

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.