

U.S. DEPARTMENT OF EDUCATION REQUEST FOR INFORMATION ON EXPANDING WORK-BASED LEARNING OPPORTUNITIES FOR YOUTH

Public Comment from Education Systems Center at Northern Illinois University

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KEY QUESTIONS

What barriers have you seen in your State or community to helping 16-and 17-year-old students gain a WBL experience?

In our efforts to support State policy and community-level efforts to develop and scale high-quality work-based learning for youth, we have encountered a number of challenges:

Employer Interest/Willingness: Even in communities where schools and organizations are making extensive efforts to establish WBL, they often share that they have difficulties recruiting employers to host/support youth in WBL roles. Reservations include: perceived/actual “lift” on the part of employers to support and mentor WBL participants, perceived/real liability challenges, and ability to compensate participants, among others.

Insurance & Perceived Liability Challenges: Even where an employer may be interested in hosting or otherwise supporting WBL participants, they will frequently cite liability and insurance issues for reasons not to host more robust, hands-on participants at their workplace. In some cases, these are simply perceived liability issues. In a manufacturing context, for example, OSHA regulations really only prohibit youth under the age of 18 from driving a forklift. However, employers might believe that a young person would not be legally able to participate in other hands-on activities on the shop floor. In health contexts, lack of youth training in HIPAA is cited as a barrier, though in some cases it is simply a matter of a medical institution offering the orientation and paperwork at scale. Further, even when an employer does not hold a limiting understanding of labor laws, they might not be able to gain insurance approval through their company/organization for a young person to play certain roles in their facility.

Transportation: In all geographic contexts, transportation poses a significant barrier to

connecting youth to WBL. This can mean that young people live far from the handful of employers who might be willing to host WBL participants, and there are legal limitations at school district or organizational levels pertaining to the ability of young people to drive themselves or others off-site. In areas where there is little to no public transportation, this challenge proves acute. Even in instances where there is public transportation, bus/train schedules can be incongruous with WBL scheduling, or at times the employer may be at such a distance that it requires multiple transfers for the participant, making travel time prohibitive to participation. In cases where a school district might theoretically be able to coordinate a bus for student participation, funding is a limiting factor. Finally, some organizations report that it can be difficult to support OY to obtain driver’s licenses.

Scheduling: For youth both in- and out-of-school, scheduling WBL experiences can be challenging. Accommodating both travel time and adequate participation in the WBL experience can prove difficult when operating with standard office hours and school schedules. For out-of-school youth who are working, particularly in service jobs with variable schedules, it may be difficult to coordinate additional WBL on a consistent basis.

Funding/Compensation: WBL participants should receive some sort of compensation for their participation, be it academic credit or some sort of pay. Employers are not always willing to pay interns, and organizations like school districts might not have the resources to compensate participants themselves. This can lead youth to turn down WBL opportunities, especially when there is financial need either personally or at a family level.

Finding OY: While many organizations hope to serve OY with WBL programming, being able to track down these youth who are disconnected from education or work settings can often prove difficult.



What WBL programs and strategies at the State or local level do you consider successful or can be efficiently brought to scale, including apprenticeship opportunities for high school and college students?

At a State level, extensive efforts to define and develop frameworks for high-quality WBL has been critical to providing the necessary infrastructure for communities across Illinois to develop and implement WBL locally. The Postsecondary and Workforce Readiness (PWR) Act provided some initial statutory definitions that an interagency body built from these and WIOA definitions to develop the [Illinois Career Pathways Dictionary](#), which includes the State’s WBL continuum and associated definitions and guidance. The continuum provides a helpful overview of the varying types of WBL and relative levels of required employer engagement.

WBL has been integrated into the accountability frameworks both under ESSA (as part of the College and Career Readiness Indicator that is a component of the School Quality Framework) and as a quality indicator under ESSA. As a result, secondary districts that might not have otherwise been pursuing broad WBL in their community are deepening their work in this arena in order to reach more students.

Exemplary WBL practices exist around the State, including the One Summer Chicago program and Township District 214’s extensive WBL that reaches a majority of its students. One strategy that communities have highlighted is particularly effective is implementing a calendar-based program model so that the experiences are mapped out over the course of the school year for teachers, students, and employers to be able to plan and work around. In some cases, this could include a “job shadow week” or “Guest Speaker Week” so a number of those activities can be delivered at scale. These practices, and other critical framework elements, are outlined in the [Career Development Experience Toolkit](#).

Many local school districts share that Perkins funding has enabled them to develop and implement internships for CTE students. Both in CTE and beyond,

districts offer Certified Nursing Assistant (CNA) training and work with local healthcare providers to embed the necessary clinical hours for students to obtain the credential.

In response to the COVID crisis, Practera has engaged with a handful of pilot communities in Illinois to deliver fully virtual WBL opportunities on their platform. While results are yet to be seen, these pilots are part of a broader NSF research effort to assess how effective these virtual models are for youth skill development and their ability to provide broader, more equitable access to WBL by removing barriers such as transportation and distance of host sites.

What role does the public elementary and secondary education system currently play in the development of career readiness for youth, and what role should it play?

Illinois has been cultivating a competency-based, student-centered approach to developing college and career readiness for all students. Undergirding the frameworks of the PWR Act as well as the ESSA College and Career Readiness Indicator is the notion that no single measure can convey an individual’s preparedness for what comes after high school. Under this philosophy, the State is moving toward an approach that sees academic preparation as going hand-in-hand with career exploration and preparation for all students as they move through their secondary careers.

The degree to which primary and secondary districts currently utilize these State frameworks varies by community, but there are many exemplars statewide. For example, communities participating in the [Illinois 60 by 25 Network](#) are all using collective impact models to drive innovative approaches to enhancing college and career readiness for their students in order to drive postsecondary attainment and employment. Community-driven efforts like the 60 by 25 Network, coupled with accountability alignment under ESSA and Perkins, will incentivize greater consideration of college and career preparation across Illinois.

How can we better align resources and administrative, regulatory, and statutory requirements to allow for greater collaboration between educators and private and nonprofit employers?

Support to Address Liability & Insurance

Challenges: At a Federal level, offering incentives and support to address the liability and insurance challenges described above could be deeply impactful in terms of removing barriers to scaling quality WBL. This could include facilitating processes to conduct background checks of employers at scale, or finding ways to push insurance companies to remove barriers that hinder student participation in WBL at scale.

Tax Incentives: In the absence of funding to directly subsidize participant wages, offering tax incentives for employers to support WBL participants could incentivize greater employer participation.

Funding: Communities across Illinois, including school district-led efforts and efforts by other organizations working in WBL, highlight that they need increased financial resources for direct efforts for offering WBL. Several respondents to a survey of community WBL partners highlighted that Federal RFP requirements can be overly onerous and inhibit the ability of their local partners to actually implement their programs. One such respondent shared, “funds are not needed for more studies or developing frameworks/models...I am often disheartened by the rules in RFPs for how the funds can be used” given that there are many effective models statewide that simply need resources to scale up to reach more participants. Other respondents indicated that they believe educators and employers should be more embedded in decision-making around how to use funds, which could be incentivized in RFP requirements. Further, the local Education For Employment (EFE) system in Illinois, which administers CTE funding, often highlights the need for additional funding to support the collaboratives they work to coordinate.

What do State and local workforce development boards established by Title I of the Workforce Innovation and Opportunity Act and their partners need to do to facilitate better leveraging Federal workforce dollars targeted at youth?

Coordination and collaboration is growing across Illinois, but there is still room to grow in terms of reaching more youth at scale with WBL. A key area of opportunity is coordinating employer engagement

in a manner that is consistent across the education and workforce systems. In some communities, communication and collaboration across entities is strong and they are able to more systematically develop and implement robust WBL continua locally, but in other communities employers complain about getting multiple asks from multiple types of partners (workforce, secondary education, postsecondary education, non-profits, etc). Some local workforce boards could work to deepen their understanding of efforts by their local education partners (including secondary and postsecondary) in order to align to and supplement those efforts for additional out-of-school populations.

DETAILED QUESTIONS

Successful Practices and Strategies: What Federal, State, and local programs or community collaborative efforts have led to expanded WBL for high school age students? What is the objective evidence of their success (e.g., evidence from rigorous evaluations using, for instance, causal research designs)?

The 2016 Postsecondary and Workforce Readiness (PWR) Act in Illinois has provided a robust set of student-centered, competency-based frameworks that leverage the power of career pathways and WBL to better prepare youth for college and career. From that powerful policy framework has emerged a robust [Career Development Experience Toolkit](#), outlining from start to finish what schools and other organizations need to consider when developing and implementing robust WBL opportunities such as internships. As outlined in that Toolkit, which communities across Illinois are using to inform their work, robust WBL should be grounded in the development of [essential and technical employability competencies such as those we have defined](#) in Illinois.

Recently, we led the launch of a pilot implementation of Practera, an online learning platform that supports entirely virtual or hybrid work-based learning experiences. Through this platform, educators can track and monitor student and employer partner progress in real-time to provide resources and support as needed. Access to the Practera platform for experiences aligned with dual credit coursework is being provided to participating sites at no cost during the 2020-2021 school year, thanks to our partnership with cooperative education and experiential learning leader Northeastern University (Boston) and funding by the National Science Foundation.

Seven locations are Illinois pilot sites for Practera and will be supported through the Illinois Work-based learning Innovation Network (I-WIN) and technical assistance from EdSystems:

- Central District 301
- East St. Louis Senior High School
- Elgin Community College
- Kankakee Community College
- Moraine Valley Community College
- North Chicago Community High School
- Northern Kane County EFE Region 110

Across the state, community leaders and school districts are working extensively with local employers to develop and implement robust WBL. In Sauk Valley, a manufacturing group has sponsored Manufacturing Career Days even at a middle school level, and has supported the local vocational center and community college by fundraising for the equipment needed in multi-craft programs. In some communities, they are able to track WBL participants longer term and see if they continue in the sector of their WBL experience.

The One Summer Chicago program, centered on youth summer employment, publishes an annual report on program participation ([example here](#)) and was evaluated in a [qualitative study by Chapin Hall in 2014](#) to assess impact on participating youth.

Successful Practices and Strategies: How might technology be leveraged to overcome geographic barriers to student participation in WBL in rural and other communities? Are there successful examples of virtual WBL?

Scaling Career Exploration: Across Illinois, communities are scaling up robust virtual career exploration opportunities, including virtual job shadows. Through video presentations and calls, young people are able to access information on a broader range of careers both within their communities and across the State. In Robinson, Illinois, they have harnessed this approach to highlight non-traditional jobs for women in order to expand career awareness for their female students.

Transportation: A key opportunity with virtual WBL is to address the extensive transportation challenges facing communities trying to develop and implement WBL. Virtual WBL can enable more students to participate in WBL by bringing the experiences to them.

Scheduling: Virtual WBL may also be able to help address scheduling challenges, allowing for young people to participate in activities that might have been difficult to access given standard school and bus schedules.

Project-Based Learning & Team-Based Challenges:

In a virtual context, it may be easier to incentivize employer support for activities that allow young people to analyze and work to address a challenge facing a local employer.

Practera Pilot: As mentioned above, there is an emerging pilot with the Practera platform that several communities across Illinois are participating in. These communities are utilizing the virtual platform to deliver virtual WBL in alignment with a Dual Credit course at the secondary level. While the pilot is underway, this direct linkage between WBL and classroom learning, oriented toward postsecondary success, is a promising framework.

Potential Challenge: Broadband access is still an area for growth across Illinois, with inequitable access both across and within communities of all geographic types.

Successful Practices and Strategies: What interventions, strategies, or practices would need to be included in a WBL program to increase the likelihood of its success?

In order for WBL programs to be successful, they need to focus on a few key areas in particular:

1. Ensuring the activities are developing [essential and technical employability competencies](#) and are real-world experiences. WBL participants should be responsible for authentic tasks appropriate to their age and skill level, and should be assessed thoughtfully in order to measure skills gains.
2. Supporting participants with wraparound supports that enable them to reach their full potential and engage deeply in their WBL experience. These supports can include mentoring, career advising, transportation assistance, financial literacy support, etc.
3. WBL participants should be compensated in some form, either through academic credit or financial incentives like a paycheck or stipend. This honors their

work and provides “skin in the game” for the employer and participant alike.

Successful Practices and Strategies: What are ways to involve parents, students, and employers in planning and implementing WBL to help ensure that strategies will be successful in meeting their needs?

Parents: One innovative approach we have heard from some communities in response to COVID-related shifts is to engage parents and other community members as professionals who can provide some career exploration and mentorship beyond a traditional employer WBL placement. More generally, communities emphasize the need to engage parents in career awareness and exploration activities so they understand a broader universe of what might be available to their children. Further, incorporating WBL as part of annual academic planning for students can help parents see those experiences as part of an overall set of activities and skills their student should be exploring.

Students: Student engagement should be a cornerstone of WBL experiences in terms of identifying valuable WBL experiences and providing feedback throughout on the nature of their experience. Upon culmination of their own experiences, students can serve as “ambassadors” to the program as well as provide valuable input to administrators on how the program can improve and better meet young people where they are in terms of skills and interests.

Employers: Employers also must be deeply engaged in the WBL development and implementation process as thought partners to define authentic roles and tasks for participants that are grounded in their sector’s realities and will result in skills gains. Just as with students, gathering feedback from employers on their experience with the WBL programs is a critical step to drive continuous improvement processes.

Examples from the field:

- Businesses and other local institutions are engaged in planning processes, asked provide job talks and job shadows to share more about employability skills needed in their field
- Employers videotape “a day in the life” as a virtual job shadow
- Teacher “Externships” allow for educators to understand what skills and experiences pertain to their field of instruction so

as to better contextualize their lesson plans

- Recognition opportunities for employers - celebrating their commitment through an annual awards breakfast or local news segment

Public and Private Partnerships: Which State, local, nonprofit, and business partners have been involved in successful initiatives to expand WBL? Which partners should be involved in the future?

Below are listed many of the existing partners who support WBL in Illinois, though this list is likely not exhaustive.

State Agencies & Leadership:

- Illinois Department of Commerce & Economic Opportunity (DCEO)
- Illinois Community College Board (ICCB)
- Illinois Department of Employment Security (IDES)
- Illinois State Board of Education (ISBE)
- Illinois Workforce Innovation Board
- Interagency Implementation Team

Types of Local Partners:

- Secondary districts and schools
- Community colleges
- Nonprofits providing wraparound supports
- Philanthropy underwriting programs
- Local employers
- Chambers of Commerce
- Local Workforce Innovation Areas
- Education For Employment (EFE) - CTE administrators
- Intermediary organizations (like Alignment Rockford or the Greater Peoria Economic Development Council)
- Career and Technical Student Organizations (CTSOs)

Other Partners:

- [Education Systems Center at Northern Illinois University](#) (EdSystems) - policy development and technical assistance for both State agency-level action and community-level efforts

- [Illinois 60 by 25 Network](#)
- [Illinois Work-Based learning Innovation Network](#)
- Stand for Children IL
- Illinois Manufacturers Association
- National Governors Association - Illinois has participated for several years in WBL Policy Labs
- Education Commission of the States - Illinois has participated in some Policy Labs

Future Engagement: Communities have shared that in the future, greater engagement with organizations working with justice-involved youth should be a priority.

Public and Private Partnerships: What role did or what role could philanthropic organizations play in supporting these types of initiatives? Philanthropy can provide critical funds connections to support:

Data Infrastructure: As mentioned elsewhere, data infrastructure is a major barrier to successful monitoring of implementation and outcomes. Organizations supporting WBL efforts benefit from direct resources to support obtaining and building out appropriate tracking systems.

Incentivizing Participation by Non-Profits: Funders can require or encourage nonprofits they fund to either provide wraparound supports for participants, or serve as a host site for a WBL participant.

Wages & Supports: Funders can provide critical funding to support the employee mentor that is working with a WBL participant to compensate them for this extra set of responsibilities, and even provide or subsidize wages for the participant as well.

Champions of WBL: Funders can and should play a critical role as champions for WBL by both directly funding WBL experiences as well as identifying opportunities to uplift and celebrate WBL programs and participants.

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

There are a number of common approaches for WBL across Illinois. In some cases, CTE/Perkins funding drives WBL experiences primarily for CTE students. However, there are still other secondary districts who braid CTE and other funding to

support a broader effort on career pathways including WBL, such as the Center for Career Discovery in Township District 214.

In other communities, we see intermediaries providing support to connect education entities and employers or industry groups. Organizations such as Alignment Rockford recruit employers and facilitate the process for secondary students to participate in a variety of career exploration and development activities.

Outcomes, Data, and Evaluation Design: What existing data collection mechanisms can be harnessed to describe the characteristics of students and employers participating in WBL and to track performance outcomes of students who participate or do not participate in WBL?

Currently, data collection is highly localized and tied to the funding stream supporting the program in question (e.g. WIOA, ESSA, Perkins, etc). These data are reported through disparate tracking systems and collect different types of data.

In our State's ESSA plan, the College and Career Readiness Indicator (CCRI) includes some career exploration and development elements, so we will have more data in the near future across secondary institutions regarding participation in WBL. Further, tracking for students completing College and Career Pathway Endorsements (CCPE) under the Postsecondary and Workforce Readiness (PWR) Act will provide more data on WBL participation as well.

From the field, we hear that tracking of individuals participating in WBL can be challenging, and often involves obtaining alternative platforms beyond their Student Information Systems (SIS) that are more tailored to WBL and career pathways data collection. Some of these platforms include: Salesforce, Transeo, Naviance, GroupTrails, and Xello.

Outcomes, Data, and Evaluation Design: What role, if any, do you believe a State's longitudinal data system should or could play in the development, tracking, and advancement of career readiness?

In the longer-term, the Illinois Longitudinal Data System can potentially support the linkages of data across funding streams to enable policymakers to assess academic and employment outcomes for individuals participating in a variety of WBL experiences. Ultimately, with enhanced data

collection and integration, programs and interventions can be assessed to determine program effectiveness, as well as opportunities to address equity gaps in access or completion. Using standardized data can help address data quality issues often faced by communities using self-reported data to assess postsecondary outcomes of their participants.

Outcomes, Data, and Evaluation Design: What do you see as the most predictive and helpful metrics and outcomes for success?

Given that data collection on WBL is so varied, it is difficult to name predictive measures that will indicate success. However, metrics we have found worth reviewing include:

- Hours worked in a Career Development Experience
- Measurable employability skills gains
- Employment and wages post-completion
- Postsecondary enrollment and retention

Outcomes, Data, and Evaluation Design: What are examples of some frameworks and protocols for sharing data efficiently across programs while meeting privacy and confidentiality requirements? What should be the specifications for additional frameworks or protocols for the effective sharing of information?

In communities that are taking a collaborative approach, developing internal data dashboards has been one mechanism by which they are able to share and review data in alignment with intergovernmental agreements honoring FERPA and other privacy requirements. One such example is the Northwest Educational Council for Student Success (NECSS), which serves as the Education For Employment (EFE) in the region and engages members from the local secondary and postsecondary entities in a collaborative driving pathways and WBL implementation.

Student Barriers: What are the legislative, regulatory, or other barriers that impede student participation in WBL? What barriers has the COVID-19 pandemic created?

Beyond barriers impeding employer participation, and other barriers described above that limit the number and accessibility of participation, current secondary students face scheduling challenges that can preclude them from participation in WBL.

Student Barriers: Are the barriers created at the Federal, State, or local level?

Beyond barriers described elsewhere, many barriers faced directly by students are at the State and local levels.

Student Barriers: Would overcoming the barriers require changes in Federal or State laws? If so, what are those provisions of law and how would they need to be changed?

In Illinois we have emerging frameworks such as competency-based education pilots that shift emphasis away from seat time and instead focus on student attainment of competencies. Any incentives that can be created at the federal level to promote similar approaches can empower states and localities to innovate in terms of approaches for preparing students for postsecondary and career success, including scaling up integrated WBL models.

Student Barriers: What are examples of schools or communities that have been successful in addressing transportation barriers to student participation in WBL?

Common strategies to address transportation challenges include: providing public transportation stipends, utilizing school bus resources, and (in a few cases, with additional efforts to address liability issues) using rideshare services such as Lyft/Uber to transport students.

Student Barriers: What are the best assessment tools to identify, address, and overcome barriers to career readiness among students?

We strongly believe in a competency-based approach to developing career readiness. Some promising emerging efforts include [Greater Peoria Essential Abilities and Knowledge \(GPEAK\)](#), which is a regional approach for assessing and validating essential skills needed in the workplace. Employers, community-based organizations, and educational partners in the region can become a GPEAK site and host the certification system.

Student Barriers: What strategies have been successful in expanding WBL opportunities for students from special populations, as well as students from major racial and ethnic groups?

Critical to ensuring students of all backgrounds and special populations are able to participate in quality WBL is establishing a clear expectation that WBL is for all students, not just certain groups

of students. One such way this is being supported in Illinois is through the College and Career Pathway Endorsement framework of the PWR Act and the College and Career Readiness Indicator embedded in the School Quality Framework under ESSA. These frameworks push school districts to innovate and ensure they are considering how to offer WBL to a broader range of students than they have historically.

In District 214, they use a tiered WBL system in order to ensure all students, including special needs populations, are able to access career exploration and development activities. For example, their Tier 3 services include “The Workcenter” which is an instructional program that provides direct instruction, supervision and support with task initiation, on-task work behavior, assembly tasks, time management, work production, and following multi-step directions, and task completion. Students are able to foster and develop those skills while working in a simulated work environment or in a closely supervised and supported micro-business. The micro-business enables students to gain valuable exposure and experience to a “real” work experience.

Some community partners have highlighted that in order to reach more racially diverse youth participants, they as administrators have worked to identify employers that have more racially diverse employee populations to generate greater student interest.

For some communities, a special population of focus is justice-involved youth. In at least one community, a pilot of a program for justice-involved youth focusing on WBL resulted in successful rapid employment for those youth.

Given the COVID crisis, virtual WBL can be harnessed to reach more students than who otherwise would have been able to access WBL for a variety of reasons linked to the barriers described above.

Employer Barriers: What are the legislative, regulatory, or other barriers, such as liability concerns, that impede employer participation in WBL when hiring high school students ages 16 to 17? For students ages 18 to 19, including college students?

Regulatory: At a federal level, it is worth exploring how insurance regulation can be reviewed and enhanced to promote better practices by insurers that will support student participation in WBL.

As described previously, even where employers are following OSHA and HIPAA regulations, insurance companies may not provide appropriate coverage for youth participation and thus this is a barrier.

Employer Barriers: Are the barriers created at the Federal, State, or local level?

Barriers exist at all levels, though Illinois has made concerted efforts in recent years to remove State-level barriers and incentivize participation.

Employer Barriers: Would overcoming the barriers require changes in Federal or State laws? If so, what are those provisions of law and how would they need to be changed?

Evaluation: Consideration must be paid to how accountability metrics for WBL programs may create perverse incentives. For example, if the only measures of success are centered on employment after WBL participation, this incentivizes WBL providers to only select participants who they believe have the highest likelihood of meeting that measure, instead of identifying potential participants who are most likely to grow and benefit from such an experience. If WBL providers increase their selectivity, they may just reinforce existing structures of social capital and not address issues of equity.

Employer Barriers: Are there incentives that would help employers be more engaged with WBL in your community?

In a constrained resource environment, finding ways to incentivize employers could include:

- Tax breaks for hosting WBL participants
- Wage subsidies to support WBL participants and defray employer costs
- Insurance subsidies to address higher premiums brought on by engaging youth in the workplace
- Systematic approaches to offering recognition of employers supporting WBL