(s), child welfare and juvenile justice systems, and a strong community-based provider network.
- **Provide Preference for Pilots which Align Not Just Federal Policies, but State and Local Policies as Well.** Preference should be given to pilots proposing efforts that align across federal, state and local (city/county) jurisdictions. For a pilot to be fully successful, it will need to align efforts both vertically (federal, state, local) and horizontally (across government agencies and disciplines). To do this, it will need flexibility from not just federal regulations, but from state and local regulations as well. Projects demonstrating buy-in and commitments to participate from state and local governments working together should get preference.

- **Department of Justice, Office of National Drug Control Policy and Department of Housing and Urban Development Policies should be Waivable.** It is important for the Department of Justice, the Department of Housing and Urban Development, and the Office of Drug Control Policy to be at the table. Many disconnected youth are court-involved, have substance abuse issues, and live in public housing. For a pilot to fully succeed they will need the ability to apply for waivers from those departments in addition to Education, Labor, and Health and Human Services.
- **Remove Cap on Funds within the Waivers.** The imposition of an arbitrary limit on how many federal dollars may be used in the pilots will limit their effectiveness. If, for example, a community applies for a waiver to pool funding from three federal programs, and if the community received a total of \$30 million from those federal programs, and if the federal government only grants them waivers on \$20 million of the funds, then the community will have to account for \$10 million of the funding streams one way, and \$20 million the other way. This will increase rather than decrease the bureaucratic burden on the community. Creating fewer but more comprehensive pilots is preferable; that will allow a true demonstration of what is possible when we change the way business is done.
- **Allow Prevention Goals in Addition to Recovery Goals.** Pilots should be allowed to include in their goals preventing youth from disconnecting, in addition to recovering young people who are already disconnected. It is fine to expect all sites to do work on dropout recovery, but they should also be allowed to do similar work on prevention because both of those efforts are closely related.
- **Pilots Should Last for a Minimum of Five Years.** There should be process checks during interim periods to ensure the pilots are on track, but the expectation should be that the pilots will remain in effect for a minimum of five years. At year two or three, it could be expected that some system improvement measures could be met (i.e., dollars flowing more directly to on-the-ground efforts, timeliness of data, reporting time reduced). If the identified system improvements aren't happening in year two, readjustments can be made with the expectation that by year five, youth outcome measures will improve.
- **Disadvantaged Youth Should Participate in Planning and Implementing Pilots.** Prioritizing applicants who engage youth in the pilot development process would incentivize such efforts. Youth Advisory Boards – sometimes referred to as Youth Councils- are one popular approach to ensuring youth are engaged in the work.
- **Application, Eligibility and Intake, Data, and Reporting Provisions Should be Waivable.** The types of policy provisions which should be waivable include but are not limited to:
 - Application Processes – Much of this work will need to be done at the federal level to ease the burden on states and localities.
 - Eligibility Criteria – Disconnected youth and youth on the verge of disconnection often have multiple risk factors and touch multiple systems. The development of an acuity score or assessment of potential for disconnection may provide a less intrusive, arbitrarily restrictive and more realistic measure of eligibility.
 - Intake Processes – Youth and their families should not be subject to multiple enrollment processes. The local workforce boards report that it takes about three hours to complete WIA enrollment paperwork for one youth. Adding additional time may prove prohibitive to youth and their families.
 - Data Management – Such as a shared client database to streamline intake, client tracking and outcome measurement.
 - Reporting Requirements – Determining appropriate measures of performance for the blended programs that don't encourage creaming yet push sites to really move the dial on the most at-risk or disconnected youth.
- **Use the Hybrid Model.** Blending formula funds helps ensure that the pilots are doing deep integration work, and sets the stage for wider adoption of this flexible approach in more communities. The competitive funding would be a welcome addition if that funding provides a way to give pilot sites support to offset their significant costs in planning and implementing innovative ways to work across agency lines.
- **Help Applicants Find Each Other.** Given the spirit of collaboration, it would be helpful to get a list of all the people in each state who plan on applying to be a pilot site. This would allow likeminded individuals to come together and develop stronger, collective proposals. A pre-application process which signals sites' intent to apply could be used for this purpose.