**WIOA Plan Modifications – TANF Presentation – November 18, 2021**

**TITLE SLIDE/FIRSTSLIDE: Requirements for Considerations for WIOA Unified and Combined State Plans Modifications and Beyond.**

Welcome to the TANF portion of the webcast for the requirements for considerations for WIOA unified and combined state plans.

**SECOND SLIDE:**

Hello, I am Karen Clairmont, a Program Specialist in the Office of Family Assistance (OFA) in the Administration of Children and Families (ACF) of the U.S. Department of Health and Human Services (HHS).

**THIRD SLIDE: How Well Does the Current WIOA Plan Address TANF?**

As you are aware, the deadline for submitting the two-year modification for the W.I.O.A. plans is March 15, 2022.

As you prepare the state plan modifications, please consider the 4 questions below to determine how well your current plan addresses families receiving or eligible for TANF. Are there areas where the state could improve?

* Does the state’s comprehensive analysis of workforce development activities adequately consider low-income individuals with barriers to employment, such as **TANF** recipients?
* Does the plan fully describe how the state intends to serve low-income individuals with barriers to employment?
* Is **TANF** well integrated into the operational planning elements?
* Does the state plan clearly describe joint planning and coordination among the core and partner programs?

**FOURTH SLIDE: Opportunities for Integration and Alignment**

The Workforce Innovation and Opportunity Act provides innovative opportunities for workforce development, human services, and education and training providers to work in partnership to help low-income individuals gain and keep employment.

The Department of Health and Human Services and the Administration for Children and Families in particular, is strongly committed to working in partnership with the same common goal…to help low-income individuals with barriers to employment receive the necessary training, support services, and skills development so that they may achieve economic success.

The W.I.O.A. legislation has further opened the door for TANF agencies to work closely with our workforce partners.

W.I.O.A. emphasizes priority for services to recipients of public assistance and other low-income individuals who are basic skills deficient.

The plan should demonstrate how workforce partners coordinate employment and training services for TANF and other low-income individuals.

**FIFTH SLIDE: WIOA Plan Modification**

W.I.O.A. requires all states to submit a plan modification every two years and update their strategies based on changes in the labor market, economic conditions or other factors affecting the implementation of the plan. States submitted their new four-year plans in March 2020 at the beginning of the COVID-19 pandemic and its significant impact on our country had only just begun.

It is critical during this plan modification that states consider the impact of the COVID -19 pandemic on low income populations and ensure that the modification reflects these changed economic conditions, adjust strategies, and work diligently with workforce partners to identify the current needs of low-income individuals with barriers to employment. The plan modification should explain clearly how they address these issues.

For combined plan programs such as TANF that have a different planning cycle from W.I.O.A., states should submit a program-specific modification that aligns with the planning cycle for that program, unless the two-year W.I.O.A. modification cycle can accommodate that program’s cycle.

A state may choose to submit the two-year modification as a TANF plan renewal, which would meet the TANF statutory requirements.

**SIXTH SLIDE: WIOA Plan Modification: Is it a TANF State Plan Renewal?**

In Section 402(a) of the Social Security Act, TANF requires states to have submitted a plan within 27 months of the end of the first fiscal quarter in order to receive TANF funds for that FY. It’s basically a two-year cycle but also includes the first quarter of the current fiscal year.

All W.I.O.A. combined plans began on 07/01/20. As reflected on the chart, the WIOA combined plans with TANF are in effect for FY 21 and FY 22. However, the first FY that does not include 07/01/20 in the TANF submission range is FY 23. Therefore, states must submit new plans for FY 23, no later than 12/31/22.

**SEVENTH SLIDE: WIOA Plan Modification: Options**

A state has the option to:

Submit its TANF plan renewal as a part of its W.I.O.A. combined plan modification by March 15, 2022. If a state chooses to renew the TANF portion of its plan, it is required to include the Governor’s signed certifications and ensure that the required 45-day public comment period for TANF plan renewals be included.

OR

Submit its TANF plan renewal as required by section 402 of the Social Security Act, by the end of the first quarter of FY 23 (i.e., no later than 12/31/22). The state is required to include the Governor’s signed certifications and ensure that the required 45-day public comment period for TANF plan renewal is included. I want to make it clear that the WIOA plan still replaces the state’s prior existing TANF plan.

I would like to include a reminder to states: if someone other than the Governor signs the TANF certifications, the state must submit a delegation of authority letter signed and dated by the Governor indicating who has been given the authority to sign on the Governor’s behalf.

**EIGHTH SLIDE: WIOA Plan Modification: Other Considerations**

We encourage states that don’t currently include TANF as a plan partner to include it. A W.I.O.A. TANF partnership can help states address the scarcity of resources by streamlining separate agency efforts which could benefit TANF recipients in the following ways: increased job placements; better access to the labor market; and a broader range of wrap-around services available.

States can amend the TANF portion of the plan at any time. If states have changes to make to program specific requirements, revisions can be completed in the portal.

It is important to note that states should communicate to the TANF Regional Office whether the plan modification submission is a TANF plan renewal, and amendment, or no changes were made to the TANF portion of the plan. Proper notification of a state’s intent will help to avoid confusion which could result in a lapse in funding.

**NINTH SLIDE: Key Requirements for TANF Portion**

Here are some things to keep in mind as you prepare the TANF portion of the combined state plans--

The state plan **must address all** of the requirements of section 402(a) of the Social Security Act, including the certifications signed and dated by the Governor or designated authority.

As you may recall for the previous state submission, the portal was not capable to receive the signed Governors’ certifications. The portal still does not have that capability. We remain hopeful that this feature will be added to the portal sometime in the future.

States need to send signed and dated certifications to the appropriate TANF Regional Offices prior to the end date of the current plan.

**TENTH SLIDE: Other Thoughts**

Conditional approval letters will be drafted by DOL and signed by the W.I.O.A. Interagency Partners once plan reviews are completed.

If a state submits a TANF plan renewal, HHS will send a separate letter once the TANF portion of the plan is determined complete.

**ELEVENTH SLIDE: Resources**

Here is a listing of some of the resources available on our website related to partnering with W.I.O.A. that you may find helpful.

**TWELFTH SLIDE: THANK YOU**

In closing, I hope that you have found the information in this webcast useful. However, should you have additional questions on anything that has been discussed, please feel free to reach out to your TANF Regional Office.

Thank you.