



---

## Low-income, Self-Sufficiency, & Eligibility for Training Services

# Squares & Rectangles

- Low-Income & Self-Sufficiency are not interchangeable terms, but can be related.
- If you are low-income, you are considered to be lacking self-sufficiency.
- If you are lacking self-sufficiency, you are not necessarily low-income.

# Definitions

- **Low-Income**

- Statutorily defined: States and Local Areas do not have the flexibility to change this definition
- An individual who meets any one of the following criteria:
  - Recipient of SNAP, TANF, SSI, or state or local income-based public assistance (individual or family receipt of these benefits within the last 6 months);
  - Member of a family with a total family income that does not exceed to the higher of the HHS poverty line or 70% of the LLSIL;
  - Is a homeless individual;
  - Receives or eligible to receive a free or reduced-price lunch;
  - Is a foster youth on behalf of whom state or local government payments are made; **OR**
  - Is an individual with a disability whose own income meets WIOA's income requirements [...]
    - Reminder: Individuals with a disability are considered a family of one
- Low-income also includes youth living in a high poverty area
- Mainly a priority category or indicative of a barrier, as not everyone receiving WIOA services needs to be low-income
- Generally, low-income status cannot be verified by self-attestation

# Definitions

- **Self-sufficiency**

- An individual is declared to “lack self-sufficiency” if:
  - Have a family income that is at or below 100% of the LLSIL;
  - Receipt of SNAP or TANF (current or within the last six months);
  - Receives SSI; **OR**
  - An individual (single family of one) who is employed, but in a job earning less than the living wage hourly rate for the State of Georgia (see living wage calculator section of TCSG OWD Policy Manual)
  
- State defines minimum standards, but LWDBs may adjust as they deem appropriate
  - Cannot adjust higher than 200% (per conversations with USDOL ETA)
  - Why might this be helpful?
    - If your area finds that you are encountering folks that have family incomes that are slightly too high to be considered for training services by the state standard, you may want to adjust it locally. If the individual is already considered self-sufficient at 100% of the LLSIL, but you know that realistically your local economics require a higher income level, then you could petition the LWDB to raise your local self-sufficiency standard in order to serve those individuals.
    - Example: For a family of 2 in Dekalb –
      - » Economic self-sufficiency is \$22,566 by the state standard of 100% of the LLSIL
      - » Economic self-sufficiency is \$45,132 by Dekalb’s LWDB-approved standard of 200% of the LLSIL

# When to Consider Income?

- Reminder: We are always looking at family income, unless the individual is considered a family of one (i.e., truly a single individual or an individual with a disability)
- Basic WIOA eligibility
  - Adult: Unemployed or underemployed
  - Dislocated Worker: N/A
  - In-school Youth: All ISY must be low-income (5% exception)
  - Out-of-School Youth: Low-income status is not required, but may be the youth's barrier
- Eligibility for Training Services
  - This is where self-sufficiency comes into play – can the individual obtain or retain self-sufficiency without the training service (i.e., can a “lower” service meet their needs)?
  - Applies to *everyone* seeking training services, but may be supported by documentation already collected for basic WIOA eligibility
- Eligibility for Supportive Services
  - Local policy can influence this as not all LWDA's require income to receive supportive services (i.e., enrolled full time in training/school may make them eligible for SS)

# Questions

- 20 CFR 680.210: “Training services may be made available to employed and unemployed adults and dislocated workers who, among other criteria...
  - Are unlikely or unable to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment through career services;
  - Are in need of training services to obtain or retain employment leading to economic self-sufficiency or wages comparable to or higher than wages from previous employment”;
  - Must have skills and qualification to participate successfully in training; selected training that is directly linked to employment opportunities; AND unable to obtain assistance from other sources”
  
- “Grey areas” regarding self-sufficiency:
  - “Unlikely or unable” & “to obtain or retain”: Flexible language
  - Let’s say an eligible individual is currently employed and considered economically self-sufficient (assuming they are not significantly above the standard). However, any of these factors could influence their ability to retain self-sufficiency and may justify the need for a training service:
    - The individual will lose their employment without additional skills or knowledge the training service could provide and would result in them no longer meeting self-sufficiency standards;
    - The individual is expecting a child and the additional person will result in them no longer meeting the self-sufficiency standard; or
    - If another family member’s income is contributing to the determination of self-sufficiency but that income is ending and would result in them no longer meeting self-sufficiency standards

# Questions

- If an Adult participant is unemployed, must they also be low-income to receive career services?
  - Apart from ISY\*, no entire eligibility category is required to be low-income to receive career or training services. However, unemployment **may** imply that the individual is low-income and place them in a priority category
    - Reminder: Family income could make the difference here
- Do Adults need to be low-income to receive training services?
  - They don't need to be considered low-income; however, they need to be lacking self-sufficiency to be eligible for training services.
  - If they are low-income, then they are automatically considered to be lacking self-sufficiency.
  - If their status as low-income is supported by documentation already collected and family income has been considered, no additional documentation is required to support their eligibility for training services.

\*Even for ISY, there is the 5% exception

# Questions

- Is homelessness an indicator that an individual is lacking self-sufficiency?
  - Yes, an individual experiencing homelessness is low-income by definition; and therefore, is lacking self-sufficiency.
  - Additional documentation for self-sufficiency is not necessarily required, assuming supporting documentation for their status as low-income/homeless was already collected.
  - For homeless individuals, the following documentation would be sufficient to support their eligibility for training services and/or supportive services\*:
    - Self-attestation (to homelessness)
    - Written statement or referral from a shelter or social service agency
    - Needs assessment
    - Case notes
    - Signed IEP/ISS
    - A letter from caseworker or support provider

\*In addition to any determination of need documentation required by local policy (i.e., Supportive Service request form)
- But I thought we couldn't verify low-income status via self-attestation?
  - Homelessness is the only criteria under low-income where self-attestation may be allowable if no other supporting documentation can be collected
  - Where possible, we want to avoid documentation being a barrier to service for eligible individuals (but must meet minimum requirements)



# Questions

- Self-sufficiency for Dislocated Workers?
  - Yes, anyone seeking to enroll in a training service needs to be lacking self-sufficiency
    - No eligibility category automatically triggers the need for training services. Some categories of DW may imply that need, but we need to support that the training service is necessary to meet the individual's need versus a “lower” service
    - If a participant can obtain or retain economic self-sufficiency through career services only, training is not justifiable
  - The only reason this might not be supported by the documentation already collected for basic WIOA eligibility is that income isn't necessarily a consideration for DWs at initial intake
    - If they are unemployed, it's almost a given that they will be lacking self-sufficiency
      - And depending on which DW category they fall into, it may be easily determined/already documented (see next slide for more detail)
    - If they are employed, they may still be under the self-sufficiency level but we need to verify that (which may require additional documentation)
      - Per *TCSG OWD Policy Manual 3.2.3(III)*, “Dislocated workers may be considered to lack self-sufficiency if they are employed, but in a job/occupation that is at a wage or skill level that is significantly less than the job of dislocation.”
      - DW underemployment is defined as:
        - » Employed but earning wages that are 85% or less of the salary that was paid at the employer of dislocation **OR**
        - » Is in employment that uses significantly less skills or abilities than that job of dislocation and is not commensurate with the individual's demonstrated level of educational attainment

# Questions

- When might I need to collect additional documentation to support eligibility for training services for Dislocated Workers?
  1. Individual was terminated/laid off through no fault of their own, eligible for/exhausted UI benefits, AND is **unlikely to return** to a previous industry or occupation
    - The unlikely to return piece is what supports their eligibility for training services (see link to checklist on resources slide) so no additional documentation would be required
  2. Employer closure\*
    - Consider why the employer is closing, additional documentation *may* be required
    - While this scenario is usually due to a declining industry or occupation, there may be other reasons and the industry/occupation could be still be a viable option for the individual to return to. If that were the case, we may be able to serve this individual with career services only.
  3. Self-employed & unemployed as a result of general economic conditions or natural disaster
    - Documented by State or local LMI **OR**
    - Demonstrated impact due to natural disaster (this could be a case note, but the situation should be clear)
  4. Displaced homemaker\*
    - Consider their experience and industry/occupation
    - Example: Individual was a teacher prior to staying home to care for their children. They become a displaced homemaker due to the death, divorce, or job loss of their spouse/family member supporting them.
      - Maybe the gap in work history is off-putting to employers, but with some resume help or interview coaching we may be able to get this individual re-employed as a teacher.
      - However, training services may still be justified if you can support the argument that a teacher's salary in the LWDA would not pay enough for them to be self-sufficient or that they need some additional certification to get back into teaching/to make a self-sufficient wage

\*Indicates that additional documentation may need to be collected to support eligibility for training services

# Questions

- CONTINUED...When might I need to collect additional documentation to support eligibility for training services for Dislocated Workers?
  
- 5. Separating service member
  - Automatically meets the definition of unlikely to return and is therefore eligible for training services
  
- 6. Active duty military spouse
  - Automatically meets the definition of unlikely to return, per State policy, and is therefore eligible for training services
  
- 7. Underemployed\*
  - Documented wages that are 85% or less than salary at employer of dislocation **OR**
  - Using significantly less skills than job or dislocation & not commensurate with demonstrated level of educational attainment
  - Example: An individual is dislocated from their employer and has a significant work history in IT. They take a job earning 80% of the previous salary because they have a family, need the income to support their family, and may not have the time to find the “right job.”
    - We may be able to assist with resume development or interviewing techniques to help this individual market their skills and get them back to a comparable wage.
    - OR we may determine that their certification is out-of-date and they need training services to get that next job making a comparable wage.
  
- 8. Separated for cause, filed an appeal to UI & determined to be at “no fault” and eligible for UI\*
  - This does not make them automatically eligible for training services, and they need to be determined as unlikely to return to the previous occupation/industry (see Unlikely to Return checklist)

\*Indicates that additional documentation may need to be collected to support eligibility for training services

# Other potential indicators of need for training services

- Determined to be basic skills deficient
- Inability to receive comparable wages or higher from previous employment due to offender status
- Lacks required certification to continue in an occupation they have experience in but no accredited education (i.e., book keeper with no Excel, Word, or Quickbooks certification)

# Basic Principles to Consider

- When you encounter situations that may not be cut and dry, consider these questions:
  - What documentation do I already have?
  - Can we present a reasonable argument to justify these services?
  - Does the case file provide a full picture?
    - Case note, case note, case note!
- Ask OWD – [WIOAprograms@tcsg.edu](mailto:WIOAprograms@tcsg.edu)

# Citations & Resources

- Policies & Guidance: <https://www.tcsg.edu/worksource/resources-for-practitioners/policies-guidance/>
- TCSG OWD Policy Manual
  - Section 3.2.3: Family Size, Income Determination and Self-Sufficiency Standards
  - 3.2.5 Adult & Dislocated Worker Participant Eligibility for WIOA and Priority of Service
  - 3.2.6 Youth Participant Eligibility for WIOA
- WIG PS-16-006 Unlikely to Return
  - Attachment: Unlikely to Return Checklist & Acceptable documentation
- WIG PS-20-004 LLSIL for Low-Income & Self-Sufficiency 2021
- WIG PS-21-001 Data Validation for Individuals with Barriers to Employment
  - Attachment A: Individuals with Barriers Checklist
  - Attachment B: Low Income Checklist
  - Attachment C: Individuals with Barriers FAQs