



Policy Memorandum 2020-01

Self-Sufficiency and Underemployment Guidelines – Effective July 1, 2019

INTENDED AUDIENCE: This policy applies to all AAWDC initiatives which require the use of a self-sufficiency, underemployment, or low-income standard for eligibility and other purposes.

SUBJECT: Self-Sufficiency and Underemployment Guidelines

LAST REVIEWED/UPDATED: New Policy – This policy is replaced annually per Federal regulations.

RESPONSIBLE OFFICE: Job Seeker Solutions

POLICY CONTACT: Vice President of Job Seeker Solutions

CANCELLATIONS

2018-AJC-06 – WIOA Title I Self-Sufficiency and Underemployment Guidelines

STANDARD OPERATING PROCEDURES

N/A

FORMS

Family Income Form

Approvals

 President and CEO, AAWDC

Introduction

AAWDC is guided by the principles laid out in the Anne Arundel County Workforce Innovation and Opportunity Act Local Plan, 2016-2020. The Plan strives to uphold the County Executive's vision of empowered, healthy, safe, educated, thriving and sustainable community development. To a large extent, workforce development's role within this framework is to assist individuals in maximizing their career potential by providing the resources they need to gain skills and certifications that will lead to self-sufficiency and a better standard of living.

To that end, AAWDC has chosen to issue guidance to staff that defines certain income standard and definitions of low-income. These definitions come into play at times where income is an eligibility issue. Individuals who cannot meet these standards will not be served.

Policy Statement

There are four standards that may apply when income is a determining factor in eligibility. Staff shall utilize the standard that is appropriate to their initiative. These standards are:

1. Statutory Definition of Low-Income
2. 70% of the Lower Living Standard Income Level (LLSIL)
3. Local Definition of Self-Sufficiency
4. Local Definition of Underemployment

Statutory Definition of Low-Income

AAWDC defines a low-income individual as an individual who:

- Receives or has received within the past 6 months, or is a member of family that is receiving or has received within the past 6 months, assistance through the Supplemental Nutrition Assistance Program (SNAP), Temporary Cash Assistance (TCA), Supplemental Security Income (SSI), or state or local income-based public assistance;
- Is a homeless or a homeless child or youth;
- Receives or is eligible to receive free or reduced priced meals through the public school system (FARMs); or
- Is a foster child on behalf of whom state or local governments are made.

2020 70% LLSIL Income Guidelines

If this standard is used, then the entire family income must be calculated for the six-month period prior to enrollment, annualized, and cannot exceed the standard as adjusted for family size. In the case of a disabled individuals, staff should calculate the income of the participant only and disregard family size. For more information, please see the Family Income Form.

Family Size	Income Standard
1	\$12,490
2	\$19,679
3	\$27,011
4	\$33,341
5	\$39,350
6	\$46,020

For families with more than six members, add \$6,670 for each additional family member.

Local Definition of Self-Sufficiency

An employed individual can be served if the individual's current family income does not produce a family-sustaining income (or "living wage"). For purposes of this definition, the Anne Arundel County Local Workforce Development Board has adopted the Massachusetts Institute of Technology Living Wage Calculator. The family's entire income must be considered and must be below the standard as adjusted for family size. The chart below established the Board's self-

sufficiency standard by family size. The chart allows for the calculation of self-sufficiency to be based on gross wages or net wages. In order to qualify, the individual's family income may meet either standard.

Family Size	Gross Wages Standard	Net Wages Standard
1 Adult	\$28,479	\$23,935
1 Adult, 1 Dependent	\$60,010	\$50,550
1 Adult, 2 Dependents	\$69,083	\$58,193
1 Adult, 3 Dependents	\$84,972	\$71,553
2 Adults	\$44,953	\$37,849
2 Adults, 1 Dependent	\$64,710	\$54,509
2 Adults, 2 Dependents	\$74,603	\$62,844
2 Adults, 3 Dependents	\$86,623	\$72,944

For other family sizes and compositions, please contact the Office of Compliance.

Local Definition of Underemployment

If an individual has been laid off or otherwise terminated from employment (through no fault of their own) within three years of the date of enrollment, the individual may qualify for services as an unemployed worker. Under this standard, an employed individual can be served if the individual's current family income (for the last 6 months prior to enrollment) is 75% or less of the pre-layoff family wage.

Use of the Family Income Form

All enrollments must contain the Family Income Form in order to calculate income, unless otherwise approved by the Office of Compliance. Where income is an eligibility factor, income data entered on the form must be supported by documentation and included in the participant file. In all other cases, income data is collected by informational purposes. Therefore, the Family Income Form is used as a self-certification and an estimate of income is acceptable.

Related Policies and Other Resources

- Law
 - *Workforce Innovation and Opportunity Act*, 29 USC 3101 *et. seq.*
- Federal Guidance
 - Federal Register, February 1, 2019, Vol. 84, Num. 22, Pgs. 1167-1168
 - Federal Register, May 29, 2019, Vol. 84, Num. 103, Pgs. 24818-24819
- State Guidance
 - *Policy Issuance 2019-06*, 2019 Federal Poverty and 2019 Lower Living Standard Income Level

Revision History

<u>Policy Number</u>	<u>Date of Revision</u>	<u>Significant Change</u>
2018-06 – WIOA Title I Self-Sufficiency and Underemployment Guidelines	5/29/2018	Updated to incorporate 2018 Federal low-income guidelines.
2017-07 – WIOA Title I Self-Sufficiency and Underemployment Guidelines	6/2/2017	Updated to incorporate 2017 Federal low-income guidelines.
2017-05 – WIOA Title I Self-Sufficiency and Underemployment Guidelines	12/1/2016	Interim guidance document for low-income and self-sufficiency under the Local Plan
2016-09 – 2016 LLSIL Guidelines		Updated to incorporate 2016 Federal low-income guidelines
2015-04 – 2015 WIA/WIOA Income Eligibility Guidelines	3/27/2015	Updated to incorporate 2015 Federal low-income guidelines
2014-02 – 2014 Federal Poverty	3/27/2014	Updated to incorporate 2014 Federal

Guidelines and Lower Living Standard Income Level		low-income guideline
2013-06 – 2013 Federal Poverty Guideline and Lower Living Standard Income Level	4/1/2013	Requirements for WIA eligibility for youth and adult programs.