

**DRAFT DIRECTIVE
COVER PAGE**

70 Percent LLSIL, Poverty Guidelines, and Self-Sufficiency Levels for 2024

GENERAL INSTRUCTIONS

The attached directive is being issued in draft to allow the Workforce Development Community to review and comment prior to final issuance.

Submit any comments by email no later than **Wednesday, October 18, 2024**

All comments received within the comment period will be considered before issuing the final directive. Commenters will not be responded to individually. Rather, a summary of comments will be released with the final directive.

Comments received after the specified due date will not be considered.

Email: MRodarte@tularewib.org
Include **"Draft Directive Comment"** in the email subject line.

Mail: Workforce Investment Board of Tulare County
Attn: **Mary Rodarte**
309 W. Main St., Ste. 120
Visalia, CA 93291

If you have any questions, contact **Mary Rodarte** at 559-713-5200



DIRECTIVE

Workforce Investment Board of Tulare County

Date: **Month XX**, 2024

TUL 24-05 70 Percent LLSIL, Poverty Guidelines, and Self-Sufficiency Levels for 2024

EXECUTIVE SUMMARY

This policy provides guidance and establishes the procedures regarding the 70 Percent Lower Living Standard Income Level (LLSIL) and poverty guidelines for determining low-income status for the Workforce Innovation and Opportunity Act (WIOA) Title I eligibility. This policy applies to all Local Workforce Development Areas (Local Area) and is effective immediately.

This Directive contains some WIB-imposed requirements. All WIB-imposed requirements are indicated by ***bold italic*** type.

This Directive supersedes WIB Directive TUL 23-03 dated November 8, 2023. Retain this Directive until further notice.

REFERENCES

- Workforce Innovation and Opportunity Act (WIOA) Sections 3(36), 127(b)(2)(C), 132(b)(1)(B)(v)(IV), and 134(d)(1)(A)(x)
- Title 20 Code of Federal Regulation (CFR) Part 675: Introduction to the Regulations for the Workforce Development Systems Under Title I of the WIOA, Section 675.300
- Federal Register, US Department of Labor (DOL) (LLSIL Guidelines)
- Federal Register, US Department of Health and Human Services (HHS) (Poverty Guidelines)
- Employment Development Department of California, WSD 24-02 August 20, 2024, Workforce Services, 70 Percent LLSIL and Poverty Guidelines for 2024.

BACKGROUND

WIOA Section 3(36)(A) sets the criteria Local Areas must use to determine an individual's low-income status for the purpose of WIOA Title I program eligibility. These criteria include two sets of data: 70 percent of the LLSIL as published by DOL and the poverty guidelines as published by HHS.

The WIOA requires annual revisions to LLSIL and poverty guidelines (WIOA Sections 3[36][B]). The HHS updates the poverty guidelines annually using information from the Consumer Price Index for All Urban Consumers (CPI-U). All Local Areas in California use the same poverty guidelines. The DOL updates LLSILs annually by using the CPI-U to reflect cost of living increases. For LLSILs in California, there are two broad geographic designations: West: Metro and West: Non-Metro areas. Additionally, the DOL identifies metropolitan statistical areas (MSA) in California that have unique LLSILs.

To accurately apply the LLSIL, Local Areas are categorized into different MSAs based on geographical designations. The Office of Management and Budget defines geographic designations called Core Based Statistical Areas (CBSA), which include MSA, micropolitan statistical areas, combined statistical areas, and metropolitan divisions. The Employment Development Department (EDD) uses area delineations of the CBSAs to determine if a Local Area belongs in the West: Metro, West: Non-Metro, or one of the unique MSAs.

It is important to note that Tulare County is classified as a West Metropolitan area. Therefore, the West Metropolitan area LLSIL and poverty guidelines were used to establish the 70 Percent Poverty Guidelines and Self-Sufficiency levels for 2024 for Tulare County,

POLICY AND PROCEDURES

Follow these steps to determine if a person is a low-income individual:

1. The Tulare County 70 Percent LLSIL and Poverty Guidelines for 2024 are attached to this directive, Attachment A. Use the highest of either the 70 Percent LLSIL or Poverty Guidelines for the appropriate family size to determine low-income status. Comparing the applicant's actual family income during the six-month income determination period with the six-month figures on the chart enables the reviewer to determine income status.
2. Local Definition of Self-Sufficiency

According to the Employment Development Department (EDD), local Workforce Development Boards (WDBs) are responsible for establishing the criteria that define whether employment leads to self-sufficiency. At the very least, these criteria must stipulate that self-sufficiency is achieved when one's employment income equals or exceeds 100 percent of the Local Living Standard Income Level (LLSIL) set for a specific Local Area. ***In alignment with this directive, the WIB has set forth its own criteria for evaluating whether employment results in self-sufficiency. To assess whether***

employed Adults (including employed Dislocated Workers) meet these self-sufficiency standards, the following criteria must be used:

- a. ***When determining WIOA Title I eligibility for employed adults, refer to Attachment A, Table 2, to determine the self-sufficiency level for the appropriate family size. Comparisons of the applicant's actual family income during the six-month income determination period with 175% of the six-month figures on the chart enable the reviewer to determine self-sufficiency status. Any employed Adult who is not considered to be economically self-sufficient is eligible to receive WIOA Title I career and training services.***
- b. ***Any employed Dislocated Worker who is not earning 85% of their hourly dislocation wage is eligible to receive WIOA Title I career and training services.***

ACTION

Notify all affected staff of the changes to the LLSIL, poverty guidelines, and Self-Sufficiency Guidelines for Tulare County in this Directive.

INQUIRIES

Please direct inquiries regarding this Directive to the WIB at (559) 713-5200.

Adam Peck
Executive Director

ATTACHMENTS

- A. Tulare County 70 Percent LLSIL and Poverty Guidelines and Employed Adult Worker Self-Sufficiency Guidelines for 2024

70 Percent LLSIL and Poverty Guidelines and Employed Adult Worker Self-Sufficiency Guidelines for 2024

The Lower Living Standard Income Level (LLSIL) and poverty guidelines are used to establish low-income status for Workforce Innovation and Opportunity Act (WIOA) Title I programs. Local Workforce Development Areas (Local Area) use the LLSIL to determine youth eligibility, eligibility of employed adults for certain services, and self-sufficiency.

Since the income received during the six-month period immediately prior to the individual's application for WIOA-funded services is used for income determination, each chart below shows the six-month, as well as the annual, figures for each family size. A comparison of the applicant's actual family income during the six-month income determination period with the six-month figures on the charts allows the reviewer to immediately determine an individual's eligibility.

Table 1 - 70% LLSIL and Poverty Guidelines for Tulare County									
Family Size									
	1	2	3	4	5	6	7	8	Each Add'l add
70% LLSIL									
Annual	\$13,951	\$22,864	\$31,391	\$38,751	\$45,726	\$53,483	\$61,240	\$68,997	\$7,757
6 Months	\$7,530*	\$11,432	\$15,696	\$19,376	\$22,863	\$26,742	\$30,620	\$34,499	\$3,879
100% LLSIL									
Annual	\$19,930	\$32,663	\$44,844	\$55,359	\$65,323	\$76,404	\$87,486	\$98,567	\$11,081
6 Months	\$9,965	\$16,331	\$22,422	\$27,679	\$32,661	\$38,202	\$43,743	\$49,284	\$5,541
Poverty Guidelines									
Annual	\$15,060	\$20,440	\$25,820	\$31,200	\$36,580	\$41,960	\$47,340	\$52,720	\$5,380
6 Months	\$7,530	\$10,220	\$12,910	\$15,600	\$18,290	\$20,980	\$23,670	\$26,360	\$2,690
*Determination of low-income status for a Family Size of 1 based on the Poverty Guidelines									

Table 2 - Employed Adult Worker Self-Sufficiency Guidelines for Tulare County Based on 175% of LLSIL									
Family Size									
	1	2	3	4	5	6	7	8	Each Add'l add
175% of 100% LLSIL									
6 Months	\$17,439	\$28,580	\$39,239	\$48,439	\$57,158	\$66,854	\$76,550	\$86,246	\$9,696