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Area 11: Local Policy
Self Sufficiency

PURPOSE:

The purpose of this policy is to provide guidance to the OhioMeansJobs Center Franklin County (OMJCFCCFC) in the provision of training services to adults and dislocated workers.

I. BACKGROUND

The term "self-sufficiency" refers to the economic standard that specifies the income needs of families and is the standard Area 11 uses when determining eligibility for WIOA training services. Pursuant to section 134 (c)(3)(A)(i)(I) of WIOA, for adults and dislocated workers to receive training services, they must need such service to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment. As part of the determination of the appropriateness for training services, Talent Development Specialists (TDS) must review "family self-sufficiency" for participants seeking WIOA adult-funded Individualized and/or Training Services.

II. Individual Criteria

ASPYR has set the criteria for self-sufficiency at 300% of the Federal Poverty Guideline.

An individual in Franklin County shall be considered not self-sufficient, thus eligible for WIOA training services when at the point of registration:

- A. The individual's gross earned income is not above 300% of the federal poverty guidelines; or
- B. The individual is a member of a family whose combined gross earned income is not above 300% of the federal poverty guidelines for its actual family size; or
- C. The individual has already been determined to be eligible for public assistance or a federal means-tested program (i.e., SNAP, TANF, Medicaid).

Priority must be given to recipients of public assistance, other low-income individuals,

individuals who are basic skills deficient, and Veterans.

III. <u>Determine Economic Self-Sufficiency</u>

Pursuant to section 134 (c)(3)(A)(i)(I) of WIOA, for adults and dislocated workers to receive training services, they must need such service to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment.

For working dislocated workers, the determination of economic self-sufficiency requires a two-step assessment of the worker's employment:

- A. Determine if the employment is "interim employment."
- B. If the employment is not "interim," determine if the wage is at least the locally defined level of self-sufficiency or if the hourly wage is comparable to or higher than wages from previous employment.

It should be noted that workers who have received notice of layoff but have not yet been laid off and who do not have any other sources of employment are not subject to review of economic self-sufficiency.

IV. Interim Employment for Dislocated Workers

Typically, employment is considered interim if the salary is below the salary of the dislocated worker's primary occupation and/or if the dislocated worker is working under the skill level of his or her customary occupation. There may be circumstances where interim employment does provide a sufficient wage temporarily but is not considered permanent employment that leads to economic self-sufficiency (e.g., working through a temporary agency). The determination about whether a dislocated worker's employment is interim employment must be made on a case-by- case basis and must take into consideration the dislocated worker's personal, family, financial, and employment situation.

A dislocated worker who is in interim employment is not considered to be self-sufficient even if the hourly wage exceeds the lower living standard income or if the hourly wage is comparable to or higher than the wages from previous employment.

If a dislocated worker has interim employment, this participant is considered unemployed at participation, and information should be entered into the State of Ohio's Case Management System.

V. Wage Standard for Non-Interim Employment for Dislocated Workers

Employed dislocated workers whose wages are over the self-sufficiency standard or comparable to or higher than the wages from previous employment are considered economically "self- sufficient" unless the employment is considered "interim employment." Dislocated workers determined to be economically "self-sufficient" may only receive career services.

VI. Family Criteria

If the individual is a member of a family whose combined gross income is not above 300% of the Federal Poverty Level Guideline, she or he will be eligible. Please reference WIOA law and eligibility guidelines for the definition of "Family" below.

SIZE OF FAMILY UNIT	100% POVERTY GUIDELINE	300% POVERTY GUIDELINE
1	\$15,650	\$46,950
2	\$21,150	\$63,450
3	\$26,650	\$79,950
4	\$32,150	\$96,450
5	\$37,650	\$112,950
6	\$43,150	\$129,450
7	\$48,650	\$145,950
8	\$54,150	\$162,450
For each additional family member	\$5,500	\$16,500

The chart below shows family size and the 300% federal poverty guidelines.

According to the <u>MIT living wage calculator</u>, a living wage in 2025 in Franklin County for one adult is \$46,259.2 annually (2,080 hours per year). This breaks down to \$22.24 an hour, \$3,854.93 monthly.

VII. Definitions

Family: Per 20 C.F.R. 675.300, two or more persons related by blood, marriage, or decree of court, who are living in a single residence and are included in one or more of the following categories:

- 1. A married couple and dependent children.
- 2. A parent or guardian and dependent children.

3. A married couple.

Family self-sufficiency: An economic standard that uses a combination of family members' incomes to determine whether the participant has the means to fund training services.

Interim employment (also known as stop-gap employment: Employment that has been accepted for income maintenance prior to, and/or during, participation in career or training services with the intention of ending such employment at the completion of the career or training services and entry into permanent, unsubsidized employment as a result of the services. Interim employment is accepted because the affected workers have lost the primary occupation for which their training, experience, or work history qualifies them. Interim employment can be part-time

or full-time and must not be with the same employer from which the affected workers were dislocated.

Poverty line: The income level defined by the federal Office of Management and Budget and revised annually by the United States Department of Health and Human Services in accordance with section 673(2) of the Community Services Block Grant Act (42 U. S. C. 9902(2)).

Priority population: Individuals who have barriers to employment, who are on public assistance, and who are basic skills deficient are given priority to receive individualized career services and training services. This priority must be consistent with priority of services for veterans and eligible spouses.

Self-sufficiency: Per section 134 (a)(3)(A)(xii) of WIOA and 20 C.F.R. 680.140(b)(6), an economic standard that specifies the income needs of families, by family size, the number and ages of children in the family, and local area geographical considerations.

Underemployment: An individual who is working part-time but desires full-time employment, or who is working in employment not commensurate with the individual's demonstrated level of educational and/or skill achievement. Also, includes individuals who fall below the dislocated worker self-sufficiency threshold, as defined by ASPYR (Area 11).

References:

20 C.F.R. 675.300

42 U. S. C. 9902(2)

https://livingwage.mit.edu/counties/39049

https://www.federalregister.gov/documents/2018/01/18/2018-00814/annual-update-of-the-hhs-poverty-quidelines

ODJFS WIOA Policy Letter 15-19 Poverty Income Guidelines and Lower Living Standard Income Level 38 U.S.C. 4213

ODJFS, Workforce Innovation and Opportunity Act Policy Letter No. 15-20.1, Priority of Service for Veterans and Eligible Spouses, (August 18, 2017).

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Approved:

Original Policy approved 3/1/19
*Board Approval Not Required