Greater Memphis Workforce Development Board

SHELBY · LAUDERDALE · TIPTON · FAYETTE

# **GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT BOARD (GMLWDB)**

## **GREATER MEMPHIS LOCAL WORKFORCE DEVELOPMENT AREA**

**EFFECTIVE DATE:** July 1, 2020

**DURATION:** 

**POLICY:** 

Self-Sufficiency

Indefinite

**PURPOSE:** This policy (i) outlines the procedure; (ii) defines the self-sufficiency wage threshold; and (iii) specifies related acceptable documentation and any applicable exceptions.

**REFERENCE(S):** WIOA of 2014 (Pub.L. 113-128), July 22, 2014 §134(C)(A); 20 CFR Part 663.230

#### BACKGROUND

Pursuant to WIOA §134©(3)(A), adults and dislocated workers may receive Training Services provided that such individual needs Training Services to obtain or retain employment that leads to economic self-sufficiency as described in 20 CFR 663.230. The Workforce Innovation and Opportunity Act of 2014 provides that the Local Workforce Development Board (LWDB) must establish criteria for determining whether employment leads to self-sufficiency. In other words, the LWDB must establish a self-sufficiency wage standard that is used to determine an employed individual's eligibility for WIOA Training Services. To be eligible for Training Services, individual must earn wages that are at the level which is less than wages that would enable self-sufficiency. In establishing the self-sufficiency threshold, the LWDB may take into consideration family size and local economic conditions. At a minimum, the self-sufficiency threshold must equal the lower living standard income level (LLSIL), as defined in WIOA §3(36)(B).

On March 21, 2012, the GMLWDA Executive Committee unanimously approved a self-sufficiency threshold of fifteen dollars (\$15.00) per hour earned wages, as ratified by the LWDB on May 23, 2012, to apply in the determination of eligibility for individuals requesting Training Services under Title I of the Workforce Innovation and Opportunity Act of2014 (WIOA). On July 18, 2012, the GMLWDA Executive Committee approved a Revision to establish the self-sufficiency wage as fifteen dollars (\$15.00) earned wages per hour based on full-time employment or thirty-one thousand two hundred dollars (\$31,200) annual income, as ratified by the LWDB on July 25, 2012.

#### ACTION/POLICY

This policy establishes a self-sufficiency wage standard that shall be used to determine whether an employed adult or dislocated worker is eligible for WIOA Training Service Programs. The self-sufficiency

wage standard will allow GMLWDA to:

- Extend services to low-income workers and place them on a path to self-sufficiency.
- Assist in developing customized training programs by targeting high-wage occupations and industry sectors of the economy.
- Offer training in occupations with career ladders that lead to self-sufficiency.
- Make job-training programs that lead to self-sufficiency a priority.

### A. Policy

The self-sufficiency threshold is fifteen dollars (\$15.00) earned wages per hour based on full-time employment or thirty-one thousand two hundred dollars (\$31,200) annual income and will be used to determine eligibility for individuals requesting Training Services under the Workforce Innovation and Opportunity Act of 2014 (WIOA). This threshold applies to all employed adults and dislocated worker.

# B. Definitions

The self-sufficiency threshold for adult and dislocated workers is the standard determined by the GMLWDA Board as the amount of earned income necessary for an individual to live self-sufficiently in Shelby, Fayette, Lauderdale, and Tipton Counties (GMLWDA). Self-sufficiency means the amount of income necessary for an individual to meet his/her basic needs (including paying taxes), without public or private assistance, such as Welfare, Food Stamps, medical care, childcare, housing, food provided by churches or other social service agencies, etc. Self-sufficiency will take into account the special needs of individuals with disabilities and other living situations causing higher living expenses, such as family size, local economic conditions, and dislocated worker's wage at layoff. More specifically, self-sufficiency for a dislocated worker may be defined in relation to a percentage of his/her layoff wage, and the special needs of individuals with disabilities or other barriers to employment should be taken into account when setting criteria to determine self-sufficiency. The self-sufficiency wage threshold will be updated on an as-need basis.

Basis needs include housing, childcare, food, transportation, healthcare, taxes and miscellaneous expenses (clothing, telephone, household items).

Full-time employment means working a forty (40) hour work week.

### C. Procedure

The WIOA employment and training programs mandate a universal access one-stop system with a non-tiered approach to service delivery (Career and Training Services). When an employed individual is unable to obtain or retain employment that leads to self-sufficiency through Career Services and requires enrollment into Training Services, documentation must be collected to prove that the individual's per hour earned wages are at or below \$15.00 per hour or annual income is at or below \$31,200 per year prior to enrollment into WIOA Training Services.

### D. Acceptable Documentation

Collection of one (1) of the following documents is required to establish that an employed adult or dislocated worker registrant's per hour earned wage is at or below the \$15.00 (or annual income is at or below \$31,200) self-sufficiency threshold on the date of enrollment into WIOA Training Services:

- 1. A current pay stub showing per hour earned wages;
- 2. A letter from an employer substantiating per hour earned wages

3. Collateral contact with the employer substantiating the individual's per hour earned wages; or

As a last recourse, a notarized statement from the individual attesting his/her per hour earned wages will be accepted.

Employed WIOA adult and dislocated worker individual whose per hour earned wages exceed \$15.00 per hour (or annual income exceeds \$31,200) will not be enrolled into a Training Services program covered by this policy, except as provide in subsection (E) below.

The Workforce Development Specialist must maintain in the individual's case file WIOA eligibility documentation and verification that is sufficient to protect against serving ineligible individuals.

E. Exceptions

The self-sufficiency threshold determination will <u>not</u> be made for low-income individuals who are:

- 1. Not employed;
- 2. Employed, but still receive public assistance;
- 3. Disabled individual whose income meets the LLSIL but whose family income does not.

### **INQUIRIES**

Please contact Amber Covington, Executive Director, <u>acovington@memphischamber.com</u>, with any questions or concerns regarding this policy.

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July 29 2020

Greater Memphis Local Workforce Development Board (GMLWDB) is a proud partner of the American Joh Center network, is an Equal Opportunity Employer. The Career Center System is an Employer/Equal Opportunity Program. Auxiliary aids and services are available upon request to individuals with disabilities. TTY: 1-800-848-0299