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Set Up for Success

Supporting Immigrant Youth Through the Workforce Development System

POLICY BRIEF

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Executive Summary

Ensuring that young people are prepared to join the workforce and be productive throughout their careers is a central concern of U.S. policymakers and employers. With immigration a primary driver of workforce growth, supporting the educational and career success of immigrant youth is an important issue for the United States as a whole and for many states and localities across the country. Comprising roughly 3.5 million young people in their late teens and early twenties who were born outside of the United States, this population has significant diversity in terms of immigration and socioeconomic status. These youth may be naturalized citizens, holders of various lawful immigration statuses, or unauthorized immigrants, and they may have resided in the United States for considerably different lengths of time, with some having lived in the country since they were young children while others only recently arrived. In the past decade, many youth have also come as refugees, asylum seekers, or unaccompanied minors and face distinct barriers to their long-term success, such as trauma, unstable legal status, or a lack of familiarity with U.S. society.

Like all young people, immigrant youth find themselves in a high-stakes period of life. The transition to adulthood can have a significant impact on their prospects for long-term educational and career success. Immigrants in this age range, like their peers, may be completing their education, building professional skills, finding employment, living independently, and starting their own families. Given the importance of this stage in young people's lives, many programs and institutions exist to support their success, most notably high schools, postsecondary colleges and universities, community and technical colleges, and trade schools. Immigrant youth are generally able to access these programs, though they may face additional barriers in doing so compared to U.S.-born youth.

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Reflecting the diversity of the population, some immigrant youth, such as those who are the children of high-income immigrants or those who are coming to the United States for a college education, may already be on pathways for success. But others, particularly those who have recently arrived, may prioritize employment and earning wages over education

(even completing high school) due to economic pressures, familial responsibilities, or the fact that they came to the country with the goal of seeking work rather than further education. Many immigrant youth also face other serious barriers to their educational and career prospects. Although some of these barriers, such as poverty, may be shared with U.S.-born youth, young immigrants may also need to overcome challenges such as limited proficiency in English, low levels of formal education in their countries of origin, a lack of knowledge of the U.S. job market or professional connections in the country, not having employment authorization, and being at heightened risk of labor trafficking.

With these challenges in mind, an important question for policymakers, government agencies, and community organizations seeking to support the success of this population is how to set young immigrants who are primarily focused on employment on trajectories that will lead to stable, higher-wage career pathways that ensure their long-term economic self-sufficiency and mobility and that help them more fully contribute to the communities in which they live. This policy brief aims to address a component of this overarching question: what role can the existing public workforce system play in promoting such outcomes for immigrant youth? To do so, the brief examines a key federal program in the public workforce system, governed by the *Workforce Innovation and Opportunity Act* (WIOA), that is dedicated to serving youth, the WIOA Youth program, and its responsiveness to the unique needs of immigrant youth. This program is overseen by the U.S. Department of Labor and supports states and local areas as they assist eligible young people in making successful educational and career transitions by helping them to navigate existing education and training systems, obtain guidance about employment opportunities and career paths, and participate in workforce preparation and job training activities.

The WIOA Youth program presents a promising, if underutilized, opportunity to serve immigrant youth due to its ability to combine workforce development activities with navigational assistance and supportive services. Immigrant youth are largely eligible to benefit from the program, and the suite of services allowed under the program can be flexibility tailored to the individual needs of youth who are primarily focused on gaining employment. The national reach of the program as well as its delivery via a network of local providers also mean that young people across the country have relatively equal access to its services.

At the same time, the WIOA Youth program faces challenges in serving immigrant youth, many of which illustrate broader issues with serving such youth via the public workforce system. Although the services the program provides could be extremely beneficial for many immigrant youth, interviews with local workforce development board staff, WIOA Youth program providers, and policymakers suggest the program does not widely serve or target this population—a common trend among programs in the broader public workforce system. Program providers reported specific challenges related to serving immigrant youth, including the relatively high English proficiency prerequisites for participation in many career services and training programs along with the requirement that participants have employment authorization to participate in workforce training activities. Program resource constraints may also limit providers' ability to serve large numbers of young immigrants, given that WIOA Youth providers are only able to meet a fraction of the need for their services under current funding levels.

This research also highlighted important ways state and local policymakers and workforce development providers can more fully leverage their programming, especially under the WIOA Youth program, to support the economic trajectories of eligible immigrant youth. For example, challenges to in-

corporating English Learners into program services could be lessened by using proven Integrated Education and Training (IET) models, which can provide a combination of contextualized English instruction and workforce development activities delivered in a single program tailored to prepare participants for a specific type of job or career path. Greater collaboration between workforce development and adult education providers could allow for other arrangements to effectively serve immigrant youth such as bridge models, which could engage participants in short-term educational programs intended to prepare them for a specific workforce development activity. Multilingual workforce development activities that tap into young people's skills in languages other than English could also open new opportunities, particularly in certain industries that may favor proficiency in Spanish or another language other than English. Zooming out, the WIOA Youth program could also serve as a model for other systems and for service providers considering how to effectively support immigrant youth who are interested in seeking employment rather than further education.

1 Introduction

Young immigrants have come more to the attention of the public and policymakers in recent years due to long-unfolding demographic changes in states and localities across the country as well as developments at the U.S.-Mexico border. The groups featuring most prominently in public discourse have included the large numbers of children and adolescents (unaccompanied and otherwise) who have arrived at the border and been admitted into the United States to seek asylum and other forms of protection since 2014, as well as Dreamers—unauthorized youth and many now-adults who were brought to the country by their parents at a young age, some of whom have been able to gain temporary legal status via the Deferred Action for Childhood Arrivals (DACA) program. Yet immigrant families with children also move to the United States through its various legal channels for work, family reunification, humanitarian protection, and more. As a result, many immigrant youth are naturalized citizens, lawful permanent residents (i.e., green-card holders), or otherwise legally present.

Failing to support the education and career success of this population, many of whom will be part of the U.S. workforce for decades to come, could lead many of these young people to become mired in low-wage employment and deprive the U.S. economy of their fuller contributions.

With the retirement of the baby boom generation well underway, and immigrants and immigration expected to be the main driver of future U.S. labor force growth,[1] effectively supporting the workforce trajectories of these young immigrants is naturally a concern of policymakers and system leaders charged with preparing youth to enter the workforce. Failing to support the education and career success of this population, many of whom will be part of the U.S. workforce for decades to come, could lead many of these young people to become mired in low-wage employment and deprive the U.S. economy of their fuller contributions. Beyond economic considerations, supporting the linguistic and civic integration of young immigrants into American society is also critically important. Both sets of aims can be advanced with effective youth workforce services.

This population of young immigrants roughly between the ages of 15 and 24 (referred to as "immigrant youth" for the remainder of this brief) sits at the intersection of several key systems intended to

support the educational and career success of young people. These include adult, career, and technical education schools or programs; postsecondary education institutions (whether community or technical colleges, four-year colleges, or universities); and other providers of workforce preparation and training services. These systems, institutions, and programs are commonly understood to be the primary actors in states' workforce development efforts, preparing young people to meet current and future workforce needs. Of course, high schools and the broader K-12 system are also critical actors for youth as well, particularly those under age 18.

Immigrant youth, however, often fall between the cracks of these very systems intended to promote educational and career success. Late-arriving and school-age immigrants, particularly English Learners, regularly face significant barriers to succeeding in school, including graduating high school, and may move more quickly into employment to support themselves or their families, whether due to economic pressures, cultural expectations, or the lure of available job opportunities.[2] Yet youth ages 16–21 are generally not targets for adult education or workforce development systems, which are generally geared toward serving older adults. Consequently, many immigrant youth, especially English Learners, may find themselves compelled to take the employment they can find, which is likely to be lower wage, and may have fewer prospects for long-term economic mobility. Without access to effective educational or workforce development services, many of these youth may struggle to find upward economic and integration trajectories over the long term. More seriously, some of these youth, particularly those who have recently arrived in the country to seek asylum or other forms of protection, may be exposed to unsafe working conditions, labor trafficking, or other acute risks.[3]

Although not always conceptualized as playing this role, the public workforce development system could be a key tool for promoting the success of immigrant youth, particularly those who are no longer enrolled in high school. Through this system, youth can access services that promote workforce preparation and career services as well as job training and other opportunities that can prepare them for in-demand, high-wage employment and, in the long run, careers that provide economic mobility to themselves and their families. Though existing research, including previous Migration Policy Institute (MPI) research, has explored the intersection of career and technical education (CTE) and secondary education for immigrant youth and English Learners, less is known about providers' experiences and effective practices for serving these youth in workforce development programs, particularly those delivered through local workforce development programs governed by the federal *Workforce Innovation and Opportunity Act* (WIOA).[4] Administered separately but connected to secondary and postsecondary educational institutions, WIOA governs the delivery of workforce development (Title I) and adult education (Title II) programs intended to support the success and economic self-sufficiency of adults and youth from a variety of circumstances, such as those who are low income or accessing major public assistance programs, dislocated workers, and individuals who have limited literacy or numeracy.

This policy brief explores efforts to serve immigrant youth in workforce development programs in more detail, seeking to better understand the promise of these programs in reaching this population as well as potential barriers. Drawing in part on a series of interviews with the staff of local workforce development boards and workforce service providers as well as a four-state analysis, this study focuses on an individual program under WIOA Title I that is specifically intended to serve young people disconnected from school or work or facing barriers to educational and career success: the WIOA Youth program. Due to its structure, combination of services, and nationwide reach, this program provides a unique case study for

challenges and opportunities in serving immigrant youth in workforce development programs.

This policy brief begins with an overview of the immigrant youth population and the WIOA Youth program's goals, requirements, and structure. The section that follows describes the approaches and practices of local programs as well as existing attempts to serve immigrant youth. The brief concludes with a discussion of how the WIOA Youth program illustrates promising practices and lingering challenges to serving larger numbers of immigrant youth in workforce development programs.

2 Immigrant Youth and Workforce Development in the United States

Immigrant youth in the United States are a highly diverse population, with a variety of legal statuses and socioeconomic situations. This population includes recently arrived unaccompanied minors and young adults who are seeking humanitarian protection in the United States, resettled refugees, and recipients of parole or other permission to reside in the country (such as DACA or Temporary Protected Status). It includes both youth without a legal status in the United States (i.e., those who are unauthorized immigrants) as well as those with temporary visas, permanent residence, and U.S. citizenship via naturalization. In addition, these youth may have immigrated to the country with parents or caregivers who are high-income, skilled workers or who hold low-wage jobs and live in poverty.

As of 2023, there were roughly 3.5 million foreign-born youth between the ages of 15 and 24 in the United States. Approximately 39 percent were older teens (ages 15–19), while the remaining 61 precent were young adults (ages 20–24).[5] In terms of immigration status, MPI estimates that there were approximately 1,577,000 unauthorized immigrant youth (ages 16–24) in the country as of 2019, comprising 14 percent of the overall unauthorized population.[6] These national figures point to the broad scale of this issue, but they can nonetheless obscure the fact that in many regions, states, and localities, immigrants make up even larger shares of young people.[7]

The Workforce Development System and the WIOA Youth Program

Workforce development services in the United States are delivered via an array of systems and programs. These include apprenticeship and pre-apprenticeship, on-the-job training, internships, workforce preparation activities (e.g., career guidance), and adult education, such as English language, literacy, and numeracy instruction. These services are administered by a diverse group of actors; funded by different federal, state, and local grants; and delivered via school districts, community colleges, workforce centers, unions, and other entities.[8]

WIOA Title I, which is overseen by the U.S. Department of Labor's Employment and Training Administration, governs and funds public workforce development programs for adults, youth, and displaced workers via a nationwide system of state workforce agencies, local workforce development boards, and one-stop centers.[9] Local workforce development boards govern the delivery of services at the local level, and each local workforce investment area includes at least one one-stop center.[10] These centers, also known as American Job Centers, provide job seekers with a centralized location to access career services and funding for workforce training, with the latter often being delivered via partners such as employers, vocational programs, apprenticeships, community colleges, and local nonprofit organizations.

Authorized under WIOA Title I and administered via this same framework, the WIOA Youth program

combines a number of workforce development, educational, and other support services into a single, individualized package of assistance for youth facing barriers to success. Established in its current form with the passage of WIOA in 2014, the WIOA Youth program received an average of $937 million per year in funding in the 2021–24 period, including slightly more than $948 million in 2024, the most recent program year.[11] The program includes educational and workforce activities as well as supportive services that help youth prepare for and obtain good jobs, gain occupational training or other work experience, earn a high school diploma or its equivalent, as well as transition to postsecondary educational programs or other direct work experiences such as pre-apprenticeship training or full-time apprenticeships. In program year 2023, the most recent year for which data are available, the program served 131,402 participants across the country.[12]

The WIOA Youth program is intended to support both in-school and out-of-school youth, though WIOA has focused the program more explicitly on the latter population, requiring that 75 percent of state funds be spent on direct services for out-of-school youth.[13] In addition to whether or not a young person is enrolled in school, there are several other important differences in how the WIOA Youth program distinguishes between these two groups and determines a young person's eligibility. As detailed in Table 1, the groups cover different age bands, with the age limit for out-of-school youth extending to 24. To participate, in-school youth must also be low income, which can be determined in a variety of ways outside of household income, and

TABLE 1

Eligibility Requirements for Participation in the WIOA Youth Program

Requirement	In-School Youth	Out-of-School Youth
Age requirement	Ages 14–21	Ages 16–24
School enrollment status	Attending school*	Not attending school (as defined by state law)
Income level	Must be a low-income individual**	No income-related requirements unless the individual has obtained a high school diploma or equivalent
Additional eligibility requirements	Faces barriers due to being at least one of the following: - basic skills deficient; - an English Learner; or - an individual who faces one of several other barriers to employment such as experiencing homelessness or being involved with foster care or juvenile justice systems.	Faces barriers due to being at least one of the following: - a "school dropout"; - a school-age youth who has not recently attended school (i.e., "for at least the most recent complete school year calendar quarter"); - a high school graduate who is a "low-income individual and is either basic skills deficient or an English language learner"; or - an individual who faces one of several other barriers to employment such as experiencing homelessness or being involved with foster care or juvenile justice systems.

* This may include youth enrolled in postsecondary programs as long as they are under the age of 21.

** As laid out in the U.S. Department of Labor's *Training and Employment Guidance Letter No. 21-16*, youth's income levels may be determined by other factors besides solely their household's income, including whether or not they or their family are enrolled in certain benefit programs, whether or not they are in foster care or are homeless, and whether or not they live in a "high-poverty area."

Sources: U.S. Department of Labor, Employment and Training Administration, "WIOA Youth Program" (fact sheet, January 2025); memorandum from Byron Zuidema, Deputy Assistant Secretary, U.S. Department of Labor, *Training and Employment Guidance Letter No. 21-16—Third Workforce Innovation and Opportunity Act (WIOA) Title I Youth Formula Program Guidance*, March 2, 2017.

face at least one type of barrier to their educational or employment trajectories. Out-of-school youth have a broader classification under the program, generally only being required to not be enrolled in school and facing one of several barriers to their educational and career success.[14] For in-school youth and for out-of-school youth who are high school graduates, being an English Learner is a named ground for eligibility.

As for the specific services delivered, local WIOA Youth programs may offer 14 different "elements" to participants. These include educational supports such as tutoring, dropout prevention, and postsecondary education preparation; workforce development activities such as paid or unpaid work experiences, skills training, and career guidance; and supportive services such as child care and transportation.[15] Although all of the program's elements must be available to participants, the exact services for each individual are generally determined by the specific barriers they are facing and what supports they require to overcome those barriers.[16] As a result, the program's services may look different for each participant.

There are also requirements in place for the share of program funding that must be spent on providing work experiences for youth participants. Local grantees must spend at least 20 percent of their non-administrative funding to identify employers and to provide paid work experiences.[17] Work experience assignments can include a variety of activities, such as on-the-job training, preparation for apprenticeship (pre-apprenticeship), job shadowing, and internships.[18] The intent of the work experience requirement is to provide an actual work opportunity, which for many WIOA Youth participants could be first-time employment. As detailed by the U.S. Department of Labor, work experiences for the WIOA Youth program must have both an "academic and occupational component"—a stipulation that is intended to ensure that youth are gaining relevant career skills and knowledge.[19] It is due to these work-experience-related requirements that local programs maintain their character as workforce development programs, rather than simply a broad set of funding intending to support the success of youth.

3 The Experiences of Local WIOA Youth Program Providers

Due to WIOA Title I's implementation across the entire country as well as its unique suite of services, the youth program it funds provides an opportunity to explore how youth currently interact with services delivered by the public workforce system and what considerations, reforms, or expansion may be needed to better serve immigrant youth in existing programs. To better understand the nature of local WIOA Youth programs and the implications for serving immigrant youth in workforce development programs, MPI researchers examined programs in four states: Florida, New Mexico, Texas, and Virginia (see Box 1).

The WIOA Youth programs analyzed for this project all had common features related to the programs' elements and requirements as well as their strategies for reaching out-of-school youth with their services. At the same time, there was variation between providers, with each leveraging the flexible nature of the WIOA Youth program to meet the needs of local youth and adapt to the community context. Broadly speaking, programs sought to support youth in gaining work experience, career goals, relevant skills, and important educational outcomes such as earning high school diplomas or equivalents (such as passing GED tests). Most providers used individualized approaches, creating a mix of services tailored to each participant's barriers, needs, and goals. The flexibility that most providers described—at least in terms of their ability to customize employment,

educational, and supportive services for each young person—provides an important model for larger efforts to serve immigrant youth, as will be discussed in more detail throughout this section.

BOX 1
About This Project

This section draws on interviews and analysis of policies, WIOA plans, and other relevant documents from four states: Florida, New Mexico, Texas, and Virginia. The four states analyzed were chosen as part of a linked MPI project on English Learners' access to career and technical education (CTE) programs in K-12 settings, and they include both states where English Learners make up sizeable shares of all students and states where this is a growing population. The interviews conducted for this project included nine conversations with staff at local workforce providers, contractors for WIOA Youth programs, and where possible, state-level policymakers connected to the administration of the program. Linking interviews for this project with those conducted for the CTE study allowed for a better understanding of the workforce services ecosystem available to school-age youth and young adults in these four states.

To learn more about the MPI project on English Learners and CTE, see: Julie Sugarman, *Unlocking Opportunities: Supporting English Learners' Equitable Access to Career and Technical Education* (Washington, DC: MPI, 2023).

A. Delivering the WIOA Youth Program

Services for Out-of-School Youth

How providers serve out-of-school youth, the main focus of the WIOA Youth program, illustrates both the unique structure of the program as well as components that carry relevance for serving immigrant youth. All of the programs examined for this study adhered to WIOA and state requirements, but they leveraged different approaches and combinations of services to support participants. As might be expected from WIOA's requirements, the work experience component was generally the defining feature of programs, at least in terms of the services delivered. The most common approaches used by programs, however, were individualized models. This flexibility was key in reaching youth—most if not all of whom were in vulnerable or challenging situations—as was the use of strong partnerships, referral networks, and supportive services.

In terms of the profile of out-of-school youth served by programs, providers interviewed for this project described these youth as being disconnected, regardless of their age and whether they were U.S. or foreign born. Participants included both youth of school age who had dropped out of high school as well as those who were older and who had, in most cases, not earned a high school diploma or equivalent and who may not have reached high-school literacy and numeracy expectations. Individuals in this population were facing a number of different (or overlapping) barriers, such as having aged out of foster care, experiencing homelessness, involvement with the criminal justice system, having a documented disability, being a teenage parent, or simply being mired in low-wage employment. Program participants required extra support and guidance to advance their educational and career trajectories, beyond mere enrollment in workforce activities such as a job training program, as would be more common in WIOA Title I's Adult program. Even if out-of-school youth were already employed—generally in low-wage jobs—WIOA Youth services were useful in setting them up for more stable, higher-wage employment or at the very least orienting them to the job market and various career paths.

Given the disconnectedness of many of the out-of-school youth in these programs, the recruitment and retention of participants often presented a challenge for providers. Many eligible youth, whether immigrant or U.S. born, were not aware of the

services available to them from local workforce providers or had limited trust in government organizations.[20] Without being able to attract youth from a single, centralized source such as a local high school, providers conducted a range of outreach and recruitment strategies. These strategies included participating in community events, word-of-mouth, and efforts such as engaging local youth at skate parks or other areas where they gathered. Most providers also reported developing formal or informal referral systems with a range of service providers in their areas, such as those working in foster care, juvenile justice, homelessness, and other related areas. Some programs also maintained relationships with local school districts, which would refer youth who had left high school to their programs.

Careers in health care were a common area of focus across the programs analyzed, and work experiences corresponding to other high-demand occupations within regional economies were also common.

As for the actual delivery of services to out-of-school youth, approaches varied depending on the program. Some relied on a single contractor to deliver the program, others multiple providers, while a few managed nearly all services themselves. Contracted organizations used by programs examined for this project included a range of local nonprofits such as Goodwill and other youth development organizations. For paid and unpaid work experiences, programs generally maintained relationships with local employers, and they leveraged technical schools, community colleges, and other training providers to deliver more skill-specific instruction. One-stop operators that delivered their own programs had the advantage of being able to match eligible and interested youth to workforce development activities under the same roof.[21] Similarly, all of the providers in this study maintained relationships with or directly administered local one-stop workforce centers, providing both services to youth and referrals of eligible participants when appropriate.

All of the services delivered to out-of-school youth matched with one of the 14 allowable elements under WIOA. For paid and unpaid work experiences, for which program expenditures had to comprise 20 percent of local areas' spending, programs used diverse approaches and models to fit both the needs of participants and their local economic contexts. As detailed in Section 2, work experiences in the WIOA Youth program may include internships, job shadowing, pre-apprenticeships, and on-the-job training activities. Providers examined for this project generally aligned such experiences with their local economies and workforce demands in order to maintain a consistent pipeline to available, well-paid jobs or career paths for participants. Careers in health care were a common area of focus across the programs analyzed, and work experiences corresponding to other high-demand occupations within regional economies were also common. For example, one program provided on-the-job training opportunities in shipbuilding due to a consistent demand for such workers in their area.[22] This dynamic did create challenges for programs in more rural areas, where work experience options and transportation to such opportunities were more limited, at least compared to the more diverse economies of more urban areas.

Beyond regional economies and workforce demands, providers also sought to align work experiences with participants' interests. Building off intake processes and initial conversations with youth, many providers found internships, training, and other experiences that matched participants' preferred career paths, even if these were not necessarily the most in-demand occupations in their areas. For example, one provider built customized pathways and on-the-job training for youth interested in careers as barbers and car mechanics.[23] Others prioritized

work experiences that would enable youth to gain exposure to the workplace and develop basic professional skills, rather than corresponding to a more permanent career pathway. In one instance, a provider assisted a program participant in gaining part-time employment with their local school district to develop initial professional skills before seeking a more permanent job in a different field.[24]

Due to the importance of work experience, providers reported that maintaining relationships with local employers and industries comprised a critical part of their work. Good connections with employers brought pipelines for work experiences into which programs could place participants. The WIOA Youth program's structure and flexibility assisted with these relationships. Programs were able to cover some of employers' costs when providing work experiences to youth, making participation more attractive to local businesses. For example, one provider reported covering expenses such as insurance for an employer to encourage the hiring of more youth participating in the program.[25]

Outside of work experiences such as job training or internships, programs also delivered a range of other supports for out-of-school youth participants. Assistance with obtaining a high school diploma equivalent was common, particularly when a diploma were necessary for occupational certification or employment in regional economies. As a result, some providers reported having strong relationships or referral networks with adult education programs.[26] Providers also delivered other forms of support to help participants successfully complete their work experiences, such as financial assistance with transportation, uniforms, equipment, child-care expenses, and books for required courses. These supports were generally based on a young person's individual needs and challenges.

A single provider might need to be prepared to serve the educational and career needs of a participant facing homelessness, one with limited literacy or numeracy, and one with a high school diploma stuck in low-wage employment, all in the same cohort, making flexibility critical to having relevant, effective services.

Individualized services such as this were a common feature of nearly all of the programs examined for this project. A few providers served out-of-school youth in cohorts, but most sought to "meet youth where they are," as one interviewee described.[27] For this strategy, most providers conducted individualized assessments when youth entered their program to determine what services and supports would fit the participants' needs and interests. In this way, providers could create a customized suite of services to assist each young person. Though more time and resource intensive, providers described such strategies as necessary to serve a diverse array of youth facing barriers of varying scale, number, and nature. For example, a single provider might need to be prepared to serve the educational and career needs of a participant facing homelessness, one with limited literacy or numeracy, and one with a high school diploma stuck in low-wage employment, all in the same cohort, making flexibility critical to having relevant, effective services. This approach, combined with the range of educational and supportive services providers could offer in addition to workforce development activities such as job training or career guidance, meant that WIOA Youth programs in many cases could offer highly unique and specialized support to help youth address many of the barriers blocking them from professional and educational progress.

However, despite the successes of many programs and participants, some challenges remain. The primary challenge program representatives reported in serving out-of-school youth was the nature of the population and the challenges they were facing. Providers noted that these youth were generally disconnected from systems and could be hard to identify, reach, and consistently connect with. In addition, out-of-school youth facing particularly serious barriers could be difficult for providers to retain in their programs, even though they were often those most in need of the services being provided. For older individuals, some providers also reported that potential participants who were already employed were at times less interested in the program, even if their career trajectories and future wages could be aided by participating.

The experiences of local providers with the WIOA Youth program illustrate its promise for serving immigrant youth. Given that many immigrant youth (particularly recent arrivals who are near or over age 18) may be interested in seeking employment rather than further education, the program presents an opportunity to work with such youth on a short-term basis to connect them to both supportive services and career counseling and training. This can put them on track for longer-term economic self-sufficiency while also helping to fill positions in local industries with much-needed workers. The flexibility to mold services into an individualized suite of supports for a young person would also allow providers to match the experiences, skills, and needs of immigrant youth of various backgrounds—much the same as they do for U.S.-born youth. This flexibility could allow the use of immigrant-specific services such as English for speakers of other languages (ESOL) instruction, assistance settling into their new U.S. communities more broadly, or support navigating the job market safely and effectively. At the same time, the work-focused nature of the program would likely be of interest to youth who are more oriented toward employment, being able to promise them access to higher-wage work in a relatively short amount of time. The connections between the WIOA Youth program and the K-12 system as well as other service sectors could also provide an opportunity to reach immigrant youth before they might leave school and fall through the cracks into low-wage employment. Such connections could also be developed with immigrant-serving organizations, such as legal services providers or refugee resettlement organizations. However, despite this promise, providers also reported challenges with serving immigrant youth, as will be described in Section 3.B.

Services for In-School Youth

Though most of the programs analyzed for this project served in-school as well as out-of-school youth, programming for students was generally secondary to services for young people not enrolled in school. Some states did have waivers to serve a higher share of in-school youth (generally 50 percent) in their programs; however, the prioritization of out-of-school youth was evident in all of the programs examined. The most notable feature of efforts to serve youth still attending a school was the program provider's relationship with local school districts. Depending on the level of partnership with school districts, in-school youth models ranged from basic efforts to engage high school students and make them aware of workforce services available to them all the way to taking on a role in CTE programs to provide additional assistance to eligible students.

For programs with less-developed partnerships with school districts, providers—generally local workforce development board staff—sought to raise awareness among high school students of services and programs available through the WIOA Youth program, such as summer employment opportunities or other work experiences. To do this, providers often participated in career fairs or other public events for school students to publicize these opportunities. At the next level of integration, several rep-

resentatives of local workforce development boards described having set up referral systems with local school districts through which school officials could inform them of youth who were at risk of dropping out or without post-graduation plans, and whom the WIOA Youth program could then support either as in-school or eventually out-of-school youth. For example, one local provider reported regularly receiving a list of youth who could be eligible for the program from a partner school district.[28] On the other side of the spectrum, some local providers described having highly integrated partnerships with school districts that enabled them to serve students. This included providing specific services, generally work experiences, for eligible in-school youth. Under such arrangements, students would be able to participate in an internship or summer employment opportunity through the WIOA Youth program outside of their regular school hours. Other providers more directly supplemented eligible in-school youth's participation in high school CTE programs or dropout prevention services, braiding their funding with schools' programming to support specific students' success. For example, one provider was able to use WIOA Youth funding to pay for steel-toed boots, uniforms, bus passes, program fees, and other costs for eligible in-school youth in a local CTE program.[29]

These successes aside, providers also described challenges in serving in-school youth through the WIOA Youth program. Eligibility was cited as one common challenge, since WIOA eligibility rules only allow providers to serve certain students within high schools (as detailed in Table 1) and this could make partnerships more difficult to develop. Though some programs found success in integrating their services with high school CTE programs, others reported that they encountered challenges in attempting to combine their WIOA funding with schools' programs due to varying performance metrics, eligibility, provider standards, and more. An additional challenge commonly raised by providers was the gap that could exist between programming for in-school and out-of-school youth. Although school enrollment is treated as a fixed state under WIOA, providers noted that many in-school youth the program could serve were borderline out-of-school youth, either due to being at risk of dropping out or due to not having career or postsecondary plans following graduation. Yet due to the requirement to serve a larger proportion of out-of-school youth, providers often had to wait for a student to transition to this other category before serving them. This gap between the two sides of the program could lead to youth having to wait to receive needed services or providers losing track of youth after they leave school.

B. Serving Immigrant Youth

As part of the interviews for this project, local workforce development board representatives and other WIOA Youth program staff were asked the extent to which they served immigrant youth, including English Learners, as well as barriers they had experienced to doing so. The insights and experiences shared by those interviewed shed light on both the WIOA Youth program's capacity to serve immigrant youth and larger lessons for workforce providers seeking to effectively support immigrant youth.

For virtually all of the programs examined, immigrant youth were not a priority group nor a population of specific focus. Some interviewees in immigrant-dense urban areas or closer to the U.S.-Mexico border did, however, have more of this focus. Yet immigrant program participants were generally served as part of the larger populations of local youth rather than due to intentional outreach to immigrant communities. For providers in other areas, the immigrant youth they served similarly came via their normal referral or recruitment networks. Although providers reported serving immigrant youth and English Learners, they faced two principal challenges in doing so: English proficiency prerequisites and immigration status requirements.

Most providers said youth needed higher levels of proficiency in English in order to participate in their programs, limiting the number of immigrants they could serve. The requirement for more advanced levels of English was largely a practical issue as programs reported having difficulty placing youth with limited proficiency into positions with local employers. Similarly, the job training programs that WIOA Youth providers partnered with generally required advanced levels of English proficiency to participate. Mirroring the findings of previous MPI research on workforce development providers' capacity to serve adult English Learners,[30] training programs often lacked the instructional capacity to serve students with limited English proficiency and also required participants to possess advanced, specialized vocabulary and to pass certification or occupational exams that were only available in English.

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Despite these limitations, some providers did report success in serving English Learner youth, particularly Spanish speakers. In certain areas, providers had success placing Spanish-speaking youth into work experience positions with employers whose workforces were predominantly Spanish speakers.[31] For educational services, some interviewees described being able to offer Spanish GED exams, which allowed more immigrant youth and English Learners to participate.[32]

Providers often used referrals and relationships with adult education programs to serve English Learners. Generally, providers reported referring most of these youth to adult education ESOL courses with the promise that once their English proficiency had reached a sufficient level, they would be able to participate in the workforce development program. Only one provider mentioned attempting to combine English instruction and workforce development activities into a single program to serve immigrant youth, a technique known as Integrated Education and Training (IET).[33] Yet this provider ultimately discontinued the approach after it was unsuccessful, due to difficulties working with youth with lower levels of English proficiency and, relatedly, having a limited number of workforce-focused staff who were equipped to work with English Learners.[34]

A young person's immigration status, and particularly whether it provides authorization to work in the United States, can also shape participation. All of the programs examined for this project, in line with federal law, required immigrant youth to have employment authorization to participate in WIOA Youth program activities—a rule that prevented unauthorized immigrant youth and those with tenuous legal statuses (such as those in the initial stages of seeking asylum and other forms of protection who were not yet eligible for work authorization) from participating. In addition to being a requirement of WIOA Title I, providers explained that this rule served a practical purpose: Given that their programs were tied so closely to work experiences and relationships with employers, it would not be possible for employers to legally pay or employ participants who lacked work authorization. This requirement limited the share of immigrant youth who were able to participate in programs, particularly recently arrived youth and young adults who did not have employment authorization.

These two challenges—along with the fact that providers were not generally focused on serving immigrants—indicate the nature of obstacles that would likely present themselves in efforts to serve more immigrant youth via the WIOA Youth program or the workforce development system at large.

4 Lessons for Serving Immigrant Youth in the Public Workforce Development System

As the immigrant youth population grows and settles in communities across the United States, finding ways to connect these young people to workforce development programs will be an important priority for many states, regions, and localities. Examining the design of the WIOA Youth program as well as how local providers have implemented and organized its services, it is clear the program holds promise for serving the career and educational needs of immigrant youth and helping them more fully contribute to local economies.

Challenges do exist related to the program's fit for some segments of this population—largely due to English proficiency prerequisites and legal status requirements. However, with some adjustments to service delivery, particularly coordination with adult education providers and school districts, and strategic partnerships with immigrant-oriented service providers such as refugee resettlement organizations, workforce development programs more broadly could increase their capacity to serve this population effectively. The implications of the research conducted for this policy brief extend beyond the WIOA Youth program and also offer important lessons for policymakers seeking to support the success of immigrant youth as well as for workforce development programs seeking to better serve this population. These lessons include:

- **Individualized approaches for serving youth that involve educational and workforce development components along with supportive services have great potential for promoting the success of immigrant youth, particularly recently arrived youth.** Individualized models allow for the delivery of a suite of services tailored to each participant's needs in a way that could allow for English instruction, career guidance, workforce development activities, and supportive services to be bundled into a single program. This approach—meeting youth where they are—is of particular relevance for serving immigrant youth, given their varying situations (such as different levels of English proficiency) as well as unique barriers (such as migration-related trauma or a lack of familiarity with the United States) that immigrant youth may or may not face. A well-designed program could lay the groundwork for immigrant youth to, depending on their needs, be able to both orient themselves to American society and their local job market while simultaneously being prepared to move into higher-wage employment and access critical services, bolstering their integration into the country.

- **Workforce development systems and service providers can develop programmatic models to simultaneously serve the English instruction and workforce development needs of immigrant youth.** English prerequisites are understandable for workforce programs, given that training courses, many high school equivalency programs, and employers themselves often demand a higher level of English proficiency. Yet only being able to serve immigrant youth who are highly proficient in English would exclude a large segment of the population most in need of these services. In addition, there are strategies that programs can leverage to better serve

immigrant youth with limited proficiency in English, such as:

- **IET models** have been used for more than a decade in the adult education field, allowing participants to complete concurrent and contextualized educational and workforce development activities for specific career fields. Although usually unable to serve those with very low levels of English proficiency, IET does have promise to serve some immigrant youth, especially if its structure and services are individualized for each participant.[35] Successful IET models will require deeper partnerships with adult education providers along with additional efforts to ensure that training providers and employers can effectively work with youth who are learning English. State workforce agencies can also support the development of IET models by providing guidance, technical assistance, and additional resources to programs, potentially in partnership with state adult education agencies.

- **Bridge models** can also allow youth with lower levels of English proficiency to get on track to enter workforce development programs. Used successfully for immigrants in some IET activities under the adult education system's Integrated English Literacy and Civics Education (IELCE) program, bridge models enable participants to receive specialized instruction and supports such as technical English courses that prepare them to participate in specific workforce development activities such as an apprenticeship.[36] Workforce development program providers would likely need to partner with adult education providers to develop effective bridge program curricula and content for immigrant youth. The use of bridge models would enable workforce development providers to build pipelines into their programs for interested youth, thus allowing those with lower levels of English proficiency to work toward a specific goal rather than merely referring them to generalized English courses. Quality pre-apprenticeship models could play a similar role for youth interested in entering into apprenticeships.

- **Multilingual models for delivering workforce services** could also be leveraged, with immigrant youth's existing language skills valued as an asset to potential employers. As described in the previous section, some local workforce development program providers have successfully placed Spanish-speaking youth into work experiences in industries with primarily Spanish-speaking workforces. This strategy holds promise for providers in regions with large populations of speakers of non-English languages, especially where particular industries have significant contingents of speakers of a certain language. Providers seeking to serve more immigrant youth should examine where the existing language skills of in-school and out-

of-school youth could be valued by local industries or employers. Successful implementation of this strategy would likely require strong connections to organizations serving these communities and/or program staff with proficiency in the language of interest.

- **Adult education providers are critical partners for workforce programs seeking to serve immigrant youth.** Given English prerequisites for many workforce development programs as well as opportunities via models such as IET, adult education providers, particularly those delivering ESOL instruction, comprise essential partners for broader efforts to serve immigrant youth in workforce development programs—as is emphasized in federal guidance around the WIOA Youth program.[37] Such connections do exist to a certain extent both via referral processes as well as the coupling of educational instruction with workforce preparation in several of the programs examined for this project. For providers seeking to serve immigrant youth, cultivating these connections will be important, as is more developed integration between workforce activities and relevant, contextualized classroom instruction. For immigrant youth with very low levels of English proficiency, learning English to an extent that would enable them to participate in workforce activities may take years rather than months, making longer-term connections with adult education providers key. For policymakers, these findings indicate the important need to better fund and support adult education and ESOL providers who are receiving these referrals, given they are providing important workforce preparation services, as well as the need to encourage such cross-system integration.

- **Workforce development programs seeking to serve immigrant youth will need to consider and train staff on how to navigate immigration-status-related eligibility rules under WIOA Title I.** Practically speaking, little can be done to serve immigrant youth whose participation in WIOA Title I training activities and other workforce development programs is restricted due to their lack of employment authorization, besides potential policy changes to WIOA or broader efforts at immigration reform by Congress. Yet many immigrant youth—including permanent residents and naturalized U.S. citizens, DACA recipients, asylees, refugees, and Special Immigrant Juvenile Status (SIJS) holders—have employment authorization and thus are able to participate in all aspects of workforce development programs. As a result, workforce systems and providers will need to understand and educate frontline staff on what statuses allow immigrant youth to participate in programs while also seeking out immigrant-serving groups, such as refugee resettlement and legal services organizations, that can help connect them to eligible youth. State workforce agencies can also help provide guidance to local providers to assist their navigation of these requirements.

- **State agencies along with local workforce development boards should seek to better understand the immigrant youth population in their area, the share of eligible young people they comprise, and the extent to which they can be served under existing funding levels.** In some communities, particularly in immigrant-dense regions or those that have experienced

influxes of unaccompanied children or other school-age immigrants, foreign-born youth may comprise a large share of disconnected youth. Determining the needs and level of emphasis programs should place on reaching immigrant youth calls for evidence-based approaches that consider population-level data, whether collected from the Census Bureau's American Community Survey, school district data, and from engagement with key local organizations that have insights into emerging trends, such as the size and makeup of an area's immigrant youth population. These considerations are particularly important given the finite funding the WIOA Youth program receives and the resulting limited capacity of local providers to serve all eligible youth in their area. Without additional infusions of funding from the federal or state level, local programs interested in serving greater numbers of immigrant youth should consider carefully how to reach the most at-risk U.S.- and foreign-born youth, balance trade-offs, and strategically partner with other organizations to expand their impact.

- **Local workforce development providers should position themselves as actors within local immigrant integration ecosystems if they are seeking to serve immigrant youth.** In building new relationships and partnering more closely with immigrant-serving organizations (such as refugee resettlement and legal aid groups) as well as state or local offices dedicated to immigrant integration (such as Offices of New Americans), workforce development providers and agencies can situate themselves to play an important role in supporting the integration success and future economic mobility of recently arrived youth. Engaging with such networks would also allow workforce development providers to better understand the needs of immigrant youth in their areas and how their services can best assist these young people.

Promoting the long-term economic mobility and successful integration of immigrant youth is a critical policy goal for the country as a whole as well as for states and localities. Workforce development systems and providers have an important role to play in furthering these goals by serving as key sources of guidance, information, and access to workforce preparation and skills development for youth, particularly those who are no longer enrolled in school. Doing so does not necessarily require a complete overhaul of policies, systems, and services, but rather effective adjustments of existing programs, such as the WIOA Youth program, to address the barriers shared by native-born and immigrant young people as well as the unique challenges that many immigrant youth face in building new lives in the United States.

Promoting the long-term economic mobility and successful integration of immigrant youth is a critical policy goal for the country as a whole as well as for states and localities.

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