TO: WIB Service Providers and WIB Staff

SUBJECT: TULARE COUNTY SELF-SUFFICIENCY LEVEL

EXECUTIVE SUMMARY:

Purpose:

This directive issues the Workforce Investment Board’s self-sufficiency criteria for employed workers.

Scope:

The self-sufficiency criterion is used as a condition for providing intensive and training or retraining services to employed adults and dislocated workers. The self-sufficiency criterion does not apply to WIA Title IB Youth Programs and unemployed adults. Use the higher of the Lower Living Standard Income Level (LLSIL) or the HHS Poverty Guidelines when determining income eligibility for Youth and unemployed adults. LLSIL and Poverty Guidelines change annually, therefore you must reference the WIB Directive issuing current LLSIL/Poverty Guidelines.

Effective Date:

This Directive is effective on date of issue.

REFERENCES:

- EDD Workforce Services Directive WSD10-6, 70 Percent LLSIL and Poverty Guidelines for 2010, September 17, 2010
- WIA Section 134(d)(3)(A)(ii); 20 CFR Part 652, 663.230; 663.240; 663.245; 663.250
- Federal Register, Volume 68, Number 104, WIA; LLSIL (June 25, 2004)
- Federal Register, Volume 69, Number 30, Annual Update of the HHS Poverty
- U.S. Census Bureau, Poverty 1999, Current Population Survey
- Official USDA Food Plans, Family Economics & Nutrition Review, Volume 12, Number 2, Summer 1999
- Making Ends Meet, How Much Does It Cost To Raise A Family In California?: A Publication of the California Budget Project, September 2001

WORKFORCE INVESTMENT BOARD (WIB)-IMPOSED REQUIREMENTS

This directive contains WIB-imposed requirements in bold, italic font.

FILING INSTRUCTIONS:

This directive supersedes WIB Directive TCWIBD-04-1 dated August 15, 2005. Retain this directive until further notice.
BACKGROUND:

WIA Section 663.230 of CFR Part 652, et al. requires a definition, established by the local board, of economic self-sufficiency for determining Employed Adults and Employed Dislocated Workers eligibility for intensive and training services to obtain or retain employment that allows for self-sufficiency. At a minimum, the criterion provides that self-sufficiency means employment that pays at least 100 percent of the LLSIL established for the local area.

Unlike predecessor employment and training programs, WIA opens up employment and training services to employed adults and dislocated workers. In doing so, the Act establishes certain criteria that employed workers must meet in order to receive services beyond core services. The term "self-sufficiency" in Sec. 663.220(b) only applies in the context of establishing eligibility for employed adults and employed dislocated workers to receive intensive services under WIA. A determination that an employed adult or dislocated worker is in need of intensive services to obtain or retain employment that allows for self-sufficiency is one of the criteria for the receipt of such services. This provision serves as a "limiter" in determining service eligibility for such employed workers, which helps ensure that intensive services are provided to those employed adults or dislocated workers most-in-need of such services, such as individuals employed in low skill/low wage jobs and dislocated workers who may be working but who have not achieved the wage replacement rate for self-sufficiency defined by a State or Local Board for dislocated workers.

The following process was followed to determine the self-sufficiency level for eligible participants in Tulare County. The Bureau of Labor Statistics' 1998 Consumer Expenditure Survey Table based on the size of the consumer unit was presented to a workgroup for discussion. This table included elements (food, utilities, entertainment, etc.) of consumer spending. The workgroup consisted of Workforce Investment Department staff and Service Provider representatives. The workgroup discussed each element on the list and decided if it was a requirement for a four-member family to be self-sufficient. The group defined self-sufficiency as requiring no subsidies (food stamps, healthy families insurance, etc.) to survive.

The elements for self sufficiency were determined to be: food, utilities, phone, housekeeping supplies, clothing, transportation, health care, outside of the home activities, personal care products and services, education costs, childcare and taxes. A dollar figure was assigned to each of these elements.

The elements were divided into basic needs and controllable costs. The basic need elements are food, housing, utilities and health care. Industry averages were used to determine the amount allocated for the basic needs. When available, Tulare County averages were used (housing, utilities). The controllable cost elements are: housekeeping supplies, clothes, transportation, outside of the home activities, personal care products and services, education, childcare and taxes. A reasonable amount was allocated to these controllable cost elements. The income taxes were compiled, as a percentage of the income required to be self-sufficient.

POLICY AND PROCEDURES:

Local Definition of Self Sufficiency

1. Employed Adults (includes employed Dislocated Workers):

   A. When determining WIA Title IB eligibility for employed adults, use the current LLSIL 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 WIA Title IB intensive and training services. or

   B. Any Employed Dislocated Worker who is not earning 85% of their hourly dislocation wage is eligible to receive WIA Title IB intensive and training services.
Sample – Use Current LLSIL When Determining Self-Sufficiency Levels

<table>
<thead>
<tr>
<th>Family Size</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>6-Month LLSIL</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>$4,722</td>
<td>$7,738</td>
<td>$10,624</td>
<td>$13,115</td>
</tr>
<tr>
<td>6-Months 175% LLSIL</td>
<td>$4722 x 1.75% = $8,264</td>
<td>$7738 x 1.75% = $13,542</td>
<td>$10624 x 1.75% = $18,592</td>
<td>$13115 x 1.75% = $22,951</td>
</tr>
</tbody>
</table>

The WIA requirement to establish a local definition of economic self-sufficiency to determine the eligibility for employed adults, does not change the WIB's Strategic Five-Year Local Plan that gives priority to serve the following low-income customers:

- Veterans that are current or former (within the last six months) public assistance / food stamp recipients and/or low-income
- Non-veterans that are current or former (within the last six months) public assistance / food stamp recipients and/or low-income
- Persons with disabilities whose own income meets the requirements of a program described in A and B, above, but is a member of a family whose own income does not meet such requirements

**ACTION:**

1. Notify all affected staff of the self-sufficiency levels.
2. Begin using the information in this directive to determine eligibility for employed adults and employed dislocated WIA Title I-B clients.

**INQUIRIES:**

Please direct inquiries about this bulletin to the Workforce Investment Board, at (559) 713-5200.

Adam Peck
Executive Director

AP:DM:EC:MS