

HRA'S BIENNIAL EMPLOYMENT PLAN

**AN OPPORTUNITY FOR REFORM TO MAKE SURE
THAT THE AGENCY'S EMPLOYMENT PROGRAMS ARE
EFFECTIVELY FIGHTING POVERTY & INCOME
INEQUITY**



REFORMS DEFINED IN MAY BUDGET TESTIMONY

When I testified before you at the May budget hearings, I noted a number of challenges that faced HRA in meeting its goals:

- Ensuring HRA's employment & training programs are effective in connecting or reconnecting New Yorkers to the workforce.
- Phasing out the one-size-fits-all approach which has not been effective in helping clients.
- Addressing counterproductive policies and procedures that kept clients from moving towards work and are associated with adverse outcomes such as homelessness.
- Changing policies that put New York City at risk of as much as \$10 million in fines for unnecessary fair hearings.

The Employment Plan implements the reforms presented in May.



REFORM TO MAKE HRA'S EMPLOYMENT PROGRAMS MORE EFFECTIVE

- Every two years, HRA is required to submit to the State Office of Temporary and Disability Assistance (OTDA) an Employment Plan, which outlines employment and training services for applicants and recipients of Cash Assistance and Supplemental Nutrition Assistance Program (SNAP) aid (formerly known as food stamps).
- This year, HRA is using its Employment Plan to propose program reforms to **improve 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**.

REFORM TO MAKE HRA'S EMPLOYMENT PROGRAMS MORE EFFECTIVE

- 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 modified accordingly.
- HRA's efforts to fight poverty and income inequity 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.

REFORM TO MAKE HRA'S EMPLOYMENT PROGRAMS MORE EFFECTIVE

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

- **Maximizing education, training, and employment-related services** will open job opportunities and create the basis for building a career pathway out of poverty.
- **Improving assessments** so we address each client's actual strengths and needs will improve outcomes and reduce the 1 out of 4 clients receiving employment assistance who return to the caseload within 12 months.
- **Eliminating unnecessary punitive** and duplicative actions that lead to preventable negative actions and fair hearings (that potentially subject New York City to \$10 million in financial penalties) will allow staff to focus on problem solving and allow clients to avoid delays in accessing services, finding jobs and moving out of poverty and into sustainable employment.

HRA'S PLAN IS BASED ON EXTENSIVE FEEDBACK

To develop this Plan that HRA will phase in, HRA obtained **feedback from a wide variety of key stakeholders**.

- More than **40 focus groups & meetings** were held with HRA staff, existing and former clients, service providers, community-based organizations, advocates, the legal services community and other City agency partners.
- A **survey of HRA's workforce** to obtain feedback on reforms resulted in more than 6,000 responses.
- An additional survey will be conducted of **current and former HRA clients** during the public comment period for the Plan.
- Additional recommendations that cover **issues not related** to the Employment Plan are being considered as part of our ongoing broader reform and program improvement efforts.

WHY DOES THE SYSTEM NEED REFORM?

- HRA spends \$200 million annually on employment programs that have not been as effective as they should be in connecting or reconnecting New Yorkers to the workforce and at minimizing return to the Cash Assistance caseload.
- HRA's past approach was to track job placements for only 6 months, but 25% of HRA's reported placements & assistance ended up with clients returning to seek recurring Cash Assistance again within 12 months.

WHY DOES THE SYSTEM NEED REFORM?

Almost half, 43,953, or 47%, 92,717 job placements that HRA claimed in 2013 were not as a result of the agency's direct efforts.

- 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 were discovered by later data matching to have found jobs on their own.
- 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.

WHY DOES THE SYSTEM NEED REFORM?

- Counterproductive HRA policies and procedures have led to punitive actions, including sanctions that are linked to negative outcomes for clients.
 - 23% of applicants for Department of Homeless Services' shelters during the first 6 months of 2013 had a Cash Assistance case that closed or had a sanction related to non-compliance in the previous 12 months.
 - 1/3 of Cash Assistance recipients had their 1st application for assistance rejected, but were accepted soon after that rejection.
 - More than 1/3 of Cash Assistance clients subject to HRA's current work programs are in the sanction process at any point in time. HRA has not permitted sanctioned clients to participate in training, work programs & job search, and thus they can't receive the help they need to get a job.

HRA'S EMPLOYMENT-RELATED WORK IS BROADER THAN WHAT IS COVERED BY THE BIENNIAL EMPLOYMENT PLAN

- Annually HRA provides critical support that helps many low-income New Yorkers remain in the workforce:
 - 3 million receiving Medicaid,
 - 1.8 million receiving federally-funded food assistance,
 - 700,000 receiving home energy assistance, and
 - 100,000 receiving one-time cash assistance to prevent evictions and utility shutoffs and assist with other emergencies.
- Efforts aimed at keeping low-income workers in the workforce are much less expensive and more efficient than providing assistance to New Yorkers after they are out of the workforce, especially after an extended absence.

WHICH HRA CLIENTS ARE AFFECTED BY THIS PLAN?

The Employment Plan is designed for the small portion of 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 assistance, 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 are working and 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 the **sanction status** or process at any given time and not participating in work or work-related activities.



EMPLOYMENT PLAN/REFORM PROGRAM

- Maximize Education, Training, And Employment-Related Services
- Phase Out The Work Experience Program (WEP) And Replace It With More Effective And Sustainable Work Activities
- Replace “One-Size-Fits-All” Approach With Improved Assessments & Programs That Address Specific Clients’ Needs & Abilities
 - Customize Hours Of Required Work-Related Activities To Enable Individuals To Succeed And Move Off Of The Caseload
 - Create A New Employment Strategy For Youth
 - Implement Employment Strategies For Limited English Proficiency (LEP) Cash Assistance Recipients
 - Create An Employment Strategy For Shelter Residents
 - Provide More Effective Support For Domestic Violence Survivors
 - Improve Services For New Yorkers With Work Limitations
- Enhance Program Participation And Dispute Resolution

MAXIMIZE EDUCATION, TRAINING, AND EMPLOYMENT-RELATED SERVICES

Among HRA's employable clients, 60% lack a high school diploma and 30% of those are below 9th grade proficiency in math and reading. Without the education and skills needed in today's labor market, Cash Assistance recipients will continue to face substantial barriers to sufficient wages and quality jobs. The challenge is to avoid training programs that do not prepare clients for the current job market and instead focus on degrees and targeted training programs that have proven value. HRA will:

- **Allow recipients up to age 24 to participate in full-time basic education**, as long as they meet yearly goals and make sufficient progress toward obtaining a credential (beyond the current 12-month limit). It is important to provide people with the education to start building a career as early as possible.
- **Allow recipients with limited English proficiency (LEP) to participate in full-time English as a Second Language (ESL) coursework** and test for literacy in their own language, in order to prepare them for work assignments or to move off of the caseload.

MAXIMIZE EDUCATION, TRAINING, AND EMPLOYMENT-RELATED SERVICES

- ***Increase access to targeted training for jobs in high-growth industries and utilize available Career Pathway programs.***
- ***Allow participation in 4-year college degree programs*** for recipients who participate in work activities for 20 hours per week and are able to maintain an appropriate average in accordance with the new state law.
- ***Increase supports for Cash Assistance recipients enrolled in college consistent with the new state law,*** and expand or replicate a CUNY program that provides supports that help students complete their studies.

PHASE OUT CURRENT WORK EXPERIENCE PROGRAM (WEP) MODEL & REPLACE IT WITH MORE EFFECTIVE & SUSTAINABLE WORK PROGRAMS

Over time, HRA will phase in these actions:

- Replace WEP requirements with **additional job search, work study, or internships** for Cash Assistance clients with recent work histories or with advanced degrees.
- Replace WEP requirements with **internships & work study** for those in college.
- Expand HRA's capacity to develop and support **internship and community service training programs as well as subsidized employment** similar to HRA's current Parks Opportunity Program for all Cash Assistance recipients who require a core work activity under federal & state law in order to replace WEP.
- **Develop the capacity to expand the JobsPlus program** that offers employment opportunities for New York City Housing Authority residents who are Cash Assistance recipients.
- **Increases employment vouchers** for uses such as with Career Pathway programs tied to careers in high-growth industries.



CUSTOMIZE HOURS OF REQUIRED WORK-RELATED ACTIVITIES SO INDIVIDUALS SUCCEED & MOVE OFF THE CASELOAD

To provide more flexibility & eliminate the one-size-fits-all approach HRA will:

- **Maintain participation at 35 hours** per week for families with children age 6 & older, but allow a reduction to 30 hours, as permitted by federal and state law, when families face necessary ongoing obligations, such as continuing medical treatments or mandated parenting classes. Families with children aged 4 & 5 who don't need childcare thanks to the Mayor's new pre-K program can also qualify for this reduction when needed.
- **Allow 25 hours for the parents of children age 3 or younger**, compared to 25 hours for parents of children under age 6 elsewhere in NYS or the 20 allowed by federal law. Childcare for very young children is more difficult to find. The reduced requirement, which with travel time can still amount to seven hours a day, will help parents remain engaged and avoid unnecessary sanctions, which can affect the financial stability of the family. A parent with a child 3 or younger who can secure child care to work longer hours will be encouraged to do so.
- Implement a **pilot a program for job ready applicants**, such as those whose Unemployment Insurance Benefits have expired, and who are already searching for work, that allows self-directed job search, subject to documentation.



CREATE A NEW EMPLOYMENT STRATEGY FOR YOUTH

About 24,000 young adults up to age 24 receive Cash Assistance from HRA. About half are ages 18-20. The overwhelming majority lack the high school degree necessary for access to the job market. HRA will:

- Create a **youth coordinator** position to manage youth services and develop relationships with community providers.
- 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.**
- Connect youth ages 18-24 without a High School **diploma or equivalent** to High School or equivalency classes in order to prepare them for work assignments and to move off of the caseload.

IMPLEMENT EMPLOYMENT STRATEGIES FOR LEP CASH ASSISTANCE RECIPIENTS

- Only 4,000 **limited English proficient** (LEP) Cash Assistance adults are subject to HRA's employment services.
- HRA will implement a customized employment strategy for these clients.

CREATE AN EMPLOYMENT STRATEGY FOR SHELTER RESIDENTS

About 13,700 cash assistance recipients reside in a Department of Homeless Services homeless shelter. To address their needs, HRA will:

- Implement **shelter-based employment** programs based on successful program models currently operated by shelter providers.
- Create new **strategic milestones** for employment vendors serving homeless clients.
- Implement a **comprehensive assessment**, case management services, and a JobsPlus-type program model for shelter clients.

PROVIDE MORE EFFECTIVE SUPPORT FOR DOMESTIC VIOLENCE SURVIVORS

Many domestic violence survivors seek assistance but do not report their status and thus miss out on receiving assistance that could be vital in helping them rebuild their lives and be safe. In order to improve its ability to determine who is eligible for these services, HRA will:

- Offer survivors an opportunity to enroll in **effective programs** like the Sanctuary for Families initiative to develop the skills to work & become self-sufficient.
- Extend the Domestic Violence **Waiver period to six months** from the current four and thereby reduce unnecessary administrative appointments for survivors of domestic violence.
- To enhance safety and security for survivors, **modify HRA's partial waiver program** and grant a full waiver for those who need it.

IMPROVE SERVICES FOR NEW YORKERS WITH WORK LIMITATIONS

HRA will improve assessing and identifying all clients with barriers to work, especially those with mental health issues who do not disclose or may not be aware of them. Missing problems can set clients on the course for failure and unnecessary sanctions, when better assessment could ensure appropriate assignments and success. HRA will:

- Implement more **comprehensive assessments** to expand access to programs for clients with work limitations due to disabilities.
- When seeing a client, HRA Job Center staff will review his or her case for a **prior history** of unsuccessful applications for federal Supplemental Security Income (SSI) benefits and a history of non-compliance with program requirements, and refer such cases for assessment by HRA's programs for clients with disabilities.

IMPROVE SERVICES FOR NEW YORKERS WITH WORK LIMITATIONS

- Implement screens for **reasonable accommodation** needs and mental health issues.
- Implement a **functional assessment** in vocational services.
- Assist clients in **filing SSI applications** and appeals of denials of SSI applications, including federal court appeals.
- Provide client-centered services for those with **substance use** disorders, including Harm Reduction programs for clients with histories of non-compliance with traditional substance use treatment based on existing successful government-supported program models.

ENHANCE PROGRAM PARTICIPATION & DISPUTE RESOLUTION

HRA is upheld in only 10% of the Fair Hearing disputes that actually go to a hearing. Because of the excessive number of unnecessary Fair Hearings, the City is now subject to potential financial penalties of up to \$10 million annually. Even more important, time and money spent on fair hearings do nothing to move clients out of poverty. HRA will:

- **Increase Program Participation, Reduce Unnecessary Sanctions and Case Closings for Non-compliance.**
 - Implement a pilot project to allow up to **5 days of excused absences** for illness without documentation based on the new local paid sick leave law.
 - Implement a pilot project to provide **pre-conciliation outreach** to avert unnecessary case closings and sanctions consistent with the state law requirement to excuse non-compliance upon a showing of good cause and, in the absence of good cause, the state law requirement that HRA must then show that the non-compliance was willful.

ENHANCE PROGRAM PARTICIPATION & DISPUTE RESOLUTION

- Implement a **grace period** for failure to report (extended to 72 hours from 24 hours).
- Develop a data system to prevent HRA from **scheduling** appointments that conflict with other known work activities and/or appointments, including court proceedings and related service appointments and appointments at other agencies.
- Implement a system of **automated appointment reminders** and the ability for clients to reschedule eligibility related appointments.
- **Improve the conciliation, good cause, and dispute resolution procedures.**
 - 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 & willfulness as required by state law.
 - Provide an **informational brochure** about the conciliation process for clients in order to avert adverse case actions.

UPDATE ON REFORMS ALREADY IMPLEMENTED

Goal: Improve Access to Benefits

- Accepted the federal waiver from work requirements for Able-bodied Adults without Dependents (ABAWD), allowing them to receive Supplemental Nutrition Assistance Program (SNAP) benefits, which had already been done by all other New York counties and 43 other states.
- Automatically updating the address on file with the Medicaid program whenever a client reports an address change to the SNAP program.
- Eliminated the requirement that sponsors of legal immigrants repay costs of assistance for those they have sponsored.

REFORMS ALREADY IMPLEMENTED

Goal: Improve Access to Benefits

- Created Certified Application Counselor function (CAC) within HRA to help New Yorkers navigate the new State Health Care Exchange.
- Conducted an outreach program with the Benefits Data Trust organization and funded by the Robin Hood Foundation to identify eligible seniors who are receiving Medicaid or heat assistance, but are not in receipt of SNAP and encourage them to apply.

REFORMS ALREADY IMPLEMENTED

Goal: Improve Access to Benefits

- Deployed Client Service Supervisors to designated Job Centers and SNAP Centers to provide information, connect clients to appropriate units and services, and assist clients with special needs such as a disability or limited English proficiency.
- Implemented an Electronic Document Submission (EDS) process that allows SNAP clients to scan their documents into a file which is later transferred into their case records by a worker. This process eliminates the long wait times often associated with in-person document submission. This process will be further enhanced through the implementation of a new system known as “Easy Access” which will allow clients to scan the documents directly into their case records rather than to a file which must be manually transferred to the case record by a worker.

REFORMS ALREADY IMPLEMENTED

Goal: Improve Access to Benefits

- Created new outreach teams at the 15 NYCHA developments identified in the Mayor's Action Plan for Neighborhood Safety to ensure residents who are eligible for HRA benefits are receiving them.
- Created an Office of Advocacy with a special focus on ensuring increased access for New Yorkers who are Limited English Proficient (LEP), those with disabilities, immigrants and the LGBTQ community.
- Enhanced Intranet Quorum (IQ) as a case management system for complaints at HRA's call center and other program areas to provide clients with a reference number for their complaints and ensure a follow up.
- Hired a new Director of Immigrant Eligibility Training.
- Created a new process for immigrant clients to receive acceptable USCIS fee waiver documentation directly in an HRA center.

REFORMS ALREADY IMPLEMENTED

Goal: Reduce Homelessness

- Worked with NYCHA to implement a new process for NYCHA to accept HRA's certification that a family in an HRA or DHS shelter is a domestic violence survivor for priority housing.
- Established a Centralized Rent Processing Unit to expedite issuance of rent arrears checks to avoid evictions and address post-eviction cases to enable clients to regain possession of their apartments.
- Implemented a system to enable Cash Assistance family members to pursue tenancy rights for a NYCHA apartment when the family member on the lease dies by arranging to provide NYCHA with use and occupancy payments while a hearing is conducted.
- Implemented new system to ensure the payment of rent arrears for vulnerable clients, such as formerly homeless families at high risk of shelter entry.

REFORMS ALREADY IMPLEMENTED

Goal: Reduce Homelessness

- Expanded anti-eviction prevention services by consolidating from other agencies a number of contracts with legal services providers for anti-eviction and civil legal services, with additional base-lined funding for anti-eviction contracts.
- Expeditiously implemented the new 30% rent cap for eligible HASA clients and issued reimbursement checks for the April-June period to more than 7,000 households.
- Working with DHS, developed and implemented the new LINC rental assistance programs.

REFORMS ALREADY IMPLEMENTED

Goal: Eliminate Unnecessary Negative Outcomes for Clients

- Increased timing of child care return appointments to 15 days so clients have time to find appropriate, reliable child care that will support their work activities.
- Closed the Intensive Services Center program (Center 71), which led to unnecessary case sanctions and closings.
- Making reminder calls for eligibility appointments for SNAP and Cash Assistance to reduce missed appointments.
- Making missed appointment calls for SNAP and Cash Assistance eligibility appointments with a rescheduling option to reduce negative case actions.

REFORMS ALREADY IMPLEMENTED

Goal: Eliminate Unnecessary Negative Outcomes for Clients

- Stopped additional engagement call-ins of clients who request a Fair Hearing with Aid to Continue (ATC) for an engagement-related infraction to avoid multiple infractions and hearings.
- Piloted five excused absences for clients in work programs, based on the City's five paid sick days law.
- Developed new procedures for compliance with the required case conciliation process to avert negative case outcomes, for example, when there is "good cause" for missing an appointment or other requirement and the infraction was not willful.

REFORMS ALREADY IMPLEMENTED

Goal: Eliminate Unnecessary Negative Outcomes for Clients

- Modified the “partial” domestic violence waiver procedure, and now provide a full waiver from Cash Assistance requirements that put survivors at risk.
- Extended the domestic violence waiver from work requirements from 4 months to 6 months, reducing client appointments to 2 per year rather than 3, and reducing workload and risk of a client missing an appointment.

REFORMS ALREADY IMPLEMENTED

Goal: Eliminate Unnecessary Negative Outcomes for Clients

- Scheduling child support enforcement appointments 20 days from date of application to give clients additional time to reschedule preexisting appointments. Clients had been required to complete the appointment within 7 days of application.
- Implemented new processes to resolve fair hearing requests prior to the hearing, when appropriate, to reduce unnecessary agency workload and provide quicker resolution of issues for clients.

REFORMS ALREADY IMPLEMENTED

Goal: Improve Access and Outcomes for Education and Training

- Allow clients to pursue four year college degrees, as provided in the new state law, if they meet work activity requirements and maintain the required grade average.