



FEDERATION OF PROTESTANT WELFARE AGENCIES

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Assemblyman Keith Wright, Chair

Public Hearing:

New York State's TANF-Funded Welfare-to-Work Programs
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My name is Jill Poklemba, and I am the Senior Policy Analyst for Income Security and Workforce Development at the Federation of Protestant Welfare Agencies (FPWA). FPWA is a membership organization with close to 300 member agencies and church-based human service programs that serve an estimated 1.5 million low-income New Yorkers in communities throughout the City. We appreciate the opportunity to comment on New York State's TANF-Funded Welfare-to-Work programs. Given the current state of the economy and the increasing competition for low-wage jobs, it is now more important than ever for the State to invest its limited resources in workforce development programs.

We strongly urge the Assembly to work in collaboration with the Senate and Governor Paterson to expand education and training opportunities for low-income populations, particularly those living below poverty. Many of these individuals turn to the welfare system only as a means of survival in times of crisis. It is essential that these families receive opportunities to gain career-focused and sector-specific skills in high demand industries with a clear career pathway while receiving public assistance benefits. If the State fails to expand these opportunities, not only will more families remain trapped in poverty and the minimum wage labor market, but our State will lose its competitive edge without the skilled workforce it needs to revitalize the economy and thrive in the long-run.

In our testimony today, we will present:

1. **Barriers to education and training faced by welfare recipients**, particularly those served by the New York City Human Resources Administration (HRA), and the importance of moving forward with State and local policy changes to remove these barriers.
2. **Innovative models implemented here in New York and in other parts of the country** that facilitate access to education and training for welfare recipients.
3. **Recommendations for eliminating barriers by coordinating workforce development programs** for all low-income populations, including those receiving public assistance.

1. Major barriers to career-focused education and training opportunities for welfare recipients remain, particularly in New York City.

While the State has recently taken steps to expand access to education and training by requiring local social services districts to increase enrollments in vocational education, job skills training, and education related to employment by 20% by January 2009,¹ there remains only a very small percentage of welfare recipients currently engaged in these activities. According to the most recent comprehensive statewide data we have received from the Office of Temporary and Disability Assistance (OTDA), as of September 2007, only 14% of the population was engaged in any type of education and training activity, and only 9% was engaged in vocational education as a core work activity. It is important to note that under federal TANF rules, we can place an unlimited number of participants in job skills training and education related to employment as a non-core activity and up to 30% of the caseload in vocational education (which includes 2-year college degree programs) at any given time.

Since September 2007, we have received an update for localities outside of New York City demonstrating progress made in increasing enrollments between September 2007 and March 2008. Since local districts have wide discretion in implementing strategies to link participants to these educational opportunities, there is large variation across the State in the numbers of recipients engaged in education and training. The districts with the most significant increases in this timeframe include: Albany (73), Monroe (54), Nassau (36), Rensselaer (33), and Suffolk (35). In total, from September 2007 to March 2008, there was an increase of 333 participants in all “Rest of State” counties in education and training. Of those, 201 participants became engaged in vocational education as their primary activity. While this is good progress, we are still concerned that this is only a small improvement in expanding access to education and training to the overall population of

¹ OTDA 07-LCM-13 (October 18, 2007). 2008-09 Temporary Assistance and Food Stamp Employment Plan, Section 3.6 Available at: <http://www.otda.state.ny.us/main/directives/2007/LCM/07-LCM-13.pdf>.

welfare recipients. We have not received up-to-date comprehensive statewide enrollment data from OTDA as of yet to know if significant improvements have been made since March of this year.

In New York City, based on the HRA Local Employment Plan for 2008-09 that was approved by OTDA, the agency plans to adjust its reporting of participants already participating in education or training, rather than expanding opportunities to those not currently engaged. HRA also indicates that it will increase the use of Individual Training Account (ITA) vouchers and increase participation by sanctioned individuals. While this would be an excellent accomplishment, based on the most recent information obtainable from HRA, only 100 ITA vouchers were issued to welfare recipients in the first five months of 2008. In addition, **there are only 1,875 HRA clients engaged in education and training as a stand-alone activity in New York City as of October 12, 2008.² This represents only 2.2% of the engageable** (i.e. those that can be assigned to work activities) **population.**

Based on information received from HRA staff, the primary way clients can combine work and education is through participation in the BEGIN program, which is offered to those with more significant literacy barriers.³ BEGIN participants receive basic literacy, ESL or GED preparation classes. Although some clients benefit from BEGIN, the program is administered by several large vendors and is not tailored to the unique needs of individuals. At the moment, BEGIN vendors do not collaborate with the wide array of adult literacy programs offered at non-profits, CUNY campuses, and public libraries throughout the City. Although HRA maintains a list of approved education and training programs outside of BEGIN, clients do not systematically receive information about the wide range of workforce development, adult literacy, ESL, GED preparation, and community college programs available in the City which would give them an opportunity to gain valuable skills and make steps on a career ladder.

² NYC Human Resources Administration (HRA), Cash Assistance – October 12, 2008 – Weekly Report, Weekly Caseload Engagement Status. Available at: <http://www.nyc.gov/html/hra/downloads/pdf/citywide.pdf>.

³ HRA/DSS BEGIN “Begin Employment, Gain Independence Now” Program. Available at: http://www.nyc.gov/html/hra/html/family_independence/begin.shtml.

For those interested in participating in any education or training program outside BEGIN, the burden is placed upon the client to request a specific educational assessment by the HRA Training Assessment Group (TAG). According to HRA staff, in order to receive an ITA voucher, clients must conduct research to investigate at least three HRA-approved education and training programs and three potential employers that may hire them upon receiving this training.⁴ Then, clients must make a well-reasoned argument to the vendor staff that the request to participate in this program should be approved. This entire package is reviewed by an HRA worker, who analyzes the information and carefully examines the client's work and sanction history to make a decision about whether to issue an ITA voucher and to allow participation in the education and training program. Clearly, this arduous process does not facilitate access to ITA vouchers for individuals in poverty.

In an effort to learn more about restrictions to basic education for welfare recipients in New York City, an informal online survey of adult literacy providers in New York City was conducted by the Welfare Reform Network (WRN)'s Policy and Advocacy Committee (PAC) in early 2008. The results of the survey showed that the **top three barriers to participation in adult education programs by public assistance recipients were: 1) access to child care (80%), 2) receiving approval from HRA (50%), and 3) fulfilling other mandatory work requirements (50%).**⁵ Of the 18 program representatives responding to the survey, 33% indicated that students receiving public assistance were less likely to complete the program than students not receiving public assistance.⁶ Several commented that students demonstrating success in one program are sometimes forced to attend a different program selected by HRA. In addition, other students are forced to choose between working and continuing their education, instead of being given the opportunity to combine them as the federal, state, and local welfare policies allow.

⁴ HRA/DSS Approved Training Programs (ATP): HRA-Approved listing of Education and Training programs. Available at: http://www.nyc.gov/html/hra/html/family_independence/approved_training_programs.shtml.

⁵ Data was collected in Spring 2008 through an informal online survey, not through a formal scientific random sample data collection process. Responders were drawn from the NYC Adult Literacy Coalition (NYCAL) and the Federation of Protestant Welfare Agencies (FPWA) member agencies. A total of 18 responses were received; 67% indicated that their program was included on the HRA-approved list of education and training providers, available at: <https://a069-webapps1nyc.gov/atp/search.cfm>.

⁶ Ibid.

2. Innovative models that facilitate access to education and training for welfare recipients.

There are a number of models implemented here in New York and in other areas of the country that facilitate access to education and training. For example, in Albany County, a partnership between the Department of Social Services, Maria College, and a private foundation created a unique and innovative model called the Renaissance Scholar Health Care Program. This program actually gives welfare recipients the opportunity to participate in a college program in the health care field as a full-time activity, even beyond the 12 month maximum to count as an allowable stand-alone work activity, until the time of degree completion. Students receive a wide range of supports, including financial aid assistance, child care, transportation, mentoring, and sanction prevention services. A recent graduate advanced from home health aide earning approximately \$8/hour to a Licensed Practical Nurse (LPN) earning approximately \$30,000 per year. While it is important to note that this program would be difficult to implement for the entire TANF caseload, it is feasible to create similar programs that allow participants to participate in higher education for up to 12 months and then combine 20 hours of work as a core activity with additional required non-core work hours spent in education. The work-study/internship program is an excellent opportunity to facilitate this type of work and education combination for welfare recipients.⁷

For those without a GED, including those with limited literacy or English language skills, the ideal programs that allow participants to blend work with education and training include contextualized basic education, ESL, and GED preparation classes. The Washington State Integrated Basic Education and Skills Training Initiative (I-BEST) program⁸ integrates ESOL or ABE instruction with training in a specific vocation. I-BEST provides funding to link an ESOL or ABE instructor with a technical instructor to provide simultaneous skills training and literacy classes. It is structured for two instructors to work side-by-side in the classroom to combine technical content learning with

⁷ New York State Social Services Law §336(8) provides that “the hours of participation in federal work study programs...shall be included as a work activity within the definition of unsubsidized employment, subsidized private sector employment, or subsidized public sector employment...and the hours of participation in internships, externships, or other work placements shall be included as a work activity within the definition of on-the-job training.” Available at: <http://public.leginfo.state.ny.us/menuetf.cgi>.

⁸ Highline Community College, I-BEST Resource Website: <http://flightline.highline.edu/ibest/index.htm>.

supplemental language instruction. In 2005, the program offered four workforce education integrated tracks including business, mechanical, public services and health services. This program is ideal for welfare recipients, as it fits the definition of several federally allowable work activities.

The new Career Pathways program receiving \$5 million in SFY 2008-09 as a combination of WIA and TANF funds is an excellent example of how New York seized a new opportunity to facilitate access to career-focused and sector-based education and training for populations facing greater barriers to employment, and specifically, a certain portion of public assistance recipients. During the implementation phase, it is essential that local social services districts provide full information about locally available programs to welfare applicants and recipients. We strongly urge the State to expand funding for Career Pathways in SFY 2009-10 and to solicit feedback from non-profit service providers in developing future Requests for Proposals (RFPs) for this program.

3. Coordinating and streamlining workforce development policy and programs for all low-income populations, including those receiving public assistance.

As a solution to facilitating access to education and training programs for all low-income populations, we are strongly supportive of improved interagency collaborations between OTDA, the State Education Department (SED) Adult Education office, the Department of Labor (DOL), and the SUNY/CUNY higher educational systems. Together, these agencies can expand access to education and training programs as part of a comprehensive economic and workforce development strategy to create career opportunities for low-wage workers, including public assistance recipients. By conducting additional outreach to welfare recipients and other non-traditional students, SUNY/CUNY administrators can play a crucial role in expanding higher education opportunities for those facing more significant barriers to college transition from adult education and GED classes. Fortunately, there are several State entities that already bring these agencies together to conduct this type of strategic planning, including the State Workforce Investment Board (WIB) and the Governor's Economic Security Cabinet workforce development workgroup. We strongly urge the State to

strengthen interagency collaborations that the WIB and Economic Security Cabinet are already conducting.

In New York City, Comptroller William C. Thompson, Jr. recently released a report that reveals the lack of coordination between all of the City's workforce development agencies.⁹ While HRA is identified as the most extensive workforce development agency in the City in this report, HRA clients do not receive the same type of intensive assessment, training, career guidance, job placement, and career advancement services offered to job seekers through the Workforce 1 Career Centers, which are overseen by the City Department of Small Business Services (SBS). Furthermore, the report exposes the fact that CUNY's certificate and degree programs in high-demand fields such as health care, education, and technology are not coordinated with the rest of the City's workforce development programs or directly with the HRA programs. Therefore, low-income individuals must navigate these disparate workforce development systems to try to create a career pathway that offers opportunities to gain new skills and increase their wages incrementally over time. It is almost impossible for those in poverty to achieve success when HRA, which can have enormous control over their daily lives, is so uncoordinated with other workforce systems in the City.

While the TANF work participation requirements create a hurdle for the State in expanding access to certain types of higher education programs, eliminating barriers to participation in allowable education and training programs will actually increase the State's work participation rate. Therefore, the State should focus TANF surplus dollars along with State and local welfare-to-work funding into strengthening workforce development systems, rather than the "work first" model or by restricting access to public assistance benefits for those who need it in times of financial crisis.

By creating incentives for local social services districts to develop formal partnerships with adult education programs, community colleges, vocational training providers, and other non-profit workforce development agencies, more clients would receive information and resources

⁹ Office of NYC Comptroller William C. Thompson, Jr. (October 2008). "Demands of the Time: Turning the Workforce Development Model of the Last Century into a Skills Education Model for Today." Available at: http://www.comptroller.nyc.gov/bureaus/opm/reports/10-15-08_demands-of-times.pdf.

about how to access these programs. For example, a liaison from each of these programs could be assigned to each site where individuals apply for public assistance to provide information about the process of enrollment. Then, social services caseworkers could explain how clients can participate in these programs as part of their overall Employability Plan. In making this a regular part of the process that is conducted for all welfare recipients, we could break down barriers to education and develop the skilled workforce that will make New York competitive and revive the economy.

At the moment, we have several new opportunities to facilitate access to education and training for welfare recipients:

- **Green Collar Jobs** – The State Task Force on Renewable Energy has charged DOL, in collaboration with NYSEDA, SED, and SUNY/CUNY systems with the task of developing an inventory of green collar training programs throughout the State and to provide resources to training organizations that can produce a skilled green collar workforce.¹⁰ **Strategic planning between members of this Task Force on Renewable Energy and the Economic Security Cabinet** will produce stronger economic development and workforce development policy and programs that will set the State on a new course for sustainable “green” economic recovery. It will ensure that the State uses its limited resources most efficiently and effectively by coordinating across State agencies towards a common goal. The end result will be a unified State economic and workforce development plan that creates new jobs, produces sustainable economic growth, generates energy savings, reduces environmental pollution, and expands opportunities for people to rise out of poverty through education and training. It is critically important for at-risk communities to take part in the greening of the environment and revitalization of the economy. **These green collar training programs must conduct outreach to low-income populations to ensure that they are actively recruited for job training programs in green collar industries** with union representation for workers.

¹⁰ “Clean, Secure Energy and Economic Growth: A Commitment to Renewable Energy and Enhanced Energy Independence,” The First Report of the Renewable Energy Task Force (February 2008), Available at: http://www.ny.gov/governor/press/lt_RETF_Report.pdf.

- **Final TANF Rule changes** – The federal Department of Health & Human Services (HHS) recently released the Final TANF Rule which allows participation in a bachelor’s degree or an advanced degree program (as well as 2-year degree programs and vocational certificate programs) to count as vocational educational training. In addition, the Final Rule allows states to count supervised homework time plus up to one hour of unsupervised homework time for each our of class time.¹¹ **We are very appreciative for the introduction of A.11297-A during the 2008 legislative session to incorporate these newly allowable higher education and homework-related work activities into State Social Services Law.** This Final TANF Rule change creates a new opportunity to build new partnerships between local districts and local colleges offering both 2-year and 4-year degree programs. We are eager to work with you in 2009 to ensure that this legislation is enacted. The Final Rule also clarifies that basic skills or ESL can count as part of vocational educational training as long as it is a necessary and integral part of the vocational educational training. Therefore, participation in contextualized adult literacy or ESL (such as the Washington I-BEST program) is definitively an allowable work activity within this category. We are still waiting for OTDA to release regulations to require local districts to conduct an assessment of the educational level of public assistance recipients and facilitate access to adult literacy programs. Specifically, **we expect that these new OTDA regulations would require local districts to offer basic education for those below the 9th grade skill level and GED preparation for those above the 9th grade skill level but without a high school diploma or GED certificate.** We have been told that this would be released before the end of 2008, however, we still have not seen these proposed in the State Register.

¹¹ Schott, Liz (February 20, 2008). “Summary of Final TANF Rules: Some Improvements Around the Margins,” Center on Budget and Policy Priorities. Available at: <http://www.cbpp.org/2-20-08tanf.pdf>.

In addition to the bill previously mentioned, we are also strongly supportive of the following bills that enhance access to education and training:

- **Basic Education Bill (A.7391-A)** – This bill would require local districts to make participants aware of all basic education providers in the area and their rights in continuing or seeking enrollment in these programs. Unfortunately, this bill passed both houses in 2002, but was vetoed by Governor Pataki.
- **Sustainable Wage/Non-Traditional Employment Bill (A.3366/S.3201)** – This bill would require local social services districts to give consideration to education and training for sustainable wage jobs and non-traditional employment opportunities for women in higher paying fields often dominated by males. Some of these fields include skilled trades, such as carpentry, construction, electricity, and plumbing; technology industries; and public service jobs, such as firefighter and police officer. Unfortunately, this bill passed both houses in 2007, but was vetoed by Governor Spitzer.
- **Career Plan/Assessments Bill (A.7990)** – This bill would require local districts to conduct more comprehensive and individualized assessments of all welfare recipients and develop a career plan that is focused on locally available employment, education and training opportunities. This bill was advanced to the Assembly Ways & Means Committee in 2008, but did not advance further.

In conclusion, we are greatly appreciative of the Assembly's efforts to expand access to education and training activities for welfare recipients through both legislative and budgetary actions. We appreciate the opportunity to testify today.