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ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 01-23

TO: STATE WORKFORCE AGENCIES

FROM: BRENT PARTON 
Acting Assistant Secretary

SUBJECT: Updated Disadvantaged Youth and Adult Data for use in Program Year (PY) 2023 and future Workforce Innovation and Opportunity Act (WIOA) Youth and Adult Within-State Allocation Formulas

1. **Purpose.** This guidance 1) advises states of the availability of disadvantaged Youth and Adult data for use in the WIOA Youth and Adult within-state allocation formulas and, 2) requests that states use this data in their PY 2023 and future within-state allocation formulas.
2. **Action Requested.** States must use the updated disadvantaged Youth and Adult data in their PY 2023 and future PYs for within-state allocation formulas.
3. **Summary and Background.**
 - a. Summary – The statutory formulas to allocate WIOA Youth and Adult funds among and within states requires the use of Disadvantaged Youth and Adults data factors.
 - b. Background – On a periodic basis, the Employment and Training Administration (ETA) notifies states of the availability of updated special tabulations of disadvantaged Youth and Adult data from the American Community Survey (ACS) for use in determining state allotment and within-state allocations starting in PY 2023. This guidance replaces TEGL 14-17.
4. **Availability of Disadvantaged Youth and Adult Data.** ETA posts the updated disadvantaged Youth and Adult data on the ETA Budget website at the following link: <http://www.doleta.gov/budget/disadvantagedYouthAdults.cfm>. The data is updated every five years. ETA used the state-level data posted to this website in the state allotment formula for PY 2023 and future program years. Starting in PY 2023 and in future program years, states must use the updated data posted to the website to determine the number of disadvantaged Youth and Adults for use in their within-state local area allocation formulas.

RESCISSIONS TEGL 14-17	EXPIRATION DATE Continuing
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Appendix A provides additional information on relevant definitions, use of the ACS, and commonly asked questions regarding use of the disadvantaged Youth and Adult data. Appendix B provides a description of the files and their content.

5. **Inquiries.** Questions concerning this guidance should be directed to the appropriate ETA Regional Office.
6. **References.**
 - Workforce Innovation and Opportunity Act Section 2, 107, 127, 128, 132, 133, and 182; P.L. 113-128; 29 U.S.C. 3101, 3121, 3162 (b), 3163 (b), 3172 (b), 3173 (b)
7. **Attachments.**
 - Appendix A: Questions and Answers on Workforce Innovation and Opportunity Act (WIOA) Disadvantaged Youth and Adult Data
 - Appendix B: Description of Website File Contents, Layout, and Caveats

Appendix A

**Questions and Answers on Workforce Innovation and Opportunity Act (WIOA)
Disadvantaged Youth and Adult Data**

1. What is the definition of a disadvantaged Youth or Adult?

See WIOA Sections 127(b)(2)(C) and 132(b)(1)(B)(v)(IV). A disadvantaged Youth is defined as “an individual who is age 16 through 21 who received an income or is a member of a family that received a total family income that, in relation to family size, does not exceed the higher of the poverty line, or 70 percent of the Lower Living Standard Income Level (LLSIL).”

The definition of a disadvantaged Adult is similar; but, per WIOA Section 132(b)(1)(B)(v)(I), the age restriction is 22 to 72. WIOA Section 127(b)(3) requires DOL to exclude college students and members of the Armed Forces on active duty [as defined in 10 U.S.C. section 101(d)(1)] from the number of disadvantaged Youth and Adults to the extent practicable.

The LLSIL is an income level determined annually by the Secretary of Labor based on the most recent lower living family budget issued by the Secretary. The LLSILs used in the special tabulations were those published in 2020 (see Federal Register, Volume 85, Number 84, April 30, 2020, for the year 2020). Notices are located at <https://www.doleta.gov/llsil/>. For American Community Survey (ACS) income data from 2016 to 2020, the Census Bureau adjusted income levels for inflation to compare it with LLSIL and poverty levels for 2020.

2. What additional requirements are there for states with concentrated employment program grant recipients?

The states of Kentucky, Minnesota, and Wisconsin, who have designated local areas served by concentrated employment program (CEP) grant recipients under WIOA Section 107(c)(1)(C), must use the higher of the number of disadvantaged Youth (or Adults) in such areas or the number of individuals age 16 to 21 (or Adults age 22 to 72) in families with an income below the “low-income level” in such area. The low-income level is defined in WIOA Section 127(b)(2)(E) and WIOA Section 132(b)(1)(B)(v)(VII). ETA calculated the following “low-income levels” in the chart below for these states for 2020, which were used by the Census Bureau to develop the special tabulations in Table 8:

Low-Income Level	
	2020
Kentucky	\$48,000
Minnesota	\$46,000
Wisconsin	\$46,000

3. If college students are excluded “to the extent practicable”, why are college students in the labor force included in the counts for Table 6?

We include college students in the labor force because it isn’t possible to exclude them. The Census Bureau cannot distinguish students who work full time from those who work part-time. The Census Bureau can exclude either: 1) all college students or 2) only college students who are not in the labor force. The Census Bureau cannot code special tabulations that exclude college students who work part-time. The Employment and Training Administration (ETA) finds it is better policy to exclude from the calculation of the number of disadvantaged youth only those college students who are not in the labor force. As a result, at the local level, some college towns may have a larger number of youth defined as disadvantaged than what the state feels is justified. ETA recognizes the issue, but it is currently not possible to exclude college students who work part-time from the tabulations.

Demographic data on WIOA Youth and Adult participants suggests that a small percentage of participants are in post-secondary education and working while participating in the programs. This being the case, excluding all college students could remove some potential WIOA participants from the counts of disadvantaged Youth and Adults. According to the most recent WIOA data (Program Year (PY) 2021), 2.2 percent of WIOA Youth participants were in post-secondary education at enrollment. Of those in post-secondary education, 26.6 percent were employed at enrollment. For Adult participants in PY 2021, 10.7 percent were in post-secondary education at enrollment. Of those, 42.9 percent were also employed at enrollment. This suggests that there are adults in the workforce who are taking some college classes who could be WIOA participants and qualify as disadvantaged.

4. Why is ETA using the ACS?

The most recent census, conducted in 2020, did not include the long form survey which ETA previously used to update the disadvantaged data. Instead, ETA worked with the Census Bureau to use data from the ACS.

ACS data is based on a rolling annual sample survey mailed to approximately three million addresses a year over five years. The data used in the special tabulations for disadvantaged Youth and Adults was collected between January 1, 2016 and December 31, 2020. By pooling several years of survey responses, the ACS can generate detailed statistical portraits of smaller geographies that can replace the data no longer collected in the long form of the decennial census.

For more information on the ACS go to <https://www.census.gov/programs-surveys/acs/>.

5. When will the next update of the disadvantaged Youth and Adult data occur?

The Census Bureau releases a new set of five-year estimates every year, but ETA anticipates updating the disadvantaged Youth and Adult data using the ACS only every five years. Therefore, the next update is anticipated to be in time for the PY 2028 allocations.

6. My state's disadvantaged data increased. Why did my state's allotment not also increase?

Allotment amounts are based on a state's relative share of the total number of disadvantaged Youth or Adults, depending on the program, compared with other states' relative shares. An increase in a state's disadvantaged data does not always increase its relative share. Despite increases in the number of disadvantaged data, a state's relative share may decrease, and that could cause the state's allotment amount to decrease.

7. What data files on the website do I need to use?

It depends on how your state defines local areas. Files labeled Table 6 contain data meeting the WIOA definition of disadvantaged Youth and Adults and are available at different geographic levels. Most states will need Table 6 at the County-level (050). Some states may need additional data at the County-Subdivision level (060) and County- or State-Place levels (155 and 160) to develop data sets for their states' local areas. States that are a single area do not need the data at all. The State-level (040) and National-level (010) data are provided for states' information.

Kentucky, Minnesota, and Wisconsin will need additional data in Table 8 because these three states have designated CEPs. CEPs use the higher of the number of disadvantaged Youth or Adults contained in Table 6, or the number of individuals in the appropriate age range with an income below a low-income level (calculated based on the definition described in WIOA Sections 127(b)(2)(E) and 132(b)(1)(B)(v)(VII)). Table 8 contains the number of individuals below these calculated income levels and is available at various geography levels (County 050, County-Subdivision 060, County-Place 155, and State-Place 160).

Arizona, and New Mexico also will need county-level American Indian Area/Alaska Native Area/Hawaiian Homeland Areas (270) data to determine Navajo Nation grant allocation amounts. Similar data at the state level (260) is also provided.

The other tables (1-3, and 7) are provided for states' information, but are not used in the WIOA Adult and Youth formulas. See Appendix B for a further description of the contents of tables 1-8.

Description of Website File Contents, Layout, and Caveats

Website File Contents

The Excel files on the website contain the estimated number of individuals by age that fall within certain defined population groups at various geographic levels. For the Workforce Innovation and Opportunity Act (WIOA) state allotment and within-state allocation formulas, the population meeting the WIOA definition of disadvantaged Youth or Adult is contained in files labeled Table 6. Three states (Kentucky, Minnesota, and Wisconsin) will also need files labeled Table 8. According to WIOA, the age range for disadvantaged Youth is 16 to 21, and the age range for disadvantaged Adults is 22 to 72 years.

The age groups are:

- Total (Persons of all ages (0 and over))
- Persons 0 to 13 years of age
- Persons 14 through 15 years
- Persons 16 through 21 years
- Persons 22 through 24 years
- Persons 25 through 54 years
- Persons 55 through 64 years
- Persons 65 through 72 years
- Persons 73 years and over

The geographic levels are:

- National (010)
- State (040)
- County (050)
- County-Subdivision (060)
- County-Place (155)
- State-Place (160)
- State-Level American Indian Area/Alaska Native Area/Hawaiian Homeland Areas (260)
- County-Level American Indian Area/Alaska Native Area/Hawaiian Homeland Areas (270)

The population groups include:

- Table 1A- Total number of persons, including persons living in housing units and persons living in Institutional or Non-Institutional Group Quarters.
- Table 1B- Total number of persons in the poverty universe (excludes unrelated individuals under 15 years of age, persons living in Institutional Group Quarters, persons

in college dormitories, and persons in military group quarters). The above-listed groups are not in the poverty universe. Persons not in the poverty universe do not have a poverty status. They are neither poor nor non-poor.

- Table 2- Number of persons in the poverty universe who have a 2020 inflation adjusted income in the past 12 months below the standard Census Bureau’s poverty threshold for that person. This is the number of persons in poverty.
- Table 3- Number of persons who had a 2020 inflation adjusted income (family or individual) in the past 12 months below 70 percent of the Lower Living Standard Income Level (LLSIL) published in Federal Register, Volume 85, Number 84, April 30, 2020, for the year 2020. Notices are located at <https://www.doleta.gov/llsil/>. The Census Bureau compared the LLSIL threshold for a person to his (or her) income in the past 12 months in the following manner:
 - If a person was a member of a family, the Census Bureau used their family income to compare with the appropriate LLSIL threshold (those for 2-person families, 3-person families, 4-person families, etc.).
 - If a person was a member of a Non-Family household or a Group Quarters person (either Institutional or Non-Institutional), the Census Bureau used the person income to compare with the appropriate LLSIL threshold (those for a 1-person family).
 - If a person was in a family household, but was a non-relative to the householder, the Census Bureau used the person income to compare with the appropriate LLSIL threshold (those for a 1-person family).
- Tables 4 and 5 were not posted to the website but are available upon request. Please contact your regional representative, who in turn will contact the national office, if this presents any state or local entity with an issue. Table 4 provides the number of persons who satisfy the requirements of Table 2 or Table 3 above. This includes persons in poverty but not below 70 percent of LLSIL, persons not in poverty but below 70 percent of LLSIL, and persons both in poverty and below 70 percent of LLSIL. Table 5 provides the number of persons in poverty (Table 2) excluding college students (undergraduate and graduate) not in the labor force (Employment Status Recode (ESR) of 6) or persons on active duty in the armed forces (ESR of 4 or 5) during the appropriate 2016-2020 American Community Survey (ACS) reference week.
- Table 6- The number of persons who satisfy the requirements of Table 2 or Table 3 (persons in poverty but not below 70 percent of LLSIL, persons not in poverty but below 70 percent of LLSIL, and persons both in poverty and below 70 percent of LLSIL) excluding college students (undergraduate and graduate) not in the labor force (ESR of 6) or persons on active duty in the armed forces (ESR of 4 or 5) during the appropriate 2016-2020 ACS reference week. **The population in Table 6 meets the definition of a disadvantaged Youth or Adult.**
- Table 7- The number of persons in the civilian labor force. The universe of Table 7 is limited to persons 16 years and over who were employed (ESR – 1 or 2) or unemployed (ESR = 3) during the appropriate 2016-2020 ACS reference week.
- Table 8- The number of persons living in Kentucky, Minnesota, and Wisconsin (the three states that have designated local areas served by a concentrated employment program (CEP)) who received a 2020 inflation-adjusted income (either family or person) below the specified state “low-income levels” listed below. The “low-income levels” below

were calculated according to the definition in WIOA Section 127(b)(2)(E) and WIOA Section 132(b)(1)(B)(v)(VII).

Low-Income Level	
	2020
Kentucky	\$48,000
Minnesota	\$46,000
Wisconsin	\$46,000

Website File Layout

The layout of the data in the files posted at <https://www.dol.gov/agencies/eta/budget/formula/disadvantagedyouthadults> is very similar to what was provided to states in 2018. Each file contains a different geographic level of detail (for example, state versus county) and a different population group, but all fifty-two state entities (including DC and Puerto Rico) are contained in each file. Each file contains two tabs. One tab contains the ACS data tabulations obtained from the Census Bureau (labeled “Census Orig” with the appropriate table number identifying the population group). On the “Census Orig” data tab, geography and age extend down the Y axis. This tab also includes margin of error information the states may find helpful. On a second tab, ETA used pivot tables to reformat the data provided by the Census Bureau to make it easier to use. The second tab contains just the number of individuals by age group meeting the population group definition for the file. This tab has been formatted to read age across the X axis instead of down the Y axis. Because each file contains information for all fifty-two state entities, filters have been added so that states can select their state or counties of interest.

The “Census Orig” tab contains nine columns:

- TBLID – Table Identifier
- GEOID – Geographic Code Identifiers (For most summary levels, a concatenation of FIPS codes)
- GEONAME – Geographic Area Name
- TITLE – Description of Row Estimate
- SUMLEVEL – Census Bureau Summary Level Code
- ORDER – Order of Table Values (Identifies a particular characteristic across the geographic areas in a summary level. The values are repeated for each geographic area)
- CEST – Estimate
- CME – Margin of Error on Estimate at the 90-percent confidence level
- SOURCE – Source of data

Notes

Please note that the lower-level geographies may not sum to the higher-level geographies. The Census Bureau separately tallied and rounded counts for each geographic summary level. Therefore, the U.S. counts do not equal the sum of the state counts and counts for a particular state do not equal the sum of the county counts for that state, and so on. Also, the Total columns, or rows if using the “Census Orig” format, were tallied and rounded separately. For example, Total Persons, All Ages, may not always equal the sum of the eight (or six) age categories for Total Persons.

Additionally, please note Census Bureau documentation regarding a data processing error impacting 2016-2020 Hispanic Origin data at <https://www.census.gov/programs-surveys/acs/technical-documentation/errata/129.html>.

Also, some files may have blank cells because the Census Bureau's Disclosure Review Board (DRB) requested that the Census Bureau suppress any areas where the table universe contains less than 3 persons. Tables that contain a universe of 1 or 2 unweighted person counts are a disclosure risk and the Census Bureau is now required to suppress that data.