

TANF SUMMER YOUTH PROGRAM QUESTIONS AND ANSWERS

UPDATED QUESTIONS/ANSWERS AS OF JUNE 10, 2010

Question: Will local WSAs be reimbursed for wages and fringe benefits paid to TANF Summer Youth Program participants?

Answer: Yes, WSAs will be reimbursed 100% for wages and fringe benefits paid to TANF Summer Youth Program participants.

Question: Can you provide examples of how the contribution from the worksite in the form of in-kind supervision and training costs affects the amount of reimbursement Minnesota can receive from the TANF Emergency Contingency Fund?

Answer: The in-kind is used as match. The TANF Emergency Contingency Fund only reimburses 80% of the cost of a new program like this. Use of in-kind funding decreases the amount of match the state must come up with.

The presumed supervision and training costs equal 25% of the wages that are paid to the participant. The 25% can only be claimed if the supervision is provided by someone who is NOT federally funded and whose salary is NOT used as match to secure federal funds.

Example 1: 100% privately funded (Joe's Tire Shop)

Wages paid to the subsidized work participants are \$100,000 so we can add 25% or \$25,000 as supervision and training costs. Our total cost would be \$125,000 and Minnesota would be reimbursed at 80% for a total of \$100,000.

Example 2: 50% federal funding, 50% private funding (Local nonprofit)

Wages paid to the subsidized work participants are \$100,000. We can add \$12,500 (half of the 25%) as supervision and training costs. Our total cost would then be \$112,500 and Minnesota would be reimbursed at 80% for a total of \$90,000.

Note: If a worksite receives some federal funding but the person who is providing the supervision and training is privately funded, the full 25% of supervision and training costs can be claimed.

Question: What is privately funded?

Answer: Privately funded means that the funding for the supervision did not originate from federal, state or local government funds.

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Question: If the WSA establishes a local goal for the TANF Summer Youth Program that at least 35% of the supervisor's time on the worksite is privately funded, would that make sense in terms of the State claiming reimbursement from the TANF ECF?

Answer: The goal is to place as many participants as possible at sites that are not federally funded or already used as match to secure federal funds. The placements may be privately funded placements or placements where the supervision is provided by someone who is privately funded. Our goal would be to have at least 35% of the placements fit that criteria. In addition, we can count a portion of the supervisory costs if the supervision is provided by someone who is partially privately funded.

FOLLOW-UP TO THE MAY 26, 2010 WEBINAR

Question: Can provider staff who are funded by the Supported Work Program assist with TANF Summer Youth program operations and case management?

Answer: Yes, employment service workers who work with the supported work program can assist with MFIP summer youth participants that are MFIP caregivers.

Question: How will wages earned in the TANF Summer Youth Program affect the participant's/parents' MFIP grant?

Answer: The treatment of this income follows the MFIP policy on WIA payments noted in Bulletin #09-11-05. Current state law for MFIP requires all WIA/TANF income be counted except for the following exclusions:

- reimbursements for employment training received through WIA/TANF,
 - reimbursements for work-related expenses, such as child care or transportation, or
 - any payment received by a minor child, a minor caregiver, or a caregiver under age 20 who is at least a half-time student in an approved elementary or secondary education program.
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Question: Would families or youth who are involved in the Diversionary Work Program also be eligible for the TANF Summer Youth Program?

Answer: Older and younger youth in TANF-eligible families (below 200% of the FPG), such as DWP, are eligible for the TANF Summer Youth Program under priority 4.

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Question: Can you explain why under Priority Group Four (other TANF-eligible youth) we can serve youth starting at age 14, but for Priority Groups One and Two (MFIP recipients) we cannot serve youth younger than 16?

Answer: DHS is placing priority on serving older youth, as reflected in the age ranges established for the first three priority groups. Youth who are 14 or 15 can be served under Priority Four if they are in a family that is TANF-eligible.

Question: Does the TANF ECF Start date on the tracking spreadsheet refer only to the date the participant started in the TANF Summer Youth Program, or does it refer to the date a participant was first enrolled in another employment activity?

Answer: This field only relates to the start date in the TANF Summer Youth Program.

Question: Will the TANF Summer Youth Program be a special program in Workforce One?

Answer: No, the TANF Summer Youth Program will not be tracked through Workforce One as a statewide program. The Excel spreadsheet will capture demographics, services and outcomes for youth in the TANF Summer Program. The data in the Excel spreadsheet will be summarized by DEED and forwarded to DHS in mid-July and mid-October.

Question: Where will the Workforce One ID number that is requested on the spreadsheet come from?

Answer: Most participants will be co-enrolled in either WIA or MYP so they will have a Workforce One ID number already assigned to them.

Question: Is a new application required for youth who are already enrolled in WIA in order to enroll them in the TANF Summer Youth Program?

Answer: A new application is not required unless the youth was eligible for WIA as a “family of one”, because “family of one” does not apply to the TANF Summer Youth Program.

Question: Can you give us more examples of supervisory training costs that are eligible for reimbursement?

Answer: The most straightforward example is when the youth is placed at a private employer, so placements at private sector sites are strongly encouraged.

TANF SUMMER YOUTH PROGRAM QUESTIONS AND ANSWERS

Question: Is it necessary to report program income and interest earned on the FSR?

Answer: Those sections are part of the standard FSR but don't apply to the TANF Summer Youth Program.

Question: If a youth is enrolled in the TANF Summer Youth Program and then the family is subsequently dropped from MFIP, can the youth continue to participate in the TANF Summer Youth Program?

Answer: Yes, the youth can continue to participate through the end of the program.

Question: Can a participant be paid a wage for hours spent in training to prepare them for work (i.e. work readiness training, etc.) or educational activities?

Answer: Activities that are part of an integrated approach addressed to the individual's employment needs are eligible for reimbursement in the subsidized work category of the TANF Emergency Contingency fund. The educational activity should be related to the individual's employment goals and have a direct impact on employability.

Question: Are there any specific participant documentation requirements for the TANF Summer Youth Program?

Answer: You should approach participant documentation the same way you do for WIA/MYP. Keep in mind that state partners expect communication between the summer youth counselor and the assigned Employment Services counselor for MFIP clients, so that hours are properly documented and participants are in compliance with any work participation requirements that apply.

Question: Is there a standard wage that must be paid to participants in the TANF Summer Youth Program? Can prevailing wage be paid?

Answer: Local areas are free to set the wage for participants so long as it is at least \$7.25 per hour (minimum wage). The WSA should include this information in their local plan.

Question: How quickly will local areas receive their funds after the workplan and budget are approved?

Answer: DEED will issue the Notice of Grant Action (NGA) to each local area as soon as possible following approval of the workplan/budget.

TANF SUMMER YOUTH PROGRAM QUESTIONS AND ANSWERS

ADDITIONAL UPDATES AS OF MAY 24, 2010

Question: For purposes of determining eligibility for the TANF Summer Youth Program (family income, household size, MFIP eligibility status, etc.), how would foster care youth be treated?

Answer: Children on whose behalf the caregiver receives federal, state or local foster care payments are generally ineligible for MFIP. However, the caregiver may still be eligible for MFIP. In that case, the foster child could be served as part of an MFIP household. Foster care teens and young adults may also qualify for the TANF Summer Youth Program if the foster family includes a minor child and the foster family's income is less than 200% of the Federal Poverty Guidelines.

Question: To what extent could adult MFIP participants (older than 25) be utilized as supervisors or crew leaders for other youth?

Answer: MFIP adult participants can be used as supervisors or crew leaders to the extent that there are qualified participants available and subsidized work funds available to pay their wages. This would require collaboration between existing employment services providers who work with adult subsidized work participants and summer youth employment program providers. Such collaboration is encouraged.

Question: What do you mean when you say a youth is "in an MFIP household, but not on the grant?"

Answer: To be eligible for MFIP, the household must include a minor child. Other members of the household can be eligible for the Summer Youth Program, even if they are excluded under MFIP, as long as they are under the age of 25 and are a part of a household with a minor child on MFIP.

Question: How is MFIP eligibility documented?

Answer: The summer youth provider must have a reasonable eligibility process in place along with reasonable verification methods. Methods such as standard identifiers can be used to identify eligible participants as long as there is sufficient information collected to verify eligibility, if needed.

Question: In the event that the WSA has a school that would work with us without staffing funds and/or we decided to pay staff dollars through MYP, can the youth get paid for academic time as well as the community service work time for their project?

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Answer: It would depend on the educational activity. Subsidized wages and activities that are part of an integrated approach addressed to the individual's employment needs are eligible for reimbursement in the subsidized work category of the TANF Emergency Contingency fund. The educational activity should be related to the individual's employment goals and have a direct impact on employability.

FOLLOW-UP TO THE MAY 12, 2010 WEBINAR

Question: Is there a priority for service for youth employed under the proposed TANF Summer Youth Program.

Answer: Yes, the Minnesota Department of Human Services has been very clear that the priority for service under the proposed TANF Summer Youth Program is:

First Priority: Teen Parents, ages 16 through 24, who are on MFIP.

Second Priority: Younger youth, ages 16 through 18, who are on the grant in MFIP households.

Third Priority: Older youth, ages 19 through 24, who are in MFIP households but not on the grant.

Fourth Priority: Other older and younger youth, ages 14 through 24, who are in TANF-eligible families (at or below 200% of the poverty level, with a minor child in the household).

Question: Has HHS approved proposals for other states to operate a TANF summer youth program? Do we expect Minnesota's proposal to be approved soon?

Answer: Ohio applied to HHS and advised that they have received over \$47 million to operate a TANF-ARRA funded subsidized summer employment program for low-income youth. Ohio has funding available to serve approximately 18,000 youth at a rate of \$7.30 per hour (based on historical data from last year's WIA Summer Youth Program funded under the Recovery Act). The Minnesota Department of Human Services is checking with HHS on the status of Minnesota's proposal which was submitted on May 7 – Minnesota asked that \$1 million be available on June 1 and \$5 million be available on July 1.

Question: When would the dollars for this program be available?

Answer: The application submitted to HHS requested \$1 million on June 1 and the remaining \$5 million on July 1.

TANF SUMMER YOUTH PROGRAM QUESTIONS AND ANSWERS

Question: Are there any minimum or maximum length requirements for a TANF Summer Youth Program?

Answer: Local areas are free to determine the length of their TANF Summer Youth Program. However, for those youth who are on an MFIP grant and subject to work participation requirements, a goal of DHS is to have the program be of sufficient length to satisfy those requirements. More information will be provided regarding this, and local areas are also encouraged to coordinate with MFIP case managers to ensure that the work experience is of sufficient length to meet the work participation requirements.

Question: Can the “Family of One” designation currently used for purposes of WIA eligibility be used in the TANF Summer Employment Program?

Answer: No, “family of one” cannot be used in the proposed TANF Summer Youth Program.

Question: Can youth who are enrolled in the ARRA Youth Program be transferred into the TANF Summer Youth Program?

Answer: Yes, as long as the ARRA youth is eligible for the proposed TANF Summer Youth Program.

Question: Are non-custodial parents eligible for this program?

Answer: DHS is focusing on MFIP households for this program rather than non-custodial parents. Youth who fall into the four priority groups identified for the program are eligible.

Question: What is the minimum match requirement?

Answer: No minimum match goal has been set by DHS. The goal would be to collect and document as much match as possible. Identification of other potential match sources (beyond in-kind supervisor wage match) will be discussed.

Question: How is MFIP eligibility documented?

Answer: We will need the name and MAXIS number for each participant who is on MFIP.

TANF SUMMER YOUTH PROGRAM QUESTIONS AND ANSWERS

Question: What would be the advantage of co-enrolling youth in WIA if supervision costs can't be paid from WIA?

Answer: Supervision costs paid from WIA cannot be used as in-kind match. However, WIA could pay for administrative costs (payroll, etc.), case management, support services, etc. for co-enrolled youth since those costs cannot be paid from the TANF funds.

Question: How would eligibility under Priority #4 (Other Youth from TANF-Eligible Families) be documented?

Answer: Household income and the presence of a minor child (under 18) would have to be verified.

Question: What ages can be served under Priority #4 (Other Youth from TANF-Eligible Families)?

Answer: Youth ages 14 to 24 can be served in this priority group.

Question: What are the guidelines for 200% of the poverty level (to determine eligibility under Priority Group #4)?

| Family Size | 100% Poverty Level | 200% Poverty Level |
|-------------|--------------------|--------------------|
| 1 | \$10,830 | \$21,660 |
| 2 | \$14,570 | \$29,140 |
| 3 | \$18,310 | \$36,620 |
| 4 | \$22,050 | \$44,100 |
| 5 | \$25,790 | \$51,580 |
| 6 | \$29,530 | \$59,060 |
| 7 | \$33,270 | \$66,540 |
| 8 | \$37,010 | \$74,020 |
| 9 | \$40,750 | \$81,500 |
| 10 | \$44,490 | \$88,980 |
| 11 | \$48,230 | \$96,460 |
| 12 | \$51,970 | \$103,940 |
| 13 | \$55,710 | \$111,420 |
| 14 | \$59,450 | \$118,900 |
| 15 | \$63,190 | \$126,380 |
| 16 | \$66,930 | \$133,860 |
| 17 | \$70,670 | \$141,340 |
| 18 | \$74,410 | \$148,820 |
| 19 | \$78,150 | \$156,300 |
| 20 | \$81,890 | \$163,780 |

TANF SUMMER YOUTH PROGRAM QUESTIONS AND ANSWERS

Question: If Minnesota secures TANF Emergency Contingency Funds for summer youth employment . . . can TANF-funded summer youth participants be co-enrolled in Regular WIA Youth given the performance measures and program design requirements of Regular WIA?

Answer: DEED has secured two waivers from DOL/ETA that will allow Minnesota the flexibility to design a summer program that focuses on work readiness, work experience, and preparing youth for long-term employment opportunities rather than meeting performance measures that do not align with the purpose of a summer employment program . . .

Waiver #1: This waiver would use the Work Readiness Indicator as the only indicator of performance for youth who are co-enrolled in Regular WIA Youth and TANF Summer Youth Employment during the summer months.

Waiver #2: Addresses program design flexibility at the local level, as follows (this waiver addresses the provisions included in TEGl 26-09, dated May 12, 2010):

- Waives the requirement to provide follow up services for not less than 12 months after the completion of the program.
- Waives the requirement to provide an objective assessment and grants WSAs the flexibility to determine the type of assessment and individual service strategy (ISS) that is appropriate for each youth participant.
- Waives the requirement that summer employment opportunities be directly linked to academic and occupational learning.

Question: Can TANF-funded summer youth participants be co-enrolled in the Minnesota Youth Program or Youthbuild?

Answer: Yes, there are no restrictions from co-enrolling TANF-funded youth participants in MYP or YB.

Question: Are there any restrictions on how the TANF \$ can be used this summer?

Answer: Yes, the TANF ARRA \$ can only be used for participant wages according to HHS/Minnesota Department of Human Services. There are zero administrative/staffing dollars available with the TANF ARRA \$.

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