

# Follow the Money:

Funding and Legislative Opportunities on the Horizon for Communities to Serve Disconnected Youth

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February 2010

### About the CCRY Network

The Communities Collaborating to Reconnect Youth (CCRY) Network is an affinity group of communities that have invested in considerable capacitybuilding and innovation to reach and reconnect youth who are disconnected from school and employment. The network is as a collective learning environment that promotes peer-to-peer learning and hands-on assistance in disseminating and expanding best practice, especially in communities with high levels of youth distress. The network aims to bring attention to the work and innovative practice that is occurring in communities across the country, and to make input into state and federal policy on issues affecting disconnected youth in distressed communities.

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### **Looking to the Future**

By Rhonda Tsoi-A-Fatt, Linda Harris & Kisha Bird

For so long, disconnected youth have been an invisible population. Not engaged in school or in work, these young people are often regarded as lacking ambition, a sense of purpose, or drive. As a result, investment in opportunities for this population of young people has historically been negligible. We now face an enormous problem – more than 5 million youth between the ages of 16 and 24 are not employed and not in school. This issue is particularly pressing in distressed communities, where large concentrations of disconnected youth lack access to resources that will help to get them back on track.

The issue of high school reform and college- and career-readiness have become a national priority, both in terms of policy and funding. The President has articulated his goal that, "by 2020, America will once again have the highest proportion of college graduates in the world." This goal is only achievable if equal focus is placed on getting both high-performing and disconnected students the skills necessary to succeed in college, where they can attain  $21^{st}$  century skills to secure meaningful employment in a global economy.

Several pieces of legislation have been proposed or passed that present opportunities to fund programs in communities to keep young people connected to school and recapture those who have fallen by the wayside. Most of these resources, however, are from competitive funding streams which will require communities to demonstrate innovative practice in planning and implementation. Communities need to be aware of these potential opportunities very early in the process in order to plan strategically and create partnerships to program at-scale and meet the needs of their disconnected youth.

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### American Graduation Initiative (Title V. Sec 503) of the Student Aid and Fiscal Responsibility Act (SAFRA) H.R.3221

#### **Description**

The American Graduation Initiative is a small component of complex legislation aimed at increasing college access and completion. Section 503 provides for grants to be awarded to local entities by the Secretary of Education, in conjunction with the Secretary of Labor, to support innovative programming or programs of demonstrated effectiveness that lead to the completion of a postsecondary degree, certificate, or industry-recognized credential leading to a skilled occupation. Priority is to be given to applications focusing on serving low-income, nontraditional students who do not have a bachelor's degree, and who have one or more of the following characteristics:

- Are the first generation in their family to attend college;
- Have delayed enrollment in college;
- Have dependents;
- Are independent students;
- Work at least 25 hours per week; and
- Are out-of-school youth without a high school diploma.

#### **Status**

Passed in the House. Senate has been working on companion legislation but in the context of Budget Reconciliation. Movement on reconciliation is tied up with Health Care Reform. Thus, timing is not clear.

#### **Funding and Flow**

\$7 Billion (half allocated to state grants / half to eligible local entities) over 10 year period. Competitive grants will be to local eligible entities which are community colleges, some public 4 year institutions, States in partnership with community colleges, or consortium of the above. Minimum grant amount is \$750,000 for four year period and grants require a match, although hardship waivers can be granted.

### **Activities That Can Be Supported**

Below is a subset of the allowable activities that relate most directly to youth development programs:

- Expanding, enhancing, or creating academic programs or training programs, which shall be carried out with industry or sector partnerships that provide relevant job-skill training (including apprenticeships and worksite learning and training opportunities) for skilled occupations in high-demand industries.
- Providing student support services, including
  - intensive career and academic advising;
  - labor market information and job counseling; and
  - transitional job support, supportive services or assistance in connecting students with community resources.
- Creating workforce programs that provide a sequence of education and occupational training that leads to industry-recognized credentials, including programs that
  - blend basic skills and occupational training that lead to industry-recognized credentials;





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- integrate developmental education curricula and instruction with for-credit coursework toward degree or certificate pathways; or
- advance individuals on a career path toward high-wage occupations in highdemand industries.
- Building or enhancing linkages, including the development of dual enrollment programs and early college high schools

### Requirements for Partnerships or Coalitions

Priority to entities engaged in partnerships; Application must detail how entity will partner with industry sectors, the public employments system and local workforce boards.

## Requirements for Demonstrating Effectiveness, Performance or Evaluation

Each applicant must provide quantifiable benchmarks in the following areas as appropriate:

- Closing gaps in enrollment and completion rates for
  - groups underrepresented in higher education; and
  - groups of students enrolled at the eligible entity who have the lowest enrollment and completion rates.
- Addressing local and regional workforce needs.
- Establishing articulation agreements between two-year and four-year public institutions of higher education within a State.

- Improving comprehensive employment and educational outcomes for postsecondary education and training programs, including—
  - > student persistence from one academic year to the following academic year
  - > the number of credits students earn
  - the number of students in developmental education courses who subsequently enroll in credit bearing coursework
  - transfer of general education credits between institutions of higher education, as applicable
  - completion of industry-recognized credentials to work in skilled occupations in high-demand industries
  - transfers to four-year institutions of higher education, and
  - job placement related to skills training or associate's degree completion.

Applicant must report annually against those benchmarks.

### Approaches & Interventions for Consideration

The allowable activities are all interventions where there are strong examples of local communities doing innovative work. Communities not currently engaged in these activities may want to learn more about particular approaches and determine local applicability. Communities may want to use this funding as an opportunity to work with area colleges to further programs of concurrent enrollment; to explore customizing certificate programs on the credit side; to create formal bridge programs that link pre-vocational training that is currently occurring in the youth system with career pathways at postsecondary institutions.

For more information on the American Graduation Initiative, see http://www.clasp.org/federal\_policy/pages?id=0020

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# Investing in Innovation (i3) Fund

#### **Description**

The Investing in Innovation (i3) Fund is a competitive grant administered by the Department of Education as established under the American Recovery and Reinvestment Act of 2009 (ARRA) to expand the implementation of, and investment in, innovative and evidence-based practices, programs and strategies that significantly:

- improve K-12 achievement and close achievement gaps;
- decrease dropout rates;
- increase high school graduation rates; and
- improve teacher and school leader effectiveness.

These grants will allow eligible entities to expand and develop their work so that their work can serve as models of best practices, allow eligible entities to work in partnership with the private sector and the philanthropic community, and identify and document best practices that can be shared and taken to scale based on demonstrated success. Eligible applicants are LEAs OR nonprofit organizations in partnership with one or more LEAs or a consortium of schools. In order to be eligible to apply, applicants must:

- Have significantly closed the achievement gaps between groups of students;
- Have demonstrated success in significantly increasing student academic achievement for all groups of students;
- Have made significant improvement in other areas (graduation rates, high-quality teachers and school leaders); and

• Demonstrate that they have partnerships with the private sector that will provide matching funds.

Applicants will submit proposals to one of three categories: "Scale-up", "Validation", or "Development." The level of evidence supporting the idea will determine which category is most appropriate.

#### **Status**

Proposed priorities and requirements were released on October 9, 2009 for public comment.

Public comment period ended November 9, 2009.

DOE anticipates releasing final notice and application materials in late winter/early spring 2010. A two-tier application process is proposed, where applicants submit a pre-application and, after screening, some applicants are invited to submit a full application.

### **Funding Flow**

The Department of Education anticipates accepting applications in early 2010, with all applications due in early spring of 2010. The department will obligate all i3 funding by September 30, 2010. The total funding level is 650,000,000.

#### **Activities That Can Be Supported**

Absolute Priorities – Must apply under one of these areas:

- Innovations that support effective teachers and school leaders
- Innovations that improve the use of data
- Innovations that complement the implementation of high standards and high-quality assessments





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Innovations that turn around persistently low performing schools

Competitive Priorities – Competitive preference given to applicants who address one of these areas:

- Innovations for improving early learning outcomes
- Innovations that support college access and success
- Innovations to address the unique learning needs of students with disability and limited English proficient students
- Innovations that serve schools in rural local education agencies

### Requirements for Partnerships or Coalitions

Nonprofit organizations may apply for these funds. They are required to be working in collaboration with LEA(s) or a consortium of schools. The LEA(s) or consortium of schools must be identified prior to grant award. If not identified in the application, a full description of the potential LEA(s) or schools must be provided, along with the process for selecting who will be the final partners. In the case of a nonprofit applicant, the partner LEA(s) or schools do not have to meet the eligibility requirements outlined. The nonprofit must demonstrate success and meet eligibility requirements working with any LEA(s) or schools in the past.

(NOTE: All information for this funding stream is based upon the proposed priorities published by the Department of Education in October 2009. As such, this information is subject to change upon the release of final priorities in early 2010)

### Requirements for Demonstrating Effectiveness, Performance or Evaluation

Scale-up grants require strong evidence. Strong evidence means evidence from previous studies whose designs can support causal conclusions, and studies that in total include enough of the range of participants and settings to support scaling up to the State, regional, or national level.

Validation grants require moderate evidence. Moderate evidence means evidence from previous studies whose designs can support causal conclusions but have limited generalizability, or studies with high external validity but moderate internal validity.

Development grants require a reasonable hypothesis that the implemented program would have promising outcomes.

### Approaches & Interventions for Consideration

- Out-of-school time supportive services i.e. tutoring, mentoring, career development, internships
- Alternative school partnerships
- Service learning partnerships
- Dropout recovery program models such as credit recovery
- Career pathway programs, particularly those with a tie to community college matriculation
- Emphasize serving a targeted subset of the student population who either have been identified as having disabilities or limited English proficiency

For more information on the Investing in Innovation Fund, see http://ed.gov/programs/innovation/factsheet.html



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# The Social Innovation Fund (SIF)

#### **Description**

The Social Innovation Fund, a new public-private collaboration created by the 2009 Edward M. Kennedy Serve America Act, is designed to create new knowledge about how to solve social challenges in the areas of economic opportunity, youth development and school support, and healthy futures, and to improve our nation's problem-solving infrastructure in low-income communities. Resources are devoted to investing in promising, innovative nonprofit organizations to help them strengthen their evidence-base and develop the infrastructure to address our national challenges in communities of need.

#### **Status**

In Fiscal Year 2010, the Corporation will award up to \$50 million in Federal funding to an estimated five to seven intermediary organizations. The Corporation for National and Community Service (CNCS) just ended their comment period for the Draft Notice of Funds Available (NOFA) and are expected to release final notice in February 2010.

### **Funding Flow**

Funding is authorized to the CNCS. CNCS will award grants to existing grantmaking intermediaries or grantmaking partnerships (which can include a non-profit grantmaking institution, high engagement philanthropic organization, or local government office) that are required to provide a 1:1 cash match. Annual awards, which will extend for five years, are expected to be in the range of \$5 to \$10 million.

Community organizations will then, receive financial support from intermediaries on the order of no less than \$100,000 per year for three to five years, as well as strategic support in areas such as management, and evaluation. Community organizations must also provide a 1:1 cash match for the total amount—Federal and private dollars—they receive from the intermediaries. The cash match requirement from community organizations is not final, though it was included in the Draft NOFA issued. By statute, SIF intermediaries must select sub-grantees on a competitive basis.

#### **Activities That Can Be Supported**

The SIF grantmaking intermediaries must have the ability to identify innovative solutions, invest in growth and replication, track records of using vigorous evidence, expertise in area focus, and depth of relationships with issue or regional stakeholders. The grantmaking intermediaries will have a choice of applying for an Issue Area or Geographically-based SIF. There are three Priority Areas that community organizations can address:

- Economic Opportunity Increasing the economic opportunities for economically disadvantaged individuals;
- Youth Development and School Support –
  Preparing America's youth for success in school,
  active citizenship, productive work, and healthy
  and safe lives; and
- Healthy Futures –Promoting healthy lifestyles, and reducing the risk factors that can lead to illness.

Specific activities are not prescribed. Rather, the SIF is designed to allow grantmaking institutions along with community partners to identify and programmatic approaches that have the likelihood of transformation change.





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#### **Requirements for Partnerships or Coalitions**

SIF is intended to support a national network of funds, led by community experts, which identify and invest in promising organizations that demonstrate impact in low-income communities. There are specific partnership requirements for community-based organizations.

## Requirements for Demonstrating Effectiveness, Performance or Evaluation

SIF calls for an emphasis on evidence- and whenever possible grantmaking intermediaries to fund programs with well-designed and well-implemented experimental or quasi-experimental studies that demonstrate the program-approach has a sizable impact. There is an explicit commitment funding promising efforts in order to build the evidence about what works, improve programs, and inform future investments.

CNCS will use definitions of impact and evidence consistent with those defined in the Investing in Innovations fund at the Department of Education. These include:

- Strong Impact: Impact with substantial likelihood of yielding major change in life outcomes. For example, a mentoring program that cut youth crime by 2% would not meet this standard but a mentoring program that cut youth crime by 20% would.
- Strong Evidence: Evidence from previous studies who designs can support causal conclusions (that have high internal validity) and studies that include enough of a range of participants and settings to support scaling up to the state, regional, and national. Examples include: more

than one well-designed, well-implemented experimental study; or well-designed and well-implemented quasi-experimental study that supports the effectiveness of a practice, strategy, or program; one large, well-designed and well-implemented randomized controlled, multi-site trial.

- Moderate Evidence: Evidence from previous studies whose designs can support causal conclusions but have limited generalizability.
- Preliminary Evidence: Evidence that is based on a reasonable hypothesis supported by research findings. Examples can include outcome studies that track program participants; pre and post test research.

### Approaches & Interventions for Consideration

- Share this opportunity with existing funders or funding collaborative that support approaches to the SIF youth development priority. This can include local and national funders.
- Working with existing partners, such as youth council, or other local, regional, or state youth collaborative(s) develop inventory of the current practices and approaches to reconnect to youth, identify areas where your community would like to expand and/or bring a specific intervention to your community, such as a bridge to college program, urban corps, dual enrollment, or specific apprenticeship or internship model that because of lack of resources partners have been unable to implement.
- Use SIF as an opportunity to further expand the menu of education and workforce options for reconnecting and off-track youth.

For more information on the Social Innovation Fund, see http://www.nationalservice.gov/



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### RAISE UP ACT (Reengaging Americans in Serious Education by Uniting Programs Act)

#### **Description**

This legislation is about building intentional dropout recovery systems at the local level. RAISE UP supports a community-wide systemic approach to provide opportunities and strengthen supports for youth across workforce development, secondary education, and postsecondary education systems to achieve their secondary and postsecondary credentials and succeed in the labor market. Priority will be given to applications from eligible entities proposing to serve areas with disproportionately high numbers of young people who have left secondary school without obtaining a diploma, and applications that serve areas with high concentrations of young people from low-income families.

#### **Status**

Senate (S. 1608) introduced 8/6/2009 by Senator's Stabenow, Brown, Franken, and Gillibrand. It now has 5 co-sponsors; House (H.R.3982) introduced 11/2/2009 by Representatives Kildee and Ehlers. It now has 41 co-sponsors.

Advocates and supporters envision RAISE UP as a separate title under WIA to be administered by the US Department of Labor, ETA Administration in partnership with the US Department of Education. Focused on reconnecting out of school out of work youth, it would build on lessons learned from Youth Opportunity Grants and other community-wide efforts.

#### **Funding Flow**

Upon passage, the funds will be administered by the Department of Labor (in consultation with Departments of Education, Health and Human Services, Housing and Urban Development, the U.S. Attorney General, and the Federal Youth Development Council) to award grants to community partnerships to integrate existing, often disparate services, into a comprehensive, cross-systems dropout recovery approach. Grants would be given to the partnerships, who would then sub-grant funds to provide services that focus on education, job training, and wraparound support services.

Authorization: This bill is authorized at \$1 billion for FY10, and "such sums as may be necessary" for FY11-FY14. Minimum grant amounts will be no less than \$1,000,000 per year for a period of five years. Grants must be provided for serving urban, rural, and suburban areas; and communities with varying degrees of experience and expertise in serving young people in disadvantaged situations. Planning Grants are authorized in the House Bill for a duration of not more than 6 months in an amount of not more than \$50,000; or for a duration of not more than one year and in an amount of not more than \$100,000.

### **Activities That Can Be Supported**

Youth must receive at least one service from among three categories of services: workforce preparation, education assistance, and youth support. This includes but is not limited to:

- Workforce preparation: job training, meaningful internship and apprenticeship opportunities, national and community service, and compensation for summer and year-round employment opportunities;
- Education assistance: tutoring, career and technical education, dual enrollment programs, early college high schools, financial assistance,





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- and post secondary programs, which may include attainment of a GED, if the GED attainment is an element of the pathway toward achieving a postsecondary credential; and
- Youth Support: case management, health services, mental health services, or drug treatment services; housing, transportation, childcare, and mentoring.

Not less than 75 percent the young people served should include youth who dropped out of secondary school, or with academic skills at/below the 8<sup>th</sup> grade level, or who face barriers to employment, or who were previously homeless, or who were previously under the care of the State child welfare agency.

### Requirements for Partnerships or Coalitions

Eligible entity must include local representatives from the following:

Mayor, or other appropriate chief executive officer, of a unit of general purpose local government in such community; educational agency or agencies; juvenile justice system; criminal justice system; workforce system; housing agency; mental health agency; child welfare agency; state agency serving youth in such community; an institution of higher education, which may include a community college; community-based organization; a business; a representative of – a secondary school, a labor management committee; and young people in disadvantaged situations, and parents or caregivers of young people in disadvantaged situations.

Local partnerships or coalitions will:

- Assess the needs and potential resources in the community;
- Integrate disparate community resources into a comprehensive strategy;
- Set goals and performance measures;

- Provide high school dropouts with education assistance, workforce preparation, and youth support (including wraparound services ranging from drug treatment to housing); and
- Measure and report results.

# Requirements for Demonstrating Effectiveness, Performance or Evaluation

{The following is lifted from H.R.3982. The Senate version (S. 1608) does not include GED language.} Interim, transitional, and long-term indicators of performance are used. Programs will be required to measure youth participation in activities; youth progress and attainment of a secondary school diploma or a GED and job readiness; entrance into post-secondary education and employment; and attainment of secondary, post-secondary, and/or industry credential or certificate.

### Approaches & Interventions for Consideration

The allowable activities support an approach where there are strong examples of local communities doing innovative work. Communities not currently engaged in these activities may want to explore successful work in other communities of similar demographic composition. To prepare for this funding opportunity, communities can begin to consider what cross-systems partnerships currently exist, and how can they be strengthened to support the requirements of this funding, particularly in the area of data sharing. Communities can also assess the size and composition of their disconnected youth population. By creating a community-wide inventory of programmatic interventions, communities can determine gaps in services, based on the population to be served.

For more information on the RAISE UP Act, see http://www.clasp.org/issues/pages?type=youth&id=0005



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### Youth Prison Reduction through Opportunities, Mentoring, Intervention, Support, and Education Act – The Youth Promise Act (YPA)

### **Description**

The purpose of the legislation is to shift juvenile justice policies from punishment and incarceration to evidence-based prevention and intervention. YPA provides funding for evidence-based and promising practices related to juvenile delinquency and criminal street gang activity prevention and intervention to help build individual, family, and community strength and resiliency to ensure that youth lead productive, safe, healthy, gang-free, and law-abiding lives.

#### **Status**

The Youth PROMISE Act (H.R. 1064/S.435) was introduced in the 111th Congress by Representatives Bobby Scott (D-VA) and Mike Castle (R-DE) in the House and Senators Bob Casey (D-PA) and Olympia Snowe (R-ME) in the Senate. The bill currently has over 225 co-sponsors in both chambers of Congress. A broad coalition of advocates from the juvenile justice, law enforcement, and child and youth development fields are working to get the bill passed in consideration with the Juvenile Justice and Delinquency Prevention Act of 1974.

#### **Funding Flow**

YPA authorizes several grant programs toward meeting its broad goals and objectives. Outlined here are funds available in Title II of the legislation, PROMISE Grants. Administrator of the Office of Juvenile Justice and Delinquency Prevention is authorized to award grants to units of local government and Indian Tribes to assist PROMISE Coordinating Councils with planning and implementation. These grants will be coordinated through the PROMISE Advisory Panel.

Planning Grants for Promise Coordinating Councils: appropriated for FY 2010 at \$300,000,000. Duration up to one year - maximum grant amount is \$300,000. Coordinating Councils are charged with creating a PROMISE plan based on assessment of community issues, resources, and gaps in services.

Implementation Grants: Grant awards shall not be for more than \$10,000,000 per year for each year of the four-grant period. Requires 25% non-federal cash or in-kind match from local unit of government receiving PROMISE grant.

### **Activities That Can Be Supported**

- Youth Promise Implementation Grants can include investments in quality evidence-based prevention and intervention programs (such as early childhood, voluntary home visiting, mentoring, mental health, job training and afterschool, school-based programs, summer jobs and recreation).
- Serves youth primarily age 18 and younger; and allows for promising approaches to be funded if outcomes from an evaluation demonstrate practice reduces juvenile delinquency and criminal street gang activity

### Requirements for Partnerships or Coalitions

Establishes PROMISE Coordinating Councils (PCCs). This council will include representatives from law enforcement, court services, schools, social





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service, health and mental health providers, and community-based organizations, including faithbased organizations. PCCs will:

- Assess their own community's needs and strengths;
- Evaluate current funding opportunities; and
- Develop a comprehensive plan for implementing evidence-based and promising prevention and intervention strategies

PCCs will focus on prevention and addressing the needs of youth already in the delinquency system. These strategies will be targeted at young people who are at-risk of becoming involved, or involved in, gangs or the criminal justice system to redirect them toward productive and law-abiding alternatives.

The legislation also creates a PROMISE Advisory Panel to work with PCCs in assessing communities' current needs and prioritize areas with the greatest needs for assistance, which is coordinated with the Office of Juvenile Justice and Delinquency Prevention.

### Requirements for Demonstrating Effectiveness, Performance or Evaluation

YPA requires its grants to be measured against the following criteria:

- prevention of involvement by at-risk youth in juvenile delinquency or criminal street gang activity;
- diversion of youth with a high risk of continuing involvement in juvenile delinquency or criminal street gang activity; and
- financial savings from deferred or eliminated costs, or other benefits, as a result of such programs and activities, and the reinvestment of savings.

There is funding for evaluation: The Administrator of the Office of Juvenile Justice and Delinquency Prevention will award grants to institutions of higher education to facilitate the evaluation process and measurement of achieved outcomes; and identify evidence-based and promising practices used by Promise Coordinating Councils under PROMISE Implementation grants that have proven to be effective in preventing involvement in, or diverting further involvement in, juvenile delinquency or criminal street gang activity.

### Approaches & Interventions for Consideration

The allowable activities support a number of activities that communities have used as a part of a comprehensive strategy for disconnected and highrisk youth. Communities not currently engaged in these activities may want to explore successful work in other communities of similar demographic composition. Partnerships between the juvenile justice, workforce, and education systems have shown positive outcomes for young people. A few key elements that communities may consider are:

- intensive case management services
- educational opportunities and consistent supports to persist in education
- year-round employment opportunities for youth to remain engaged in work and build sustainable skills
- transitional support services such as job readiness training, life skills, individual counseling, or career and educational planning

For more information on the Youth Promise Act, see http://www.bobbyscott.house.gov/

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# (Temporary Assistance for Needy Families) TANF Emergency Fund

#### **Description**

The American Recovery and Reinvestment Act of 2009 (ARRA) created a new \$5 billion TANF Emergency Fund. Subsidized employment has long been an allowable use of TANF block grant funds, and the TANF Emergency Fund now allows states to draw additional funds if they increase their TANF-related spending in three categories, one of which is subsidized employment. States that increase TANF or state funds claimed as maintenance of effort on subsidized employment in federal FYs 2009 or 2010 (as compared to the equivalent quarter in FYs 2007 or 2008) can receive 80 percent of that increase back as additional federal dollars. Only the State TANF agency can apply for these funds, but local or private third-party expenditures can be claimed as Maintenance of Effort (MOE), with the third party's permission, as long as they do not come from another federal funding stream and are not claimed as match or MOE for another program.

#### **Status**

The TANF Emergency Fund is scheduled to end on September 30, 2010. However, the President's budget proposal calls for an additional \$2.5 billion for the emergency fund in FY 2011. The proposal would also expand the allowable uses of the Emergency Fund to include employment-related services and allow subsidized employment to be claimed for 100 percent reimbursement rather than 80 percent.

#### **Activities That Can Be Supported**

To qualify for the Emergency Fund based on increases in subsidized employment, the state must have an increase in expenditures on subsidized employment compared to the equivalent quarter in the base year, FY 2007 or 2008, whichever had the lower total expenditures on subsidized

employment. States do not need to have a caseload increase to qualify for the Emergency Fund on the basis of increased expenditures on subsidized employment.

Subsidized employment is defined as "payments to employers or third parties to help cover the cost of employee wages, benefits, supervision or training." HHS specifically directs states to include "all expenditures related to operating a subsidized employment program, including the cost of overseeing the program, developing work sites, and providing training to participants."

HHS has issued guidance saying that employer costs of training and supervision can be claimed as equal to 25 percent of wage costs without additional documentation. That means that such in-kind contributions can count as the 20 percent non-Emergency Fund contribution that is required.

In general, TANF subsidized jobs programs are targeted to low-income parents with children (including non-custodial parents) and to youth who meet a state definition of "child."

### Approaches & Interventions for Consideration

If TANF funds are anticipated to be used to support summer jobs: If TANF funds are being used in summer 2010 to support summer jobs, and it represents an increase from the base year (2007 or 2008), then 80% of that increase should be eligible for re-imbursement from the Emergency Fund.

If non-TANF funds are being directed to support summer jobs, transitional jobs for youth, youth corps, or other subsidized work for youth: If non-TANF state or local funds were used or are being programmed for use during the period October 2008 to September 30, 2010 and this funding represents an increase over the base period, these funds may be eligible for 80% reimbursement.

For information about the TANF Emergency Fund, see www.clasp.org/TANFEmergencyFund