

I. Purpose:

The Youth Eligibility policy provides direction to ensure that every Workforce Innovation and Opportunity Act (WIOA) participant who receives WIOA Youth Program funded services is eligible to receive those services. The policy describes WIOA mandated youth eligibility requirements, identifies the criteria for the 5% limitation and 5% exception, identifies the criteria for determining if additional assistance is needed for a participant to complete an educational program or to secure or hold employment. Additionally, this policy addresses documentation requirements and STLWDA Out-of-School Youth priority as a result of the mandated youth expenditure requirement.

II. Background:

The Workforce Innovation and Opportunity Act (WIOA) presents new opportunities to improve job and career options for our nation's workers and jobseekers through an integrated, job-driven public workforce system that links diverse talent to businesses. WIOA places a priority on serving out-of-school youth, providing work-based experience, and improving services to youth with disabilities. WIOA promotes career pathways, increased attainment of recognized credentials and post-secondary certificates or degrees. Youth must meet eligibility requirements to participate in the WIOA Title I Youth Program. Eligible youth are those who are 14-24 years of age and face specific barriers to school completion or employment.

III. Instructions:

It is the program operator's (e.g. sub-contractors, partners) responsibility to inform all staff of the policy and ensure adherence and accountability of its contents. Additional guidance and definitions can be found in TEGL 21-16.

Definitions:

1. **School** - any secondary or post-secondary school as defined by the applicable State law (**TCA 9-6-301 and 49-7-2001-2003**) for secondary and postsecondary institutions (**20 CFR 681.230**). For purposes of WIOA, the Department does not consider providers of adult education under Title II of WIOA, YouthBuild programs, the Job Corps program, high school equivalency programs, or dropout re-engagement programs to be schools (**20 CFR 681.230**). In all cases except the one provided below, WIOA youth programs may consider a youth to be an OSY for purposes of WIOA youth program eligibility if he or she attends adult education provided under title II of WIOA, YouthBuild, Job Corps, high school equivalency programs, or dropout re-engagement programs regardless of the funding source of those programs. Youth attending high school equivalency programs funded by the public K-12 school system who are classified by the school system as still enrolled in school are an exception: they are considered ISY.
2. **Attending School** - An individual is considered to be attending school if the individual is enrolled in a secondary school or registered for credit-bearing courses at a post-secondary institution. Such schools include, but are not limited to: TCATs, community colleges, 4-year

college/university, traditional K-12 public and private, and alternative (e.g., continuation, magnet, and charter) schools.

3. **Not Attending School** - is an individual who is not attending a secondary or post-secondary school (**WIOA Section 129[a][1][B]**). An individual who is enrolled in adult education, Youth Build, or Job Corps is not considered to be attending school (**Final Rule 681.230-32**).

4. **Alternative School** - is a type of school designed to achieve grade-level (K- 12) standards and to meet student needs (**Education Code EDC Section 58500**). Examples of alternative schools include, but are not limited to: continuation, magnet, and charter schools. If the youth participant is attending an alternative school, at the time of enrollment, the participant is considered to be in-school.

5. **Low-income** – a Low-Income Individual is One Who:

- a. Receives or in the past 6 months has received - or is a member of a family that is receiving or in the past 6 months has received - assistance through the supplemental nutrition assistance program (SNAP), the supplemental security income program established under Title XVI of the Social Security Act, or State or local income-based public assistance
- b. Is in a family with total income that does not exceed the higher of –
 - The poverty line, or
 - 70 percent of the lower living standard income level
 - For additional guidance, see Low Income Guidelines policy
- c. A homeless individual
- f. Receives or is eligible to receive free or reduced-price lunch (See **TEGL 21-16** for additional information)
- e. A foster child on behalf of whom State or local government payments are made;
- g. An individual with a disability whose own income meets the low-income level for eligibility purposes
- h. Youth who reside in a High Poverty Area. (See **TEGL 21-16** for additional information)

WIOA Title I Youth Participant Eligibility:

WIOA establishes separate criteria for Out-Of-School Youth (OSY) and In-School Youth (ISY).

1. An Out-Of-School Youth is defined as an individual who is:

- a. Not attending any school at the time of enrollment
- b. Not younger than 16 or older than 24 at the time of enrollment (participants may continue to receive services beyond the age of 24 once they are enrolled in the program **20 CFR 681.210**); and
- c. Meets one or more of the following conditions:
 - i. School dropout
 - ii. Within the age of compulsory school attendance but has not attended school for at least the most recent complete school year calendar quarter. School year calendar is based on how a local school district defines its school year quarters.

- iii. Recipient of a secondary school diploma or its recognized equivalent who is low-income and basic skills deficient or an English language learner
- iv. An offender who has been subject to any stage of the criminal justice process
- v. A homeless individual aged 16 to 24 who meets the criteria defined in **Violence Against Women Act of 1994 Section 41403(6)**, a homeless child or youth aged 16 to 24 who meets the criteria defined in of the **McKinney Vento Homeless Assistance Act Section 725(2)**, or who is a runaway
- vi. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care of kinship guardianship or adoption, a child eligible for assistance under **Social Security Act (42 USC 677)**, or in an out-of-home placement
- vii. Pregnant or parenting
- viii. An individual with a disability
- ix. Low-income individual who requires additional assistance to enter or complete an educational program or to secure or hold employment (**WIOA Section 3[46]** and **WIOA Section 129[a][1][B]**)

The criteria include the following barriers:

- a. Expelled or suspended from a secondary or post-secondary training program
- b. Has poor or sporadic work history, no work history, or has been fired from a job and has not gained employment a result of being fired.
- c. Has been placed in group home, foster care, or kinship between the ages of 14-16
- d. Has parent(s) or guardian(s) who are currently incarcerated or have been incarcerated within the last five years
- e. Has neither the work experience nor credential required for an in-demand occupation for which approved training will be provided
- f. Needs an Individual Training Account or supportive services to enter or complete an educational program or secure and hold employment
- g. At risk youth who have been involved in domestic violence, human trafficking, gang involvement or at risk for gang affiliation
- h. Would be a first-generation college student

2. An In-School Youth is defined as an Individual Who Is:

- a. Attending school at the time of enrollment (**TEGL 21-16**)
 - i. If the youth is enrolled in the WIOA summer youth program during the summer and is in between school years, the youth is considered ISY if they are enrolled to continue school in the fall
 - ii. If a youth is enrolled in the youth program between high school graduation and postsecondary education, the youth is considered an ISY if they are registered for postsecondary credit-bearing courses, even if they have not yet begun postsecondary classes at the time of enrollment
 - iii. If the youth does not follow through with attending postsecondary education, then such a youth would be considered an OSY if the eligibility determination is made after the point that the youth decided not to attend secondary education

- iv. Post-secondary courses must be credit-bearing classes. An individual attending non-credit-bearing post-secondary classes (remedial courses) are to be considered out-of-school
- b. Not under the age of 14 or older than 21 (unless an individual with a disability who is attending school under State law) at the time of enrollment
- c. Low-income; and meets one or more of the following conditions:
 - i. Basic skills deficient
 - ii. An English language learner
 - iii. An offender who has been subject to any stage of the criminal justice process
 - iv. A homeless individual aged 14 to 21, who meets the criteria defined in the **Violence Against Women Act of 1994 Section 41403(6)**, a homeless child or youth aged 14 to 21 who meets the criteria defined in the **McKinney Vento Homeless Assistance Act Section 725(2)**, or a runaway
 - v. An individual in foster care or who has aged out of the foster care system or who has attained 16 years of age and left foster care of kinship guardianship or adoption, a child eligible for assistance under *Social Security Act (42 USC 677)* or in an out-of-home placement
 - vi. Pregnant or parenting
 - vii. An individual with a disability
 - viii. Requires additional assistance to complete an educational program or to secure or hold employment. **The 5% limitation applies to all ISY with this barrier. (Refer to TEGL 8-15)**

The criteria include the following barriers:

- a. Needs to repeat a post-secondary course(s) or needs credit recovery to complete secondary school
- b. Has been suspended or placed in alternative secondary school as a result of disciplinary action or involved in truancy
- c. Has been placed in group home, foster care, or kinship between the ages of 14-16
- d. Has parent(s) or guardian(s) who are currently incarcerated or have been incarcerated within the last five
- e. Needs support in completing dual credit or dual enrollment courses in the course of completing secondary education
- f. At risk youth who have been involved in domestic violence, human trafficking, gang involvement or at risk for gang affiliation
- g. Would be a first-generation college student

3. Residency Requirement

At the date of application for WIOA services, eligible applicants must reside in STLWDB's Local Area, which includes the counties of: Bledsoe, Bradley, Grundy, Hamilton, Marion, McMinn, Meigs, Polk, Rhea, and Sequatchie.

Documentation of Residency for Eligibility

Applicants must provide documentation of residency documentation during the eligibility intake process, to be maintained in participant's case file. Acceptable documentation includes:

- Unexpired Driver's License or State ID
- Social Services printout on an active case

- Current utility bill, medical statement, bank statement, or similar correspondence
- Current school letter or transcripts based on official records
- Current rent receipt with pre-printed address, including name/phone number of landlord or property manager
- Current letter from a shelter verifying homeless residency
- Signed attestation from a family member or friend if residing with them temporarily

Residency Requirement Exceptions

Exceptions to the residency requirement will be considered on a case-by-case basis and require prior written approval from STLWDB before enrollment and service provision. Access to services for individuals residing outside the local area may be granted for special circumstances, such as recent dislocation from employment within the local area and participation in cross-regional workforce initiatives, or other extenuating circumstances as determined by STLWDB staff.

NOTE: Youth with disabilities who have an Individualized Education Program may be enrolled as ISY after the age of 21. *TCA 0520-01-11-04* includes the factors used to determine eligibility for youth with disabilities enrolled as an ISY after the age of 21. Details are provided below:

Term of the Individualized Education Account:

For purposes of continuity of educational attainment, a student with disabilities who enrolls in the program shall remain eligible until the participating student meets one of the following, whichever occurs first:

1. Enrolls full-time in a public school in the LEA in which the parent or student who has attained the age of majority resides

2. Graduates from high school. The student may continue in the program until such time as he or she and receives a high school diploma or received a passing score on all subtests of the GED or HiSET. Certificates of attendance do not constitute graduation from high school for the purposes of this program; or
3. Reaches twenty-two (22) years of age. The student may complete the school year in which he or she reaches the age of twenty-two (22), provided a student shall not be enrolled in the program past August 15 of the next school year after they have reached twenty-two (22) years of age.

Youth 5% Low-income Eligibility Exception:

As described in **WIOA 20 CFR 681.250(c)**, WIOA allows a low-income exception where five (5) percent of WIOA youth may be participants who ordinarily would be required to be low-income for eligibility purposes and meet all other eligibility criteria for WIOA youth except the low-income criteria. A program must calculate the five percent based on the percent of newly enrolled youth in the local area's WIOA youth program in a given program year who would ordinarily be required to meet the low-income criteria. It is not based on all youth since many of the OSY categories do not require low-income status. Because not all OSY are required to be low-income, the five percent low-income exception under WIOA is calculated based on the five percent of youth enrolled in a given program year who would ordinarily be required to meet the low-income criteria.

***Example:** If 20 ISY and 100 OSY and are enrolled in the given program year, and only 50 of the OSY were required to be low-income, the denominator would be 70 (20 ISY plus 50 OSY) in the calculation.*

Youth 5% Additional Assistance Barrier Limitation for ISY:

There is a limitation related to the “requires additional assistance” criterion that applies only to ISY. WIOA Section 129(a)(3)(B) states that in each local area, not more than 5% of the ISY enrolled in a given program year may be eligible based on the barrier for ISY who requires additional assistance to complete an educational program or to secure and hold employment. Local areas must ensure that in a given program year, no more than five (5) percent of ISY enrolled are eligible based only on the “additional assistance” criterion. The 5% Limitation ensures that ISY enrollments are limited to those with significant barriers.

***Special Note:** Opportunities to enroll youth based on the 5% exception and limitation are extremely limited and require an accurate count of enrollments required to be low-income, or ISY who “require additional assistance” in a given program year. Career Service providers should not expect utilization of the 5% exception without documented necessity and prior approval from the One-Stop Operator.*

Youth Expenditure Requirements

The state of Tennessee received a waiver to the 75% OSY expenditure requirement, reducing the target rate for OSY expenditures to 50% for Program Years (PYs) 2022 and 2023 through the life of the award. STLWDA intends to expand services to ISY in accordance to this waiver.

Approval for Exceptions

Prior to intake, Career Service Providers must submit electronic written requests for exceptions to the 5% exception or limitation to the One-Stop Operator. The request must contain the specific

information about the applicant that necessitates WIOA intervention. A written determination from the One-Stop Operator should be provided within 3 business days. Written approval must be scanned into the electronic file with all other eligibility and assessment documents.

US Citizenship or Authorization to Work in the United States if a Non-US Citizen

Eligible youth must also be a citizen or national of the United States, lawfully admitted permanent resident alien, refugee, asylee, and parolee, and other immigrant authorized by the Attorney General to work in the United States (**WIOA Section 188(a)(5)**).

Selective Service Registration Requirements for Males Under Age 26

Before being enrolled in WIOA Title I services, all males who are not registered with Selective Service and have not reached their 26th birthday must register through the Selective Service website at www.sss.gov. If a male turns 18 while participating in any applicable services, registration must be completed no later than 30 days after he becomes 18 in order to continue to receive WIOA Title I funded services. If a man under the age of 26 refuses to register with Selective Service, WIOA Title I funded programs must be suspended until he registers. For transgender customers, compliance with Selective Service is predicted on the individual's gender as assigned at birth/as recorded on a birth certificate.

Documentation for Participant Eligibility

Documentation is necessary to support WIOA Title I Youth Eligibility. Providers must verify and confirm that youth are eligible to participate in WIOA Youth services through an examination of documents. *Please see Attachment A*. Documentation should be stored electronically by uploading the documents into the participant's file in Jobs4TN, and documentation must be available to program, fiscal monitors, and auditors for monitoring purposes. Monitoring will occur through local and TDLWD monitoring processes, including PAR monitoring. A document tag must be added with the documentation indicating the eligibility requirement that the document is supporting. LWDA's must retain records for a period of at least five (5) years after the submittal of the final closeout expenditure report for that funding period. Provide

Attachment A: Youth Eligibility and Criteria Documentation

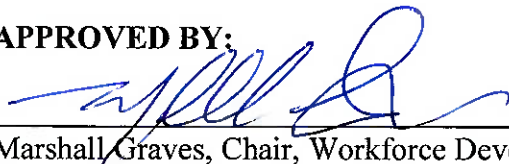
AUTHORIZED BY:



Michele Holt, Director, Workforce Development

12/10/2024
Date

APPROVED BY:



Marshall Graves, Chair, Workforce Development Board

10 DEC 2024
Date

Youth Eligibility Policy, revision effective 12.10.2024

Youth Eligibility Criteria and Documentation – Attachment A

Note: One document per group is required

Youth Eligibility Criteria	Documentation in File
Eligibility Basics	These items are required for basic participation verification for all participants
Age/Birth Date	<ul style="list-style-type: none"> • Birth certificate • Baptismal record if date of birth is shown • DD-214 transfer or discharge paper • Hospital record of birth • Driver's license state, federal, or local government ID • Passport • Work permit • Cross match with public assistance records via state MIS system • Other public assistance records • School record or ID cards • Tribal records
Citizenship Status/ Authorization to Work in the US	<ul style="list-style-type: none"> • Citizenship Status/ Authorization to Work Self-Attestation • U.S. passport, certificate of U.S. citizenship, certificate of naturalization, permanent resident card, unexpired refugee travel document • U.S. Social Security card issued by the Social Security Administration (other than a card stating not valid for employment), Certificate of Birth Abroad issued by the Department of State, birth certificate issued by a state, county, municipal authority or outlying possession of the U.S., • U.S. citizen ID card, ID card for use of Resident Citizens in the U.S. • Cross match with public assistance records via state MIS system • Other public assistance records

<p align="center">Selective Service Registration</p>	<ul style="list-style-type: none"> • Selective service card • Verification from the Selective Service web site: https://www4.sss.gov/regver/verification1 .asp • Documentation that failure was not willful and knowing if an applicant failed to register or too old to register and approval to serve individual • DD-214 "Report of Separation" • Stamped Post Office Receipt of Registration
<p align="center">School Status at Participation</p>	<ul style="list-style-type: none"> • Self-Attestation • Applicable records from educational institution • WIOA intake forms • State MIS
<p align="center">Receipt of High School Diploma</p>	<ul style="list-style-type: none"> • Self-Attestation • School records • Diploma • Letter or other documentation from school system
<p align="center">Low-Income Individual</p>	<p>Low-income is required for all in-school youth and for out-of-school youth who has a secondary school diploma and is basic skills deficient or an English language learner or requires additional assistance to enter or complete an education program or to secure or hold employment.</p>
<p align="center">TANF Receives, or is a member of a family that receives, cash payments under the Temporary Assistance for Needy Families, which is a Federal income-based public assistance program</p>	<ul style="list-style-type: none"> • Cross match with public assistance records via state MIS system
<p align="center">Other Cash Public Assistance Receives, or is a member of a family that receives, cash payments under a federal, state, or local income-based public assistance program (includes refugee assistance and other cash public assistance)</p>	<ul style="list-style-type: none"> • Verification by the public assistance agency • Cross match with public assistance records via state MIS system • Other public assistance records • Refugee assistance records • Verification from the refugee assistance provider

<p style="text-align: center;">Family Income</p> <p>Determined when an individual received income, or is a member of a family that received income, for six month period prior to application for the program that in relation to family size does not exceed the higher of poverty line or 70 percent of lower living standard income</p>	<ul style="list-style-type: none"> • Self-Attestation, only in cases when an individual has no income or receives very little undocumented income; the statement should include some description of how the applicant has been supported in the past six months • Pay stubs • Employer statement of earnings • Compensation award letters • Social Security retirement benefits letter • Pension statement • Bank statements • Court award letter • Family or business financial records • Quarterly estimated tax for self-employed persons • Alimony agreements • Award letter veteran's administration • Unemployment Insurance documents • Low-income Housing Authority verification
<p style="text-align: center;">Supplemental Nutrition Assistance Program (SNAP)</p> <p>Is a member of a household that receives (or has been determined within the six month period prior to the application for the program involved to be eligible to receive) food stamps pursuant to the Food Stamp Act of 1977</p>	<ul style="list-style-type: none"> • Verification by the public assistance agency • Cross match with public assistance records via state MIS system • Other public assistance records • Copy of authorization to receive SNAP benefits
<p style="text-align: center;">Free and reduced-price lunch <i>(In- School and Out-of-School whose own dependents receive free and reduced-price lunch – must be due to income eligibility)</i></p>	<ul style="list-style-type: none"> • Self-Attestation • Approval Letter • Completed Application
<p style="text-align: center;">Youth living in a high-poverty area</p>	<ul style="list-style-type: none"> • American Community Survey Data (see <i>Directions for Using Census Data for WIOA Formula Program</i> attached to Youth Eligibility Policy)

Youth Eligibility Criteria	Documentation in File
Additional Youth Barriers	Youth must document one of the following seven barriers in addition to meeting one of the low income criteria.
Basic skills deficient <i>(In- School and Out-of-School)</i>	<ul style="list-style-type: none"> • Standardized assessment test, such as TABE or CASAS, or other assessment that meets criteria stated in federal, state, or local guidance within past six months of eligibility determination date. • School records • Case notes
English language learner <i>(In- school and Out-of-School)</i>	<ul style="list-style-type: none"> • Self-Attestation • School records • Case notes
School dropout <i>(Out-of- School)</i>	<ul style="list-style-type: none"> • Self-Attestation • Applicable records from educational institution • State MIS • WIOA Intake form • School board verification of dropout status • Dropout Letter
Not attending school <i>(Out-of- School)</i>	<ul style="list-style-type: none"> • Self-Attestation • School records • Court documents
Homeless or Runaway <i>(In- School and Out-of-School)</i>	<ul style="list-style-type: none"> • Self-Attestation • Verification from a shelter or social services agency • Written statement from individual providing residence
Foster Child or Emancipated Foster Child <i>(In-School and Out-of-school)</i>	<ul style="list-style-type: none"> • Case notes • Court documentation • Verification from a social services agency
Pregnant or Parenting Youth <i>(In-school and Out-of-school)</i>	<ul style="list-style-type: none"> • Self-Attestation • Physician's statement • Birth certificate if parenting • Baptismal record • Case notes • Verification with social service agency

<p style="text-align: center;">Offender <i>(In-school and Out-of-School)</i></p>	<ul style="list-style-type: none"> • Self-Attestation • WIOA intake • Court records • Halfway house resident • Letter of parole • Letter from probation officer • Police records
<p style="text-align: center;">Individual with a disability <i>(In-school and Out-of-School)</i></p>	<ul style="list-style-type: none"> • Self-Attestation • Letter from drug or alcohol rehabilitation agency • Medical records • Physician's statement/ Psychologist diagnosis • Social Security disability records • Individual Education Plan (IEP) • Veteran Administration Letter/Records • Social Services records • Vocational Rehabilitation Letter and/or Referral • Worker's Compensation Records
<p style="text-align: center;">Require additional assistance to complete an educational program or to secure and hold employment <i>(In-School and Out-of-School)</i></p>	<ul style="list-style-type: none"> • Self-Attestation • Local area plan • Local area policy • Individual Service Strategy • Case notes • WIOA intake form • State MIS

ATTACHMENT B

Youth Eligibility Criteria and Documentation - Requires Additional Assistance

Out-of-School (Age 16-24) Youth who requires additional assistance to enter or complete an educational program or to secure and hold employment.	
Criteria	Acceptable Documentation
Expelled or suspended from a secondary or post-secondary training program	documentation from school, case note – self-attestation
Has poor or sporadic work history, no work history, or has been fired from a job and has not gained employment a result of being fired	documentation from employer such as separation notice, or as a last resort – self-attestation
Has been placed in group home, foster care, or kinship between the ages of 14-16	documentation from court or DHS
Has parent(s) or guardian(s) who are currently incarcerated or have been incarcerated within the last five years	documentation from court, or jail roster
Has neither the work experience nor credential required for an in-demand occupation for which approved training will be provided	documentation from intake/application or ISS regarding highest level of education or training, and/or work history
Needs an Individual Training Account or supportive services to enter or complete an educational program or secure and hold employment	documented in objective assessment, case notes or ISS
At risk youth who have been involved in domestic violence, human trafficking, gang involvement or at risk for gang affiliation	documented by school official, police report, or referring agency supporting at-risk populations
Would be a first-generation college student	self-attestation, case note

In-School Youth (Age 14-21) who requires additional assistance to complete an educational program or to secure and hold employment.	
Criteria	Acceptable Documentation
Needs to repeat a post-secondary course(s) or needs credit recovery to complete secondary school	documented in school records, transcripts, case notes, self-attestation
Has been suspended or placed in alternative secondary school as a result of disciplinary action or involved in truancy	documented in school records, or truancy court documents
Has been placed in group home, foster care, or kinship between the ages of 14-16	documentation from court or DHS
Has parent(s) or guardian(s) who are currently incarcerated or have been incarcerated within the last five years	documentation from court, or jail roster
Needs support in completing dual credit or dual enrollment courses in the course of completing secondary education program	documented in school records, class schedule, TSAC supporting documents
At risk youth who have been involved in domestic violence, human trafficking, gang involvement or at risk for gang affiliation	documented by school official, police report, or referring agency supporting at-risk populations
Would be a first-generation college student	self-attestation, case note

Revised Directions for Using American Community Survey Data to Determine High-Poverty Areas

The WIOA youth formula program allows youth living in high-poverty areas to be considered low-income individuals. The Census Bureau has changed its website for accessing American Community Survey data, and so this is to provide revised instructions on how to use Census data to document high-poverty areas.

Out-of-school youth who are high school dropouts are not required to be low-income to be served by the WIOA formula youth program, but youth with a high school diploma or its equivalent who are basic skills deficient, English language learners, or who require additional assistance to complete an educational program or to secure or hold a job are required to be low-income to be served by the program. Documenting that these youth live in a high-poverty area is a non-intrusive way of allowing these youth to meet the low-income criteria. Similarly, in-school youth may meet the low-income criteria by receiving or being eligible to receive a free or reduced price lunch, but in some cases it may be easier to document an in-school youth's low-income status by showing that they live in a high-poverty area. Also, living in a high-poverty area satisfies the low-income eligibility requirement for receiving supplemental youth services in the WIOA Section 166 Native American Program.

The WIOA regulations at 681.260 define high poverty area as a Census tract, a set of contiguous Census tracts, an American Indian Reservation, Oklahoma Tribal Statistical Area (as defined by the U.S. Census Bureau), Alaska Native Village Statistical Area or Alaska Native Regional Corporation Area, Native Hawaiian Homeland Area, or other tribal land as defined by the Secretary in guidance, or county that has a poverty rate of at least 25 percent as set every 5 years using American Community Survey 5-Year data.

Revised directions for using American Community Survey data to determine high-poverty areas are as follows. Section 1 describes how to determine if an individual youth lives in a high-poverty area based on their street address. Section 2 describes how to identify if an overall county has a poverty rate of 25 percent or above. Section 3 describes how to determine the poverty rate of American Indian Reservations, Oklahoma Tribal Statistical Areas, and Alaska Native Village Statistical Areas. Section 4 describes how to identify high-poverty areas in your city or county for targeting your services on high-poverty neighborhoods.

You can use the Microsoft Edge, Google Chrome, or Microsoft Explorer browsers for the directions in Sections 1 and 2. You will need to use either the Microsoft Edge or Google Chrome browser for Section 3 and on 4.

If you run into problems with these directions, send an e-mail to youth.services@dol.gov for technical assistance.

Section 1: Determining if an Individual Lives in a High-Poverty Area Based on Their Street Address.

There are two steps to this—first determining the Census tract in which the street address is located, and second determining the poverty rate of the Census tract.

1. For the first step of determining the Census tract in which the street address is located, click on <https://geocoding.geo.census.gov/geocoder/geographies/address?form>. There will be two choices: **Find Locations Using...** and **Find Geographies Using...** We want use the second choice **Find Geographies**

Using, but Find Geographies Using is not clickable. Rather, under Find Geographies Using Click on Address.

The screenshot shows a sidebar on the left with three main sections: "FIND LOCATIONS USING..." OPTION, "FIND GEOGRAPHIES USING..." OPTION, and "ABOUT DATA...". Under "FIND GEOGRAPHIES USING...", the "Address" option is highlighted with a blue arrow. The main panel on the right is titled "Find Address Results" and contains input fields for Street, City, State, and Zip. Below these are dropdown menus for Benchmark (set to "Public_AR_Current") and Vintage (set to "Current_Current"). A "FIND" button is at the bottom left of the main panel.

2. Type in the street address, city, and state. You don't need to type in the zip code. Then we need to change the Benchmark to **Public_AR_Census2020** if it is not already the Benchmark. Click on the Benchmark down arrow to get the dropdown menu for the Benchmark.

The screenshot shows the "Find Address Results" form with the following values: Street: "100 Main Street", City: "Providence", State: "Rhode Island", and Benchmark: "Public_AR_Current". A blue arrow points to the downward arrow of the Benchmark dropdown menu. The "FIND" button is visible at the bottom left.

3. When you click on the down arrow for the Benchmark you will get a dropdown menu of three items. Click on the third item in the dropdown menu **Public_AR_Census2020**.

The screenshot shows the "Find Address Results" form with the Benchmark dropdown menu open. The third item, "Public_AR_Census2020", is selected and highlighted with a blue arrow. The Vintage dropdown menu now shows "Census2020_Census2020". The "FIND" button is at the bottom left.

4. Once you have **Public_AR_Census2020** as the Benchmark you are ready to click on **FIND**.

"FIND LOCATIONS USING..." OPTION

- One Line
- Address
- Address Batch

"FIND GEOGRAPHIES USING..." OPTION

- One Line
- Address
- Address Batch
- Geographic Coordinates

ABOUT DATA...

- Benchmarks
- Vintages

Find Address Results

Street :

City :

State :

Zip :

Benchmark :

Vintage :

5. Once you click on FIND, a list of geographic identifiers will appear by state, Census Block, County, and Census Tract. Scroll down to the list of geographic identifiers by **Census Tract**. In the middle of the information for Census Tracts there will be listed **Name**. This will give the Census tract number of the street address. The name of a Census Tract is its number.

Census Tracts:
GEOID: 44007003602
CENTLAT: +41.8288350
AREAWATER: 0
STATE: 44
BASENAME: 36.02
OID: 20790251201774
LSADC: CT
FUNCSTAT: S
INTPTLAT: +41.8288350
NAME: Census Tract 36.02
OBJECTID: 85404
TRACT: 003602
CENTLON: -071.4042610
AREALAND: 823788
INTPTLON: -071.4042610
MTFCC: G5020
COUNTY: 007



Sometimes it will not scroll down all the way to Census Tracts and you will get an error message that “Layer Query encountered an error, missing required element for GEO Look-up.” In which case all that you need to do is go back up to the top and in the dropdown menu for **Benchmark** try each of the other two Benchmark items. Then click on **Find** and one of the other two Benchmark items should make the Census Tract information available when you scroll down.


▼ Find Address Results

Street :


City :

State :

Zip :

Benchmark : ▼ 

Vintage : ▼



Note: At times when you type in the street address your query will come back “No matches found”. We have no practical way of determining the Census Tract if the street address is not in the Census data base.

4. For the second step of determining the poverty rate of the Census tract, Go to:
<https://www.census.gov/acs/www/data/data-tables-and-tools/narrative-profiles/>

5. There will options to select from various geographic types. Select Census Tracts and then select your state from the dropdown menu.

American Community Survey

- Data Profiles
- Narrative Profiles**
- Geographic Comparison Tables
- Subject Tables
- Ranking Tables
- Supplemental Tables
- Data.census.gov
- More ACS Tools & Apps
- [Back to Data Tables & Tools](#)

Narrative Profiles

Narrative Profiles are short, analytic reports derived from the ACS 5-year estimates. Each Narrative Profile covers 15 different topic areas and provides text and bar charts to display highlights of selected social, economic, housing and demographic estimates for a selected geographic area.

2019 2018 2017 2016 2015 2014

2019

2015–2019 ACS 5-Year Narrative Profile

Select a Geography Type

- Nation
- State
- County
- Place
- Census Tract**
- ZIP Code Tabulation Area
- Metropolitan/Micropolitan Statistical Area
- American Indian Area/Alaska Native Area/Hawaiian Home Land

Select a state to begin. ▼

6. After you have selected your state you will then be asked to select your county, and then to select the Census tract within the county.

2019

2015–2019 ACS 5-Year Narrative Profile

Select a Geography Type

- Nation
- State
- County
- Place
- Census Tract**
- ZIP Code Tabulation Area
- Metropolitan/Micropolitan Statistical Area
- American Indian Area/Alaska Native Area/Hawaiian Home Land

Rhode Island ▼

Providence County, Rhode Island ▼

Choose a Tract ▼

7. Once you have selected the Census Tract click on **Get Narrative Profile** in the green border. It will take about 10 seconds for the Narrative Profile to load.

2019

2015–2019 ACS 5-Year Narrative Profile

Select a Geography Type

- Nation
- State
- County
- Place
- Census Tract**
- ZIP Code Tabulation Area
- Metropolitan/Micropolitan Statistical Area
- American Indian Area/Alaska Native Area/Hawaiian Home Land

Rhode Island

Providence County, Rhode Island

Census Tract 36.02, Providence Co

Selected Geography: **Census Tract 36.02, Providence County, Rhode Island**

GET NARRATIVE PROFILE

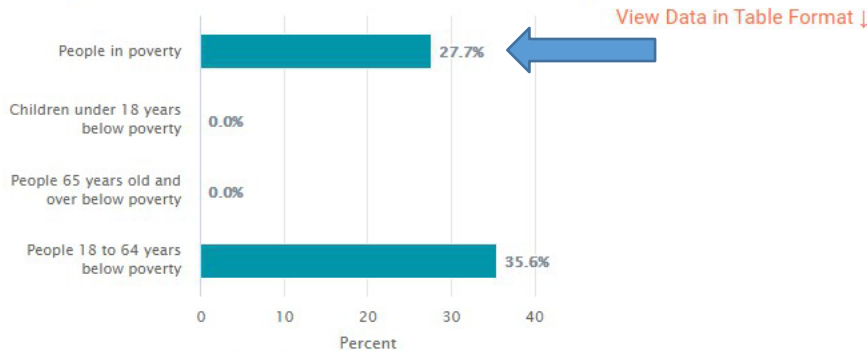
8. Once the Narrative Profile loads, scroll down to **Poverty and Participation in Government Programs** to see the Poverty Rate. Use the Poverty Rate shown first, **People in Poverty**.

Poverty and Participation in Government Programs

Note: The presence of "****" means that the estimate could not be calculated or cannot be published for this topic or geography.

In 2015-2019, 27.7 percent of people were in poverty. An estimated 0.0 percent of children under 18 were below the poverty level, compared with 0.0 percent of people 65 years old and over. An estimated 35.6 percent of people 18 to 64 years were below the poverty level.

Poverty Rates in Census Tract 36.02, Providence County, Rhode Island in 2015-2019



Section 2: Determining if a County has a Poverty Rate of 25 Percent or Above.

To check if your overall county has a poverty rate of 25 percent or above, there are separate directions for counties with populations of 5,000 and above and for counties with a population of less than 5,000.

For counties with a population of 5,000 and above:

1. Click on <https://www.census.gov/>.
2. In the middle of the page, go to **Quick Facts: Access Local Data** and click on **Go to Quick Facts**.

United States Census Bureau

Search

BROWSE BY TOPIC EXPLORE DATA LIBRARY SURVEYS/ PROGRAMS INFORMATION FOR... FIND A CODE ABOUT US

99 PERCENT
Census Bureau Statement on 2020 Census Data Collection Ending
Read More

Over 99.9% of housing units have been accounted for in the 2020 Census. Self-response and field data collection operations will conclude on October 15, 2020.

SURVEYS
Help for Survey Participants
Verify that the survey you received is real and learn how to respond.

QUICKFACTS
Access Local Data
Learn about your community, county, state and the U.S. It's fast, easy and shareable.

POPULATION CLOCK October 18, 2020
USA: 330,462,619
World: 7,690,728,181

U.S. CENSUS BUREAU ECONOMIC INDICATORS

Business Inventories August 2020 Report Released 10:00 AM EDT, 10/16/20	\$1,919.2 B ↑ 0.3%
Advance Monthly Retail Sales September 2020 Report Released 8:30 AM EDT, 10/16/20	\$549.3 B ↑ 1.9%
Business Formation Statistics 3rd Quarter 2020 Report Released 10:00 AM EDT, 10/14/20	1,566,373 Applications ↑ 77.4%
	\$635.5 B ↑ 0.4%

All Economic Indicators

3. On the page that comes up, type in the name and state of your county, and then hit return. You don't need to select a fact.

United States Census Bureau

QuickFacts
United States

QuickFacts provides statistics for all states and counties, and for cities and towns with a *population of 5,000 or more*.

Search: Mendocino County, California x -- SELECT A FACT -- CLEAR TABL

4. A page will come up with various information on your county and the entire United States. Scroll down near the bottom of the table under **Income and Poverty** and it will give you **Persons in Poverty, Percent** for your county and for the United States.

Economy		
In civilian labor force, total, percent of population age 16 years+, 2015-2019	58.2%	63.0%
In civilian labor force, female, percent of population age 16 years+, 2015-2019	53.0%	58.3%
Total accommodation and food services sales, 2012 (\$1,000) (c)	182,602	708,138,598
Total health care and social assistance receipts/revenue, 2012 (\$1,000) (c)	427,217	2,040,441,203
Total manufacturers shipments, 2012 (\$1,000) (c)	453,444	5,696,729,632
Total merchant wholesaler sales, 2012 (\$1,000) (c)	407,625	5,208,023,478
Total retail sales, 2012 (\$1,000) (c)	1,095,233	4,219,821,871
Total retail sales per capita, 2012 (c)	\$12,527	\$13,443
Transportation		
Mean travel time to work (minutes), workers age 16 years+, 2015-2019	20.8	26.9
Income & Poverty		
Median household income (in 2019 dollars), 2015-2019	\$51,416	\$62,843
Per capita income in past 12 months (in 2019 dollars), 2015-2019	\$29,035	\$34,103
Persons in poverty, percent	14.0%	10.5%

For counties with a population of less than 5,000:

1. Go to: <https://www.census.gov/acs/www/data/data-tables-and-tools/narrative-profiles/>.
2. A page will open with options to select from various geographic types. Select **County**. Then select your state from the dropdown menu.

2019

2015–2019 ACS 5-Year Narrative Profile

Select a Geography Type

- Nation
- County**
- State
- Place
- Census Tract
- ZIP Code Tabulation Area
- Metropolitan/Micropolitan Statistical Area
- American Indian Area/Alaska Native Area/Hawaiian Home Land

Select a state to begin.

3. Once you have selected your state you can select your county from the dropdown menu of counties.

2019

2015–2019 ACS 5-Year Narrative Profile

Select a Geography Type

- Nation
- County
- State
- Place
- Census Tract
- ZIP Code Tabulation Area
- Metropolitan/Micropolitan Statistical Area
- American Indian Area/Alaska Native Area/Hawaiian Home Land

Colorado

Ouray County, Colorado



4. Once you have selected your county click on the **Get Narrative Profile** in green border. It will take about 10 seconds for the Narrative Profile to load.

2019

2015–2019 ACS 5-Year Narrative Profile

Select a Geography Type

- Nation
- County
- State
- Place
- Census Tract
- ZIP Code Tabulation Area
- Metropolitan/Micropolitan Statistical Area
- American Indian Area/Alaska Native Area/Hawaiian Home Land

Colorado

Ouray County, Colorado

Selected Geography: **Ouray County, Colorado**

GET NARRATIVE PROFILE



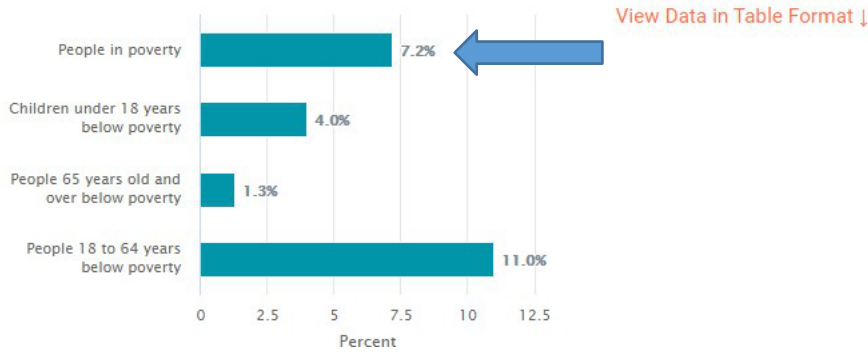
5. Once the Narrative Profile loads, scroll down to **Poverty and Participation in Government Programs** to see the Poverty Rate. Use the Poverty Rate shown first, **People in Poverty**.

Poverty and Participation in Government Programs



In 2015-2019, 7.2 percent of people were in poverty. An estimated 4.0 percent of children under 18 were below the poverty level, compared with 1.3 percent of people 65 years old and over. An estimated 11.0 percent of people 18 to 64 years were below the poverty level.

Poverty Rates in Ouray County, Colorado in 2015-2019



Section 3: Determining the Poverty Rate of Reservations, OSTAs, and ANVSAs.

Go to: <https://data.census.gov/cedsci/advanced>

United States Census Bureau

Search

Narrow search with filters

FIND A FILTER

e.g. 336111 - Automobile Manufacturing

BROWSE FILTERS

- Topics
- Geography
- Years
- Surveys
- Codes

Please select a filter to narrow your search.

Send Feedback
cedsci.feedback@census.gov

CLEAR SEARCH SHOW

10:46 AM
2/8/2021

The image shows a screenshot of the United States Census Bureau's data portal. The browser address bar displays the URL <https://data.census.gov/cedsci/>. The page header includes the United States Census Bureau logo and a search bar. On the left, there is a 'BROWSE FILTERS' section with a 'Topics' sub-section. The main content area is titled 'TOPICS' and lists several categories: Business and Economy, Education, Employment, Families and Living Arrangements, Government, Health, Housing, Income and Poverty, Populations and People, and Race and Ethnicity. A red arrow points from a red-bordered box containing the text 'Click on Income and Poverty' to the 'Income and Poverty' item in the list. At the bottom of the page, there is a 'Send Feedback' link, 'CLEAR' and 'SEARCH' buttons, and a 'SHOW' button. The Windows taskbar at the bottom shows the time as 10:56 AM on 2/8/2021.

https://data.census.gov/cedsci/ x + data.census.gov/cedsci/advanced

United States Census Bureau Search

BROWSE FILTERS

- Topics
- Geography
- Years
- Surveys
- Codes

TOPICS

- Business and Economy
- Education
- Employment
- Families and Living Arrangements
- Government
- Health
- Housing
- Income and Poverty**
- Populations and People
- Race and Ethnicity

INCOME AND POVERTY

- Income and Poverty
- Income and Earnings
- Poverty
- Wealth and Assets

Click on Poverty

Send Feedback: cedsci.feedback@census.gov CLEAR SEARCH SHOW

11:32 AM 2/8/2021

https://data.census.gov/cedsci/ x + data.census.gov/cedsci/advanced?t=Poverty

United States Census Bureau Search

BROWSE FILTERS

- Topics
- Geography
- Years
- Surveys
- Codes

TOPICS

- Business and Economy
- Education
- Employment
- Families and Living Arrangements
- Government
- Health
- Housing
- Income and Poverty**
- Populations and People
- Race and Ethnicity

INCOME AND POVERTY

- Income and Poverty
- Income and Earnings
- Poverty**
- Wealth and Assets

POVERTY

- Poverty
- Official Poverty Measure
- Supplemental Poverty Measure
- Well-Being

Check Poverty

Send Feedback: cedsci.feedback@census.gov Poverty Topic CLEAR SEARCH SHOW

12:18 PM 2/8/2021

Now that you have selected Poverty as your topic, select the geographic area you want, such as an American Indian Reservation, Oklahoma Tribal Statistical Area (OTSA) or Alaska Native Village Statistical Area (ANVSA). To select the geography, go back over to the left hand side of your screen and click on Geography.

The screenshot shows the data.census.gov/cedsci/advanced?l=Poverty interface. The page is divided into several sections:

- BROWSE FILTERS:** A vertical sidebar on the left with options: Topics, Geography, Years, Surveys, and Codes. The 'Topics' option is currently selected.
- TOPICS:** A central list of topic categories including Business and Economy, Education, Employment, Families and Living Arrangements, Government, Health, Housing, Income and Poverty (highlighted), Populations and People, and Race and Ethnicity.
- INCOME AND POVERTY:** A section with checkboxes for 'Income and Poverty', 'Income and Earnings', 'Poverty' (highlighted), and 'Wealth and Assets'.
- POVERTY:** A section with checkboxes for 'Poverty' (checked), 'Official Poverty Measure', 'Supplemental Poverty Measure', and 'Well-Being'.

At the bottom of the page, there is a 'Send Feedback' link, a 'Poverty Topic' tag, and buttons for 'CLEAR' and 'SEARCH'. The Windows taskbar at the bottom shows the time as 12:18 PM on 2/8/2021.

The screenshot shows the 'United States Census Bureau' website with the 'Poverty' topic selected. The 'GEOGRAPHY' filter menu is open, listing various geographic levels. A red arrow points to the 'American Indian Area/Alaska Native Area/Hawaiian Home Land' option, which is highlighted. A red box contains the text: 'Select American Indian Area/Alaska Native Area/Hawaiian Home Land'. The browser address bar shows 'https://data.census.gov/cedsci/advanced?t=Poverty'. The Windows taskbar at the bottom shows the date as 2/8/2021 and the time as 1:11 PM.

This screenshot shows the same website, but the 'AMERICAN INDIAN AREA/ALASKA NATIVE AREA/HAWAIIAN HOME LAND' filter menu is expanded. It lists various sub-categories, including 'All AIA/ANA/HHL in United States', 'Acoma Pueblo and Off-Reservation Trust Land, NM', 'Adais Caddo (state) SDTSA, LA', 'Adais Caddo SDAISA, LA', 'Agua Caliente Indian Reservation and Off-Reservation Trust Land, CA', 'Agua Caliente Reservation, CA', 'Akiok ANVSA, AK', 'Akiachak ANVSA, AK', and 'Akiak ANVSA, AK'. A red box highlights this expanded menu with the text: 'Here is where you can select a reservation, Oklahoma Tribal Statistical Area or Hawaiian Home Land'. The browser address bar and Windows taskbar are identical to the first screenshot.

United States Census Bureau

Search

FIND A FILTER

e.g. 336111 - Automobile Manufacturing

BROWSE FILTERS

- Topics
- Geography**
- Years
- Surveys
- Codes

GEOGRAPHY

Show Summary Levels

- Place
- Voting District
- Traffic Analysis Zone
- County Subdivision
- Sub-Minor Civil Division
- Alaska Native Regional Corporation
- American Indian Area/Alaska Native Area/Hawaiian Home Land**
- Metropolitan Statistical Area/Micropolitan Statistical Area

White

- White Earth Reservation and Off-Reservation Trust Land, MN
- White Mountain ANVSA, AK

Send Feedback: cedsci.feedback@census.gov

Poverty Topics

White Earth Reservation and Off-Reservation ... Geography

CLEAR SEARCH

1:28 PM 2/8/2021

You can use the search function to search for a specific reservation, Oklahoma Tribal Statistical Area or Hawaiian Home Land. In this example, the search function was used to search for the White Earth Reservation in Minnesota.

After selecting the White Earth Reservation, click on the search button.

https://data.census.gov

United States Census Bureau

ALL TABLES

About 55,729 results | Filter

EXPLORE DATA

24.4% +1.7% Poverty, All people in White Earth Reservation and Off-Reservation Trust Land, MN

Source 2019 American Community Survey 5-Year Estimates
https://www.census.gov/programs-surveys/acs/

ACS & CPS 2004-2018
Public Use Microdata
Create record level custom tables

Tables

POVERTY STATUS IN THE PAST 12 MONTHS
Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012 Table: S1701

POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES
Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010 Table: S1702

UPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)
Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010 Table: S2201

Send Feedback
cedsci.feedback@census.gov

Windows taskbar: 1:45 PM 2/8/2021

The 24.4% poverty rate below is the poverty rate for all people on the White Earth Reservation. However, we want the poverty rate for American Indians Alone living on the White Earth Reservation. Therefore, we will not use this number. Instead, click on "Explore Data" to get the poverty rate for American Indians Alone living on the White Earth Reservation

Do not use this number.

https://data.census.gov

United States Census Bureau

ALL TABLES MAPS PAGES

174 Results FILTER | DOWNLOAD

POVERTY STATUS IN THE PAST 12 MONTHS
Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012 Table: S1701

POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES
Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010 Table: S1702

FOOD STAMPS/SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)
Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010 Table: S2201

RATIO OF INCOME TO POVERTY LEVEL IN YEARS IN FAMILIES
Send Feedback
cedsci.feedback@census.gov

POVERTY STATUS IN THE PAST 12 MONTHS
Survey/Program: American Community Survey
Product: 2019, ACS 5-Year Estimates Subject Tables
TableID: S1701

CUSTOMIZE TABLE

Label	poverty level		Percent below poverty level	
	Estimate	Margin of Error	Estimate	
Male	1,207	±120	24.0%	
Female	1,183	±85	24.8%	
▼ RACE AND HISPANIC OR LATINO ORIGIN				
White alone	460	±77	10.4%	
Black or African American alone	4	±6	11.1%	
American Indian and Alaska Native alone	1,647	±166	39.7%	
Asian alone	1	±2	2.0%	
Native Hawaiian and Other Pacific Islander alone	0	±12		
Some other race alone	7	±7		
Two or more races	271	±60		
Hispanic or Latino origin (of any race)	101	±34		
White alone, not Hispanic or Latino	452	±78		
▼ EDUCATIONAL ATTAINMENT				

Note: you will need to scroll down and to the right to find this figure in the table.

Windows taskbar: 1:34 PM 2/8/2021

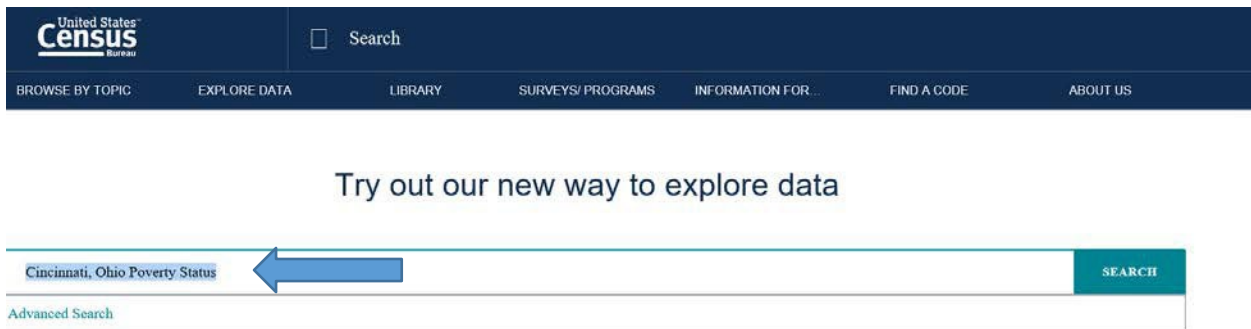
The poverty rate for American Indians Alone living on the White Earth Indian Reservation is 39.7%. Accordingly, This meets the special rule in WIOA at Section 129(a)(2) and the WIOA Final Rule at 20 CFR 684.430 (3) (b) that allows youth living in an area where the poverty rate is at least 25% to be considered low-income for eligibility purposes (see the definition of low-income at 20 CFR 684.130).

Section 4: Identifying Contiguous High-Poverty Areas in your City or County for Targeting Your Services on high-poverty neighborhoods.

If your county does not have a poverty rate of 25 percent, you can still identify contiguous Census tracts within your county or city with poverty rates of 25 percent or above. This can be useful in a couple of ways. First, you can identify high-poverty contiguous Census tracts in your city or county for the purpose of targeting your services and recruitment efforts in these communities. Second, if you identify a contiguous set of Census tracts to serve as a target area for your services and recruitment all of the individual Census tracts within the target area do not have to have a 25 percent poverty rate as long as the overall set of Census tracts within the target area have an overall poverty rate of 25 percent.

You can identify more than one high-poverty area in your county or city as long as the Census tracts within each high-poverty area are contiguous. For example, you can identify a high poverty area in the West side of town and a high poverty area in the South side of town, as long as the Census tracts within the West side poverty area are contiguous with each other and the Census tracts within the South side poverty area are contiguous with each other. The directions for finding the poverty rates of a contiguous set of Census tracts in your city or county are as follows. You can use the Microsoft Edge or Google Chrome browsers for these directions. Microsoft Explorer will not work for this section.

1. Go to: <https://www.census.gov/data.html>
2. Where it says **Search** type in the name of your city or county and state and the words Poverty Status, for example, Cincinnati, Ohio Poverty Status or Hamilton County, Ohio Poverty Status. Don't just click on the name of the city or county when it comes up, you need to type in the name of the city or county plus the words Poverty Status. You need to type in the words Poverty Status in order to get to the data set that you need. Then click on **Search**.

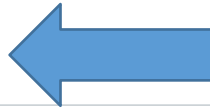


3. On the next page, under **Tables** click on the first table **Poverty Status in the Past 12 Months**.

Tables

POVERTY STATUS IN THE PAST 12 MONTHS

Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010 Table: S1701



POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES

Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010 Table: S1702

SELECTED CHARACTERISTICS OF PEOPLE AT SPECIFIED LEVELS OF POVERTY IN THE PAST 12 MONTHS

Survey/Program: American Community Survey
Years: 2018,2017,2016,2015,2014,2013,2012,2011,2010 Table: S1703

4. A table will appear showing the poverty rate of the overall city or county. Right above the table it will say **Product: 2019: ACS 1-Year Estimate**. You need to use the 5-Year data to get data on Census tracts, so click on **2019: ACS 1-Year Estimates** and a dropdown menu will appear allowing you to select a different data set.

POVERTY STATUS IN THE PAST 12 MONTHS
Survey/Program: American Community Survey
TableID: S1701
Product: 2019: ACS 1-Year Estimates Subject Tables
Cincinnati city, Ohio

5. Select the second item **2019: ACS 5-Year Estimate Subject Tables**.

2019: ACS 1-Year Estimates Subject Tables
2019: ACS 5-Year Estimates Subject Tables
2018: ACS 1-Year Estimates Subject Tables
2018: ACS 5-Year Estimates Subject Tables
2017: ACS 1-Year Estimates Subject Tables
2017: ACS 5-Year Estimates Subject Tables

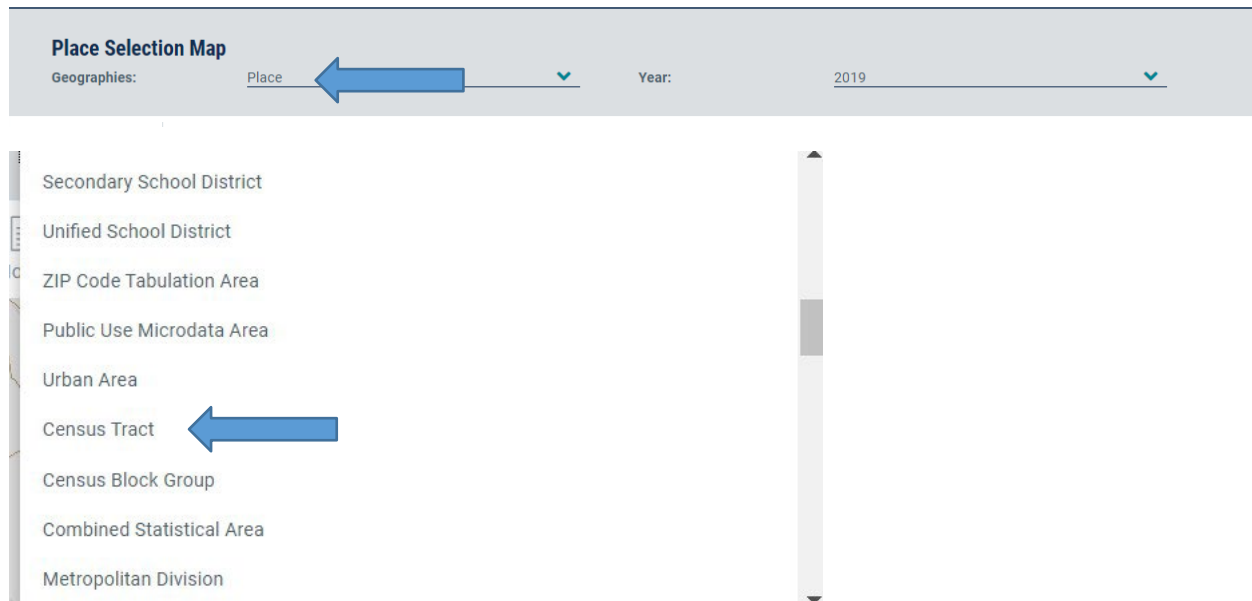
6. Next, click on **MAPS** in the top left corner of the page outside the table.

United States Census Bureau
cincinnati, ohio poverty status
ALL TABLES MAPS
POVERTY STATUS IN THE PAST 12 MONTHS
Survey/Program: American Community Survey
TableID: S1701
Product: 2019: ACS 5-Year Estimates Subject Tables
3 Results FILTER DOWNLOAD

The map should take you directly to your city. If it just takes you to your overall state, start all over again and add City to the name of your city or add County to the name of your county. For example, instead of St. Louis, Missouri Poverty Status, type in St. Louis City, Missouri Poverty Status. Then the map will take you directly to your city. This may happen for example if the name of St. Louis on the map is St. Louis City and the computer only recognizes St. Louis as St. Louis City.

7. Then, you need to change the Geography to Census tracts. Above the map to the left of 2018: ACS 5-Year Estimate Subject Tables it will say **Geographies: Place** if you started with your city or **Geographies: County** if you started with your county. Click on **Place** or **County** and a dropdown menu will appear with different levels of Geography. Scroll down to the 20th item and click on **Census tracts**. Note: It may stop

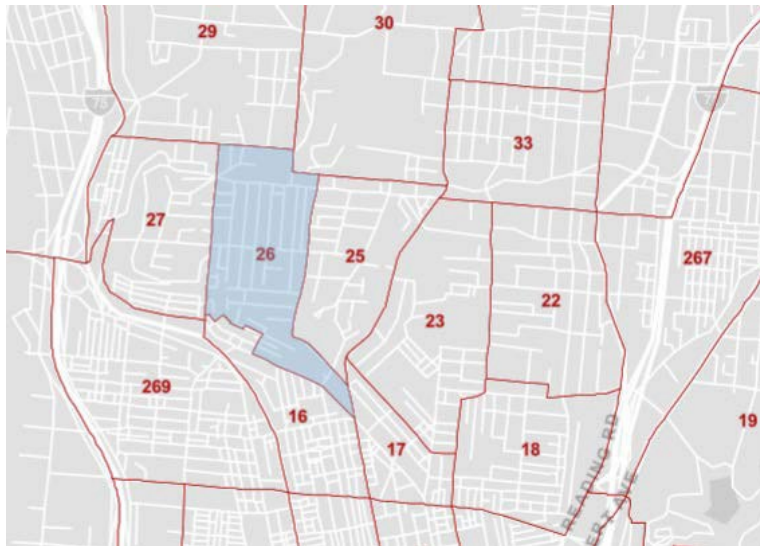
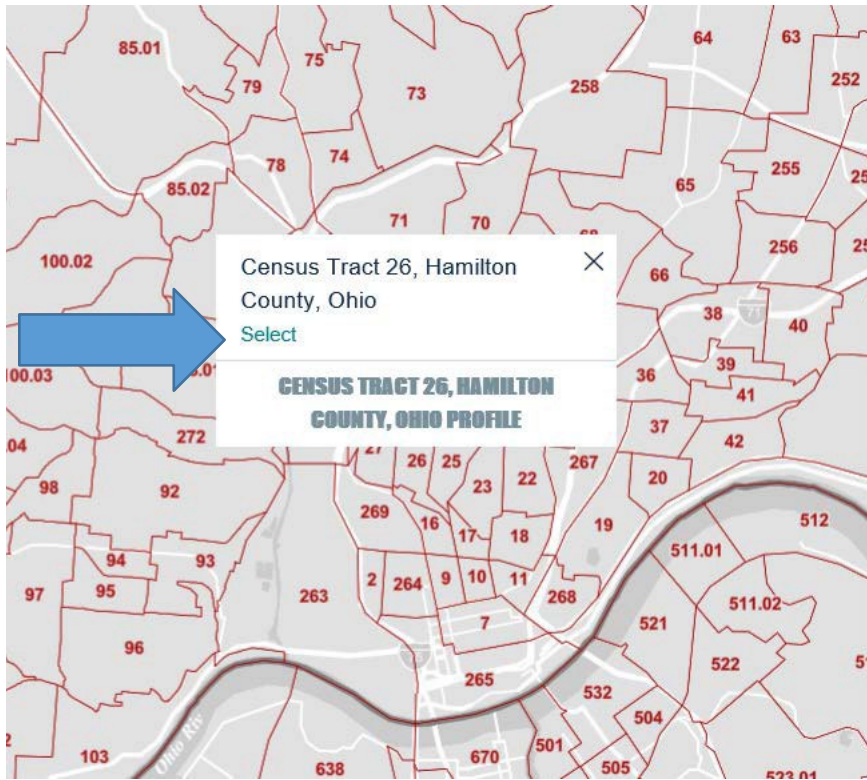
at other Geography levels as you scroll down, so you may have to keep trying a couple of times until you get to Census tracts.



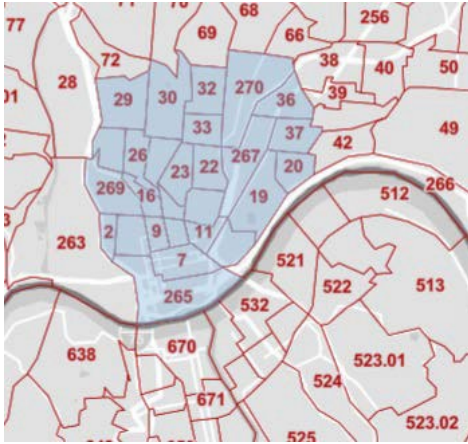
8. Once you click on **Census tracts** you will see the Census tracts in your city or county. To see the Census tract numbers you may need to increase the magnitude of the map. You can increase or decrease the magnitude of the map by using the plus and minus toggle switch in the bottom right corner of the map.

9. The map does not have directional arrows, so you need to use the directional arrows on your keyboard to move around the map. Please note that each time you want to use your directional arrows you need to click on a Census tract on the map. Otherwise nothing will happen when you try to use the directional arrows on your keyboard. Once you click on any Census tract on the map your directional arrows will start to work.

10. Now you are ready to start selecting Census tracts for your target area. Place your cursor over a Census tract and click on it, and then you will be given the opportunity to Select it. Click on **Select** for that Census tract when given the option. It is not enough to just click on a Census tract, you need to click on Select when given the option. The first time you select a Census tract it will increase the magnitude of the map and you will need to use the toggle switch in the bottom right corner to reduce the magnitude. After that it will be fine. Also, you just need to click once on Select. If you double-click on Select it will select the Census tract and increase the magnitude of the map, so you will need to use the toggle switch in the bottom right corner to reduce the magnitude. When you select a Census tract it will become highlighted.



11. Click on the Census tracts that you expect to be in the target area. Make sure that the Census are contiguous as required by the definition of high-poverty area in the regulations. See the instructions in Step 20 below for an easy workaround if you need to deselect a Census tract as currently the Deselect key is not working. When you have selected all of your Census tracts it is probably best at this point to save the map as described below in Step 21.



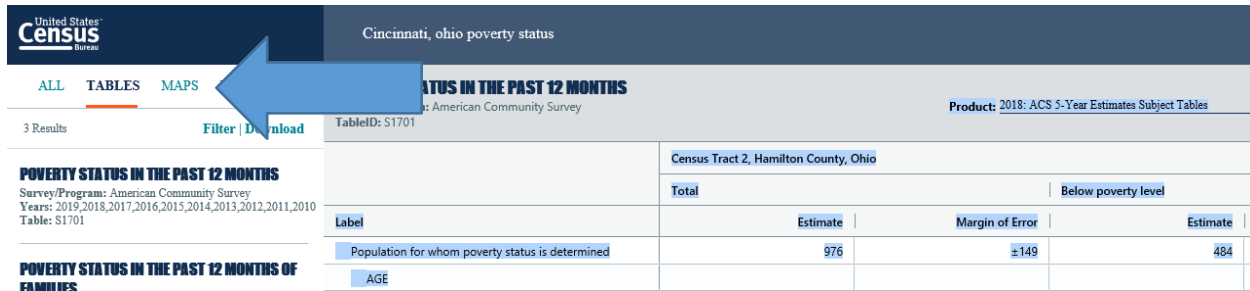
12. Once you have selected all the Census tracts that you want, on the top left corner of the screen outside the map click on **Tables**.

13. A table should show up providing the total population, population in poverty, and poverty rate for each of the Census tracts that you selected. You can use the directional arrow at the bottom of the table or the directional arrows on your keyboard to scroll to the right on the table to see each Census tract. We are only interested in the top row of the table—the total population of the Census tract and the total number in poverty.

Census Tract 2, Hamilton County, Ohio		Below poverty level		Percent below poverty level		
Label	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Population for whom poverty status is determined	976		484	±141	49.6%	±10.2

14. If you are setting up a high-poverty target area you can now make a handwritten spreadsheet in a notebook which you can later copy into Excel with three columns, the Census tract number, the Total Population in the Census tract, and the Number in Poverty in the Census tract. You do not need to, but you may want to add a fourth column showing the percentage in poverty in the Census tract. Individual Census tracts can have a poverty rate of below 25 percent as long as the overall poverty rate of the target area is 25 percent or above, but it may be useful to you later to know the poverty rate of each tract if you need to go back and remove some Census tracts with low poverty rates to get to a poverty rate for the entire target area of 25 percent or above.

15. After you have copied your spreadsheet into Excel, add up the Total Population and the Population in Poverty columns, and divide the Population in Poverty by the Total Population. If the poverty rate of the combined Census tracts is 25 percent or above, you are done. Save your work at this point as described below. Also, you may wish to go back to the top left corner of the page and click on MAPS to take you back to the map of your city to do a Print Screen of the map, which you can use to document the high-poverty area in your files. To see the boundaries of the Census tracts continue to magnify the map until you can see the names of the streets that bound the Census tracts.



United States Census Bureau

Cincinnati, ohio poverty status

ALL TABLES MAPS **STATUS IN THE PAST 12 MONTHS**

Product: 2018: ACS 5-Year Estimates Subject Tables

3 Results Filter Download TableID: S1701 American Community Survey

Census Tract 2, Hamilton County, Ohio			
Total	Below poverty level		
Label	Estimate	Margin of Error	Estimate
Population for whom poverty status is determined	976	±149	484
AGE			

POVERTY STATUS IN THE PAST 12 MONTHS
Survey/Program: American Community Survey
Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010
Table: S1701

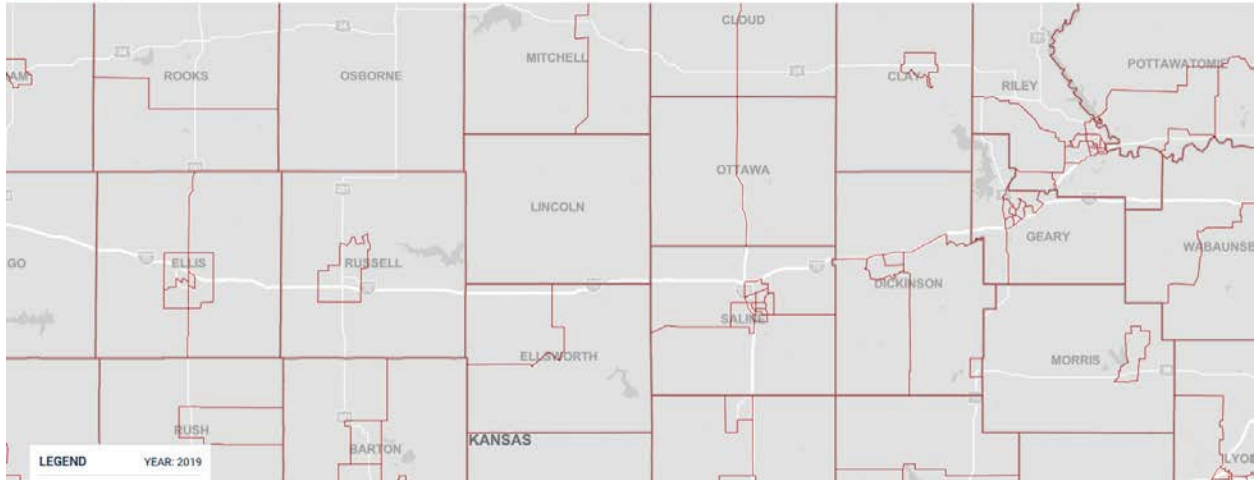
POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES

16. If when you click on Maps it doesn't take you back to the map of your city but rather to a map of a different state altogether simply click twice on **Search** above the top right corner of the map. You have to click on **Search** twice and it will take you back to the map of your city. You will then need to click on **Place** or **County** at the top of the map and select **Census tracts** again in the dropdown menu and it will take you back to your map with the Census tracts highlighted that you have selected.

Census Tract Selection Map

Geographies: Census Tract Year: 2019

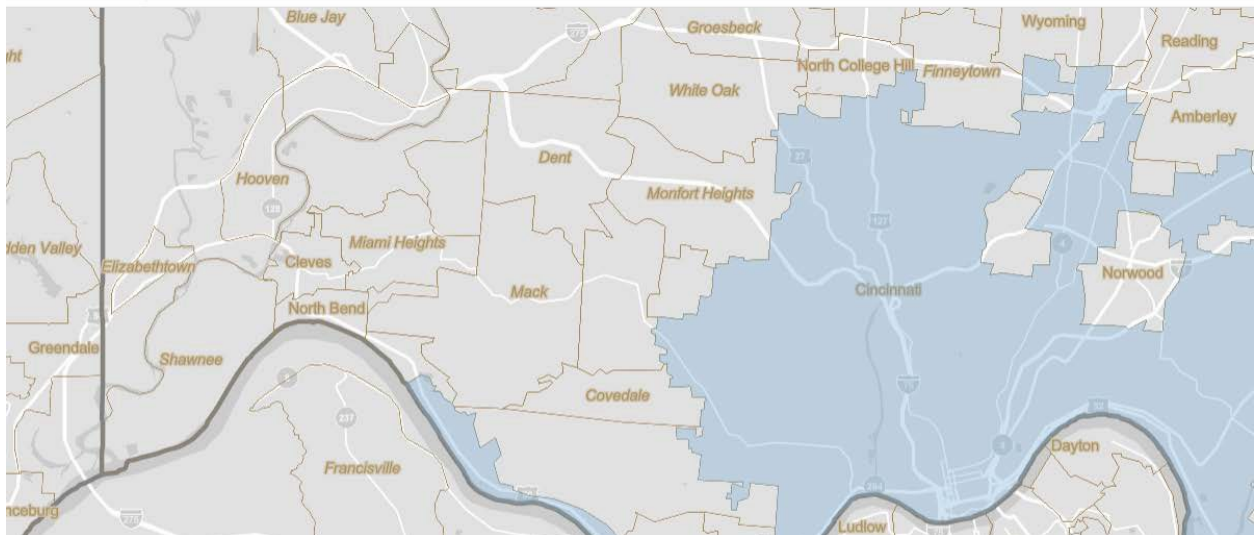
Select Clear Geos Table Notes

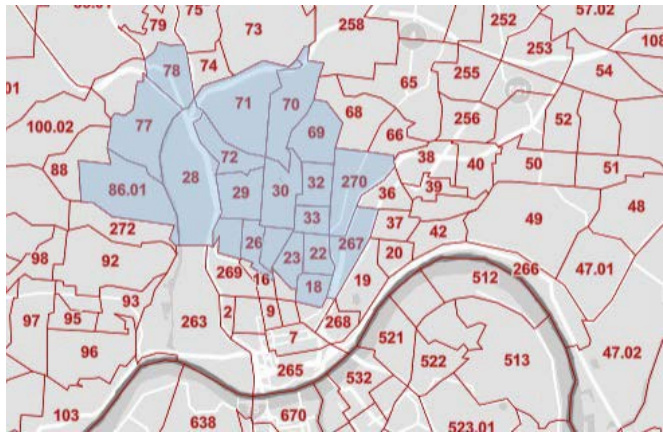
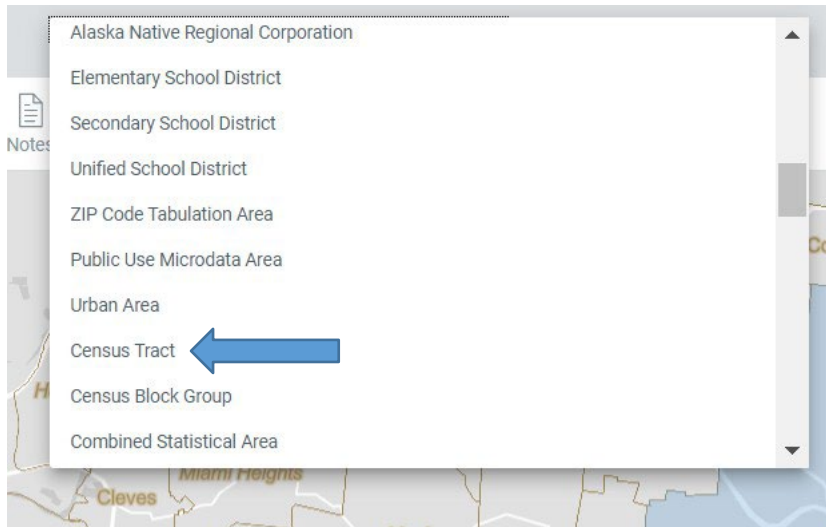


Place Selection Map

Geographies: Place Year: 2019

Select Clear Geos Table Notes

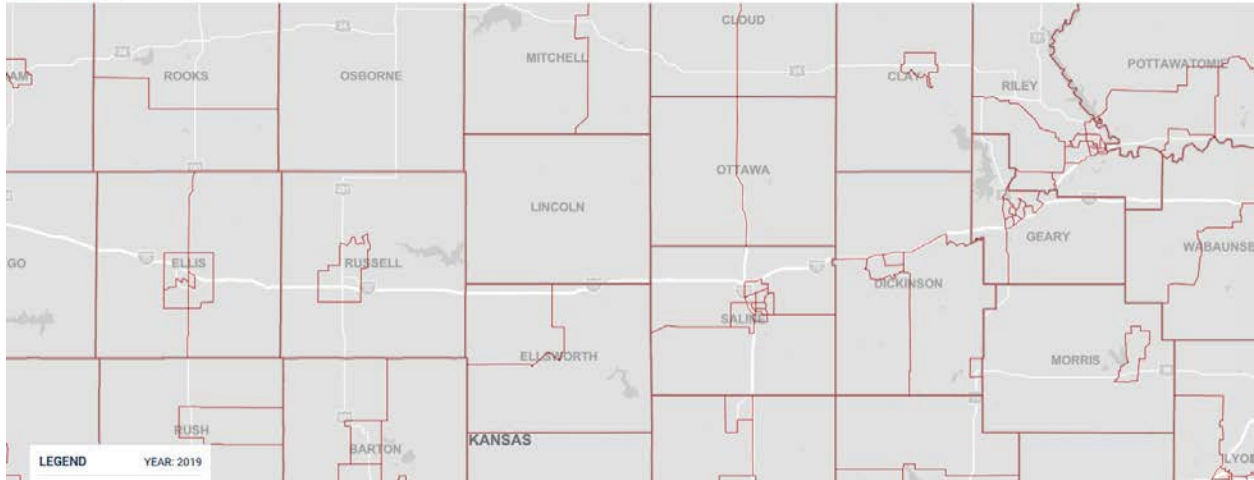




17. If you are trying to set up a target area and the poverty rate of the combined Census tracts is below 25 percent, you can go back to the top left corner of the page and click on **MAPS**, which will take you back to the map of your city with the selected Census tracts to add or delete Census tracts. As described above in Step 16, if when you click on Maps it doesn't take you back to the map of your city but rather to a map of a different state altogether simply click twice on **Search** above the top right corner of the map. You have to click on **Search** twice and it will take you back to the map of your city. You will then need to click on **Place** or **County** at the top of the map and select **Census tracts** again in the dropdown menu and it will take you back to your map with the Census tracts highlighted that you have selected.

Census Tract Selection Map
Geographies: Year:

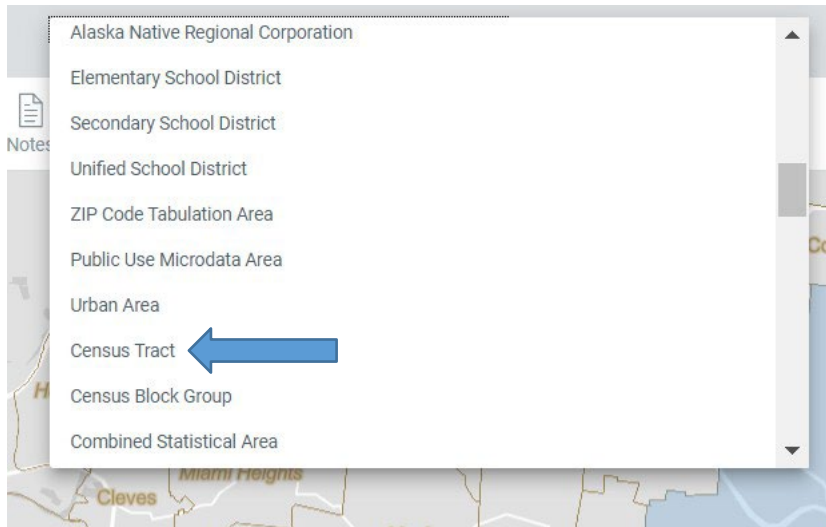
Select Clear Geos Table Notes



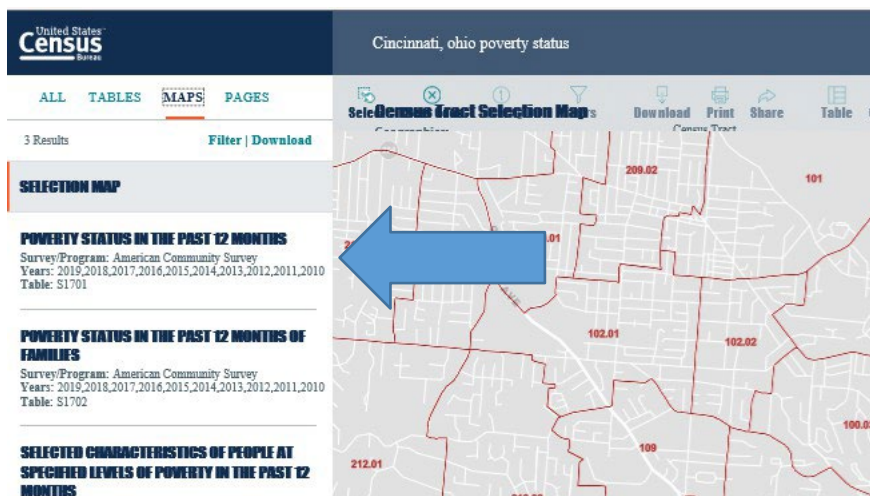
Place Selection Map
Geographies: Year:

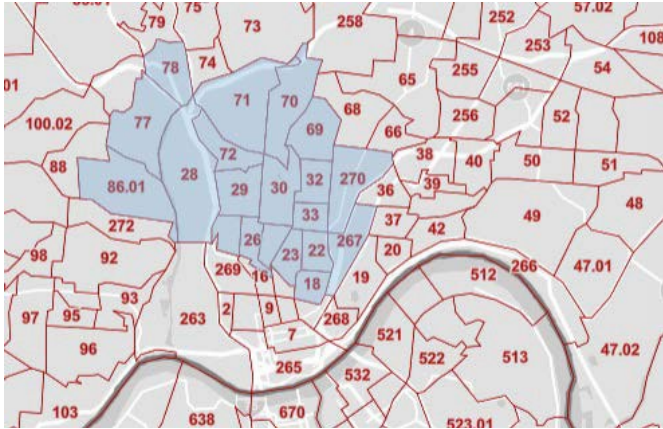
Select Clear Geos Table Notes





18. Note that any time you switch from the Map to the Table and Back to the Map you need to click on **POVERTY STATUS IN THE PAST 12 MONTHS** on the left of the map to continue selecting Census tracts. You can delete Census tracts with low poverty rates by clicking on the tract and then clicking on **DeSelect**. You can go back and forth from the map to the table until you get a target area with an overall poverty rate of 25 percent or above.





19. If for some reason after switching back and forth from the table to the map the table is showing the poverty status for families instead of the poverty status of the overall population you simply need to click on **Poverty Status in the Past 12 Months** to the left of the table, and the Table will change to give you the poverty status of the overall population.

ALL TABLES MAPS PAGES

3 Results Filter | Download

POVERTY STATUS IN THE PAST 12 MONTHS
 Survey/Program: American Community Survey
 Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010
 Table: S1701

POVERTY STATUS IN THE PAST 12 MONTHS OF FAMILIES
 Survey/Program: American Community Survey
 Years: 2019,2018,2017,2016,2015,2014,2013,2012,2011,2010
 Table: S1702

SELECTED CHARACTERISTICS OF PEOPLE AT SPECIFIED LEVELS OF POVERTY IN THE PAST 12 MONTHS
 Survey/Program: American Community Survey
 Years: 2018,2017,2016,2015,2014,2013,2012,2011,2010
 Table: S1703

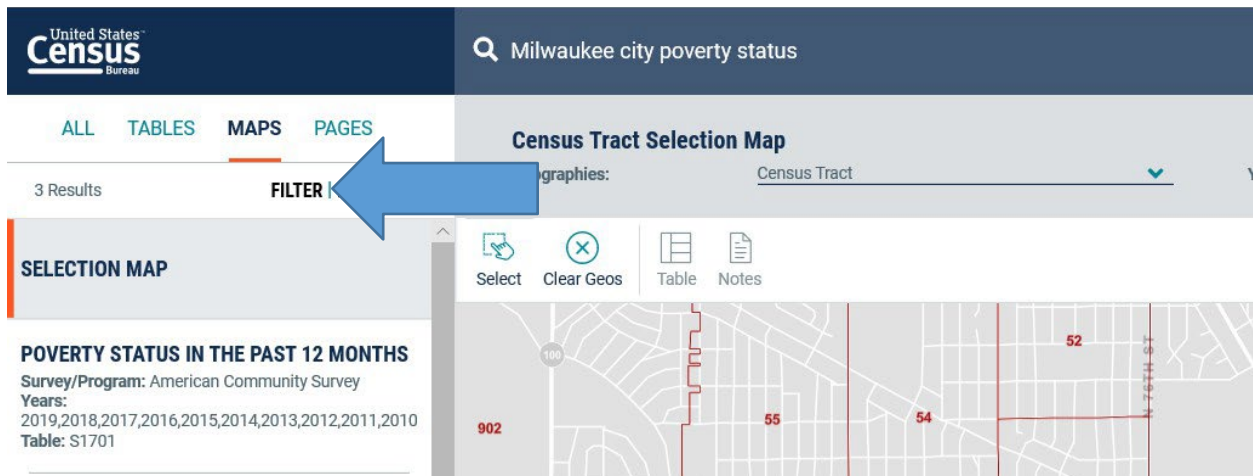
POVERTY STATUS IN THE PAST 12 MONTHS
 Survey/Program: American Community Survey
 TableID: S1701

Product: 2018, ACS 5-Year Estimates Subject Tables

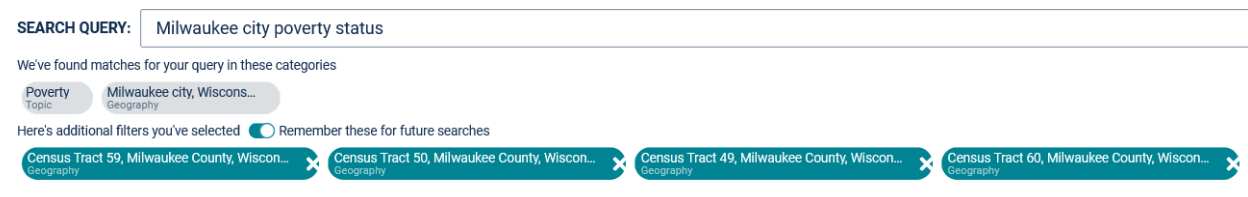
Census Tract 29, Hamilton County, Ohio

	Total	Below poverty level	
	Estimate	Margin of Error	Estimate
Population for whom poverty status is determined	3,388	±384	1,093
AGE			
Under 18 years	164	±135	0
Under 5 years	50	±51	0
5 to 17 years	114	±128	0
Related children of householder under 18 years	164	±135	0
18 to 64 years	3,105	±340	1,074
18 to 34 years	2,445	±370	998
35 to 64 years	660	±191	76
60 years and over	215	±104	19
65 years and over	119	±20	19

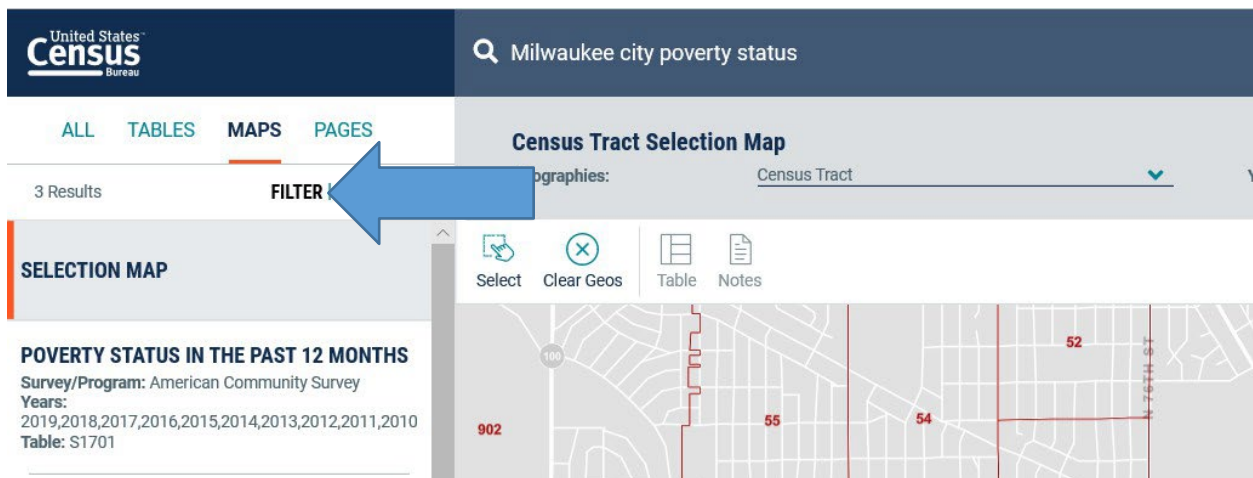
20. The function to deselect Census tracts currently is not working, so to deselect a Census tract click in **Filter** in the top left corner of the screen outside the map.



Once you have clicked on **Filter** a screen will appear showing in green borders the Census tracts that you have selected. To deselect a Census tract click on the X next to the Census tract.



Once you have deselected the Census tracts click on **Filter** again to get back to your map.



21. You can save your work either by saving the table you were working on or by saving the map, as either one will take you back to the other, or you can save both. It is best to save the map. To save the table or the map, click and save the URL at the very top of the page and then copy it using the Clipboard **Paste** option onto a Word document. The URL will be much too long to past into an e-mail, so that's why you need to paste it into a Word document and then you can save and e-mail the document to

yourself. When you are copying the URL make sure that you are clicking on the URL such that you are copying the entire URL at one time. It won't work if you try to copy the URL by scrolling it word by word. When you are ready to go back to work on the table or map just click on the URL that you have saved.

data.census.gov/cedsci/map?q=Cincinnati,%20Ohio%20Poverty%20Status&g=1400000US39061003000,39061003200,39061003300,39061006800,390610...



22. If after you have saved your map the URL takes you back to different state altogether, as described above in Step 16 simply click twice on **SEARCH** on the top right corner above the map and it will take you back to your city or county, and then you will also need to click on **Place** or **County** at the top of the map and scroll down and click on Census tracts, and it will take you back to the map with the Census tracts highlighted that you have selected.

U.S. Department of Labor

Assistant Secretary for
Employment and Training
Washington, D.C. 20210



May 28, 2024

The Honorable Bill Lee
Governor of Tennessee
1st Floor, State Capitol
Nashville, TN 37243

Dear Governor Lee:

Thank you for your waiver request submission to the U.S. Department of Labor regarding certain statutory and regulatory provisions of the Workforce Innovation and Opportunity Act (WIOA) and the accompanying plan to improve the statewide workforce development system (enclosed). The waiver requests were received March 5, 2024, as part of your recent WIOA State Plan submission. This letter provides the Employment and Training Administration's (ETA) official response to your request and memorializes that Tennessee will meet the outcomes and implement the measures identified in its plan to ensure accountability agreed to by Tennessee and ETA. This action is taken under the Secretary of Labor's authority to waive certain requirements of WIOA Title I, Subtitles A, B, and E, and Sections 8–10 of the Wagner-Peyser Act in WIOA Section 189(i).

Requested Waiver: Waiver of 20 CFR 681.550 to allow WIOA individual training accounts (ITAs) for in-school youth (ISY).

ETA Response: ETA approves for Program Year (PY) 2024 and PY 2025, the State's request to waive the requirement limiting ITAs to only out-of-school youth (OSY), ages 16–24. In addition to these OSY, the State may use ITAs for ISY, ages 16–21. ETA reviewed Tennessee's waiver request and plan and has determined that the requirements requested to be waived impede the ability of the State to implement its plan to improve the workforce development system. Approval of this waiver should not impede the State's efforts to prioritize OSY, including outreach to the OSY population.

Requested Waiver: Waiver associated with the requirement at WIOA Section 129(a)(4)(A) and 20 CFR 681.410 that the State and local areas expend 75 percent of Governor's reserve youth funds and local formula youth funds on OSY.

ETA Response: ETA approves for PY 2024 and PY 2025, which includes the entire time period for which states are authorized to spend each of those Program Year fund allotments, the State's request to waive the requirement that the State expend 75 percent of Governor's reserve youth funds on OSY. ETA reviewed Tennessee's waiver request and plan and has determined that the requirements requested to be waived impede the ability of Tennessee to implement its plan to improve the workforce development system. Tennessee may lower the expenditure requirement of Governor's reserve funds to 50 percent for OSY.

In addition, ETA approves for PY 2024 and PY 2025, which includes the entire time period for which states are authorized to spend each of those Program Year fund allotments, the State's request to waive the requirement that local areas expend 75 percent of local youth formula funds on OSY. Tennessee may lower the local youth funds expenditure requirement to 50 percent for OSY. As a result of this waiver, ETA expects that the number of in-school youth (ISY) served will increase, and performance accountability outcomes for overall WIOA Youth (including both ISY and OSY) will remain steady or increase for the majority of the WIOA Youth performance indicators.

The State must report its waiver outcomes and implementation of the approved waivers in the WIOA Annual Report. ETA will use this information to assess continued waiver approval and to identify promising practices that may be adopted more widely. ETA is available to provide technical assistance to you in support of your goals. If you have questions, feel free to contact my office at (202) 693-2772.

Sincerely,

A handwritten signature in blue ink that reads "José Javier Rodríguez". The signature is written in a cursive style with a large initial "J" and "R".

José Javier Rodríguez

Enclosure

cc: Dawn Tawater, Tennessee Department of Labor & Workforce Development
Kimberly Staley, ETA Regional Administrator – Atlanta Region
Stephanie Holt, ETA Federal Project Officer

Tennessee 2024 State Plan Waivers

Please see following two (2) State of Tennessee Waiver Requests:

1. **Out-of-School Youth Expenditure, and**
2. **Individual Training Account for At-Risk In-School Youth**

#1 - Waiver Subject: Out-of-School Youth Expenditure Statutory and Regulatory Requirement:

Statutory and Regulatory Requirement:

Tennessee is seeking a waiver of Section 129(a)(4)(A) and 20 CFR 681.410 which requires not less than seventy-five percent (75%) of funds allocated to states under section 127(b)(1)(c) reserved under Section 128(a) and available for statewide activities under subsection (b) and not less than seventy-five percent (75%) of funds available to local areas under subsection (c) shall be used to provide youth workforce investment activities for out-of-school youth (OSY).

Background:

Tennessee has many initiatives that are supporting individuals in their pursuit of post-secondary education in order to propel themselves and their families to self-sufficiency and increased social mobility. TN workforce initiative Drive to 55 – the Drive to get 55 percent of Tennesseans equipped with a college degree or certificate by the year 2025 – has increased the higher education enrollments and demands all agencies to answer the call for support. TN Promise, one initiative under Drive to 55, offers high school graduates two years of tuition-free education for community or technical college. TN Pathways is the K-12 initiative under Drive to 55 and supports alignment among K-12, postsecondary, and industry to provide students with relevant education and training to jumpstart their postsecondary degrees and credentials.

Waiver Request:

Reducing the percentage of expenditures for out-of-school youth from seventy-five percent (75%) to fifty percent (50%) would allow the State and Local Workforce Development Boards (LWDBs) ability to meet the needs of In-school youth (ISY) in the local demographic area.

The State is requesting liganacy in the expenditure requirement for the specific barrier to effectively serve and assist in the success of our Governor's Drive to 55 initiatives (TN Reconnect and TN Promise), our Governor's Investment in Vocational Education (GIVE) Act, TN Department of Education (Carl D. Perkins Vocational and Technical Education) initiatives and other ISY focused initiatives.

Reason for the Request:

The seventy-five percent {75%} OSY expenditure requirement limits the ability of the State and local areas to:

- Consider local demographic needs and direct resources to youth population determined to have the highest need for that area.
- Effectively support TN Governor's initiatives and partner with State agencies.
- Prevent at-risk ISY from dropping out of school and from increasing the number of OSY in the State.

Actions Undertaken to Remove State or Local Statutory or Regulatory Barriers:

We would like to continue utilizing the flexibility of the waiver beyond program year 2022.

Currently, no state or local statutory or regulatory barriers exist. The State of Tennessee regulation and policy statements are in compliance with current federal law and/or approved waivers.

Goals and Outcomes:

As data collected becomes available the state will provide the latest outcome:

- The approval of this waiver would permit LWDBs the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the population, geographical location, and economic and employment conditions of each LWDBs.
- Additionally, increasing support to ISY while maintaining a focus on serving OSY will help develop a larger pool of young people qualified

and prepared to meet the current and future needs of employers in their workforce areas and throughout the state

Individuals impacted by this Waiver:

- The ISY who will receive the services as described in WIOA Section 123; Section 129(c)(2) and 20 CFR 681.420.
- Tennessee's youth providers that will increase the number of ISY receiving services based on the demography of the ISY in the local workforce area and across TN.

Description of the Monitoring Process:

Tennessee Department of Labor and Workforce Development (TDLWD) and youth providers will be responsible for monitoring the increase of in-school participation rate during the annual monitoring on-site and desktop review.

Opportunity for Local Board and Public Comment on Waiver Request:

The waiver request will be included in TN's Combined State Plan and posted on the TDLWD's website for thirty (30) days and for public review and comment, and for comments from our partners. Consistent with general waiver request requirements, TDLWD is adhering to publication requirements to ensure the broadest participation possible including informing appropriate youth program partners such as schools, labor and community-based organizations.

Waiver #1 Feedback and Revisions requested Friday April 3, 2020:

1. **75 Percent OSY Expenditure Requirement** **The State must provide:**
 1. **More discrete projected outcome information;**

The approval of this waiver would permit LWDBs the opportunity to determine how best to meet the educational and training needs of youth, regardless of school status, and specific to the

population, geographical location, and economic and employment conditions of each LWDA. It is the goal that partnerships with the local workforce boards and school districts will increase by five percent over the duration of the waiver.

Additionally, increasing support to ISY while maintaining a focus on serving OSY will help develop a larger pool of young people qualified and prepared to meet the current and future needs of employers in their workforce areas and throughout the state. It is the goal that the success rate of in-school youth completing work-based learning programs increases 10 percent of the duration of the waiver. It is also the goal to steadily increasing services to in-school youth across the State through intentional partnerships by 10 percent over the duration of the waiver.

- 1.
2. **Evidence that the State met its goals (performance results) for its last waiver approval;**

The data regarding performance results for the last waiver approval would be available through the WIRED division.

- 1.
3. **Evidence that the state and/or local areas are in jeopardy of missing 75 percent OR information on past years' attempts to reach 75 percent. (If the data shows the State is spending it, what is the data behind the request?);**

The State currently has a waiver for program year 2022 and 2023 for a 50 percent expenditure rate for out-of-school youth. The State is meeting that requirement. The State is requesting this waiver to continue utilizing the 50 percent expenditure rate to allow for increased services to youth participating in early postsecondary opportunities, work-based learning programs and Governor driven initiatives such as Tennessee Reconnect and Drive to 55.

- 1.
4. **Description of how the State will continue to serve OSY;**

The State will continue to develop and maintain Statewide partnerships with organizations that have a heavy focus on the young adult population facing significant barriers to education and employment that will disseminate to local boards. For example, the State is currently delving into exploratory conversations with the TN Urban League, which are in the four major metropolitan areas of TN that houses the highest concentration of WIOA eligible youth. We are exploring how their connection and services can be shared with local boards in the area to assist with reaching and serving eligible youth, and they are participating in the Summer Youth Employment Program initiative as a partner.

#2 - Waiver Subject: Individual Training Account for At-Risk In-School Youth Statutory and Regulatory Requirement:

Tennessee is seeking a waiver of 20 CFR 681.550 and WIOA Section(c)(2)(D) that allows Individual Training Accounts (ITA) for in-school youth (ISY) ages 14-21.

Background:

Tennessee has served both in-school and out-of-school youth (OSY) since the inception of WIOA. With the economy of Tennessee improving and the unemployment data remaining at a low-level post-pandemic, workforce development can effectively use this situation to connect with employers to provide ITAs to at-risk ISY. This juncture of low unemployment in the state will enable the at-risk youth to cultivate their skills in a work- educational environment and give them direction of what they want to do once they leave school. The Individual Training Account provides the at-risk youth a wide variety of choices for skills development with an employer.

Including enrollment in a community college providing classroom training coupled with hands on experience for a successful employment in the area the youth will excel.

Waiver Request:

Request to allow Tennessee to provide ITAs to at-risk ISY and to provide work-based training opportunities, including pre-apprenticeships, along with high-quality occupational training.

Reason for the Request:

Youth determined at-risk by the educational institution are not given an opportunity to develop work-skills through the use of work-based training services. Providing ITAs for these at-risk youth will lead to a high school diploma or industry recognized credential and result in skills development including employment opportunities leading to self-sufficiency. It will also decrease the number of school drop-outs in the state. Providing ITAs to at-risk ISY will also allow for better service integration with TN's Governor initiatives such as Drive to 55, Governor's Investment in Vocational Education (GIVE) Act, and TN Department of Education (Carl D. Perkins Vocational and Technical Education) initiatives.

Actions Undertaken to Remove State or Local Statutory or Regulator Barriers:

TN applied for the waiver in June 2018 and US DOL ETA granted TN this waiver request for program years 2022 and 2023. TN would like to continue utilizing the flexibility of the waiver beyond program year 2023. Currently, no state or local statutory or regulatory barriers exist. The State of Tennessee regulation and policy statements are in compliance with current federal law.

Goals and Outcomes:

- Increase the number of at-risk youth receiving ITAs in work-based programs especially pre-apprenticeship programs
- Help companies to develop new skills based on the need of business to develop young talents
- Promote sufficient pre-apprenticeship programs that youth can access
- Positive impact on all youth to attend pre-apprenticeship or any of the work-based services needed to close the gap in talent shortage, while providing hands on experience for youth
- Creates a pipeline of well-educated skilled workers entering the workforce to strengthen the State's overall economy.

Individuals impacted by this Waiver:

- Tennessee's Local Workforce Development Boards (LWDBs) that provide quality pre- apprentice services tied to demand occupations in the area.
- At-risk youth who will be positively impacted and who will be given an additional avenue that will enrich their livelihood when entering the workforce.

Description of the Monitoring Process:

- Tennessee Department of Labor and Workforce Development (TDLWD) and LWDBs will be responsible for monitoring ITAs and the type of pre-apprentice services provided to at risk youth during the annual monitoring on site and desk top review.
- Ensure work-based training programs are high-quality and meeting industry needs in conjunction with Tennessee Department of Education (Pathways TN).

Opportunity for Local Board and Public Comment on Waiver Request:

The waiver request will be included in TN's Combined State Plan and posted on the TDLWD's website for thirty (30) days and for public review and comment, and for comments from our partners. Consistent with general waiver request requirements, TDLWD is adhering to publication requirements to ensure the broadest participation possible including informing appropriate youth program partners such as schools, labor, and community-based organizations. This waiver has is developed in consultation with LWDBs.

Waiver #2 Feedback and Revisions requested Friday April 3, 2020:

2. Youth ITAs The State must provide:

1. More discrete projected outcome information;

Increasing the number of youth pre-apprenticeships by 5 percent over the duration of the waiver.

Increasing the number of in-school youth participating in work-based learning and early postsecondary opportunities by 5 percent over the duration of the waiver.

Increasing the post-secondary credential attainment rate for in-school youth.

1.

2. Justification should be about program strategy where they are able to use the waiver and details of program design;

Providing ITAs to at-risk ISY will also allow for better service integration with TN's Governor in TN Department of Education (Carl D. Perkins Vocational and Technical Education) initiatives. The State intends to deepen the relationship with TN Board of Regents (TBR) and postsecondary institutions to support the academic needs of the students that are receiving income driven aid and continue to have unmet financial needs.

1.

3. As a renewal, how widespread is the use of this waiver and what are the performance results?;

Areas that have had strong in-school youth partnerships and services saw an increase in utilization of ITAs ISY as well as increase successful completion rates. The State continues to collect data as technical assistance is administered to other local workforce areas who are still developing partnerships that will allow the use of ITAs for ISY.

1.

4. **Our logic has been that ITAs wouldn't be used for youth younger than 18 or who don't have their HSD yet, but in the request, TN suggests that ITAs would be helpful for getting their HSD and for getting into a pre-apprenticeship program. Please provide clarity on how ITAs would be used for younger ISY if this waiver is approved.**

Under TN's Drive to 55 initiative, TN Reconnect and TN Promise provide federal aid for individuals pursuing a postsecondary degree. Tennessee Reconnect is specifically assisting adults (any age) that are returning to higher education and TN Promise is assisting high school students. In order to receive TN Promise, a youth has to apply and enroll in an eligible postsecondary institution while still in high school. In order to receive TN Reconnect, an individual must meet the independent student status via FAFSA which aligns to many of the eligibility barriers for the WIOA Title I youth program. As stated above, both initiatives are federally funded and only support the tuition aspect. Any tools, books, supplies, testing fees, etc. would not be covered with this funding. Additionally, students receiving TN Reconnect and TN Promise are often receiving Pell Grant. Pell Grant is typically awarded to low-income students. Providing support via ITAs to the youth would help ensure that they have the tools, supplies, and other items they need in order to successfully complete their academic goals. In partnership with TN Board of Regents (TBR), data has been shared with the State that reflects that of the 40 percent enrolled receiving Pell Grant, only around 25 percent of them are graduating. For TN Promise, around 70 percent of students are receiving and only about 25 percent are graduating. Students are citing reasons such as lack of childcare, transportation, not having the funds to purchase course materials and many other challenges that prevent them from completing or starting. While the State recognizes that some of the needs cited can be covered through supportive services, the need to expand the expenditure requirement for in-school youth would allow the State to assist more of this population with those needs as well as providing ITAs to the population to cover any costs that would not be covered by other federal aid and supportive services. The federal funding above would only support those individuals that have received a high school diploma. Allowing ITAs to the in-school youth population also allows the State to support dual enrollment opportunities that high school students are participating in.

