

BOARD POLICY

POLICY NUMBER POL 100-1

Title: | Self-Sufficiency

Effective: August 17, 2023 Revised: N/A

Supersedes: N/A Version: 001

I. OF INTEREST TO

This policy is applicable to CareerSource South Florida (CSSF) American Job Centers (AJC), partners and Youth Service Providers.

II. PURPOSE AND SCOPE

The purpose of this policy is to provide guidance and establish the economic self-sufficiency standard for Workforce Innovation Opportunity Act (WIOA) for Adult, Dislocated Workers and Youth. This standard will be used when determining eligibility to provide WIOA Individualized Career and Training Services to unemployed and employed individuals seeking workforce services.

III. BACKGROUND

The one-stop delivery system is the basic delivery system for adult and dislocated worker services. Through this system, adults and dislocated workers can access a continuum of services, which are career and training services. Pursuant to section 134 of WIOA, training services may be made available to unemployed and employed adults and dislocated workers. In order to provide WIOA training services, a need for such services must be identified that individuals could not obtain or retain employment that leads to economic self-sufficiency.

CareerSource South Florida will provide youth services in compliance with WIOA Section 129 (c)(2), to assist young people, who face significant barriers to success in the labor market, by leveraging community resources (CFR 681.470), training services (CFR 681.540), and support services (CFR 681.570) to overcome those barriers and successfully transition to self-sufficient adulthood to both employed and unemployed young people.

IV. STATUTORY AUTHORITIES

- Department of Commerce Administrative Policy 105, Priority of Service
- 540, 570, 680.210, 680.600, 681.470, Code of Federal Regulations (CFR)
- <u>Living Wage Calculator Living Wage Calculation for Miami-Dade County, Florida</u> (mit.edu)

Approved By:	
Approved by.	
Rick Beasley, Executive Director	
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- <u>Living Wage Calculator Living Wage Calculation for Monroe County, Florida</u> (mit.edu)
- <u>Training and Employment Guidance Letter (TEGL) 07-20</u>, Effective Implementation of Priority of Service Provisions for Most in Need Individuals in the Workforce Innovation and Opportunity Act (WIOA) Adult Program
- TEGL 19-16, Guidance on Services provided through the Adult and Dislocated Worker Programs under the Workforce Innovation and Opportunity Act (WIOA) and the Wagner-Peyser Act Employment Service (ES), as amended by title III of WIOA, and for Implementation of the WIOA Final Rules
- United for ALICE Asset Limited Income Constrained Employed
- WIOA Sec.129 (c)(2)
- Workforce Innovation and Opportunity Act (WIOA) sec.134(c)(3)(E)
- WIOA Desk Reference Priority of Service for WIOA Adult Funds

V. DEFINITIONS

- Basic Skills Deficient An individual who is unable to compute or solve problems, or read, write, or speak English at a level necessary to function on the job, in the individual's family or in society. Youth participants must be assessed below the 8th grade level on the generally accepted assessment state approved test to be considered basic skills deficient.
- 2. Economic Self-Sufficiency The minimum amount of cash resources needed in order for a family to meet its basic needs.
- 3. Eligible Spouse The spouse of:
 - a. Any veteran who died of a service-connected disability;
 - b. Any member of the Armed Forces serving on active duty who, at the time of application for the priority, is listed in one or more of the following categories and has been so listed for a total of more than 90 days:
 - i. Missing in Action;
 - ii. Captured in line of duty by a hostile force; or
 - iii. Forcibly detained or interned in line of duty by a foreign government or power;
 - c. Any veteran who has a total disability resulting from a service-connected disability, as evaluated by the Department of Veterans Affairs;
 - d. Any veteran who died while a disability was in existence.
- 4. Low Income An individual who:
 - a. Receives, or in the past six months has received, or is a member of a family that is receiving or in the past six months has received, assistance through the Supplemental Nutrition Assistance Program (SNAP) established under the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), the program of block grants to States for Temporary Assistance for Needy Families (TANF) program under part A of title IV of the Social Security Act (42 U.S.C. 601 et seq.), or the

- Supplemental Security Income program established under title XVI of the Social Security Act (42 U.S.C. 1381 et seq.), or state or local income-based public assistance;
- b. Is in a family with total family income that does not exceed the poverty line; or 70 percent of the Lower Living Standard Income Level;
- c. Is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6)), or a homeless child or youth (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a (2));
- d. Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act (42 U.S.C. 1751 et seq.);
- e. Is a foster child for whom state or local government payments are made; or
- f. Is an individual with a disability whose own income meets the income requirement, but who is a member of a family whose income does not meet this income requirement.
- 5. Public Assistance Recipient An individual who receives, or in the past six months has received, or is a member of a family that receives or in the past six months has received, assistance through one or more of the following:
 - a. Supplemental Nutrition Assistance Program;
 - b. Temporary Assistance for Needy Families;
 - c. Supplemental Security Income; or
 - d. Other state or local income-based assistance.
- 6. Veteran An individual who served in the active military, naval, or air service, and was discharged or released under conditions other than dishonorable. Active service includes full-time duty in the National Guard or a Reserve component, other than full-time duty for training purposes (38 U.S.C. 101(2)).
- 7. Veteran Priority of Service Veterans and eligible spouses are given priority over non-covered persons for the receipt of employment, training and placement services provided under a qualified job training program. Priority means veterans and eligible spouses are entitled to precedence over non-covered persons for services. This means a veteran or an eligible spouse either receives access to a service earlier in time than a non-covered person or, if the resource is limited, the veteran or eligible spouse receives access to the services instead of or before the non-covered person.

VI. POLICY

Under WIOA sec 134(c)(3)(A) training services may be available to unemployed and employed adults and dislocated workers, including young people when the AJC staff, or youth staff have determined after conducting an interview, evaluation, or assessment, and career planning, that the participant is:

 unlikely or unable to obtain or retain employment that leads to economic selfsufficiency or wages comparable to or higher than wages from previous employment through career services;

- 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;
- have the skills and qualifications to participate successfully in training services;
- is determined eligible in accordance with the State and local priority system in effect for adults under WIOA sec. 134(c)(3)(E) if training services are provided through adult the adult funding stream; and
- selected a program of training services that are directly linked to the employment opportunities in the local area or the planning region, or in another area to which the adults or dislocated workers are willing to commute or relocate.

VII. PRIORITY OF SERVICE

Veterans and eligible spouses must be provided with priority of service when seeking training services. A veteran must meet the program's eligibility criteria to receive services under the respective employment and training program. Priority must be provided in the following order:

- First, to veterans and eligible spouses. This means that veterans and eligible spouses who are recipients of public assistance, other low-income individuals, or individuals who are basic skills deficient would receive first priority for services with WIOA Adult formula funds for individualized career services and training services.
- Second, to non-covered persons (that is, individuals who are not veterans or eligible spouses) who are included in the groups given priority for WIOA Adult formula funds for individualized career and training services.
- Third, to veterans and eligible spouses who are not included in WIOA's priority groups.
- Fourth, priority populations established by the Governor and the Local Workforce Development Board (LWDB).
- Last, to non-covered persons outside the groups given priority under WIOA.

VIII. UNEMPLOYED AND EMPLOYED ADULTS & YOUTH

A. Unemployed at Time of WIOA Registration

Unemployed individuals that had an income during the previous 6 months that is over the threshold as identified on the Florida Poverty Level (FPL) / LLSIL, per family size, but is lower than the self-sufficient level determined by ALICE, per family size, may be provided WIOA individualized career and training services.

There is no economic self-sufficiency determination for unemployed dislocated workers.

B. Employed at Time of WIOA Registration

Adult and Youth individuals who are employed at the time of WIOA registration may be provided with WIOA Individualized Career and Training services, it they do not meet

the economic self-sufficiency wage standard. Dislocated workers that are employed at the time of WIOA registration, earned wages cannot exceed 80% of the wages earned from the job of dislocation.

IX. SELF-SUFFICIENCY TOOLS

A. Asset Limited, Income Constrained, Employed (ALICE)

ALICE represents the growing number of families who are unable to afford the basics of housing, child care, food, transportation, health care, and technology.

ALICE defines the amount of income necessary to meet the minimum average income that a household needs to afford housing, childcare, food transportation, health care, and a smartphone plan, plus taxes. The standard, therefore, estimates the level of income necessary for a given family type that does not qualify for public assistance but are receiving wages or received wages higher than the FPL and/or the LLSIL. These households struggle to make ends meet but often earn too much to qualify for assistance.

B. Living Wage Calculator

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 economic self-sufficiency.

X. EXCEPTIONS

Exceptions to this policy, or any part thereof, must be approved in writing by the SFWIB Executive Director.