

EXECUTIVE SUMMARY

INTRODUCTION

The Human Resources Administration (HRA) is committed to reforming its policies and procedures to more effectively fight poverty and income inequality by:

- Helping working families stay in the workforce when their jobs don't pay enough to live on by providing supports such as food and cash assistance, public health insurance, and emergency cash assistance and eviction prevention.
- Aiding those struggling to return to or enter the workforce by providing a variety of employment-related services, including access to education and job training, help with job search and placement, and temporary cash assistance.
- Providing a safety net for those permanently or temporarily unable to work.

New Yorkers seek HRA's assistance for a variety of reasons that require different responses to ensure successful and durable outcomes. Some are already working and need help to stay in the workforce and move up a career ladder. Others are struggling to return to work after losing a job or being out of the workforce for an extended time. Many may lack the skills to successfully join the workforce. There are also clients who are vulnerable or have special needs such as: survivors of domestic violence, young adults, persons with disabilities or mental or physical health barriers, immigrants, homeless individuals, persons with substance use issues, people with Limited English Proficiency (LEP), those lacking necessary literacy skills, and lesbian, gay, bisexual, transgender and gender non-conforming New Yorkers.

As announced at a May 19, 2014 City Council budget hearing, HRA will begin to implement a thorough and comprehensive approach to employment services that more fully recognizes the needs of individual clients in order to more effectively help each of them enter or return to the workforce and build sustainable careers, or obtain federal disability assistance if they are unable to work on an ongoing basis.

The Employment Plan

Every two years, HRA is required to submit to the New York State Office of Temporary and Disability Assistance (OTDA) an Employment Plan, which outlines HRA's employment services for applicants and recipients of Cash Assistance and Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps) benefits. In this year's plan, HRA is proposing a number of reforms aimed at improving employment and training outcomes so that more clients have an opportunity to achieve increased economic security by obtaining employment, moving off the caseload and out of poverty. HRA's efforts to fight poverty and income inequality through its employment services will be enhanced by comprehensive employment initiatives that are being developed by the Mayor's "Jobs for New Yorkers" task force.

In accordance with the biennial Employment Plan process, HRA's reforms will be phased in during the two-year period covered by this plan. As the reforms are phased in, they will be evaluated for efficacy and impact, and they will be modified accordingly.

The reforms to HRA's employment plan are based on these principles:

- **Improving assessments** to address each client's actual strengths and needs will improve outcomes compared to the current one-size-fits-all approach that has led to one out of every four clients who are reported to have received employment assistance returning to the caseload within 12 months.
- **Maximizing education, training and employment-related services** will open job opportunities and create the basis for building career pathways out of poverty.
- **Eliminating unnecessary punitive and duplicative actions** that lead to preventable negative actions and fair hearings (that now subject New York City to potentially \$10 million in financial penalties) will allow staff to focus on more effective problem solving and allow clients to avoid delays in accessing services, finding jobs and moving into sustainable employment.

In developing this Employment Plan, HRA obtained feedback from a wide variety of key stakeholders. More than 40 focus groups and meetings were held with HRA staff, current and former clients, service providers, community-based organizations, advocates, the legal services community and other City agency partners. A survey of all HRA staff to obtain their feedback on reforms resulted in more than 6,000 responses. Workgroups of HRA staff met regularly to consider this feedback and to propose concrete reforms, recognizing that some reforms can be implemented quickly and that others will be longer term efforts. An additional survey will be conducted of current and former HRA clients during the public comment period for the Plan.

Helping low-income workers stay employed

While this plan is focused on Cash Assistance recipients who are not in the workforce, it is important to note that many of the New Yorkers receiving some assistance from HRA are already working and that HRA's support helps them remain in the workforce. Living in a very expensive city, low-income workers, who are generally struggling to begin with, can be derailed by a variety of emergencies and unexpected expenses. For the three million New Yorkers receiving Medicaid, 1.8 million receiving food assistance, 700,000 receiving home energy assistance, and 100,000 receiving one-time cash assistance to prevent evictions, utility shutoffs or assistance with other emergencies, these supports can be critical in maintaining employment. Having health insurance means those workers can stay healthy and working and avoid the economic disaster that severe illness can impose on those with no insurance. Food and energy assistance, child support, and the Earned Income Tax Credit strengthen households and help families survive on low-income jobs. Emergency Cash Assistance and services to prevent homelessness can also stabilize families and individuals and keep them from losing employment in the face of sudden emergencies. Subsidized child care assistance, provided through the Administration for Children's Services (ACS), is another essential program to help keep low-income workers in the workforce. While perhaps not traditionally seen as part of HRA's formal employment plan, HRA's ability to help New

Yorkers stay in their jobs is as important as assisting those without jobs. Clearly, efforts aimed at keeping low-income workers in the workforce are much less expensive and more efficient than having to help New Yorkers return to the workforce, especially after an extended absence.

Which HRA clients are affected by this employment plan?

The Employment Plan is primarily aimed at improving outcomes for Cash Assistance recipients who are required by federal and state law to engage in work and work-related activities.

- Of 350,000 New Yorkers on Cash Assistance in any given month and of 500,000 unduplicated New Yorkers who receive recurring Cash Assistance during the year, about half are children below age 18.
- Of 172,000 households receiving recurring assistance each month, about 92,000 are permanently or temporarily exempt because they are child-only cases or have an adult who is unemployable and/or exempt due to disability, illness or age, etc., based on the criteria of federal and state law as applied under prior Administrations.
- About 24,000 households have a working adult, but have income low enough to qualify for Cash Assistance. They already meet the work requirement.
- About 56,000 households have adult Cash Assistance recipients required to participate in work and work-related activities in order to receive assistance. The Employment Plan is aimed at helping this group.
- About 20,000 of the 56,000 are in sanction status or process at any given time. HRA's prior policies have not allowed them to participate in work or work-related activities.

Who are Cash Assistance applicants?

When a New Yorker comes to HRA for Cash Assistance, it creates an opportunity for him or her to move towards employment and a more stable economic future. It also creates the obligation for the City to wisely use taxpayer dollars so that clients will be less likely to need assistance in the future.

New Yorkers who come to HRA for Cash Assistance generally fall into several categories, and each needs a different approach within the context of the rules governing this aid.

- People with substantial work experience and marketable skills who know how to seek a job. *Requiring unrelated work assignments outside their area of expertise or resume writing workshops will only slow them in finding a job quickly.*
- People who have some marketable skills but have problems searching for employment or have given up. *They need support in searching for a job.*
- People who have not completed high school, trade school or college and need training. *They, particularly single parents, need the opportunity to complete the highest possible level of training or*

education as quickly as possible so that they can start to build a career to move off of the caseload and out of poverty.

- People with barriers to employment, such as low literacy levels or limited English. *They need to develop language and literacy skills as quickly as possible.*
- People with disabilities or medical, mental health or substance use problems or other barriers who can still engage in appropriate work. *They need help addressing their barriers and identifying and preparing for the jobs they can perform and in which they can thrive.*
- People with short-term medical problems or substance use challenges that prevent immediate return to work. *They need help getting and remaining healthy so they can return to work.*
- People with serious medical problems or other barriers who cannot work at all. *They need help obtaining federal disability assistance through programs such as Supplemental Security Income or Social Security Disability Insurance.*
- People who are not eligible. *They need to find out expeditiously that they do not qualify so they can seek other types of help.*

Why does the system need reform?

HRA spends \$200 million on employment programs annually, but an analysis of the performance of these programs shows that they have not been as effective as they could be in connecting or reconnecting New Yorkers to the workforce and at minimizing the chances that they will need to return to Cash Assistance.

HRA reported 92,717 job placements in 2013. But that number includes:

- 15,107 individuals, or 16%, who were already working when they received a one-time grant, usually rental assistance to prevent eviction and homelessness.
- 11,721 applicants, or 13%, who were rejected for assistance, but later data matching determined they found themselves a job.
- 17,125 clients, or 18%, who were not connected to HRA's employment programs and later data matching found they had a job, or had a job already when they were accepted for ongoing assistance or food stamps.

It is of course positive and worth knowing that these New Yorkers found employment. However, the only way to measure the effectiveness of each of HRA's job placement efforts is by measuring the actual results of those efforts.

The current "one size fits all" approach to employment programs has resulted in 25% of clients who are reported as being connected to the workforce by HRA returning to HRA within 12 months to seek recurring Cash Assistance again.

Moreover, there are counterproductive policies and procedures that can lead to punitive actions, including sanctions that are linked to negative outcomes for clients, including homelessness. HRA has not permitted sanctioned clients to participate in work, training and job search, and thus they are not preparing to get a job and start the climb out of poverty. For example, during a representative week in

May of this year, of the 56,000 Cash Assistance clients subject to work requirements, more than 20,000, or more than one third, were sanctioned or in process to be sanctioned.

Homelessness also makes obtaining a job substantially more difficult. Of all the children and adults who filed applications for shelter with the Department of Homeless Services during the first six months of 2013, almost one quarter were part of a Cash Assistance case that HRA closed or sanctioned because of alleged non-compliance in the previous 12 months.

In addition, a recent study of HRA Cash Assistance recipients found that one third of them had their first application rejected, but were accepted soon after, raising the question of whether they should have been accepted and given assistance to find work sooner.

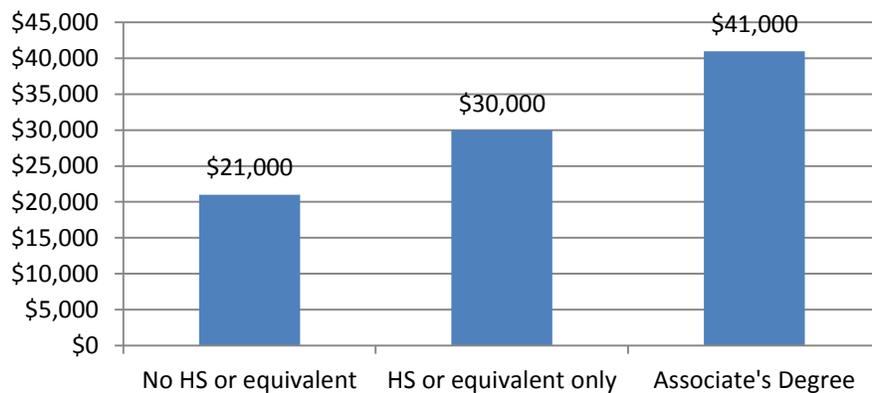
The specific reform proposals described below are incorporated into the Employment Plan. These proposals focus on improving how HRA interacts with all the different types of individuals who come to the agency for help and on maximizing positive outcomes from HRA's support for them. A summary of the feedback from focus groups, meetings and surveys is included in Appendix B to the Executive Summary. Some valuable suggestions received as part of this process relate to issues outside the Employment Plan and will be addressed as part of the ongoing broader reform efforts to improve HRA's operations. In addition, during the 30-day public comment period, HRA will make the Plan available on the HRA Intranet/Internet and hold a public hearing and a staff forum to ensure all interested parties have the chance to comment. Any comments received will be carefully evaluated.

MAXIMIZE EDUCATION, TRAINING, AND EMPLOYMENT-RELATED SERVICES

1. Increase Access and Supports for Education and Training Opportunities

There is a vast literature on the positive economic returns associated with investments in education and training.¹ In New York City, workers with a high school diploma or equivalent earn 1.5 times what workers without these credentials earn, and workers with an Associate's Degree earn 2 times more (see Figure 1).²

Figure 1: Median Earnings for Full-time, Full-year Workers in NYC
U.S. Census Bureau, American Community Survey, 2012



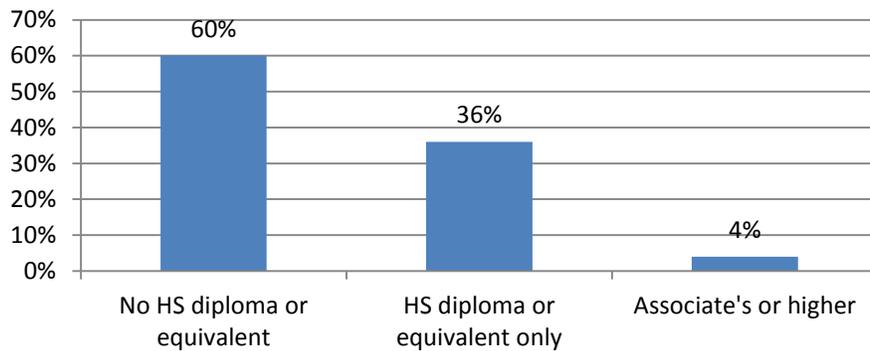
Many of HRA's Cash Assistance recipients lack the basic education needed to realize these positive economic returns. Among HRA clients who are determined to be employable, 60% lack a high school diploma or equivalent and 30% of those without a diploma or equivalent are below 9th grade proficiency for Math and Reading.³ Among the 40% with a high school diploma or equivalent, only 4% have an Associate's Degree or higher (see Figure 2). Without the education and job skills needed in today's labor market, Cash Assistance recipients will continue to face substantial barriers to obtaining sufficient wages and quality jobs to move out of poverty.

¹ A few examples include: Hollenbeck, Kevin, and Jean Kimmel. 2001. "The Returns to Education and Basic Skills Training for Individuals with Poor Health or Disability." Upjohn Institute Working Paper No. 01-72. Kalamazoo, MI: W.E. Upjohn Institute for Employment Research http://research.upjohn.org/up_workingpapers/72; Pew Research Center, "The Rising Cost of Not Going to College", <http://www.pewsocialtrends.org/files/2014/02/SDT-higher-ed-FINAL-02-11-2014.pdf>; and McGraw-Hill Research Foundation, "The Return on Investment from Adult Education and Training", <http://www.mcgraw-hillresearchfoundation.org/wp-content/uploads/the-return-on-investment-from-adult-education-and-training.pdf>.

² Source: US Census Bureau American Community Survey, 2012. Median earnings for workers working full-time, full-year was: \$21,000 (no HS), \$30,000 (HS alone), and \$41,000 (Associate's Degree).

³ Source: HRA administrative data from October 2013. 46,769 clients were employable, of which 27,948 lacked a HS diploma or equivalent and 8,223 scored below 9th grade on Math or Reading TABE.

Figure 2: Education Level of HRA Employable Adult Cash Assistance Recipients (n=46,769)



After a close review of the literature and receiving extensive feedback from HRA staff and clients which indicated the need to improve access to education and training for Cash Assistance clients consistent with federal and state law, HRA proposes to expand access to education and training in order to improve the employment prospects of Cash Assistance recipients in the following ways:

- **Allow participation in 4-year college and liberal arts degree programs.** In accordance with state law, which HRA supported, HRA will allow participation in 4-year college. Students will be allowed to have full-time education count toward work participation for 12 months, the current limit. In addition, based on state law, as long as a liberal arts degree program is linked to employment, it will be allowed to count toward work participation. After 12 months, to increase the chances of success, HRA will develop work study programs and internships to meet the 20 hours of work requirement that are located near the college and that are, as much as possible, related to the course of study.
- **Increase supports for Cash Assistance recipients enrolled in college.** According to CUNY's Office of Institutional Research and Analysis, only 20% of first-time freshman enrollees earn an Associate's degree within 6 years.⁴ To address the low completion rate, HRA will seek to expand or replicate CUNY ASAP for Cash Assistance recipients. CUNY ASAP provides comprehensive advisement, job development and tutoring support to enrolled students. Students are also scheduled into block classes to allow them to balance work and school and to form a community with their fellow classmates. An evaluation of CUNY ASAP found that it leads to better retention, credit accrual, and degree attainment.⁵ In addition, HRA will develop a partnership with CUNY to provide work study and internships to Cash Assistance recipients enrolled in college that are tailored to their field of study and satisfy their state and federal work requirements.

⁴ As reported in the evaluation of CUNY ASAP, accessed here: <https://www.cuny.edu/academics/programs/notable/asap/Pagesfrom2012ConferenceProceedings.pdf>.

⁵ Ibid.

- Allow recipients up to age 24 to participate in full-time basic education, as long as they meet established goals and sufficient progress is made toward obtaining a credential (beyond the current 12-month limit).** As part of HRA’s strategy to ensure youth have access to education and opportunity, HRA will allow full-time engagement in post-secondary school, sector-based contextualized literacy training for those with low literacy levels, and Test Assessing Secondary Completion (TASC, formerly GED) preparation for those at the appropriate skill level, beyond the current 12-month limit, as long as established goals are met and there is sufficient progress toward obtaining a credential. This will involve partnering with the Department of Education (DOE), the Department of Youth and Community Development (DYCD), and other community-based organizations to utilize their services to ensure young adults receiving Cash Assistance complete their high school education or equivalent or obtain further credentials.
- Allow recipients with limited English proficiency (LEP) to participate in full-time English as a Second Language (ESL) coursework, and test them for literacy in their own language.** As part of HRA’s strategy to more positively engage LEP immigrants and clients and ensure their future success, Cash Assistance recipients in need of ESL classes will be allowed full-time engagement in these activities, subject to the 12-month limit on education as a full-time work activity. In addition, HRA will test LEP recipients to determine their literacy in their own language, since that may affect their ability to learn a new language, and find an appropriate ESL class for them. Currently, ESL classes are offered to Cash Assistance recipients through the Back 2 Work (B2W) program, but their participation is limited to the 2 days they are with the B2W program, while the other 3 days are spent in a work assignment (usually the Work Experience Program-WEP). This proposed change recognizes that 2 days a week of English training is insufficient to prepare LEP Cash Assistance recipients to compete meaningfully in the job market or to obtain additional education credentials. HRA data suggests that as much as 72% of LEP clients (including those with “education unknown”) lack a high school diploma or equivalent.⁶ Limited English skills along with low basic education suggest that these clients face particular challenges to finding employment at sufficient wages to move off of the public assistance caseload. In response, HRA proposes to allow them the opportunity to participate in ESL coursework full-time (5 days a week), as long as sufficient progress is being made, up to the 12 month limit. HRA intends to work with community partners to offer full-time options, as well as, in the longer-term, to modify the employment program contracts to allow this option.
- Increase access to short-term, sector-based training opportunities and utilize available Career Pathway programs.** There is limited evidence that traditional welfare-to-work programs that incorporate training improve the long-term income of Cash Assistance recipients.⁷ However, there is a growing body of research that suggests that sector-based training programs (those that train participants for a particular job in a particular high-growth industry) are effective at

⁶ Source: HRA OER analysis of clients with limited English proficiency, June 2014.

⁷ See Hamilton et al. (2001) How Effective Are Different Welfare-to-Work Approaches? Five Year Adult and Child Impacts for Eleven Programs, MDRC; Hendra, et al. (2010), How Effective Are Different Approaches Aiming to Increase Employment Retention and Advancement?, MDRC;

increasing employment levels and earnings for participants.⁸ Programs, such as Year-Up for young adults and Per Scholas in New York City, have been shown to increase employment levels and earnings compared to control groups (although these programs do not specifically target Cash Assistance recipients).⁹ Common among these programs are strong employer relationships and training of participants for particular employers. In addition, there is promising data that Career Pathway approaches, which incorporate sector-based strategies, may be more effective than traditional welfare-to-work training approaches. States such as Arkansas, Kentucky, and Oklahoma utilize Career Pathway approaches and have become national models for how to provide education and training to Cash Assistance recipients (see Appendix C for a summary of these state programs).

Based on this evidence, HRA is proposing to increase access to short-term sector-based training and to link Cash Assistance recipients with Career Pathways programs. Currently, short-term training opportunities for Cash Assistance recipients are rolled into the B2W program contracts, with training provided as part of their performance-based contracts. HRA is proposing to increase the use of training vouchers (e.g., Individual Training Account-ITA-vouchers) to enhance the availability of short-term, sector-based training for Cash Assistance recipients that centers around building strong employer partnerships. In addition, HRA is proposing to proactively facilitate Career Pathway partners to work with its employment program vendors.

- ***Improve client assessment to develop individualized service approaches and move away from a “one size fits all” model.*** HRA is committed to matching clients, especially those who may be vulnerable or have special needs, to appropriate and tailored services. Over time, HRA proposes to improve the current process for assessing clients’ education, training, and employment goals and to provide counseling and support to clients in meeting these goals. Although this will be a longer-term effort, the goal is to provide a comprehensive assessment that identifies strengths and challenges, and develops an individualized service plan. Identifying the education and training needs of clients and the resources available to meet their needs will be a large component of the improved client assessment structure.

2. Phase Out the Current Work Experience Program (WEP) Model and Implement Other More Effective and Sustainable Work Programs

HRA believes that the current Work Experience Program (WEP) model is not the most effective means to meet the goal of providing valuable work experience that truly leads to employment. This is supported by administrative data that shows that 45% of WEP referrals result in failure within 6 weeks of their

⁸ See Roder et al (2008), “Targeting Industries, Training Workers and improving Opportunities: The Final Report from the Sectoral Employment Initiative”, Public/Private Ventures; Maguire et al. (2010), “Tuning In to Local Labor Markets: Findings from the Sectoral Employment Impact Study”, Public/Private Ventures; Roder and Elliot (2011), “A Promising Start: Year Up’s Initial Impacts on Low-Income young Adults’ Careers”, Economic Mobility Corporation; and Eyster et al (2010), “Implementation and Early Training outcomes of the High Growth Job Training Initiative: Final Report”, Urban Institute.

⁹ Roder and Elliot (2011), “A Promising Start: Year Up’s Initial Impacts on Low-Income young Adults’ Careers”, Economic Mobility Corporation; Maguire et al. (2010), “Tuning In to Local Labor Markets: Findings from the Sectoral Employment Impact Study”, Public/Private Ventures.

referral.¹⁰ WEP participation declined substantially in the prior administration as some City agencies terminated the program, the caseload declined and the City increased the number of subsidized jobs in the Parks Department. Expanding the type of work and better meeting the needs of the clients was a common theme among the HRA staff focus groups and survey. For some HRA clients, spending more time doing job search activities or other work activities that better meet their needs may be more beneficial than the one-size-fits all approach of the current WEP. As WEP assignments are reduced, HRA will work with other City agencies to ensure that gaps in city services are not created.

As the reforms are phased in, HRA is proposing to replace the current Work Experience Program (WEP) model with other work programs that are better suited to improving the employment prospects of Cash Assistance recipients. Specifically, HRA is proposing the following:

- **Replace WEP requirements with additional job search, work study, or internship activities for Cash Assistance recipients with recent work histories and those with college degrees.**
Currently, almost all Cash Assistance recipients who are assigned to the employment track (e.g. B2W) must do 21 hours of WEP along with 14 hours of their program activity, which generally involves job search, job readiness, and short-term training as needed. Those who have very recent work history, as well as those with college degrees, would likely benefit more from full-time job search and job readiness beyond what is currently allowed. HRA will implement a pilot project to identify job ready applicants, defined as (1) recently employed and/or highly educated; (2) ready to find and accept employment; and (3) effective at looking for work. Those who meet all three criteria will be allowed to do self-directed job search, with weekly check-in. If they are unsuccessful in job search, HRA intends to work toward developing other meaningful work programs for these groups, such as internships or apprenticeships. Therefore, HRA proposes to phase out the WEP requirement for these two groups of participants and replace it with job search, internships, and apprenticeships.
- **Replace WEP requirements with internships and work study for those enrolled in college.**
Currently, Cash Assistance recipients enrolled in school beyond the federal and state 12-month full-time allowance are required to participate in WEP for 21 hours per week, as well as during breaks when class is not in session. In partnership with CUNY, HRA proposes to replace the current WEP assignments for these students with internships, community service, and/or work study assignments that are tailored to the individual needs of each student.
- Expand capacity to develop and support **internship opportunities, community service and part-time subsidized jobs for all Cash Assistance recipients who require a core work activity.** As the reforms are phased in, HRA proposes to replace WEP with other opportunities for all Cash Assistance clients required to participate in work activities, not just those identified above. Currently, WEP is the primary activity for all clients who require and do not already have a core work activity. HRA proposes to replace the current WEP assignments with internship

¹⁰ Source: HRA OER Analysis of October and November 2013 WEP referrals (n=14,633), which found that 5,709 (39.0%) ended in an FTR or FTC within 4 weeks of the referral date and 6,652 (45.5%) ended in an FTR or FTC within 6 weeks of the referral date.

opportunities, community service and part-time subsidized jobs, including enhanced programs in City agencies, that meet the individual needs of each Cash Assistance client.

- ***Develop new programs and support the transition to new engagement options with a comprehensive assessment structure and case management services.*** In the next generation of employment provider contracts, HRA plans to include new programs that more effectively meet the individual needs of clients. To support this effort, a comprehensive assessment structure will be developed to better place clients on a service track that meets their needs and identifies those who can benefit from case management services. The goal is to increase participant engagement by providing effective activities for clients that lead to employment. A report by the Center on Budget and Policy Priorities (2000) identified comprehensive assessments as a key strategy to increase program participation and reduce harm to clients caused by inappropriate sanctions.¹¹ In addition, other states, such as Utah and Iowa, use assessments to place people in the proper activities and avoid inappropriate sanctions.¹² Finally, focus groups conducted with current and former clients (see Appendix B) suggested that assessments by trained professionals that identify the individual needs of clients are needed.

3. Customize the Hours of Required Engagement in Work-related Activities to Each Individual

A one-size-fits-all approach of 35 hours of required work activities for all employable Cash Assistance applicants and recipients does not recognize the different circumstances of each individual and family. This is evidenced by the fact that most Cash Assistance recipients assigned to 35 hours of work activity fail to achieve 35 hours based on the prior City Administration's analysis.¹³ While full-time employment remains the overarching goal, HRA recognizes that engagement policies should be tailored to each individual family.

In response, HRA is proposing to customize the number of hours of required engagement in the following ways:

- ***Maintain the engagement requirement at 35 hours per week for families with children, except in response to continuing challenges where the lower limit permitted by law will avoid unnecessary sanctions.*** Some families face necessary ongoing obligations, such as housing search for those in shelters, attending mandated Administration for Children's Services (ACS) parenting classes, caring for a child with disabilities attending school for whom after school care is difficult or impossible to find, or taking a parent who does not live with the family for regular dialysis or other continuing medical treatment. Since federal and state laws allow a reduced requirement of 30 hours, it is both legal and reasonable to adjust the engagement requirement in such cases so these important family activities do not lead to unnecessary sanctions.

¹¹ Goldberg, H. and Shott, L. (2000). A compliance-oriented approach to sanctions in state and county TANF programs. Center on Budget and Policy Priorities, October 2000.

¹² Source: HRA OER, Review of State Practices to Avoid Sanctions, April 2014 (see Appendix).

¹³ Source: HRA Office of Data Reporting and Analysis (ODRA), work participation rate chart.

- ***Reduce the engagement requirement from 35 hours to 25 hours per week for families with children age three or younger as allowed by federal law.***
 - Elsewhere in New York State, the requirement has been reduced to 25 hours (rather than the 20 allowed by federal law) for families with children under the age of 6. New York City is proposing the same reduction to 25 hours, but only for the parents of children age three or younger. Childcare for very young children is often more difficult to find and more expensive. The reduced requirement, which with travel time can still amount to seven hours a day, will assist parents of young children, who have often unforeseen child-related demands on their time, to remain engaged and avoid unnecessary sanctions which affect the financial stability of the family. A parent with a child age three or younger who can secure child care to work longer hours will be encouraged to do so.
 - As to families with children aged four and five, thanks to the City and State’s new Universal Pre-Kindergarten program, they will have access to full-day care in either a school setting or a not-for-profit that includes wraparound childcare after 3 p.m., and thus should be able to meet the 35-hour requirement. These families will still have the ability to use the lower 30-hour limit provided by federal and state law in special circumstances as provided above.
- ***Pilot a program that allows self-directed job search for job ready Cash Assistance applicants.***

Currently, all applicants for Cash Assistance that are determined to be employable and not already enrolled in school are referred to the B2W program for full-time job search and job readiness training. HRA plans to implement a pilot project that identifies applicants who are job ready (with “job ready” defined as applicants who meet all three of the following criteria: (1) recently employed *and/or* highly educated; (2) ready to find and accept employment, based on self-report; and (3) have a high level of job searching self-efficacy, based on a short questionnaire) and allows them to do self-directed job search with a weekly check-in at a B2W provider. The weekly check-in will provide an opportunity for the applicant to obtain Metrocards and to attest to job search activities. This contrasts with the current model that requires daily attendance at the B2W provider for job search related activities, which diverts clients from actually looking for a job. The pilot will involve a subset of job ready clients in order to evaluate the effectiveness on program participation, job placements, and receipt of Cash Assistance.

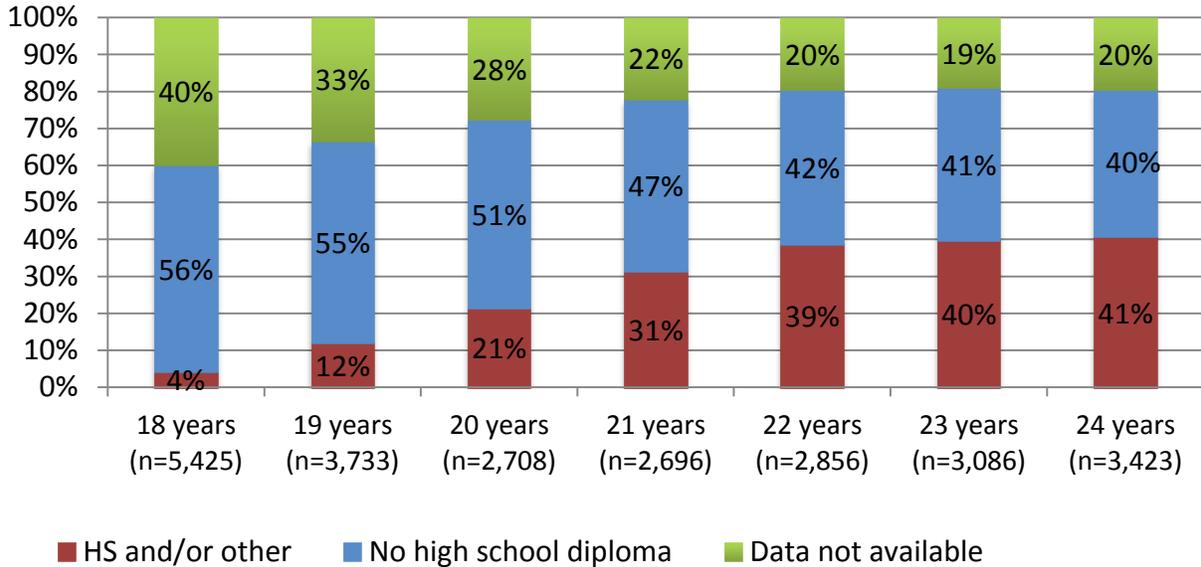
4. Create a New Employment Strategy for Youth

At any point in time, approximately 24,000 young adults are receiving Cash Assistance from HRA. This includes approximately 11,900 young adults ages 18-20 and 12,100 young adults ages 21-24. An analysis of administrative data for these young adults shows that the 18-20 year olds are very different from 21-24 year olds (as well as older adults) in terms of their case composition, history of Cash Assistance receipt, and the program activities in which they engage. This suggests that a customized approach for young adults receiving Cash Assistance is needed.

- **Create a youth coordinator position to manage youth services and develop relationships with community providers.** HRA recognizes that young adults receiving Cash Assistance have certain strengths and face different challenges than their older counterparts. As such, a comprehensive approach to young adult programming is needed. HRA will create a youth coordinator position to manage the new employment strategy for youth.
- **Establish a relationship and devise a multi-year strategy with the Administration for Children Services (ACS) to coordinate employment services for youth aging out of foster care.** HRA intends to engage with ACS to develop a strategy for youth aging out of foster care and target HRA programs and services to benefit them.
- **Connect youth ages 18-24 without a High School diploma or equivalent to High School or equivalency classes.** An analysis of administrative data shows that most 18-20 year olds receive Cash Assistance on their parents' case and lack a high school diploma or equivalent. According to the analysis, while 70% of 18 year-olds were exempt from Cash Assistance requirements because they were full-time high school students, only 30% of 19 year olds and 5% of 20 year olds were enrolled in high school. The analysis also shows that a very small percentage of young adults ages 18-24 receiving Cash Assistance have a high school diploma or equivalency. Figure 3 shows that as much as 69% (with "education unknown" included) of 21 year olds lack this credential and as much as 60% of 24 year olds lack this credential.

A high school education or equivalent is crucial to obtaining sufficient wages to move off of the public assistance caseload and young adults in particular should focus on achieving a basic education as a path toward economic security. HRA plans to partner with the DOE to encourage all 18- and 19-year-old Cash Assistance recipients who can remain in full-time high school to do so since the 12-month limit does not apply to them. In addition, HRA intends to encourage young adults up to age 24 to obtain their equivalency degree if they are not enrolled in high school. However, currently, many Cash Assistance recipients, including young adults, who participate in high school equivalency preparation classes, must also participate in a core work activity for 21 hours per week. This generally means participating in classes two days a week (or 14 hours) and participating in WEP for the core 21 hours. HRA proposes to allow young adults who are under age 24 and do not have a basic education credential to study full-time (either enrolled in high school or in preparation classes to obtain an equivalency credential), as long as established goals are met and there is sufficient progress toward obtaining a credential. HRA will partner with the DOE, existing providers, and the Department of Youth and Community Development (DYCD) to access basic education classes for this population, as well as develop a more robust basic education program within the services provided by HRA's employment program vendors.

Figure 3: Educational Attainment for Young Adult Cash Assistance Recipients, Oct. 1 2013



Source: HRA Administrative Data.

5. Create a Customized Employment Strategy for Shelter Residents

Approximately 13,700 Cash Assistance recipients reside in a DHS homeless shelter. Recognizing that shelter residents face unique challenges, HRA proposes to create customized employment strategies for this group. In addition, to the extent that shelter residents include client groups covered in other areas (e.g., youth, LEPs, etc.), they will be provided with the benefit of services designed for those groups. Specifically, the following are being proposed for shelter residents:

- Create new strategic milestones for HRA’s employment program vendors serving homeless clients.** To ensure that the employment program vendors serving homeless clients are providing services that meet the individual needs of shelter clients, as it phases in the reforms, HRA will establish new payment milestones for specific services tailored to meet shelter clients’ needs.
- Implement a comprehensive assessment, case management services, and a JobsPlus-like program model for shelter clients.** Recognizing that homeless shelter clients have unique needs, as a long-term measure, HRA plans to implement a comprehensive assessment that will evaluate the specific needs of homeless shelter clients and link the assessments to intensive case management for those who need it. In addition, HRA will develop a JobsPlus-like model to meet the specific employment and training needs of shelter residents. JobsPlus is a proven employment program that offers services to residents in targeted public housing developments, helping residents build skills and connect to the labor market so they can increase their incomes and financial security.

- **Better serve the employment needs of clients in DHS shelter.** HRA will pilot placing employment program providers in the DHS shelters to provide services and help clients resolve issues. For clients in a shelter with existing employment programs, HRA will establish relationships with these providers and give clients the option of enrolling with them. During the phasing in of the reforms, HRA will develop capacity to partner with existing shelter providers so that shelter residents can receive seamless services.

6. Create a Customized Employment Strategy for LEP Cash Assistance Recipients

As of October 1, 2013, there were 28,000 Limited English Proficiency (LEP) Cash Assistance adult clients, of whom 56% (or 15,680) were over age 60 and exempt from HRA employment requirements due to age (Figure 4). The remaining 18-59 year-olds (44% or 12,320) were mostly Spanish-speaking (87%) (Figure 5) and only 33% were required to participate in HRA work activities either because they were not already exempt due to disability or other reasons or because they were not already working full-time. This means that only 4,065 LEP Cash Assistance adults could access HRA’s employment services. HRA proposes a customized employment strategy for this small, but important component of the employable caseload.

Figure 4: LEP Adults Receiving Cash Assistance by Age Group, Oct. 1 2013 (n=27,709)

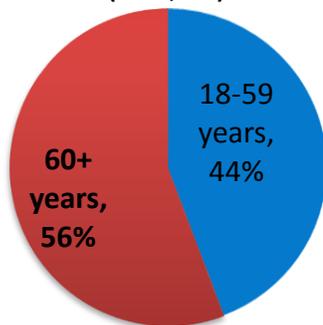
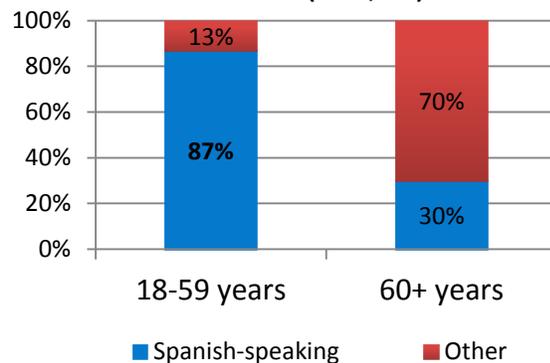


Figure 5: LEP Adults by Age and Language, Oct 1. 2013 (n=27,709)



Source: HRA OER, Analysis of Limited English Proficiency (LEP) Cash Assistance Recipients, June 2014.

7. Provide better support for domestic violence survivors

HRA plans to provide more client-centered services to domestic violence survivors. The agency plans to improve its ability to determine who is eligible for these services, by implementing the following:

- **Engage survivors in successful programs.** There are several successful programs for survivors, such as the Sanctuary for Families Economic Empowerment Program (EEP), which help survivors develop the skills to work and become self-sufficient. HRA will identify these programs and encourage survivors to participate in them.

- **Extend the Domestic Violence Waiver period to six months.** Domestic violence waivers may be granted for a minimum of four months up to a maximum of six months, and may be renewed as needed. In the past, HRA has granted survivors only four-month domestic violence waivers. The domestic violence waiver period will be extended to six months, which will reduce unnecessary administrative appointments.
- **Modify the partial waiver.** Federal and state law exempts domestic violence survivors from compliance with specific public assistance program requirements, such as work assignments, which may subject them to further risk. New York City will modify its “partial waiver” program. All domestic violence survivors determined to be at risk will receive a full waiver to help ensure safety and achieve stability. However, domestic violence survivors who want to participate in employment programs will be encouraged and supported in doing so.

IMPROVE SERVICES FOR THOSE WITH LIMITATIONS TO WORK

8. Increase Access to Services by Implementing More Comprehensive Assessments

HRA believes that not all clients with work limitations are currently being identified through our existing application and recertification processes due to the limitations in the existing HRA employability assessment, which asks simplistic questions regarding clients’ perceived medical and/or mental health barriers to employment. This may be especially the case for individuals with mental health issues who may not want to self-disclose them or even be aware of them. Additionally, HRA will work with its contractors to strengthen assessments in these same areas in an effort to better identify and serve these clients based on their individual needs, including any needs for reasonable accommodations.

The following outlines the key strategies for strengthening assessments:

- **When seeing a client, HRA Job Center staff will review his or her case for a history of federal Supplemental Security Income (SSI) applications and/or denial and a history of non-compliance.** Physical and mental health issues that prevent someone from being successful in the labor market and/or lead to a history of non-compliance can go unnoticed by Job Center staff. To address this problem and make a determination about whether a referral for additional services is required, Job Center staff will review cases for SSI application history and non-compliance history and assess whether there is a previously unidentified physical and/or mental health limitation that may be contributing to non-compliance and whether the client could benefit from a referral for additional services.
- **Implement screens for reasonable accommodation needs and mental health issues.** HRA will develop a standardized screening tool to identify Cash Assistance recipients who require reasonable accommodations, such as travel accommodations, workplace accommodations, and/or program participation accommodations. In addition, feedback from HRA staff recommended that HRA should better identify and serve people with mental health needs. As such, HRA will develop a plan to implement the Modified Mini Screen that will be used on a

voluntary basis for clients to identify mental health issues that may go undiagnosed or unnoticed. These screening tools will help ensure that clients with barriers to participation receive the accommodations they need, as well as ensure that those who can benefit from additional services are properly referred.

- ***Strengthen assessments provided by contracted vendors.*** Contracted vendors will also be required to strengthen screens for reasonable accommodation needs and to review cases for a history of SSI applications or denials. Based on the results of these screens, vendors will be required to use this information to assess clients' employability and better identify those clients who may be eligible for federal disability benefits.
- ***Implement a functional assessment in vocational services.*** Currently, clients who are determined work-limited participate in a Diagnostic Vocational Evaluation (DVE) that focuses on the vocational strengths of the client. Working with contracted vendors, HRA intends to apply aspects of the Social Security Administration's (SSA) sequential evaluation and grid rules to identify those clients who may be "functionally disabled" due to a combination of clinical conditions, lack of education and work histories, and work-limitations. HRA will modify the current DVE process to better assess identified subgroups that may qualify for federal disability benefits and use the DVE to focus on their limitations to strengthen a SSI application based on the sequential evaluation and aspects of the grid rules.
- ***Reduce face-to-face appointments for clients in Wellness Plans.*** Currently, participants with a Wellness Plan are required to attend a face-to-face appointment once a month with a vendor for the duration of their Wellness Plan. HRA proposes to replace this face-to-face appointment requirement with a telephone option in order to better meet the needs of clients. This will allow clients with unstable clinical conditions to fulfill this requirement by telephone, reduce the number of face-to-face appointments, and decrease negative actions resulting from problems traveling to and from a vendor site.

9. Assist clients with SSI applications and appeals

HRA intends to strengthen services around obtaining federal disability benefits for those clients for whom it is appropriate, while at the same time reducing HRA appointments for this vulnerable population. HRA understands that assisting clients in obtaining SSI improves the quality of the client's life, while providing him or her with a better income source. Furthermore, HRA believes clients who are awaiting Social Security Administration decisions on disability applications or have been denied federal disability assistance for citizenship reasons should be allowed a biennial recertification for Cash Assistance. Preliminary data analysis suggests this may involve approximately 3,000 clients. This will reduce the potential for unnecessary adverse actions of case closings or sanctions for these clients. Since there is little to no change in resources until a client is awarded federal disability benefits in place of Cash Assistance, HRA proposes the following:

- ***Assist clients denied status due to citizenship status.*** An analysis of administrative data found that 84% of all Cash Assistance adults over age 60 with limited English proficiency were non-citizens who had an SSI application denied or were in pending status.¹⁴ It is unlikely their citizenship status will ever change and thus they will never be eligible for SSI benefits. HRA intends to move these clients to the currently unused Employment Code 36 (Incapacitated six months or more – Exempt) to prevent unnecessary call-ins and the filing of multiple SSI applications that will be denied due to citizenship status. Currently, there are several thousand of these cases that appear as SSI pending on engagement reports when in fact these numbers reflect multiple unnecessary applications. HRA also intends to develop a plan to implement biennial recertification periods, contingent upon OTDA approval, and thereby reduce unnecessary appointments for these clients who are exempt from work requirements because of their disabilities.
- ***Support the SSI application and appeal needs of clients who are determined to be homebound for more than one year.*** HRA intends to provide assistance to homebound New Yorkers with SSI applications, as well as to move toward biennial recertifications contingent upon OTDA approval, and home-based SSI application assistance.

10. Provide client-centered services for those with substance use disorders

HRA plans to provide more client-centered services to clients with substance use disorders and other issues by evaluating the use of harm reduction services for clients with a history of non-compliance with intensive treatment and, with appropriate approvals, begin making referrals and monitoring compliance. This approach is consistent with the New York State Medicaid Redesign and is consistent with the agency’s goal to not sanction New Yorkers at risk of becoming homeless.

HRA recognizes that these clients often cycle in and out of care and have histories of HRA imposed sanctions for failing to comply with mandates to participate in substance use treatment. Harm reduction approaches constitute a well-established portal of entry to substance use services, which recognizes that the engagement of these clients may require client-centered services designed to decrease potential harm to themselves and the community due to the clients’ substance use related activities. Providers work with clients on decreasing use and/or amounts of substances; safety; providing clean, positive space for clients to meet staff and other clients; and decreasing unprotected sex and other high risk or criminal behaviors. They also use motivational interviewing and other techniques aimed at encouraging the client to accept clinical substance use treatment. The New York State Department of Health supports this approach to reducing substance use.

- ***Explore implementing a harm reduction mandate for clients with history of non-compliance with traditional substance use treatment.*** Such an approach would not subject clients to a sanction for non-compliance with traditional treatment, and give them an opportunity to address their needs through harm reduction programs. This approach is consistent with what

¹⁴ Source: HRA OER, Analysis of Limited English Proficiency (LEP) Cash Assistance Recipients, June 2014.

other states do, as well as with New York State's Medicaid Redesign approach. In addition, it supports HRA's goal of not harming those at risk of becoming homeless with sanctions that are linked with homelessness.

ENHANCE PROGRAM PARTICIPATION AND DISPUTE RESOLUTION

11. Increase Program Participation, Reduce Unnecessary Sanctions and Case Closings

An internal analysis of HRA administrative data found that over the course of an 18-month period, 45.6% of Cash Assistance recipients experienced either a sanction or a closing for non-compliance.¹⁵ Some of these adverse actions may lead to unintended consequences, such as homelessness or increased need for emergency assistance. An internal HRA study found that more than one in ten family Cash Assistance cases with an adverse action applied for homeless shelter after the action and almost one-quarter received housing or utility emergency assistance after the adverse action.¹⁶ In addition, these adverse actions can often result in fair hearing requests that require substantial agency resources and have the potential to result in financial penalties from the state in certain circumstances. Analysis of HRA administrative data suggests that fair hearings are requested for 22% of infractions that result from employment-related requirements.¹⁷ To reduce the potential for unintended consequences and unnecessary fair hearings, HRA proposes to implement the following efforts to increase program participation, reduce sanctions and closings for non-compliance.

- ***Pilot project to allow up to five days of excused absences for illness without documentation.*** Currently, participants in HRA's employment-related programs must provide documentation to be excused from an absence. Recognizing that not all illness results in documentation, HRA is implementing a pilot where up to five absences per calendar year will be excused without formal documentation, which is consistent with New York City's new paid sick leave law. The excused absences will be restricted to sick leave and participants will still need to contact the provider to explain the absence. The pilot project is also intended to provide clearer guidance to employment program providers about when to grant excused absences.
- ***Pilot project to provide pre-conciliation outreach.*** Currently, when a participant in an employment-related program does not attend his or her work assignment and does not make contact with HRA, a sanction process begins with a conciliation notice to the participant. In order to increase program participation without having to implement sanctions, other states such as Utah, Florida, Iowa, Oklahoma, and California, utilize pre-conciliation outreach efforts to try to reengage the participant.¹⁸ The pre-conciliation process can often identify issues that previously went unnoticed and can be a more effective way to engage participants in work

¹⁵ Based on an analysis by HRA's Office of Evaluation and Research of all active recurring Cash Assistance recipients from January 2012 through June 2013.

¹⁶ Source: HRA Office of Evaluation and Research, Analysis of Cash Assistance Noncompliance, DHS Shelter, and Emergency Utility and Housing Grants – April 2014.

¹⁷ Source: HRA Office of Data Reporting and Analysis (ODRA) analysis of monthly infractions Calendar Year 2012 and 2013.

¹⁸ Source: HRA OER, Review of State Practices to Avoid Sanctions, April 2014 (see Appendix).

activities. The goal is to reduce the number of participants that ultimately end up sanctioned and to reduce the number of unnecessary fair hearings by addressing issues earlier through outreach. The pilot project will implement a pre-conciliation outreach period of 10 days to allow HRA staff to attempt to contact the participant by phone and by mail to reengage them before the sanction process begins. The pilot will be evaluated to determine whether the effort leads to a reduction in conciliation notices, sanctions, and ultimately fair hearing requests.

- ***Grace period for failure to report will be extended to 72 hours from 24 hours.*** Currently, employment service providers allow a 24-hour grace period to post an infraction for participants who fail to report to an initial appointment. HRA proposes to extend this grace period to 72 hours rather than 24, which allows participants the opportunity to resolve issues before being terminated from the assignment. Focus groups conducted with HRA staff suggested that participants attempt to address issues with the provider, but because the infraction is posted within 24 hours they have no ability to resolve the issue without going back to a Job Center and being reassigned. Staff also suggested that clients often have legitimate reasons for missing an appointment, but that 24 hours does not give them enough time to resolve the issue with the provider.
- ***Institute a standard lateness policy.*** Currently, HRA staff and employment service providers have discretion in terms of how to address lateness issues. Focus groups conducted with HRA staff resulted in feedback that providers infract participants for being a few minutes late. In order to address this problem, HRA will develop a standard policy for employment service providers and HRA staff on how to address lateness that can be applied consistently.
- ***Develop a data system that prevents HRA from scheduling appointments that conflict with other known work activities and/or appointments.*** Feedback from staff and participants suggested that HRA scheduling conflicts can lead to missed appointments, which then lead to the sanction process. Staff focus groups also identified problems with data systems not communicating as a cause of fair hearing requests. Currently, HRA has multiple data systems that do not communicate, resulting in more than one appointment being scheduled for overlapping times. In response, a data solution will be developed that prevents this from occurring.

12. Improve the conciliation, good cause, and dispute resolution procedures

As stated above, 22% of infractions related to employment-related requirements end in a fair hearing request, while the same analysis found that 40% result in the client establishing a “good cause” for a missed appointment or other infraction, and 35% result in an adverse action.¹⁹ Decreasing the unnecessary fair hearing requests and inappropriate adverse actions can result in efficiency gains as

¹⁹ Source: HRA Office of Data Reporting and Analysis (ODRA) analysis of monthly infractions Calendar Year 2012 and 2013.

clients reengage in work activities rather than being sanctioned or requesting a fair hearing. As such, HRA proposes the following to improve the conciliation, good cause, and dispute resolution procedures:

- ***Allow more flexibility for the conciliation appointment.*** Currently, conciliation appointment notices include the date of the last day of the conciliation period, but inform clients that they can come in at any time before that date. Clients frequently treat that date as the day to appear and thus come in on the last day, which leaves little time to address issues if they don't make it in. In addition, conciliations are mostly held at Job Centers. Feedback from HRA staff suggested that moving the conciliation appointment earlier in the process would allow the client more time to reschedule after a missed appointment. Feedback from HRA staff also suggested that offering the conciliation appointment at alternate locations such as at the offices of the employment and training vendors would increase the compliance rate with the conciliation appointment and may lead to fewer sanctions. As such, HRA is proposing to station conciliation staff at employment service providers and other HRA offices.
- ***Develop a standard question set to be used by conciliation workers (centralized and out-stationed) to guide workers in their decision making concerning good cause and willfulness.*** Generally, conciliation staff determines whether the failure or refusal to comply was both without good cause and willful (and thus subject to sanction) or whether to grant a good cause for the infraction. The question set will create a uniform process for determining when to find that an infraction was without good cause and willful as provided by state law. The question set will also guide workers in assessing other issues that may be contributing to program non-compliance and make appropriate referrals. This should help avoid unnecessary fair hearings, but also provide HRA with a stronger case when fair hearings become necessary.
- ***Provide information about the outcomes of conciliation and an explanation to those whose issue was not resolved at conciliation.*** Clients will be informed in a timely manner about the results of conciliation. If the issue was not resolved at conciliation, they will be provided with the reason and with information about the next step in the process, specifically that a conference can be held to attempt to again resolve the infraction. The goal is to resolve the issue before a fair hearing is requested.

HRA EMPLOYMENT PLAN EXECUTIVE SUMMARY APPENDICES

APPENDIX A

Key Stakeholder Feedback Efforts

Feedback Method and Key Stakeholder	Organizations Involved	Specific Sites/Respondents
Focus groups with HRA line staff and supervisors	Held at 14 Job Centers; included staff from Job Centers, as well as SNAP, IREA/BEV, HASA, MICSA, and OCSE	Richmond Job Center Waverly Job Center Clinton Hill Job Center Refugee Job Center Family Services Call Center Melrose Job Center Crotona Job Center Queens Job Center East River Job Center Coney Island Job Center St. Nicholas Job Center Union Square Job Center RTSC SeniorWorks Center
Focus groups with current or former clients recruited from 7 community-based organizations	Community Voices Heard Voices Of Community Activists & Leaders NY Housing Works The Center for Independence of the Disabled, NY Make the Road New York The Audre Lorde Project/TransJustice Welfare Rights Initiative	Current and former clients
Survey of HRA staff	All HRA program areas	6,227 responses to the survey (approximately 44% response rate), which included 2,321 responses to the open-ended question: "Please describe any other specific strategies or services that you think HRA should prioritize as it re-envision its approach to providing employment-related services to HRA clients."
Survey of HRA clients		During public comment period.

APPENDIX B

Summary of Responses from Key Stakeholder Feedback Efforts

HRA Staff Survey on the 2014-2015 TA and SNAP Employment Plan

In May 2014, HRA asked all of its staff members to take a web-based survey intended to help develop the 2014-2015 Employment Plan. Of the 6,227 staff who completed the survey, 73% had worked directly with clients at some point during their time at HRA.

In addition to the open-ended final question described in the table in Appendix A, the survey also included questions specifically related to the three main areas of the Employment Plan:

- A. Policies related to employment and training services.
- B. Policies for people with work limitations or disabilities.
- C. Policies and practices related to program participation, compliance, and fair hearings.

Regarding area A, 80% of respondents felt strongly that job search and readiness assistance, education and training, and paid work experience were very important in helping clients find jobs. Unpaid work experience was considered somewhat or very important by 87% of respondents. The problems with which HRA clients frequently need assistance were housing (81%), child care (79%), and job skills (75%).

Regarding area B, an overwhelming number of respondents felt it was very important to ask clients whether they need assistance with their disability (81%) and to assess clients who have missed multiple appointments (78%). Staff also felt that providing employment services for people with work limitations and making thorough assessments were very important (90% and 89%, respectively). Access to education and training (81%) and assistance with SSI applications (80%) were identified as important.

Regarding area C, HRA staff felt that confirming appointments was very important (85%), as were conducting client outreach (76%) and giving clients the opportunity to reschedule appointments (71%). According to the respondents, two reasons clients frequently cite for missing appointments were failing to receive an appointment notice (62%) and childcare problems (46.4%). Open-ended comments related to this area pointed to a need remind clients of appointments and to reduce unnecessary appointments.

HRA Staff Focus Groups

In order to collect a wide range of feedback from HRA line staff and supervisors, HRA conducted focus group discussions at various co-located Job Centers. The resulting feedback provided valuable information that enhanced the development of the Employment Plan.

In these focus groups, staff suggested that HRA:

- Increase the work exemption from three months to six months or a year for parents of infants since staff believes it is hard to find childcare for very young children.
- Don't sanction clients so quickly.
- Let clients reach higher levels of education so they can hold "more sustainable jobs".
- Concentrate efforts "on hard-to-serve populations such as undocumented residents".
- Strive for consistency "between different agencies and systems".
- Do a better job of matching clients to jobs through B2W vendors.

B2W Vendor Focus Group

In this focus group, representatives of current B2W vendors were asked questions about how their organizations currently serve HRA clients and how the program could be changed to make it more successful. Among the most commonly expressed ideas were:

- The clients who are most successful in B2W are connected to work that engages them and do not have extensive barriers to work, such as severe housing problems, criminal backgrounds, or mental illness. This last barrier could be addressed by requiring WeCare assessments for all participants.
- Vendors could benefit from assessments that provide a more holistic view of clients, including their history with public assistance and a self-assessment of their skills.
- Helping clients address concerns outside of the job itself—such as clearing up issues related to a client’s child support, criminal background, or immigration status—are nonetheless among the most valuable services vendors provide for helping clients find and retain employment.
- Providing more training and requiring fewer hours in WEP could help more people on cash assistance find and keep jobs.

Focus Groups with Clients Affiliated with Community-Based Organizations

In keeping with the high value HRA places on feedback from the communities it serves, the Agency held focus groups with community-based organizations (listed in Appendix A) to better understand clients’ perspectives on their experience with HRA and to hear suggestions for changing HRA’s employment programs and policies.

While topics and views ranged widely, the focus groups repeatedly expressed certain points, including:

- A conviction that HRA’s current one-size-fits-all assessment process and employment programs fail to address the unique needs of each client
- A strong sense of support for connecting clients to education and training opportunities, including four-year colleges, and for making work requirements realistic for full-time students
- A preference—expressed by a majority—for a subsidized employment program to replace HRA’s WEP program, which, they argued, does not encourage employers to make permanent hires.

Participants also recommended that HRA:

- Expand the use of Individual Training Accounts, which allow clients to pay for training or certifications and improve their employment prospects
- Expand opportunities for English as a Second Language coursework
- Screen potential employers to ensure that they have—and enforce—anti-discrimination policies.

Every focus group discussed barriers to accessing assistance, how HRA communicates with clients, and ways to improve the agency’s interaction with clients. One suggestion was to more clearly express, by signage and other means, that HRA encourages diversity and to provide training to workers in such issues as anti-discrimination policies, disability awareness, supervisory practices, and providing reasonable accommodations.

APPENDIX C

Detailed Summary of States' Postsecondary Education Programs

Kentucky²⁰

Kentucky's Ready-to-Work Program helps TANF recipients pursue postsecondary degrees and credentials through a strong partnership with Kentucky's college system, which is the main provider of educational programs for TANF clients. The program has a special track called Work and Learn for lower skilled participants. Participants in this track must be TANF recipients who do not have a GED or high school diploma or who possess a high school diploma/GED but are in need of some basic academic skills instruction. Direct referrals to Ready-to-Work/Work and Learn come mostly from TANF case managers but can also come from community partners and Adult Education providers. The college system also does "reverse referrals" to the TANF agency for low-income students who are eligible for, but not enrolled in, TANF. Kentucky does not allow exceptions to federal guidelines for education as a TANF work activity, but it helps students use work-study to meet federal requirements in cases such as vocational education programs that go beyond 12 months, and income from work-study does not affect TANF eligibility or benefit calculations. Participants receive wraparound supportive services including a potential work-study opportunity (as funds permit), academic and employment counseling, child care, transportation, assistance with the FAFSA and Pell applications, general case management (including referrals to TANF), access to all services available at the colleges, and financial counseling (including access to an individual development account program). Ready-to-Work does not cover tuition costs for students; students are encouraged to use their work-study income to pay any gaps in tuition after accounting for financial aid.

Washington²¹

Like Kentucky's, Washington's model is based on a strong partnership with the community college system, the State Board for Community and Technical Colleges (SBCTC), which provides most of the educational activities for TANF recipients, including GED and basic skills. Referrals to educational programs can come from TANF caseworkers, but schools also refer students to the TANF agency (reverse referral). SBCTC developed the Integrated Basic Education and Skills Training (I-BEST) model, which combines basic skills and occupational instruction. By enrolling TANF recipients in I-BEST courses, the state is able to provide basic skills instruction as vocational education training, which under federal guidelines can count as a core activity for 12 months. A study of I-BEST indicated that basic skills students who completed at least one year of postsecondary education and obtained an occupational certificate reached a "tipping point" that led to substantial increases in earnings. With this in mind, I-BEST programs are designed to include a one-year certificate. Besides I-BEST, there are other programs that students can enroll in, such as the Customized Job Skills Training (CJST), a shorter (8–22 weeks) training program that is customized to the needs of specific employers. The state of Washington also

²⁰ Interview with representative of Kentucky college system (March 2014); Bone, Josh. *Kentucky's Ready-to-Work Program*. CLASP (January 2010).

²¹ Interview with representative from State Board for Community and Technical Colleges (SBCTC) in Washington; Strawn, Julie. Hearing on the Role of Education and Training in the TANF Program, CLASP (April 2010); Issue Brief from NGA Center for Best Practices (June 13, 2007); Opportunity Grant website http://www.sbctc.ctc.edu/college/s_opportunitygrants.aspx

offers support services including child care, transportation, funds for GED testing fees, assistance putting together students' participation reports for TANF, and work-study placements (on and off campus). Furthermore, the state offers "Opportunity Grants" to low-income adults, which cover tuition and fees, as well as up to \$1,000 per year for books and supplies.

Oklahoma²²

Oklahoma Special Projects is a TANF-funded program designed to help participants pursue postsecondary degrees. The program determines whether a client should be referred to training after a "battery" assessment including a staff discussion where the client, the caseworker, a representative from the educational program, a substance abuse specialist, and other staff involved in the case determine the best plan for that individual. (Note that applicants already in a training program are not required to take the entire assessment battery.) Clients whose assessment scores indicate that they can get a GED in a short length of time are referred to education for 10 or more hours per week as long as they are participating in 20 hours of a core work activity. The TANF agency contracts with the Department of Libraries and the Department of Education to provide ABE, GED, and literacy, and it works with community college and technology campuses for additional education programs. Oklahoma has determined that some clients do better if they get the GED before training, even if they have to participate in the GED program for more hours (i.e., as their core activity) and thus do not meet federal work participation guidelines. In these cases, the referral is made in spite of the negative effect on the state's work participation rate (WPR). More than half of the adults on TANF in Oklahoma participate in Special Projects, and this focus on Special Projects caused the state to exceed its federal limit on having no more than 30 percent of participating clients in vocational education training. Services under Special Projects include employment and retention, as well as workshops on soft skills, life skills and other topics.²³ Although degree completion beyond an Associate's degree is not a part of the Special Projects, Oklahoma allows four-year college education as long as the participant has enough time to complete the degree within their lifetime TANF limit—and as long as the major is considered vocational training (philosophy and art history degrees, for example, are not allowed to count). Among its support services, Oklahoma provides funds for tuition for clients who are not Pell-eligible (including if Pell grants are exhausted), as well as funds for uniforms, licenses, fees, automobile repair, gas vouchers, and a multitude of other items that students may need for program retention and subsequent employment. In addition, in Oklahoma City, there are multiple TANF-funded training programs through both community colleges and technology centers. Most individuals get into training as a result of the assessment and joint staffing process. If an applicant is already enrolled in college, case managers let them continue, especially when necessary to avoid default on student loans.

Arkansas²⁴

The Arkansas Career Pathways Initiative (CPI) is funded through TANF and has been in operation since 2004. It works particularly, although not exclusively, with TANF participants. Eligible individuals are adult caretakers of children under 21, with income below 250 percent of the federal poverty line. Participants

²² Interview with representative from the Oklahoma Department of Human Services (March 2014).

²³ Kenefick, Elizabeth, "The Oklahoma Special Projects" (2011) CLASP.

²⁴ Bone, Josh. The Arkansas Career Pathways Initiative. (2010). CLASP.

sign up through two-year colleges and technical centers in the state. The referral relationship between the state and the colleges works as a partnership between the local community college and the local state Department of Workforce Services (DWS) Centers. TANF participants are placed in the program based on their interest in education, as well as on the assessment outcomes. Students who enroll are assigned a counselor who coordinates support services, such as child care or transportation. Tutors track academic progress and provide support as well. After leaving training, participants retain access to career services such as resume writing and individual career counseling. Participants are required to apply for Pell grants, and these funds must be exhausted before using TANF funds for tuition. (Tuition funding is about \$1,500, depending on the case.) To work within the federal 12-month lifetime limit on education as a work activity, the program is considering having TANF students participate in work-study for at least 20 hours per week as their core activity; hours of school attendance can then be counted as job skills training (secondary TANF activity).

A variety of career options are offered in CPI, each of which has a set of credentials that are appropriate to the industry. An example is the Fast-Track Nursing Program, which allows students who need remedial education to take classes contextualized to the nursing profession instead of regular remedial classes, increasing completion rates.²⁵ Support services include counselors and tutors assigned to each student throughout their time in the program. After students leave the program, clients keep access to career support services, including classes in resume writing and individual career counseling.

California²⁶

In California, TANF recipients may be referred to GED, occupational skills training and two-year or four-year colleges. Educational programs are supervised at the state level, but administered at the county level, with some counties offering their own GED classes or co-locating GED classes within agency centers. Most of the GED programs, however, are provided through the community college system. Individuals already enrolled in an educational program when they then apply for TANF are typically allowed to continue. For applicants not enrolled in education, referrals to educational programs depend on the case manager's assessment. The most common practice is to recommend shorter programs; it is uncommon for clients to either be enrolled in or referred to four-year programs. A recent evaluation focusing on the effects of TANF client participation in education and training in L.A. County looked particularly at the group of clients who self-initiated their educational programs. Participants in self-initiated programs had higher rates of employment during the quarter of education program exit than did other TANF participants; self-initiated education participants also had higher levels of employment after their education program versus before. More generally, the evaluation concluded that completion of an education program increased the likelihood of finding employment.²⁷

California helps students who are on welfare and those who are transitioning off welfare through coordinated student services at community colleges, including work-study and job placements. In 2013, the state implemented legislation that allows recipients to participate in education without meeting

²⁵ Hearing on the Role of Education and Training in the TANF Program, CLASP April 2010; CLASP "The Arkansas Career Pathways Initiative" (April 2010).

²⁶ Phone interview with representative from the California Department of Social Services (March 2014).

²⁷ L.A. County's Gain Program: Outcomes of Engagement with Education and Training Components (January 2014).

federal core work activity requirements for up to 36 months. Although it is not common for TANF recipients to pursue four-year degrees, such students can attend school full time for 24 months, after which they are required to start complying with the federal guidelines—that is, they begin using up their 12 months of vocational education training as core activity. Further, the state allows for extensions in six-month increments, which could theoretically result in education-based participation for 48 months. The idea behind the 24-month exemption is to provide additional flexibility so that clients are more prepared to meet federal TANF rules after 24 months.

It is worth noting that California has not been able to comply with their federal work participation rate for the past few years.

Iowa²⁸

In Iowa, TANF recipients who do not have a high school diploma or high school equivalency are encouraged to obtain a diploma. The TANF agency does not offer high school equivalency courses itself, but refers clients to Iowa Workforce Investment Act (WIA) partners or to training agencies. The participant can locate their own training site too, as long as providers are approved or registered with the state and accredited by an appropriate accrediting agency. Recipients can also participate in occupational skills training or postsecondary education (attendance at a four-year college program is allowed). Participants self-initiate and/or caseworkers promote the option when appropriate. These programs are offered through a variety of community colleges, private colleges, and so on. To pursue postsecondary education, participants must have a specific vocational goal and complete an educational evaluation, through which the worker determines the likelihood of success. The evaluation may include assessments in reading comprehension, math, and writing skills, occupation-specific skills assessments, and current or past grades in education programs. Participants who are already enrolled in postsecondary education at the time of TANF application must also have a specific vocational goal and complete an education evaluation to determine the likelihood of success. If postsecondary education is not approved, the recipient will be required to participate in other approved activities. Iowa generally works within the federal requirements in terms of what is a countable activity, whether it is core or non-core, and how long participation is countable. However, Iowa does allow participants to continue in activities beyond countable time limits. Support services provided to those in educational programs include work skills workshops, tuition assistance for courses not covered by Pell grants or other postsecondary financial aid (limited to short-term training programs of 29 weeks or less and issued directly to the training facility), child care, transportation, training expenses, enrollment fees, school application fees, educational grant or scholarship application fees, licensing, certification, testing fees, travel costs required for certification testing, and certain practicum expenses.

Minnesota

Minnesota's FastTRAC Initiative is a Career Pathway system designed to assist workers with very low skills by providing bridge programs that lead to industry-recognized credentials. The goal is to offer integrated adult basic education (ABE) instruction through every Minnesota Community College. The Minnesota Department of Human Services, which manages the state's TANF program, is involved in the

²⁸ Email from representative in Iowa's Department of Human Services.

initiative. An implementation study of FastTRAC found wide variation in the implementation of the program elements, but confirmed general fidelity to the model by all pathway programs, including contextualized classes. An earlier outcomes report of this program found that rates of persistence and completion of the program were lower for students who entered through ABE compared to non-ABE students. Of the awards obtained by ABE students, 45.4% were certificates and 31.2% were Associate degrees. The outcomes report used a comparison group of non-ABE graduates who earned similar awards to ABE students to measure employment and wage rates. System graduate data was matched to the state's unemployment insurance wage files. They found that ABE students earning an award had somewhat lower employment and wage rates than non-ABE graduates from similar programs.

Pennsylvania²⁹

The Pennsylvania Keystone Education Yields Success (KEYS) program assists TANF and/or SNAP recipients who are in certificate or degree programs in 14 of the state's community colleges. The TANF agency refers clients, although clients can also self-initiate their enrollment. A facilitator at the college is assigned to each student to ensure that the student gets essential services from the TANF agency, including funds for child care, registration fees, transportation, school/training fees, books and supplies, test fees, clothing, equipment/tools needed for training, car purchase/repair, motor vehicle operator fees (including driver's license), union dues or professional fees, and adult dependent care costs. If a student is expected to qualify for financial aid but has not yet received it, the program can fund tuition for up to two courses. Students can pursue one-year certificate programs and other short-term programs, up to two-year Associate degrees. This program allows students to count vocational education as their core activity for up to 24 months. After the 12-month federal limit is exhausted, the state cannot count these students toward the federal work participation rate, but the number of students pursuing degrees during a second year is small enough that there is no significant impact on the state's work participation rate. The state has also introduced a new core work activity, vocation-specific work experience (VWE), which pays students for internships and practicums and counts these activities toward the federal work participation rate as "work experience." The income from these activities is treated as earned income for TANF eligibility purposes, but the TANF agency applies the state's standard 50% earnings disregard.

²⁹ Bone, Josh. "Pennsylvania's KEYS Program" (2010). CLASP; Interview with the lead member of a consultant team that designed KEYS in 2004.

APPENDIX D

Sanction Avoidance Strategies from Other States

Introduction

The purpose of this review is to summarize the literature on sanction avoidance policies and best practices. The literature describes two implications of TANF-related sanction policies: (1) identifying barriers and needs that prevent TANF recipients from participating and (2) encouraging those who have a willful disregard for program rules to comply. In both cases, sanction policies can be used to maximize participation in work-related or other activities, while at the same time ensuring that recipients are not unnecessarily harmed. States have used various sanction avoidance strategies, and a few common themes emerge. It is interesting to note that these common themes emerged even across states with very different populations.

The main sources of information for the summary below were: a Mathematica report published in 2007 on using sanctions to increase TANF related work participation,³⁰ a conversation with the author of the Mathematica report who outlined what they learned from other states, a report from the Center on Budget and Policy Priorities (CBPP) from 2000 that highlighted sanction avoidance best practices,³¹ and communication with a few states concerning their current sanction policies and practices. The main themes are summarized below, followed by a description of specific efforts in select states on sanction avoidance strategies.

Common Sanction Avoidance Practices among State/Local TANF Agencies

The main goal of most states is to maximize the engagement of TANF families, and they view sanction avoidance efforts as an important step in this process. They use the threat of penalty or the actual penalty to re-engage those willfully not complying, but they also use the sanction process to identify those with barriers and reassess them for different, more properly targeted, services. The challenge, however, is to ensure that there are appropriate services available for people with identified barriers (whether these activities count toward federal participation or not) and to ensure that agency staff are capable of deciding when recipients are willfully not complying versus facing barriers that limit their ability to comply.

The literature describes the sanction process in three phases and recommends that policies should be developed to address each phase:

1. Efforts to re-engage a family before the infraction is issued (i.e., after the infraction but before the sanction process starts),
2. Efforts to re-engage after the infraction is issued but before the sanction is imposed (i.e., conciliation, conference, pre-sanction review, etc.), and
3. Efforts to re-engage after the sanction is imposed.

³⁰ Kauff, Derr, Pavetti, and Sama Martin (2007). Using Work-Oriented Sanctions to Increase TANF Program Participation. Final Report Submitted to the Department of Health and Human Services, ACF Office of Planning, Research, and Evaluation.

³¹ Goldberg, H. and Schott, L. (2000). A Compliance-Oriented Approach to Sanctions in State and County TANF Programs.

Once the act of noncompliance is discovered, states/localities have flexibility in how they handle the case. Many states implement outreach efforts as part of phase 1—before the sanction process is initiated—and use this time to identify barriers that may have been missed during the initial assessment. A critical component to making this phase work is ensuring a quick response shortly after the noncompliant behavior presents; this requires strong monitoring and quick staff follow-up. Ideally, any barriers to participation would be discovered in phase 1, with those who reach phase 2 and 3 demonstrating willful noncompliance. If phase 1 is successful, it should limit the number of recipients with an initiated sanction process to those who have demonstrated some level of willful noncompliance or a disregard for program rules. In phases 2 and 3, states/localities use the threat of sanction or actual sanction to encourage willfully noncompliant participants to re-engage. This can be tricky because it requires discretion on the part of staff.

Specific Strategies to Maximize Engagement and Avoid Sanctions

A report by the CBPP in 2000 identified compliance-oriented strategies that aimed to reduce the harm created by inappropriate sanctions. The report argued that most families begin the sanction process because they face barriers to participation rather than display a willful disregard for program rules. To address this problem, the report recommended the following best practices:

- **Conduct in-depth assessments prior to referrals for work activities.** Proper assessments and referrals can prevent sanctions for noncompliance that result from inappropriate work activity assignments.
- **Provide workers with flexibility in setting work participation requirements.** Work participation requirements should reflect the needs and barriers identified by the assessment. A wide range of activities should be allowed (e.g., substance abuse treatment, mental health counseling, adult basic education, training programs, etc.) and flexibility in setting hourly participation requirements tailored to each individual should be considered.
- **Conduct a pre-sanction case review.** Non-compliance often results from barriers or family circumstances not discovered during an employment assessment. A pre-sanction case review provides another opportunity to identify needs and barriers, as well as providing another opportunity to communicate program rules and offer the recipient a chance to comply.
- **Continue to work with sanctioned families.** Post-sanction services can allow agencies to help families come into compliance and avoid future sanctions, as well as continue to identify barriers and supports that may be needed.

State/Local Examples

Some states have used sanction avoidance strategies as a way to increase engagement in work activities for TANF families. Their goal is largely to meet federal work participation requirements, but also to ensure that families with barriers and/or unmet needs are being helped. Consistent across these states seems to be the stated belief that program rules must be followed, but their strategies also reflect a belief that not all client actions are willful noncompliance. States must strike a balance between being tough to encourage work participation (which benefits the state and the client), while also being flexible to accommodate those with barriers and unmet needs. The following highlights some examples of how states/localities have attempted to strike this balance.

Utah³²

Utah has fairly strict sanction policies and uses gradual full-family sanctions to ensure that clients make an informed choice not to participate before facing a full sanction. However, a unique characteristic of the Utah program is that it allows flexibility in assigning work activities to clients, and it includes a two-step problem solving process before a sanction is imposed. The engagement process requires that all clients participate at their maximum ability, but their maximum ability is determined by a caseworker and is tailored to the individual. The case managers assign hours and activities depending on the client's abilities, including clients with documented physical or mental health conditions. The goal is to reduce noncompliance because work participation requirements are tailored to the individual and agreed upon by the client. However, if noncompliance occurs, Utah requires a two-step formal problem solving process to identify and resolve issues before the imposition of sanctions. The first phase is a meeting between the client, case manager, and a social worker. The second is a case conference with a wider variety of staff and partners such as child welfare agency staff, employment service providers, probation officers, and mental health therapists in order to address barriers. Including these individuals provides different perspectives and ensures that several people review a case before it is sanctioned. However, it should be noted that Utah's caseload is less than 10,000.

Arizona³³

Arizona uses a gradual full-family sanction, but caseworkers are instructed to use a sanction as a last resort. A lawsuit in 1999 led to a series of changes to the sanction process in Arizona that were designed to ensure clients' right to due process. Supervisors must review all sanction requests using a standardized form, staff must show that they addressed or attempted to address all barriers identified during assessment and previously documented in the case file before requesting a sanction, and each quarter the state agency conducts an internal review of all sanctioned cases to check for errors. While this process is very rigorous, it is labor intensive and time-consuming and apparently one implication is that clients often cycle in and out of participation and sanction status.

Florida³⁴

Florida case managers are required to make three attempts by phone to a client upon an act of noncompliance. If the client is not reached, the caseworker sends a pre-penalty letter giving the client 10 days to contact the case manager and demonstrate good cause or a sanction will be imposed. If the client still does not contact the case manager, another letter is sent indicating that the sanction will be imposed. In Duval County, case managers follow this process and request a sanction if these components are not met, but to ensure consistency a single person makes the determination about imposing the sanction (although it should be noted that the Duval County caseload is small).

³² Kauff et al. (2007).

³³ Kauff et al. (2007).

³⁴ Kauff et al. (2007); phone interview with administrator from Florida's Department of Economic Opportunity (DEO); Welfare Transition Program Final Guidance on Work Penalties and Pre-Penalty Counseling (revised 2004, provided by DEO).

Iowa³⁵

Iowa caseworkers develop a self-sufficiency plan in consultation with the client. The plan includes the steps the client will take to become independent of assistance, including agreement on work activities for the client (e.g., job search, skills training, GED, etc.). Once the plan is approved and agreed upon by the client, the case manager monitors compliance with the plan. If the client fails to meet the requirements of the agreement, they are “choosing a limited benefit plan.” The limited benefit plan is a reduction of their full grant—in essence a sanction but framed as a choice by the client. However, the worker makes every effort to engage the client to get them back on track to their full benefit. These efforts include discussing the participation issue, identifying barriers to participation, clarifying expectations, and offering supervisory intervention. If these efforts are not successful, the case is referred to a specialist for review. This is to ensure that clients get another person to review their case, as well as to ensure that the policy is being implemented consistently across the state. Only after all of these efforts is the sanction imposed.

Oklahoma³⁶

Oklahoma also has a full-family sanction, but before sanctioning a case, case managers are required to conduct outreach that includes written notifications and efforts to achieve face-to-face contact with the clients. The case managers are to prioritize face-to-face contact to assess the reasons for noncompliance. If the caseworker has not been able to reengage the client in two months, the sanction is automatically applied.

Texas³⁷

Texas has fairly strict sanction policies, having gone from a partial to an immediate full-family sanction policy in 2003. However, they have implemented some efforts to limit inappropriate sanctions. For example, Tarrant County created a special sanction unit within the Department of Human Services to review and impose all sanctions identified by their employment service providers. This approach facilitates identification of participants who face barriers to noncompliance versus willfully disregard program rules. When Texas had a partial family sanction, Tarrant County used outreach efforts to engage clients. Staff was required to make personal phone calls to noncompliant recipients in efforts to try to re-engage them. However, once they went to a full-family sanction staff was able to use the full sanction as a threat to encourage compliance and outreach was utilized less often.

Connecticut³⁸

Connecticut’s approach is to offer incentives to keep clients engaged in their work activities and avoid noncompliance. For example, in the north of the state they provide “pantry bucks” to those who show up to activities on time, and clients can use the “bucks” to purchase items from a pantry that the

³⁵ E-mail to HRA Office of Evaluation and Research from a representative of the Department of Human Services (DHS) in Iowa (March 2014).

³⁶ Sanction Process submitted to the Office of Evaluation and Research by a representative from the Oklahoma Department of Human Services (March 2014).

³⁷ Kauff et al. (2007).

³⁸ Derr, Michelle, and Laird, Elizabeth. *Engaging the Unengaged: TANF Program Factors That Might Influence the Number of Clients with Zero Participation Hours* (February 2014), Draft Version. Mathematica Policy Research.

provider stocks with items that cannot be purchased with SNAP benefits, such as shampoo and house cleaning supplies.

California³⁹

California uses a partial sanction—a reduction of the grant by the adult portion—for acts of noncompliance. Each county in California must follow the general sanction policies set by the state, but they are allowed flexibility in offering supports to re-engage clients. Los Angeles County had a home visiting program (as of 2007) to engage TANF recipients who were at risk of being sanctioned. The home visiting program was part of a larger plan to reduce the sanction rate in Los Angeles County. (California has struggled to meet the federal work participation rate in part due to the large number of sanctioned cases.) In an effort to address clients' personal and family challenges promptly, Los Angeles County hired new case managers to decrease client-case manager ratios and make it more feasible for case managers to re-engage clients before they impose a sanction. In addition, Sonoma County uses aggressive re-engagement efforts before the sanction is imposed, and county administrators believe that a threat of a sanction combined with aggressive outreach is more effective for re-engagement than the actual sanction.

Conclusions

A common practice across these states and localities is to conduct outreach to noncompliant families before the sanction process is initiated and/or imposed. The main goal is to increase engagement by avoiding the sanction. As previously stated, many of these efforts are intended to help meet federal work participation requirements; although only a handful of states have failed to meet their participation requirements (only California does not meet it among the states reviewed above).

Another common practice is the use of case management and relying on the case managers to conduct the outreach and use discretion in initiating a sanction or offering good cause. This approach has advantages because case managers are familiar with the circumstances of the case and can develop a relationship with the family. However, the disadvantage is that it is labor intensive and leaves a great deal of discretion to individual workers. Many states also stressed the importance of having a second level of review before a sanction is initiated or implemented. This could be a supervisor or a special sanction unit.

While we did not find evidence of a broad three-strike policy (i.e., a client gets three instances of noncompliance before a sanction is imposed), it is clear that many states use the discretion of caseworkers to offer warnings and second chances before a sanction is initiated and/or imposed. Some of the more innovative approaches we found were the Utah approach, which includes a two-step problem solving process involving multiple agencies before a sanction is imposed, and Los Angeles County, which uses a home visiting model. Other best practices seem to be around making personal contact with the noncompliant family and creating plans for re-engagement.

³⁹ Kauff et al. (2007); Derr and Laird (2014); and phone interview with CalWorks representative (March 2014).