

8.3.4 Economic Self-Sufficiency (ESS) Feedback for Q&A

[8.3 Program Design \(wisconsin.gov\)](#)

1. Historically, participants tend to complete their training and then drop out of sight. This raises a concern about whether a low completion rate for SSC at exit could have negative repercussions.

There will not be negative repercussions because, per the policy, "Career planners do not need to complete this calculation if there has been no change in household composition or income or if the participant is unreachable."

2. Previously, there was a performance measure for pre- and post-program earnings, which was eliminated, presumably because income data could be gathered through DOL. The SSC, however, would compare household income as well as individual income. Focusing on household income may not be valuable due to the numerous variables that can change over a three-year period, such as significant others/spouses, divorces, children, and parents moving. This variability makes it difficult to ensure comparisons are accurate, so gathering individual income through DOL records might be more practical. This new requirement could add extra work and pressure on the Career Services Specialist (CSS) team without yielding significant value.

Thank you for your concern. To align with [WIOA's purpose](#) of increasing ESS, DWD identified the plan to establish a policy requiring the completion of an ESS calculation at the time a participant exits the program (assuming the exit is due to the participant obtaining unsubsidized employment) in the [Governor's Council on Workforce Investment Strategic Plan](#). Due to the requirement DWD-DET will incorporate reviewing ESS at program exit into the policy.

3. Another point to consider is the criteria and justification for determining someone as ESS but working in low-skill, inconsistent, or unstable jobs. Using the minimum amount of income required for a household to meet its basic expenses at a minimally adequate level, without public or private assistance as the determinant for whether or not someone is eligible for program-funded training seems counter intuitive to the mission of WIOA and not in alignment with the DOL Good Job Principles. Being ESS does not mean the individual is financially stable; someone who is considered to be ESS could be one unexpected expense away from financial disaster. Adding these restrictions to policy will negatively impact individuals who are in need of upskilling, who are working in a low-growth industry or who need training to enter into a career that provides family-sustaining benefits that promote economic security and mobility so they can do more than just meet their basic expenses at a minimally adequate level, without public or private assistance. For example, in one situation DWD initially disallowed training funds for an ESS individual working at Taco Bell, which was successfully contested because it was agreed that the job was not reliable for maintaining ESS.

Thank you for your feedback. The policy's training eligibility criteria come directly from DOL guidance, so DWD-DET made no additional changes to the policy at this time.

4. Additionally, there may be a punitive outcome if a participant refuses to be coached for greater success in this area or if they are coached and switch employers after exit but as a part of follow-up services with the new business services metric. The Eligibility for Training Services Policy gives us the responsibility to state whether the participant is eligible for training services based off LMI, and likelihood of success (for lack of a better term), etc. On the surface this could help us in coaching participants toward jobs that have higher potential for ESS, which is how I plan to use it, but will we be penalized for creating barriers if we find that a participant is ineligible for training services?

"[Policy 8.5.3](#) references the "Training Eligibility Criteria." It further states that "If a participant is not eligible for training, DWD-DET requires the career planner to document, in an ASSET case note, which criteria were not met and the reason(s) the participant failed to meet the criteria."

DWD-DET's WIOA Local Program Liaisons stated, "If there is a case note reasonably explaining why the participant was found ineligible for training, it would not be negatively noted during monitoring."

5. How would this affect an individual who is considered to be ESS but is in need of additional training/certification in order to retain their employment? The training/certification program could take more than six months to complete; however, per the proposed verbiage they would only be eligible for training support if they were going to lose their ESS status within 6 months. Would we have to wait to support them until they were inside of the 6 month window for losing their employment?

The duration of the training does not impact training eligibility. No, you need not wait to support them until they are within a six month window. Participants may receive other career services and can be reassessed for ESS if their circumstances change. DWD-DET made no additional changes to the policy at this time.