



## Ohio Valley Employment Resource

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Proudly serving Monroe, Morgan, Noble & Washington Counties, since 2000

### **Ohio Valley Employment Resource Policy Letter No. 6-15 (Determination of Self Sufficiency and Family Sufficiency)**

#### **I. Purpose**

This policy is to establish a definition and range for Self Sufficiency and Family Sufficiency.

#### **II. Effective Date with WDB and COG motion #s**

July 1, 2015 youth added  
June 1, 2016; COG motion 25-15 on 5/23/16; WDB motion 11-15 on 12/14/15

#### **III. References**

WIOAPL15-09 Training Services for Adult and Dislocated Workers  
WIOAPL15-10 Youth Program Services  
WIOAPL15-11 Use of Individual Training Accounts  
WIOAPL15-06 Determination of Dependent Status

#### **IV. Requirements**

##### **Dislocated Workers and Adults (Adults - see also required Family self-sufficiency below)**

WIOAPL15-09 Training Services for Adult and Dislocated Workers defines training services as:

- Occupational skills training, including training for nontraditional employment;
- On-the-job training;
- Incumbent worker training;
- Programs that combine workplace training with related instruction, which may include cooperative education programs;
- Training programs operated by the private sector;

- Skill upgrading and retraining;
- Entrepreneurial training;
- Transitional jobs;
- Job readiness training;
- Adult education and literacy activities;
- Customized training.

### **Eligibility for Training Services**

Pursuant to section 134 (b)(3)(A) of the WIOA, training services may be provided to adults or dislocated workers who:

1. After an interview, evaluation, or assessment and career planning, have been determined by OhioMeansJobs:
  - 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. This does not include DW wages from non-interim employment. (Interim employment is explained on page 7 of WIOAPL15-09). If a DW has interim employment, this DW is considered unemployed in OWCMS (WIOAPL15-09).
  - In need of training services to obtain or retain employment that leads to economic self-sufficiency or wages comparable to or higher than wages from previous employment; and
  - Have the skills and qualifications to successfully participate in the selected program of training services.
2. Selects 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; and
3. Are unable to obtain other grant assistance for training or require assistance beyond the assistance made available under other grant assistance programs, including Pell Grant funds.

### **Additional Requirements for Adult-Funded ITAs**

As part of the determination of the appropriateness for training services, the local area must review "family self-sufficiency" for participants seeking a WIOA adult-funded ITA. WIOA adult-funded may only be approved for those who have been determined to be below a locally defined standard of "family self-sufficiency." This requirement is intended to ensure that adult participants seeking adult-funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed in order to obtain or retain employment.

### Dependency status all youth and adults ages 18-24

Additionally, all young adults, ages 18-24, who are seeking WIOA adult-funded ITAs, must also be screened for dependency status. Refer to WIOAPL No. 15-06, Determination of Dependent Status, for guidance on determining dependency status.

The use of an ITA is allowed for out-of-school youth, ages 18 to 24, using WIOA youth funds when appropriate. (See YOS 18-24 below also)

As part of the determination of the appropriateness for occupational skills training, a review of "family self-sufficiency" must be completed for those youth participants whose eligibility was not based upon being a low income dependent, "family self-sufficiency" would include the income(s) of all family members, including the young adult's parent(s).

### **Extenuating Circumstances for WIOA Adult-Funded ITAs (WIOAPL15-9)**

If a family income exceeds the "family self-sufficiency" standard, a participant may still receive an adult-funded ITA if extenuating circumstances exist. When evaluating extenuating circumstances, the costs related to the economic hardship must be the responsibility of that person or for his or her legal dependent, spouse, or parent. Those costs must be ongoing and expected to cause a financial hardship for the duration of the ITA.

Economic hardships include, but are not limited to:

- The portion of medical procedure or prescription medication costs that are not covered by insurance and are ongoing and determined to be medically essential;
- Health insurance premium payments that are not paid for by private or public sources;
- Payments on past due or back mortgage, rent, or essential services (e.g., electric, water, natural gas, propane, and other utility arrearages) that accumulated because of involuntary unemployment or underemployment;
- Court-ordered child support or spousal payments;
- Ongoing payments to a nursing home, home health care provider, elder care provider, or assisted living provider;
- Payments toward debt that accumulated as a result of a natural disaster, severe illness, or disability.

Extenuating circumstances do not include normal rent, mortgage, utility, automobile, fuel, grocery, credit card, or "pay-day loan," payments. Exceptions may be approved on a case by case basis for individuals whose family incomes exceeds the family self-sufficiency standard. Documentation explaining the extenuating circumstances must be maintained in the participant file, along with the signature approval of the local WDB Fiscal Agent and WDB Director or designee.

### **Out of School Youth, age 18-24, ITAs**

WIOA youth-funded ITAs may only be approved for those who have been determined to be below a locally defined standard of "family self-sufficiency." This requirement is intended to ensure that participants whose eligibility was not based upon being a low income individual and who are seeking youth-funded ITAs are those whose families lack or have limited ability to pay for training and supportive services needed in order to obtain or retain employment.

### **Steps to Determine Family Size and Family Self Sufficiency**

The self sufficiency determination begins with determining family size. For youth and adults under 25 this must be the dependency determination explained in WIOAPL No. 15-06, Determination of Dependency Status and documented using local form.

In WIOAPL15-09 Family is defined as: "two or more persons related by blood, marriage, or decree of court, who are living in a single residence and are included in one or more of the following categories:

- Two spouses and dependent children.
- A parent or guardian and dependent children.
- Two spouses.

Family sufficiency is determined using the above state definition. Use of the combination of family members' incomes to determine whether or not the participant has the means to fund training services.

Once dependency is determined and the size of the family is known, determine family sufficiency. (If a family of one, self-sufficiency and family sufficiency are the same.)

The local areas has determined the criteria for self-sufficiency to be as follows:

### **Self Sufficiency for Adults, Out of School Youth, and Dislocated Workers is defined as:**

A participant (based on the size of the household) who is earning an income annualized being greater than 200% of the Lower Living Standard Income Level(LLSIL) to support the family size or employed at the Dislocated Workers Layoff wage, whichever is greater.

**Family Sufficiency for Adults and Out of School Youth uses the same criteria. Now the income of all members of the family is compared to 200% of the Lower Living Standard Income Level. Example:** Self sufficiency is the only applicant's income compared to the 200% LLSIL of the household size. Whereas, family sufficiency is all family members' income to the 200% LLSIL of the household size. The LLSIL does not change in the two comparisons.