

**Self-Sufficiency Policy for the
Northeast Ohio Consortium Council of Governments
Workforce Innovation and Opportunity Act Policy C-03.**

I. Purpose.

The purpose of this policy is to outline the requirements for determining self-sufficiency.

II. Effective Date.

August 5, 2015.

III. Background.

Pursuant to section 134 (b)(3)(A)(i)(I) of WIOA, for adults and dislocated workers to receive training services, they must be in need of such service to obtain or retain employment that allows for economic self-sufficiency. In other words, in order for an individual to be eligible for certain training services, s/he when applying must not already be self-sufficient, and must be seeking training in a good faith effort to become self-sufficient. Pursuant to the terms and conditions set forth below, individuals must not be self-sufficient in order to be eligible for all training, or certain types of training.

It is up to each Workforce Area to set the criteria for determining self-sufficiency. This policy sets forth the terms, conditions, and criteria pursuant to which “self-sufficiency” and “family self-sufficiency” shall be defined, and when and how the same shall be determined.

IV. Requirements.

A. Definition of Self-Sufficiency.

Pursuant to this policy, self-sufficiency shall be deemed established when an individual has total income:

1. exceeding three hundred percent (300%) of the federal poverty guidelines when applying the individual worker’s income at the time of application to the attached chart, and considering the individual worker’s respective family size;
- or-
2. that pays comparable or higher wages than what the individual received in previous employment.

When staff are determining individual self-sufficiency, and/or any type of income determination, the determination is to be made by gathering their individual income information for a full one month period of at least 28 days or more, immediately prior to the review being made to determine self-sufficiency or income. This can be accomplished through the calculation of

actual wages received, or where the income being considered is based on annual salary, by dividing that annual salary by 12.

B. Definition of Family Self-Sufficiency.

Pursuant to this policy, family self-sufficiency shall be deemed established when the family has total income:

1. exceeding three hundred percent (300%) of the federal poverty guidelines when applying the following family members' income at the time of application to the attached chart, and considering the individual worker's respective family size.

Family members' income to be considered:

1. the income of the spouse of the individual,
2. the income of all parents and/or guardians if the individual seeking services is twenty-four (24) years of age or younger, and

When staff are determining family self-sufficiency, and/or any type of income determination, the determination is to be made by gathering their families' income information for a full one month period of at least 28 days or more, immediately prior to the review being made to determine self-sufficiency or income. This can be accomplished through the calculation of actual wages received, or where the income being considered is based on annual salary, by dividing that annual salary by 12.

C. When Self-Sufficiency or Family Self-Sufficiency Must Be Determined.

1. All Adult Workers Seeking Classroom Training.

- a. General rule.

WIOA adult classroom trainings may only be approved for those whose income has been determined to have not met or established 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.

Since family self-sufficiency includes the family income of multiple individuals, and not just the individual, only the definition of family self-sufficiency need be applied. The definition of self-sufficiency does not need to be applied to the individual's income and determine.

- b. Exceptions to the General Rule.

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
- 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, court ordered child support, court-ordered spousal support, 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 OMJ Center manager, and the local WDB Director.

2. All Adult Workers Seeking Any Training Other than Classroom Training, and/or Employed Dislocated Workers Seeking Any Type of Training.

Family self-sufficiency does not need to be determined and does not apply except to all Adults seeking classroom training.

a. All Adults, Employed and Unemployed, Seeking any Training Other Than Classroom Training.

All WIOA adult trainings, other than classroom trainings, may only be approved for those eligible Adults whose training is deemed suitable, if they have income has been determined to have not met or established a locally defined standard of "self-sufficiency." This requirement is intended to ensure that adult participants seeking adult funded trainings are those whose individually lack or have limited ability to pay for training and supportive services, needed in order to obtain or retain employment.

b. All Employed Dislocated Workers.

Self-sufficiency standard may apply if it is determined that the individual's employment is not interim employment.

For working dislocated workers, determination of self-sufficiency status requires a two-step assessment of the dislocated worker's employment:

- a. Determine if the employment is "interim employment."
- b. If the employment is not "interim," determine if the wage is at least the lower living standard income or if the hourly wage is comparable to or higher than wages from previous employment.

It should be noted that dislocated workers who have received notice of layoff, but have not yet been laid off, and who do not have any other sources of employment are not subject to review of self-sufficiency.

Step #1. Is the Individual's Employment Interim?

Employment is considered to be interim if:

1. the salary is below the salary of the adult or dislocated worker's primary occupation, and/or
2. if the adult or dislocated worker is working under the skill level of his or her customary occupation.

There may be circumstances where interim employment does provide a sufficient wage temporarily but is not considered permanent employment that leads to self-sufficiency (e.g., working through a temporary agency). The determination about whether or not a dislocated worker's employment is interim employment must be made on a case by case basis and take into consideration dislocated worker's personal, family, financial, and employment situation.

A dislocated worker who is in interim employment is not considered to be self-sufficient even if it produce income that causes the individual to be deemed self-sufficient, or if the interim employment produces income that is comparable to or higher than the wages from previous employment.

If a dislocated worker is engaged in interim employment, this participant is considered to be unemployed at participation. This means that the individual is eligible for training services without further consideration into Step #2. Proceed by entering the information of the individual into the Ohio Workforce Case Management System (OWCMS) as such.

Step #2. Is the Individual's Wage at a Qualifying Level?

Step #2 only needs to be completed if the individual is determined to be employed in a capacity that is not interim employment. If Step #1 determines that the individual is engaged in interim employment, this step does not need to be completed.

Employed dislocated workers whose employment is not interim employment, must have the Area's definition of self-sufficiency applied to their disclosed income. Employed dislocated workers who are determined to be "self-sufficient" may not receive training services; they may only receive career services only Pursuant to Area Policy A-02.

3. Unemployed Dislocated Workers.

No family self-sufficiency or self-sufficiency determination needs to be made.

V. Definitions.

Self-Sufficiency: Pursuant to this policy, self-sufficiency shall be deemed established when an individual has total income:

1. exceeding three hundred percent (300%) of the federal poverty guidelines when applying the individual worker's income at the time of application to the attached chart, and considering the individual worker's respective family size; or
2. that pays comparable or higher wages than what the individual received in previous employment.

Family Self-Sufficiency: Pursuant to this policy, family self-sufficiency shall be deemed established when the family has total income:

1. exceeding three hundred percent (300%) of the federal poverty guidelines when applying the following family members' income at the time of application to the attached chart, and considering the individual worker's respective family size.

Family members' income: shall be the income of all of the following:

1. the income of the spouse of the individual,
2. the income of all parents and/or guardians if the individual seeking services is twenty-four (24) years of age or younger, and
3. the income of all parents and guardians if the individual is living within the same residence of the parents and/or guardians.

VI. Monitoring.

The Area will conduct oversight and monitoring of the implementation of all Area Workforce programming by all OMJ Center operators, partners, and/or providers pursuant to **Area Workforce Policy D-03**. Any issues discovered will be handled through the area's monitoring resolution process.

VII. Technical Assistance.

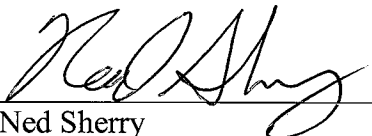
To get questions answered and technical assistance regarding this policy or issues regarding administration of WIOA, you are urged to contact the Executive Director of the Area Workforce at craigsernik@neohio.twcbc.com.

The question/issue will be researched, analyzed, and a formal written response will be provided. If a second opinion is required, the director is not available, or there is no clear answer to the question/issue, either the Executive Director or any OMJ Center or provider staff may seek additional guidance by submitting the same to the Office of Workforce Development: WIAQNA@jfs.ohio.gov; and by copying your request to the Executive Director of the NOC COG.

VIII. References.

- Workforce Innovation and Opportunity Act, Public Law 113-128.
- Section 134 (b)(3)(A)(i)(I) of WIOA

IX. Signatures.



Ned Sherry
Area WDB Chairperson

Date 9-28-2022



Jim Dvorak
Geauga County Commissioner
Northeast Ohio Consortium Council of Governments,
Chief Elected Official

Date 9-28-2022

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August 31, 2022