

COMMONWEALTH OF VIRGINIA
VIRGINIA COMMUNITY COLLEGE SYSTEM

WORKFORCE INVESTMENT ACT

VIRGINIA WORKFORCE LETTER (VWL) #01-02 (REVISED)

TO: LOCAL WORKFORCE INVESTMENT BOARDS AND WIA ADULT AND
DISLOCATED WORKER SERVICE PROVIDERS

FROM: WORKFORCE DEVELOPMENT SERVICES

SUBJECT: EMPLOYED ADULT SERVICE PROVISION AND SETTING SELF-SUFFICIENCY
LEVELS

DATE: JUNE 22, 2001 (REVISED AUGUST 12, 2010)

The purpose of this document is to ensure that there is clarity in the Commonwealth on the difference between and provisions that apply to employed adults and incumbent workers for purposes of WIA, and to offer guidance on factors for use in determining self-sufficiency levels for employed adults.

1) Definitions:

For purposes of this guidance, the following definitions shall apply:

Employed Adult – An individual that is working but not earning a wage that is self-sufficient as defined by a local area and documented in a local WIA plan. Such individuals may be served by adult or dislocated worker funds. Services for employed adults are governed by applicable regulations and state policies for all WIA participants, with the exception that provisions and procedures in State Policy 02-04 for incumbent workers **do not apply.**

Incumbent Worker – An individual that is working without regard to their current level of income. Such individuals may be served by statewide funds, or local formula dislocated workers funds that have been appropriately designated as incumbent worker training funds in accordance with the waiver granted to the Commonwealth and State WIA Policy 02-04.

2) Core Services:

All individuals have access to the universal “core” services offered to the general public, including information, self-services, and other services, not requiring WIA-funded, staff assistance. Access to staff-assisted, WIA-funded core services requires establishing the

applicable WIA eligibility and registration and appropriate qualifications regardless of whether an individual is an employed adult or an incumbent worker.

3) Intensive Services for Employed Adults:

An employed adult who expresses interest in “intensive” services must meet WIA eligibility for the applicable funding stream from which they will be served, and must have received at least one core service. In addition, the One-Stop operator must determine that the customer is in need of intensive services to obtain or retain employment that leads to *self-sufficiency*. (See section 6 below for further information on self-sufficiency).

4) Training Services for Employed Adults:

An employed adult who expresses interest in WIA-funded “training” services must meet eligibility, have received at least one intensive service and have been determined to be unable to obtain or retain employment through intensive services. Additional requirements for access to training are specified at §663.310 of the WIA Regulations and State WIA Policy 00-8. (In need of training with the skills and qualification necessary to be successful, select a program linked to local employment opportunities or be willing to relocate, and unable to obtain grant assistance from other resources or require WIA assistance in addition to those resources).

5) Intensive and Training Services for Incumbent Workers:

Please refer to State WIA policy 02-04 for service sequence for incumbent workers.

6) Guidance in Determining Self-sufficiency in Serving Employed Adults

Per 20 CFR §663.230, WIBs may set the criteria for determining whether employment leads to self-sufficiency for employed adults. This determination must be included in a local area WIA plan, and should also be outlined in a local policy.

a. At a minimum, such criteria must reflect the following:

i. Self-sufficiency is defined as employment that pays **at least** the lower living standard income level (100%). *WIA §101(24) defines ‘lower living standard income level’ as an income level determined annually by the Secretary of Labor based on the most recent lower living family budget issued. The VCCS provides annual updates with Virginia-specific information for local use.*

ii. Self-sufficiency for dislocated workers may be defined as a percentage of the layoff wage.

iii. Special needs of individuals with disabilities or other employment barriers should be taken into account when setting criteria to determine self-sufficiency.

b. Additional factors that a local area may choose to consider in setting self-sufficiency levels:

- Consideration to local economic conditions, family size, employer-paid fringe benefits, and the financial needs of the populations to be served related to their ability to cover expenses such as food, housing, health care, transportation, child care, utilities, clothes, and taxes.

c. Additional resources on the topic

- Workforce Boulder County in Colorado uses a wage that is equal to or greater than 75% of the average wage of all industries sectors in Boulder County. The source of the average wage of all industry sectors is identified in Quarterly Census of Employment and Wages (QCEW).
http://www.wfbc.org/policies/policyApril2005/2005_02.pdf
- The Tulare County WIB in California arrived at a level of 175% of the LLSIL rate for the six month determination period. They arrived at this figure after defining what they considered to be the elements for self-sufficiency: food, utilities, phone, housekeeping supplies, clothing, transportation, health care, outside of the home activities, personal care products and services, education costs, childcare and taxes.
<http://tcwib.org/documents/docsUnderWIBcontrol/280%5EDirectives/115-02-13-02%20Tulare%20County%20Self-sufficiency%20Level%20000-2.pdf>
- Wider Opportunities for Women, a non-profit organization promoting economic independence, suggests that in defining self-sufficiency, consideration should be given to the amount of income necessary to meet basic needs (including paying taxes) without other forms of public assistance—such as public housing, food stamps, Medicaid or child care—or private/informal subsidies—such as free babysitting by a relative or friend, food provided by churches or local food banks, or shared housing.