

WORKFORCE POLICY BULLETIN

<p>DATE: July 10, 2009</p> <p>TO: Contracted Service Providers ATTN: Operational Management</p> <p>FROM: Joe Valentine, Acting Executive Director Tracey Brown-Carter, Business and Economic Development Coordinator Workforce Development Board</p> <p>SUBJECT: Updated Self-Sufficiency Standard Policy for Workforce Investment Act Services</p>	<p>WPB #02-09</p> <p>SUBJECT:</p> <ul style="list-style-type: none"><input type="checkbox"/> ADMIN<input type="checkbox"/> PLANNING<input type="checkbox"/> MARKETING<input type="checkbox"/> EEO/AA<input type="checkbox"/> FISCAL<input checked="" type="checkbox"/> OPERATIONS<input type="checkbox"/> RAPID RESPONSE <p>SPECIAL FILING: X</p>
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The purpose of this Workforce Board Bulletin is to update this Workforce Investment Area's Policy regarding a Self-Sufficiency Standard for enrollment into WIA intensive and training services for working adults who do not earn enough income to be self-sufficient. The Self-Sufficiency Standard estimates the income that working adults require to meet basic needs without subsidies of any kind. The Standard estimates the minimum amount of money working adults must earn to meet their family's basic needs for housing, childcare, food, transportation, healthcare and taxes. Each June the Department of Labor under Title I of the Workforce Investment Act issues the Lower Living Standard Income Level.

Through WIA regulations, 20 CFR, Part 663-Adult and Dislocated Worker Activities under Title I of the Workforce Investment Act, Subpart B Intensive Services, 663.230, "Criteria used to determine whether an employed worker needs intensive services to obtain or retain employment leading to self-sufficiency". The Department of Labor (DOL) placed the responsibility for defining self-sufficiency in the hands of state and local Workforce Investment Boards in determining eligibility and extending services to low wage workers. The DOL provides a minimum threshold for each board known as the Lower Living Standard Income Level (LLSIL). The LLSIL, a poverty measure created by the Bureau of Labor Statistics, uses a basic family budget approach based on the cost of food.

The self-sufficiency standard recommended by the Workforce Development Board is calculated at 200% of the LLSIL. This self-sufficiency standard takes into account cost variations based on geography, particularly the cost of housing, family size and the age of household members; as well as costs for childcare, transportation, food and healthcare.

Adoption of the Standard will allow the WDB to:

- Extend services to low-wage workers and place them on a path to self-sufficiency, thereby raising community standards.
- Target high-road sectors of the economy and demand occupations for training; and develop customized training programs.
- Prioritize job-training programs that lead to self-sufficiency.
- Offer training in occupations with career ladders that lead to self-sufficiency, or at a minimum, a wage gain.
- Set minimum standards for customized training.
- Establish placement wage goals for customized training and the overall One-Stop system.

Policy

It is the policy of the Workforce Development Board of Contra Costa (WDB) that it will adopt a Self-Sufficiency Standard that is 200% of the Lower Living Standard Income Level (LLSIL). The WDB used the updated 2009 LLSIL to create the self-sufficiency wage scale and revise this policy. The Workforce Development Board adopted an initial policy on November 24, 2003. **This Workforce Board Bulletin updates the policy and replaces all previous policies on the Self-Sufficiency Standard.**

When applying the self-sufficiency standard to individuals seeking training, current wages and family household size for that individual should be considered. The total household wage should be divided by two when more than one adult wage earner lives in the household.

200 % of the Lower Living Standard Income Level (LLSIL)
Family Size

Self-Sufficiency Wage	1	2	3	4	5	6	Each Add'l add
Annual	\$28,026	\$45,922	\$63,028	\$77,808	\$91,822	\$107,392	\$15,000
6 Months	\$14,013	\$22,961	\$31,514	\$38,904	\$45,911	\$53,696	\$7,500

The Self-Sufficiency Standard will be applied when determining the following:

- Individual customer intake based on family size and household income.
- Employed-worker eligibility for Adult and Customized Training programs in occupations with career ladders that lead to self-sufficiency.
- Job training program priority in high-road sectors of the economy and demand occupations.
- Minimum standards for customized training.

If you have any questions regarding this bulletin, please contact Tracey Brown-Carter (925) 646-5023.

cc: Stephen Baiter, Administrator, Contra Costa One Stop Consortium/EASTBAY Works
 Wendy Therrian, Director, Employment and Human Services Department, Workforce Services Bureau
 Joe Valentine, Director, Employment and Human Services Department
 Linda Palmquist, EDD WID Regional Advisor
 Jack Kennedy, Title V Project Director
 Contracted Youth Providers

DIRECTIVE

WORKFORCE SERVICES

Number: WSD08-9

Date: June 11, 2009

69:123:cs:12752

TO: WORKFORCE DEVELOPMENT COMMUNITY

SUBJECT: 2009 70 PERCENT LLSIL AND POVERTY GUIDELINES

EXECUTIVE SUMMARY:

Purpose:

This directive issues the 2009 70 percent Lower Living Standard Income Level (LLSIL) published by the Secretary of Labor in the Federal Register on March 26, 2009. It also issues the 2009 poverty guidelines published by the U.S. Department of Health and Human Services (HHS) in the Federal Register on January 23, 2009.

Scope:

The LLSIL and poverty guidelines are used to establish low-income status for Workforce Investment Act (WIA) Title I programs. Local Workforce Investment Areas (LWIA) use the LLSIL to determine eligibility for youth, eligibility for employed adults for certain services, self-sufficiency, and eligibility for the Work Opportunity Tax Credit. The LWIAs should consult the WIA and its regulations, and preamble for more specific guidance.

Effective Date:

The 2009 LLSIL and 2009 poverty guidelines became effective on their dates of publication in the Federal Register, March 26, 2009 and January 23, 2009, respectively.

REFERENCES:

- WIA Section 101(24), 101(25), 127(b)(2)(C), 132(b)(1)(B)(v)(IV), and 134(d)(3)(A)(ii)
- Title 20 Code of Federal Regulations (Title 20 CFR) Section 663.230
- Federal Register, Volume 74, Number 57, WIA; LLSIL (March 26, 2009)
- Federal Register, Volume 74, Number 14, Annual Update of the HHS Poverty Guidelines (January 23, 2009)

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STATE-IMPOSED REQUIREMENTS:

This directive contains one State-imposed requirement, which is in ***bold italic*** print.

FILING INSTRUCTIONS:

This directive supersedes Workforce Services Directive WSD08-3, dated August 20, 2008, and finalizes Workforce Services Draft Directive WSDD-22, issued for comment on May 12, 2009. The Workforce Services Division received no comments during the draft comment period. Retain this directive until further notice.

BACKGROUND:

The WIA Section 101(25)(B) sets the criteria LWIAs use in determining whether an individual is a low-income individual. This criteria includes two sets of data: the poverty guidelines, as published by HHS, and 70 percent of the LLSIL, as determined by the Secretary of Labor. The LWIAs use the higher of these two measures to establish low-income status for eligibility purposes of WIA Title I Programs. The WIA requires annual revisions to both sets of data.

All LWIAs use the same poverty guidelines. However, the LLSIL identifies maximum qualifying income levels for residents in either of two broad geographic designations: metropolitan and nonmetropolitan areas. Metropolitan income levels apply to residents living within Metropolitan Statistical Areas (MSA) as defined by the Office of Management and Budget. Nonmetropolitan income levels apply to places with populations under 50,000. In addition to the broad metropolitan and nonmetropolitan designations, the Department of Labor identifies three MSAs in California that have unique LLSILs: the San Diego MSA, the Los Angeles/Riverside/Orange County MSA, and the San Francisco/Oakland/San Jose MSA.

POLICY AND PROCEDURES:

1. Select the appropriate table for use by your LWIA from the five tables in Attachment 1. ***(In those instances where a LWIA encompasses both metropolitan and nonmetropolitan areas, the State has designated the higher of the LLSIL figures for use within the entire LWIA.)***
2. Use the higher of either the LLSIL or the poverty guideline for the appropriate family size to determine low-income status. A comparison of the applicant's actual family income during the six-month income determination period with the six-month figures on the charts enables the reviewer to immediately determine income status.
3. The WIA, together with Title 20 CFR 663.230, requires LWIBs to set the criteria for determining whether employment leads to self-sufficiency. At a minimum, such criteria must provide that self-sufficiency means employment that pays at least 100 percent of the LLSIL established for a LWIA.

ACTION:

Notify all affected staff of the changes to the LLSIL and poverty guidelines in this directive.

INQUIRIES:

If you have any questions, please contact your [Regional Advisor](#) at (916) 654-7799.

/S/ BOB HERMSMEIER
Chief
Workforce Services Division

Attachment

2009 70 PERCENT LLSIL AND POVERTY GUIDELINES

The Lower Living Standard Income Level (LLSIL) and poverty guidelines are used to establish low-income status for Workforce Investment Act (WIA) Title I programs. Local Workforce Investment Areas (LWIA) use the LLSIL to determine eligibility for youth, eligibility for employed adults for certain services, self-sufficiency, and eligibility for the Work Opportunity Tax Credit. The LWIAs should consult the WIA and its regulations, and preamble for more specific guidance.

Tables 1 through 5 show the 70 percent LLSIL and the poverty guidelines for western metropolitan and nonmetropolitan areas, and for three specific Metropolitan Statistical Areas in California. In addition, each LLSIL table includes the 100 percent LLSIL that establishes the Department of Labor's minimum self-sufficiency levels. The last column in each table shows the amount to be added to the figure for a family of six for each additional family member.

Since the income received during the six-month period immediately prior to the individual's application for WIA funded services is used for income determination, each chart below shows the six-month, as well as the annual, figures for each family size. A comparison of the applicant's actual family income during the six-month income determination period with the six-month figures on the charts enables the reviewer to immediately determine an individual's eligibility.

Effective Dates: LLSIL: March 26, 2009
Poverty Guidelines: January 23, 2009

Table 1—San Diego Metropolitan Statistical Area							
LWIAs	San Diego Consortium						
Family Size							
	1	2	3	4	5	6	Each Add'l add
70% LLSIL							
Annual	\$ 10,798	\$ 17,689	\$ 24,287	\$ 29,979	\$ 35,379	\$ 41,377	\$ 5,998
6 Months	\$ 5,399	\$ 8,845	\$ 12,144	\$ 14,990	\$ 17,690	\$ 20,689	\$ 2,999
100%	\$ 15,426	\$ 25,270	\$ 34,696	\$ 42,827	\$ 50,541	\$ 59,110	\$ 8,569
Poverty Guidelines							
Annual	\$ 10,830	\$ 14,570	\$ 18,310	\$ 22,050	\$ 25,790	\$ 29,530	\$ 3,740
6 Months	\$ 5,415	\$ 7,285	\$ 9,155	\$ 11,025	\$ 12,895	\$ 14,765	\$ 1,870

Table 2—Los Angeles/Riverside/Orange County Metropolitan Statistical Area

LWIAs	Anaheim Foothill E&T Consortium Pacific Gateway (formerly Long Beach City) Los Angeles City	Los Angeles County Orange County Riverside County Santa Ana City San Bernardino City	San Bernardino County SELACO Consortium South Bay Consortium Ventura County Verdugo Consortium					
Family Size								
	1	2	3	4	5	6	Each Add'l add	
70% LLSIL								
Annual	\$ 9,784	\$ 16,034	\$ 22,013	\$ 27,175	\$ 32,068	\$ 37,507	\$ 5,439	
6 Months	\$ 4,892	\$ 8,017	\$ 11,007	\$ 13,588	\$ 16,034	\$ 18,754	\$ 2,720	
100%	\$ 13,977	\$ 22,905	\$ 31,447	\$ 38,822	\$ 45,811	\$ 53,582	\$ 7,771	
Poverty Guidelines								
Annual	\$ 10,830	\$ 14,570	\$ 18,310	\$ 22,050	\$ 25,790	\$ 29,530	\$ 3,740	
6 Months	\$ 5,415	\$ 7,285	\$ 9,155	\$ 11,025	\$ 12,895	\$ 14,765	\$ 1,870	

Table 3—San Francisco/Oakland/San Jose Metropolitan Statistical Area

LWIAs	Alameda County Contra Costa County Marin County Napa County NOVA Consortium	Oakland City Richmond City San Benito San Francisco City/Co. San Jose/Silicon Valley	San Mateo County Santa Cruz County Solano County Sonoma County					
Family Size								
	1	2	3	4	5	6	Each Add'l add	
70% LLSIL								
Annual	\$ 9,809	\$ 16,073	\$ 22,060	\$ 27,233	\$ 32,138	\$ 37,587	\$ 5,449	
6 Months	\$ 4,905	\$ 8,037	\$ 11,030	\$ 13,617	\$ 16,069	\$ 18,794	\$ 2,725	
100%	\$ 14,013	\$ 22,961	\$ 31,514	\$ 38,904	\$ 45,911	\$ 53,696	\$ 7,785	
Poverty Guidelines								
Annual	\$ 10,830	\$ 14,570	\$ 18,310	\$ 22,050	\$ 25,790	\$ 29,530	\$ 3,740	
6 Months	\$ 5,415	\$ 7,285	\$ 9,155	\$ 11,025	\$ 12,895	\$ 14,765	\$ 1,870	

Table 4— Metropolitan Areas

LWIAs	Fresno County Golden Sierra Consortium Imperial County Kern/Inyo/Mono Consortium Kings County Madera County Merced County	Monterey County NoRTEC Consortium North Central Consortium Sacramento City/Co. San Joaquin County San Luis Obispo County Santa Barbara County	Stanislaus County Tulare County Yolo County				
Family Size							
	1	2	3	4	5	6	Each Add'l add
70% LLSIL							
Annual	\$ 9,240	\$ 15,142	\$ 20,790	\$ 25,665	\$ 30,285	\$ 35,422	\$ 5,137
6 Months	\$ 4,620	\$ 7,571	\$ 10,395	\$ 12,833	\$ 15,143	\$ 17,711	\$ 2,568
100%	\$13,200	\$21,632	\$ 29,700	\$ 36,664	\$ 43,264	\$ 50,603	\$ 7,339
Poverty Guidelines							
Annual	\$ 10,830	\$ 14,570	\$ 18,310	\$ 22,050	\$ 25,790	\$ 29,530	\$ 3,740
6 Months	\$ 5,415	\$ 7,285	\$ 9,155	\$ 11,025	\$ 12,895	\$ 14,765	\$ 1,870

Table 5—Nonmetropolitan Areas

LWIAs	Humboldt County Mendocino County	Mother Lode Consortium					
Family Size							
	1	2	3	4	5	6	Each Add'l add
70% LLSIL							
Annual	\$ 8,853	\$ 14,509	\$ 19,921	\$ 24,588	\$ 29,019	\$ 33,939	\$ 4,920
6 Months	\$ 4,427	\$ 7,255	\$ 9,961	\$ 12,294	\$ 14,510	\$ 16,970	\$ 2,460
100%	\$ 12,647	\$ 20,727	\$ 28,458	\$ 35,126	\$ 41,455	\$ 48,484	\$ 7,029
Poverty Guidelines							
Annual	\$ 10,830	\$ 14,570	\$ 18,310	\$ 22,050	\$ 25,790	\$ 29,530	\$ 3,740
6 Months	\$ 5,415	\$ 7,285	\$ 9,155	\$ 11,025	\$ 12,895	\$ 14,765	\$ 1,870