

<b>TRAINING AND EMPLOYMENT NOTICE</b>	<b>NO.</b> 33-11
	<b>DATE</b> March 26, 2012

**TO:** STATE WORKFORCE AGENCIES  
STATE WORKFORCE LIAISONS  
ONE-STOP CAREER CENTER LEADS  
ALL STATE AND LOCAL WORKFORCE INVESTMENT BOARDS  
ALL WIA SECTION 166 INDIAN AND NATIVE AMERICAN  
GRANTEES

**FROM:** JANE OATES   
Assistant Secretary

**SUBJECT:** Partnering with Temporary Assistance for Needy Families (TANF) Jurisdictions, State Community Services Block Grant (CSBG) Offices, and local CSBG Entities to Create or Expand Summer Youth Employment Opportunities

**1. Purpose.** To provide the workforce system with Information Memoranda sent by the U.S. Department of Health and Human Services' Administration for Children and Families (ACF) to TANF jurisdictions, State CSBG offices, and local CSBG entities that encourage the use of TANF and CSBG funds for summer employment opportunities. Also, to encourage the public workforce system to partner with TANF jurisdictions, State CSBG offices, and local CSBG entities in their efforts to promote subsidized employment opportunities allowable under TANF and CSBG funding for the creation and expansion of subsidized summer employment for low-income youth.

**2. Background.** Subsidized employment, such as summer employment opportunities, provides valuable skills and work experience for young people and serves as a stepping stone on the path to unsubsidized employment. As Summer 2012 approaches, the Employment and Training Administration (ETA) and ACF encourage partnerships between state, local and tribal workforce areas, TANF jurisdictions, State CSBG offices, and local CSBG entities to create or expand summer youth employment opportunities. In concert with the release of this TEN, ACF is releasing the attached Letter to Commissioners and Information Memoranda to TANF jurisdictions and State CSBG offices encouraging State CSBG offices, local CSBG entities, and TANF jurisdictions to work with state, local, and tribal Workforce Investment Boards to explore ways to coordinate resources in developing or expanding subsidized employment programs. Also where appropriate, programs may co-enroll eligible youth in the TANF and Workforce Investment Act programs so that participants can benefit from additional services such as supportive services, occupational skills training, and other relevant services.

**EMPLOYMENT AND TRAINING ADMINISTRATION  
U.S. DEPARTMENT OF LABOR  
WASHINGTON, D.C. 20210**

Similar to the encouragement provided in a joint letter by ETA and ACF released on January 19, 2010, [http://wdr.doleta.gov/directives/corr\\_doc.cfm?DOCN=2844](http://wdr.doleta.gov/directives/corr_doc.cfm?DOCN=2844), this Training and Employment Notice (TEN) and the attached memoranda reflect the effort of both ETA and ACF to identify and explore areas of collaboration that support training and employment opportunities for low-income youth in the Summer of 2012. It is our hope this summer that this national partnership focused on subsidized employment will be modeled throughout TANF, CSBG and workforce agencies.

For more information on TANF and the use of funds, see [http://www.acf.hhs.gov/programs/ofa/resources/funding\\_guide.htm](http://www.acf.hhs.gov/programs/ofa/resources/funding_guide.htm).

For a list of Regional TANF Program Managers, see [http://www.acf.hhs.gov/programs/ofa/states/ACF\\_Regional\\_Program\\_Managers.html](http://www.acf.hhs.gov/programs/ofa/states/ACF_Regional_Program_Managers.html)

For more information on CSBG and the use of funds, see <http://www.acf.hhs.gov/programs/ocs/csbg/>.

For a list of CSBG Regional Contacts, see <http://www.acf.hhs.gov/programs/ocs/csbg/aboutus/staffassignments.html>

**3. Action Requested.** ETA encourages state, local, and tribal workforce areas to review the attached memoranda and Letter to Commissioners and reach out to TANF jurisdictions, State CSBG offices, and local CSBG entities to discuss partnership opportunities.

**4. Inquiries.** Questions concerning this TEN should be directed to the appropriate Regional Office or the Division of Indian and Native American Programs.

**5. Attachment(s).**

- Letter to Commissioners;
- Temporary Assistance for Needy Families Information Memorandum; and
- Community Services Block Grant Information Memorandum.



March 22, 2012

Dear Colleague:

As we look forward to next summer, we know many young people will seek to gain valuable work experience during those months. We want to remind State agencies that they have the potential to expand the job opportunities for low-income youth by allocating Temporary Assistance for Needy Families (TANF) resources to summer youth employment programs and supportive services such as job shadowing and mentoring.

With the availability of the TANF emergency funds during fiscal years 2009 and 2010, we saw State and local TANF agencies throughout America play a crucial role in creating or expanding subsidized youth employment programs that operated during the summer months. TANF agencies entered into key partnerships with State and local Workforce Investment Boards (WIBs) and organizations in their communities, allowing for the combination of resources and effective execution of large jobs programs in a short period of time. By September 2010, 24 States and the District of Columbia created partnerships between their TANF and workforce development agencies to create youth employment programs, and 138,050 youth had been placed in subsidized jobs funded in whole or in part by the TANF Emergency Fund.<sup>1</sup>

Over these two summers, we witnessed the benefits that summer youth employment programs can bring to a community: youth were connected to the labor force and were given the opportunity to build new and valuable skills; community members earned needed income, and in turn, supported local economies; and businesses and non-profit organizations were provided with the resources needed to hire employees.

While emergency funds are no longer available, States continue to have the opportunity to use Federal TANF and State maintenance-of-effort (MOE) funds for the creation and expansion of subsidized summer employment programs and additional activities such as job shadowing and mentoring for low-income youth. All expenditures that qualified for Emergency Fund reimbursement remain allowable expenditures, including employer supervision and training costs that can be claimed as third-party MOE.

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<sup>1</sup> Pavetti, LaDonna, Liz Schott, and Elizabeth Lower-Basch, Creating Subsidized Employment Opportunities for Low-Income Parents: The Legacy of the TANF Emergency Fund, CBPP and CLASP, 2011  
<http://www.cbpp.org/files/2-16-11tanf.pdf>




We encourage State and local TANF agencies to work with WIBs to explore ways to combine resources in developing or expanding subsidized employment programs and related supportive services. Where appropriate, programs may co-enroll youth in the TANF and applicable Workforce Investment Act (WIA) programs so that participants in TANF-funded subsidized employment opportunities can benefit from additional WIA services such as occupational skills training and other relevant services. In addition, we encourage State and local TANF agencies to pursue partnerships with State Community Services Block Grant (CSBG) offices and local CSBG entities to identify opportunities that may exist at the State and local levels for supporting and integrating subsidized employment efforts with life and work skills programs provided by local nonprofit agencies, such as Community Action Agencies.

Please see the Information Memorandum No. TANF-ACF-IM-2012-01, available on the Office of Family Assistance website (<http://www.acf.hhs.gov/programs/ofa/>), for additional guidance on how to target and structure your programming to include subsidized employment and related services.


Additionally, for guidance on how to partner with the CSBG State offices and local CSBG entities, the CSBG Information Memorandum No. 126 can be found on the Office of Community Services website (<http://www.acf.hhs.gov/programs/ocs/csbg/guidance/infomemoranda.htm>).

We appreciate all that you do to help the vulnerable children and families in your States. If you have any questions, please feel free to contact the TANF program manager in your region.

Sincerely,



George H. Sheldon  
Acting Assistant Secretary  
for Children and Families  
U.S. Department of Health and Human Services



Jane Oates  
Assistant Secretary  
Employment and Training Administration  
U.S. Department of Labor

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# Temporary Assistance for Needy Families Information Memorandum

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Family Assistance  
Washington, DC 20447

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**Memorandum No. TANF-ACF-IM-2012-01**

**Date: March 22, 2012**

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**TO:** States, Tribes, and Territories Administering the Temporary Assistance for Needy Families (TANF) Program.

**SUBJECT:** Use of TANF funds to support summer jobs for youth.

**REFERENCE:** Sections 401, 403(a)(1), and 403(a)(3) of the Social Security Act, 45 CFR 260.31(b).

**PURPOSE:** Inform TANF jurisdictions of the opportunities to support the creation or expansion of summer youth employment programs with TANF funds.

## **BACKGROUND:**

Subsidized employment can provide valuable skills and work experience for young people, and serves as a stepping stone on the path to unsubsidized employment. By allocating TANF resources to summer youth employment programs, TANF jurisdictions have the potential to bring additional subsidized job opportunities to low-income youth across the nation.

## **INFORMATION:**

As we look forward to next summer, the Administration for Children and Families (ACF) reminds TANF jurisdictions of the opportunity to use Federal TANF and State maintenance-of-effort (MOE) funds for the creation and expansion of subsidized summer employment programs for low-income youth. We encourage State and local TANF agencies to work with State and local Workforce Investment Boards to explore ways to combine resources in developing or expanding subsidized employment programs. Where appropriate, programs may co-enroll youth in the TANF and applicable Workforce Investment Act (WIA) programs so that participants in TANF-funded subsidized employment opportunities can benefit from additional WIA services such as supportive services, occupational skills training, and other relevant services.

When developing summer youth programs under TANF, jurisdictions may choose to target the program narrowly to youth in families already receiving TANF cash assistance, or expand eligibility to a more broadly defined group of "TANF-eligible" families; for example, a TANF agency may choose to serve youth that are members of a family who meet an income eligibility criterion that is higher than the one established for TANF cash assistance. Furthermore, the wages paid under these summer youth employment programs are not considered TANF cash assistance, and States may choose to disregard the earnings of summer jobs participants in determining a family's eligibility for or amount of assistance. Moreover, if the summer jobs participant is not a



Work Eligible Individual, his or her hours of participation do not affect the State's work participation calculation; if the participant is a Work Eligible individual, hours of participation can help the State meet work participation rate requirements.

In addition to subsidizing wages (paid to an employer or third-party), jurisdictions may use TANF funds for this program on other related activities such as:

- Education and training
- Supportive services
- Transportation for employed persons for the purpose of attending work or training
- Counseling and employment related services
- Incentive payments that reward the participant for achieving a pre-determined milestone (e.g., a one-month job retention bonus).

In some communities, summer jobs programs may place a strong emphasis on encouraging private sector jobs to make available work opportunities for youth in need of employment, with a local program covering costs other than the costs of wages --- for example, providing assistance in identifying eligible youth, providing job readiness services, providing support services and incentives, and assisting employers in addressing workplace issues through case management or other supports. In such a model, TANF and MOE funds can be used to address public costs for such a program, insofar as the program furthers the purposes of TANF for needy youth.

When considering ways to allocate TANF and/or MOE funds for summer youth employment programs, we would like to remind TANF agencies that a jurisdiction may use TANF and/or MOE funds to serve youth up through the age of 24 in a subsidized employment program under TANF statutory purpose one. While a jurisdiction may use Federal TANF funds on subsidized employment for youth whether or not they are residing in the home of their parent or caretaker relative, MOE expenditures under this purpose one activity are limited to expenditures for youth who are residing in the home of a parent or caretaker relative; otherwise the youth must themselves be a parent or pregnant woman. This is because except for expenditures authorized under the Healthy Marriage and Responsible Fatherhood provisions of the TANF statute, the TANF regulations limit the use of MOE funds to members of eligible families, which the regulations at 45 CFR 263.2(b)(2) specify must include "a child living with a custodial parent or other adult caretaker relative." (A jurisdiction may interpret "custodial parent" to include a parent who had previously been the custodial parent, in the case of a child who is no longer a minor child). Please note that if a State commingles Federal and MOE funds, the more restrictive rules would apply, i.e., in this situation, the requirement to expend the funds for eligible families would apply to the commingled funds.

Efforts to develop summer youth employment programs will serve to support *Summer Jobs+*, a new Administration-led initiative to encourage and support businesses, non-profits, and government to work together to provide pathways to employment for low-income and disconnected youth in the summer of 2012. Subsidized employment will provide youth on-the-job skills in a learning environment while earning wages for their work. TANF agencies and partner organizations can also collaborate with schools and higher education institutions to give youth the opportunity both to strengthen their academic skills while working, as well as to connect learning to the context of work.



ACF also encourages State and local TANF agencies to make information available to disconnected and low-income youth about *Summer Jobs+* opportunities. In the coming weeks, the Federal government will release the ***Summer Jobs+ Bank***, a one-stop search tool for youth to access postings for any participating employers seeking to reach youth online. The search tool builds upon an open standard, the *JobPosting* schema endorsed by schema.org in November 2011 in support of the *Veterans Jobs Bank*, and will include technical and promotional support by Google, Internships.com, AfterCollege, LinkedIn and Facebook. ACF encourages State and local TANF agencies to use their various communication tools and relationships to inform the youth who are most in need of the *Summer Jobs+ Bank* website.

More information on the Pathways Pledge and the *Summer Jobs+* challenge can be obtained on the following websites:

<http://www.whitehouse.gov/the-press-office/2012/01/05/we-cant-wait-white-house-announces-federal-and-private-sector-commitment>

<http://www.dol.gov/summerjobs/>

Jurisdictions can refer to the following resources for more information about the targeting and structure of subsidized employment programs:

*Using TANF Funds to Support Subsidized Youth Employment: The 2010 Summer Youth Employment Initiative*, by Linda Rosenberg, Megan Hague Angus, Cassandra Pickens, and Michelle Derr, Mathematica Policy Research, available at: [http://wdr.doleta.gov/research/keyword.cfm?fuseaction=dsp\\_resultDetails&pub\\_id=2481&mp=y](http://wdr.doleta.gov/research/keyword.cfm?fuseaction=dsp_resultDetails&pub_id=2481&mp=y)

*Subsidizing Employment Opportunities for Low-Income Families: A Review of State Employment Programs Created Through the TANF Emergency Fund*, by Mary Farrell, Sam Elkin, Joseph Broadus, and Dan Bloom, MDRC, December 2011, available at: [http://www.acf.hhs.gov/programs/opre/welfare\\_employ/stedep/reports/tanf\\_emer\\_fund.pdf](http://www.acf.hhs.gov/programs/opre/welfare_employ/stedep/reports/tanf_emer_fund.pdf)

*Creating Subsidized Employment Opportunities for Low-Income Parents: The Legacy of the TANF Emergency Fund*, by Pavetti, LaDonna, Liz Schott, and Elizabeth Lower-Basch, CBPP and CLASP, February 2011, available at: <http://www.cbpp.org/files/2-16-11tanf.pdf>

*Innovating Under Pressure: The Story of the 2009 Recovery Act Summer Youth Employment Initiative: Chicago, Detroit, Indianapolis & Marion County, Phoenix and Maricopa County*, by Susan Curnan and Andrew Hahn, Heller School for Social Policy and Management, Brandeis University, June 2010, available at: [http://wdr.doleta.gov/research/FullText\\_Documents/Innovating%20Under%20Pressure%20The%20Story%20of%20the%202009%20Recovery%20Act%20Summer%20Youth%20Employment%20Initiative.pdf](http://wdr.doleta.gov/research/FullText_Documents/Innovating%20Under%20Pressure%20The%20Story%20of%20the%202009%20Recovery%20Act%20Summer%20Youth%20Employment%20Initiative.pdf)

*Financing and Sustaining Summer Youth Employment Programs*, by The Finance Project, June 2010, available at: <http://www.financeproject.org/publications/PPP-SYEP.pdf>

*Reinvesting in America's Youth: Lessons from the 2009 Recovery Act Summer Youth Employment Initiative*, by J. Bellotti, L. Rosenberg, S. Sattar, A. M. Esposito, and J. Ziegler, Mathematica Policy Research, February 2010, available at: [http://www.mathematica-mpr.com/publications/PDFs/labor/youth\\_employment\\_program.pdf](http://www.mathematica-mpr.com/publications/PDFs/labor/youth_employment_program.pdf)

In January, the White House Council for Community Solutions released *A Toolkit for Employers: Connecting Youth and Business*. This toolkit was created in collaboration with the Corporation for National and Community Service and employers to support businesses and communities in their efforts to help young people become productive citizens and connect to greater opportunities, both of which are critical for the long-term strength and competitiveness of the Nation. The toolkit is available at: [http://www.serve.gov/new-images/council/pdf/youth\\_employment\\_toolkit.pdf](http://www.serve.gov/new-images/council/pdf/youth_employment_toolkit.pdf)

Additional resources from the White House Council for Community Solutions can be found at: [http://www.serve.gov/council\\_resources.asp](http://www.serve.gov/council_resources.asp)

**INQUIRIES:** Inquiries should be directed to the appropriate Regional TANF Program Manager.

/s/

Earl S. Johnson  
Director  
Office of Family Assistance



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**COMMUNITY SERVICES  
BLOCK GRANT PROGRAM**

U.S. Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Division of State Assistance  
370 L'Enfant Promenade, S.W.  
Washington, D.C. 20447

**Information Memorandum**

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**Transmittal No. 126**

**Date: March 22, 2012**

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**TO:** States, Tribes, and Territories Administering the Community Services Block Grant (CSBG), Eligible Entities for CSBG Resources

**SUBJECT:** Use of CSBG funds to support summer jobs for youth and related services.

**PURPOSE:** To inform CSBG agencies of the opportunities to support the summer youth employment efforts with CSBG funds.

**INTRODUCTION:**

Many Community Action Agencies and other eligible entities that receive CSBG funds have a long history of involvement and support for summer jobs for low-income youth. Youth employment is a critical element of success for young people and can provide valuable opportunities for low-income youth to start a path to self-sufficiency. As we look forward to summer, the Administration for Children and Families (ACF) encourages State CSBG offices to work with local CSBG eligible entities to help facilitate the involvement of low-income youth in summer jobs programs and to provide linkages to other supportive services that will help assure successful involvement in jobs programs. Within existing CSBG grant resources—and to the extent justified by local CSBG needs assessment efforts—State CSBG offices are encouraged to promote involvement of local eligible entities in both government-sponsored and private sector summer jobs efforts. State CSBG offices are also encouraged to provide flexibility to allow local eligible entities to adjust current service plans where appropriate to facilitate involvement in summer jobs efforts.

**BACKGROUND:**

As a pathway to careers and education, meaningful summer employment not only helps young people develop workforce and leadership skills to acquire and maintain good jobs, but also connects them to long term economic opportunity. Summer employment helps introduce youth to the working world and provides the skills and experiences they need to launch their careers. According to a Department of Labor report, nearly 75 percent of low-income youth who participated in summer jobs programming funded by the American Recovery and Reinvestment Act of 2009 Workforce Investment Act (WIA) Youth Program reported increased work readiness skills. Subsidized employment can provide valuable skills and work experience for young people, and serves as a stepping stone on the path to unsubsidized employment.

CSBG eligible entities have the potential to enhance opportunities for low-income youth at a critical stage of development. By utilizing CSBG resources to support summer youth employment efforts directly, or through supportive services, eligible entities can help young people make use of employment opportunities as a stepping stone to self sufficiency through assistance with financial planning, mentoring, and linkage to other needed services.

## **INFORMATION:**

CSBG eligible entities are required to conduct an annual assessment of community needs. Where appropriate based on identified community needs, CSBG eligible entities may support employment opportunities directly or may offer additional supports for youth in the Temporary Assistance for Needy Families (TANF) and applicable WIA programs. For example, CSBG participants also in TANF-funded subsidized employment opportunities can benefit from occupational skills training and other relevant services such as financial planning, mentorship, and linkage to other supportive services. When possible, already-existing CSBG programming for youth can include such summer opportunities. ACF encourages CSBG offices and CSBG eligible entities to work with State and local Workforce Investment Boards and with TANF jurisdictions to explore ways to combine resources in developing or expanding subsidized employment programs.

In addition to partnering with subsidized summer employment programs and supporting youth services directly, CSBG eligible entities can also play an important leadership role in facilitating partnerships with local businesses and private sector charitable organizations. Many of the local eligible entities that provide CSBG services also have strong connections to the local business community, and can offer valuable assistance in identifying low-income youth, publicizing employment opportunities, providing job readiness services, assisting employers in addressing workplace issues through case management, or through other supports.

In the coming weeks, Departments and Offices across the Federal government will be supporting *Summer Jobs+*, an initiative to encourage and support businesses, non-profits, and government to work together to provide pathways to employment for low-income and disconnected youth in the summer of 2012. In support of efforts to serve these youth, State CSBG offices and CSBG eligible entities may make commitments or encourage other public and private sector organizations to make a commitment to provide opportunities for low-income and disconnected youth in at least one of the following three ‘pathways’ to employment:

- **Life Skills:** Provide youth work-related soft skills, such as communication, time management and teamwork, through coursework and/or experience. For example, local organizations can offer resume writing or interview workshops or provide employee mentors.
- **Work Skills:** Provide youth insight into the world of work to prepare for employment. For example, organizations can host job shadow days.



- **Learn and Earn:** Provide youth on-the-job skills in a learning environment while earning wages for their work. For example, organizations can offer paid internships, and/or offer permanent positions that provide on-the-job training. Organizations can also partner with schools and higher education institutions to give youth the opportunity both to strengthen their academic skills while working as well as to connect learning to the context of work.

ACF also encourages State CSBG offices and eligible entities to make information available to disconnected and low-income youth about *Summer Jobs+* opportunities via these three pathways. In the coming weeks, the Federal government will release the *Summer Jobs+ Bank*, a one-stop search tool for youth to access postings for any participating employers seeking to reach youth online. The search tool builds upon an open standard, the *JobPosting* schema endorsed by schema.org in November 2011 in support of the *Veterans Jobs Bank*, and will include technical and promotional support by Google, Internships.com, AfterCollege, LinkedIn and Facebook. CSBG eligible entities have access to families and youth and ACF encourages eligible entities to use their various communication tools and relationships to inform the youth who are most in need of the *Summer Jobs+ Bank* website.

If State CSBG offices and eligible entities have summer opportunities available for youth, ACF encourages them to post their commitments on the *Summer Jobs+ Bank* at the following link: <http://www.dol.gov/summerjobs/addingopportunities.htm>. State CSBG offices and eligible entities should also inform their private and public sector partners of the initiative and ask them to post their commitments online as well.

The latest information on the Pathways Pledge and the *Summer Jobs+* challenge can be obtained on the following website: <http://www.dol.gov/summerjobs/>

Grantees can refer to the following resources for more information about the targeting and structure of subsidized employment programs:

In January, the White House Council for Community Solutions released *A Toolkit for Employers: Connecting Youth and Business*. This toolkit was created in collaboration with the Corporation for National and Community Service and employers to support businesses and communities in their efforts to help young people become productive citizens and connect to greater opportunities, both of which are critical for the long-term strength and competitiveness of the Nation. The toolkit is available at: [http://www.serve.gov/new-images/council/pdf/youth\\_employment\\_toolkit.pdf](http://www.serve.gov/new-images/council/pdf/youth_employment_toolkit.pdf)

Additional resources from the White House Council for Community Solutions can be found at: [http://www.serve.gov/council\\_resources.asp](http://www.serve.gov/council_resources.asp)

*Innovating Under Pressure: The Story of the 2009 Recovery Act Summer Youth Employment Initiative: Chicago, Detroit, Indianapolis & Marion County, Phoenix and Maricopa County*, by Susan Curnan and Andrew Hahn, Heller School for Social Policy and Management, Brandeis University, June 2010, available at:  
[http://wdr.doleta.gov/research/FullText\\_Documents/Innovating%20Under%20Pressure%20The%20Story%20of%20the%202009%20Recovery%20Act%20Summer%20Youth%20Employment%20Initiative.pdf](http://wdr.doleta.gov/research/FullText_Documents/Innovating%20Under%20Pressure%20The%20Story%20of%20the%202009%20Recovery%20Act%20Summer%20Youth%20Employment%20Initiative.pdf)

*Financing and Sustaining Summer Youth Employment Programs*, by The Finance Project, June 2010, available at: <http://www.financeproject.org/publications/PPP-SYEP.pdf>

*Reinvesting in America's Youth: Lessons from the 2009 Recovery Act Summer Youth Employment Initiative*, by J. Bellotti, L. Rosenberg, S. Sattar, A. M. Esposito, and J. Ziegler, Mathematica Policy Research, February 2010, available at:  
[http://www.mathematica-mpr.com/publications/PDFs/labor/youth\\_employment\\_program.pdf](http://www.mathematica-mpr.com/publications/PDFs/labor/youth_employment_program.pdf)

#### **INQUIRIES:**

Inquiries should be directed to the appropriate CSBG regional liaison staff. Contact information is available on the following web address:

<http://www.acf.hhs.gov/programs/ocs/csbg/aboutus/staffassignments.html>

  
Jeannie L. Chaffin  
Director  
Office of Community Services