

WORKFORCE IMPLEMENTATION GUIDANCE (WIG) LETTER

DATE: May 30, 2025

NO: COM-24-003

TO: LOCAL WORKFORCE SYSTEM STAKEHOLDERS

FROM: Kristin Laarhoven, OWD Executive Director

SUBJECT: Income Guidelines for Determining Low Income Levels

1. <u>Purpose.</u> To provide guidance regarding the use of the Lower Living Standard Income Level figures.

2. <u>References.</u> <u>WIOA sec. 134 (a)(3)(A)(xii)</u>

WIOA sec. 134 (d)(1)(A)(x) WIOA sec. 3(36) (A)(B)

20 CFR 680.210

TCSG OWD Policies & Procedures Guide Section 3.2.3(III), Section

3.2.5(III), Section 3.2.6(III)

3. <u>**Definitions.**</u> WIOA – Workforce Innovation & Opportunity Act

TCSG – Technical College System of Georgia OWD – Office of Workforce Development

USDOL – U.S. Department of Labor

HHS - U.S. Department of Health and Human Services

LLSIL – Lower Living Standard Income Level LWDA – Local Workforce Development Area LWDB – Local Workforce Development Board SNAP – Supplemental Nutrition Assistance Program TANF – Temporary Assistance to Needy Families

SSI – Supplemental Security Income

4. <u>Background.</u> The U.S. Department of Labor has issued Lower Living Standard Income Level figures, which was published in the *Federal Register* on May 13, 2025, and referenced the U.S. Department of Health and Human Services Poverty Guidelines updated January 17, 2025.

5. LLSIL Use for Low Income Determinations.

WIOA provides for use of one of two sets of data in determining economically disadvantaged persons and program eligibility: HHS Poverty Guidelines or LLSIL. The higher of the poverty guidelines or 70% of the LLSIL for each family size and area was used in construction of the table below.

To determine low-income level for any family size, LWDA staff should compare the customer's family income with the corresponding poverty level figure based on family size and area. See *Attachment 1* for a listing of Georgia's counties by Metropolitan Areas, Non-





metropolitan Areas, and Atlanta MSA. Income figures listed in the Poverty Level columns below are utilized when determining whether a customer is considered low income for WIOA eligibility for youth, priority services for adults, and federal reporting for all target groups.

WIOA sec. 3(36)(A) defines the term "low-income individual" for eligibility purposes as an individual who—

- (i) Receives, or in the past 6 months has received, or is a member of a family that is receiving, assistance through SNAP, TANF, is a recipient of SSI, or State or local income-based public assistance;
- (ii) Is in a family with total family income that does not exceed the higher of
 - (I) The poverty line; or
 - (II) 70% of the LLSIL;
- (iii) Is a homeless individual (as defined in section 41403(6) of the Violence Against Women Act of 1994) or a homeless child (as defined under section 725(2) of the McKinney-Vento Homeless Assistance Act);
- (iv) Receives or is eligible to receive a free or reduced-price lunch under the Richard B. Russell National School Lunch Act:
- (v) Is a foster child on behalf of whom State or local government payments are made; or
- (vi) Is an individual with a disability whose own income meets the income requirement of clause (ii), but who is a member of a family whose income does not meet this requirement.

Additionally, sec. 127(b)(2)(c), and sec. 132(b)(1)(B)(v)(IV)(aa & bb) respectively, define the terms "disadvantaged youth" and "disadvantaged adult" in terms of the poverty line or LLSIL for State formula allotments.

According to additional guidance from USDOL, LWDBs are <u>not permitted</u> to create a local definition of low income. In response to a request for a "regulation [that] allows for a local definition of low income rather than the Federal definition LLSIL," USDOL responded that "the term 'low income individual' is statutorily defined in WIOA sec. 3(36); it includes language that the LLSIL is determined by the Secretary."





Program Years 2024 – 2025 Six-Month Income Guidelines for WIOA:

Low Income Level Figures Effective May 13, 2025

Family Size	Metropolitan Areas	Atlanta MSA	Nonmetropolitan Areas
1	7,825	7,825	7,825
2	10,575	10,575	10,575
3	13,724	13,559	13,325
4	16,944	16,733	16,301
5	19,998	19,748	19,236
6	23,389	23,093	22,496
7	26,780	26,438	25,756
8	30,171	29,783	29,016
For each over 8 Add:	3,391	3,345	3,260

6. LLSIL Use for Self-Sufficiency Determinations.

WIOA does not set a federal definition for self-sufficiency; but section 134(a)(3)(A)(xii) and 134(d)(1)(A)(x) address state and local determinations of economic self-sufficiency standards. WIOA gives States the discretion to adopt self-sufficiency standards at a higher level than the federal minimum.

Section 3.2.3(III) of the state policy manual defines minimum standards of "lacks self-sufficiency" as an individual who:

- A. Has a family income that is at or below 100% of the LLSIL;
- B. A Food stamp [SNAP] or TANF recipient (current or within the last 6 months);
- C. An SSI recipient; or,
- D. An individual (single family of one) who is employed, but in a job earning less than the living wage hourly rate for the State of Georgia (per Living Wage Calculator for the State of Georgia).

State policy further delegates that authority to LWDBs in 3.2.3(III), which states "local areas are permitted to define self-sufficiency at a higher income level than the state minimum, as long as supporting documentation is provided."

7. LLSIL Use for JVSG

An eligible veteran or eligible spouse who is considered to be "low-income" based on WIOA Section 3(36)(A) is determined to have a significant barrier to employment (SBE) under the Jobs for Veterans State Grant and qualifies them to be served by a Disabled Veterans Outreach Program (DVOP) specialist.





8. Additional Guidance.

When considering the use of LLSIL figures for these separate determinations, the 70% standard is used to determine basic <u>WIOA eligibility</u>, per the federal definition; while the 100% standard stipulated below is to determine <u>eligibility</u> for training <u>services</u>.

- **9.** Action Requested. These revisions are effective for the Georgia Workforce System on May 30, 2025. Also attached is a chart with the new guidelines for determining low income. OWD requires that LWDAs ensure all staff and service providers who are involved in eligibility determinations for WIOA services receive a copy of the attached revisions.
- **10.** <u>Inquiries.</u> Inquiries regarding this guidance should be directed to the OWD Compliance team at <u>WIOAcompliance@tcsg.edu</u>.

11. Attachments.

Attachment 1: LLSIL Federal Register Notice Attachment 2: HHS 2025 Poverty Guidelines

Attachment 3: GA Counties within Metropolitan, Nonmetropolitan Areas & Atlanta MSA

Attachment 4: 2025 LLSIL at 70% Level Attachment 5: 2025 LLSIL at 100% Level

- **12.** Expiration. This WIG updates and rescinds *COM-23-004*. The income levels shown in the table will apply to WIOA eligibility and reporting in federal program years 2024-2025, or until another update occurs.
- 13. Authorization.



