

**Capital Region Workforce Partnership (CRWP)**  
**Workforce Development Board (WDB)**  
**Workforce Innovation and Opportunity Act (WIOA) Service Policy #SP110**

**Self Sufficiency**

**References:**

WIOA sec. 3(36)20 CFR 680.600, Training and Employment Guidance Letter (TEGL) 3-15, WIOA sec. 3(24), 20 CFR 680.640. TEGL 10-09, WIOA sec. 134(c)(3)(A), 20 CFR 680.780 and TEGL 22-04

**Effective Date:** December 15, 2017

**Replaces:** Resource Management Policy #2

**Purpose:**

The purpose of this policy is to provide guidance to Board-contracted service providers with respect to determining eligibility for training services under the Workforce Innovation and Opportunity Act (WIOA).

This policy applies only to Adults and Dislocated Workers who were employed on the date of participation under the WIOA program. It does not apply to individuals who are not employed on the date of participation.

**Background:**

In addition to providing career and training services to individuals who are unemployed, there remains a significant population of job seekers who are underemployed. Individuals who are underemployed may include:

- Individuals employed less than full-time who are seeking full-time employment;
- Individuals who are employed in a position that is inadequate with respect to their skills and training;
- Individuals who are employed who meet the definition of a low-income individual; and
- Individuals who are employed, but whose current job's earnings are not sufficient compared to their previous job's earnings from their previous employment, per State and/or local policy

In recognition of the above, WIOA regulations allow for training services to 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, and
- 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.

The WIOA allows enrollment of employed adults and dislocated workers who are not earning a self-sufficient wage. WIOA requires that local workforce boards set the criteria for determining whether an employed applicant needs WIOA Title 1 funded adult or dislocated worker services to obtain or retain employment leading to self-sufficiency.

The regulation provides maximum flexibility, requiring only that self-sufficiency mean employment that pays at least the Lower Living Standard Income Level. The regulation allows self-sufficiency for a dislocated worker to be defined in relation to a percentage of the lay-off wage.

## **Policy**

### **Adults**

For adults, self-sufficiency is to be calculated using the Massachusetts Institute's Living Wage Calculator, which may be accessed at: <http://livingwage.mit.edu/>. This site provides a living wage calculation for each jurisdiction in the state, by family size, and should be accessed by staff at the date of determination to document if the participant's current income is providing a living wage.

Many self-sufficiency models are based on poverty levels, but those models do not account for living costs beyond a very basic food budget. The federal poverty measure does not take into consideration costs like childcare and health care that not only draw from one's income, but also are determining factors in one's ability to work and to endure the potential hardships associated with balancing employment and other aspects of everyday life. Further, poverty thresholds do not account for geographic variation in the cost of essential household expenses.

The living wage model is an alternative measure of basic needs. It is a market-based approach that draws upon geographically specific expenditure data related to a family's likely minimum food, childcare, health insurance, housing, transportation, and other basic necessities (e.g. clothing, personal care items, etc.) costs. The living wage draws on these cost elements and the rough effects of income and payroll taxes to determine the minimum employment earnings necessary to meet a family's basic needs while also maintaining self-sufficiency.

*Limitation: In a program year (July 1 through June 30), only up to 49% of the total number of adults enrolled may be enrolled using the self-sufficiency criteria, in accordance with the Board's Priority of Service policy.*

### **Dislocated Workers**

For Employed Dislocated Workers self-sufficiency shall be defined as employment which provides the worker a wage that is equal to or greater than 85% of his or her wage at the time of dislocation.

For calculation purposes, the word "wage" and "income" are interchangeable for this policy. Therefore, the wage/income to meet the 85% criteria may be calculated by either:

- Comparing the hourly wage at time of dislocation to the current hourly wage.
- Comparing the monthly income (total earnings for the month) to the current monthly earnings.

**Signed By:**

  
Director