



**Human Resources
Administration**
Department of
Social Services

TESTIMONY

Robert Doar, Commissioner
Human Resources Administration/Department of Social Services

*Public Hearing on
Intro 0648-2011, 0649-2011, and 0657-2011*

*Hearing of the New York City Council
General Welfare Committee*

September 22, 2011

Good morning Chairwoman Palma and members of the General Welfare Committee, as you know I am Commissioner Robert Doar of the Human Resources Administration (HRA). With me today is Katy Gaul, Deputy Commissioner of Employment for the HRA's Family Independence Agency (FIA) and Lisa Fitzpatrick, Deputy Commissioner of FIA Operations. Thank you for the opportunity to discuss Introductory Number 648, 649 and 657. Like the Council, I share your interest in making sure that the young adults in New Yorker City are afforded the opportunities necessary to succeed in life and become responsible adults. Unfortunately, rather than encouraging HRA to better link these young adults to established programs in the City, these bills suggest replacing them with Cash Assistance.

HRA administers the Temporary Assistance for Needy Families (TANF) program, under the supervision and governance from both the state and federal government. The TANF statute is clear that it is not intended for households without children although in New York, single adults are served through the State Safety Net Assistance program. As we mentioned in our June testimony before the Committee, federal statute and state regulations require that as a condition of Cash Assistance (CA) eligibility, an unmarried, pregnant and/or parenting minor under 18 years of age must reside with a parent, legal guardian, or adult relative unless the minor meets a living arrangement exemption which would allow for receipt of cash welfare when it is unsafe for a minor to live with a parent. It is clear that the program is intended to encourage youth to remain attached to a responsible adult while a part of the welfare system. Also, the TANF program does not utilize the terms "youth" or "young adult" as identified in these proposals and instead refers to "minor child" or "adult" with a minor child" being defined as anyone under 18 or under 19 if in secondary school or the equivalent. Beyond that age, they are considered adults.

Overall, we have significant concerns about the underlying assumption in these bills that a specialized approach should be created in the welfare system for young adults under the age of 25. In the fifteen years of administering the TANF program, we have not received federal or state guidance calling for a differential approach to serving young adults or even youth as head of households in the TANF program.

Not only HRA but also the Department of Small Business Services (SBS) has shown success in placing youth/young adults in employment without a specialized approach with 30 percent of their job placements for individuals under 25 yrs of age at the Workforce1 Career Centers. Similarly, our Back to Work (BTW) program offers over a dozen services for all clients to find and keep a job. These services are based on established workforce practices such as resume building, job search, and interviewing preparation that are designed to take into consideration employment barriers regardless of age. Youth, like all clients, are asked not only about their work experience but also about their skills and employment goals. Similar to youth, there are several groups of clients who might not have a robust work history such as those who were formerly homemakers or those released from residential settings. In all cases the BTW program is able to look at the client's interests and strengths. One of the strengths of our BTW program is that it

helps young people who might lack a strong resume develop the skills which can enable them to obtain a first job. Due to the fact that HRA has utilized these techniques towards the placement of over 50,000 people in jobs in 2011 thus far, with almost 11,000 under the age of 25, the need for a youth specific employment program at HRA has not been proven.

We also are concerned about the unintended consequences of encouraging school age youth onto cash assistance. We want to make sure they receive the benefits they are eligible for but it should not be encouraged as a goal for such a young population. As you know, the TANF program has a life-time maximum time limit of 5 years with many states using an even shorter time frame. A minor parent could therefore exhaust the ability to participate in the TANF program later on in their life. A reliance on cash assistance is also contrary to the administrations goals of family reunification or self-sufficiency for these disconnected youth. At this time I would also like to provide additional feedback specific to each of the bills.

Intro 648

As you know, Intro 648 requires HRA to display on its website all information relating to how high school age youth and those between the ages of 20 and 25 can access public assistance, including state and local statutes, copies of state regulations, state and city policy directives and memoranda. This bill would create an inconsistency between its definition of youth and the way the State and Federal governments define minor child and adult for TANF purposes. Although we want our policies to be clearly understood and available to potential applicants, we believe requiring HRA to publicize the few exemptions in federal and state law that specifies the narrow rules for youth participation in the TANF program as head of household is the wrong approach, however well intentioned. Also, each and every one of our policy documents for the Cash Assistance and Safety Net programs affect or concern all adults, regardless of age. Posting the totality of information on the website would be a major undertaking. Translating State statutes into “plain English” would also require significant resources and oversteps our role with our state oversight agency which is responsible for interpreting statute. To post a public document of our own interpretation of statute would be inappropriate.

Intro 649

Although the legislative text of Intro. 649 is unclear on whether it requires the creation of specific employment programs for applicants and recipients under the age of 25, it is clear that the intent is that there should be such a “youth/young adult” approach. The bill suggests that this approach involve not only specialized welfare employment programs but also training and education programs as well as specialized assessment tools. It also calls for establishing a “youth liaison” at each Job Center.

Beyond the broader concerns over conflicts with the programs already existing state and federal oversight, and the other issues already mentioned we find the creation of youth liaisons in every Job Center problematic. This designation could require the hiring of specialized staff and corresponding supervisors to manage and evaluate their

performance. It is unclear what additional skill sets are imagined for these liaisons. It would also be difficult to manage an operation where these liaisons are identified to meet with all applicants under the age of 25. Our experience is that with the press of business it is at times difficult in the Centers to direct applicants to a specific liaison in a timely manner. This could lead to additional waiting time for such applicants. If we were to create these new positions, the cost of such liaisons and their supervisors would be in the range of \$1.5 - \$1.7 million annually.

We also disagree with the proposal to create different assessment tools within the application and investigation process for applicants under the age of 25 years. The application, including the investigation process, is part of the eligibility process and therefore setting up different assessment standards would create unacceptable disparities in the eligibility process. Within the present intake process, there are already a host of questions that address persons with minimal to no employment history and limited educational backgrounds as well as other barriers which are common to all applicants regardless of age.

HRA should not be viewed as the “one stop” for youth educational, training, and employment resources. There are multiple agencies, notably DYCD and DOE, that are well suited to address the well intentioned purpose of these bills - to help identify available resources in the city that support the education and training needs of youth.

Intro 657

Intro 657 requires HRA to quarterly report over 200 data elements to the City Council related to minor children and adults under the age of 25 years. This information includes both applicant and recipient data on case heads and members of the household related to education and employment outcomes and past history.

We presently have a very rich reporting structure for the State and Federal government, and also post on our website an abundance of data on all the activities that recipients participate in within the program. We believe strongly in the importance of data as a tool for administering and measuring our programs. However, we have very significant and substantial concerns about this proposal.

In addition to system barriers and financial issues which I will review shortly, the proposal’s call to define a “successful youth/young adult” based solely on receipt of public assistance is a disservice to youth and an inappropriate message to all New Yorkers. It also runs counter to the progress made over the last 15 years to encourage success through a concurrent combination of employment and training. This proposal would require us to report someone who we assist in securing full time employment while in the application stage as “unsuccessful”.

There are many systems issues with this bill, primarily because our program relies on multiple systems and the primary one is the Welfare Management System (WMS) under the jurisdiction and control of the State Office of Temporary and Disability Assistance

(OTDA) and not HRA. Although there are several data elements for which we regularly report and in the same format suggested by the proposal, a majority of the over 200 data elements proposed are not presently captured at all, while other elements are captured but categorized and coded differently. The elements presently collected also vary with regards to our confidence in their validity as we are unable to verify every self-reported data element. This information is collected for the purpose of developing appropriate employment plans rather than for public data reporting purposes.

For example, a large portion of this bill requires outcome data on applicants that speaks to their education and employment history prior to application. HRA tracks applicants as they move through the process but not in the aggregate way required by the bill. Also WMS files are continually updated so it does not retain a history specific to their financial or employment situation when they applied if it has since changed. In addition, some of the information collected is scanned into a file for record keeping (for example prior pay stubs) but is not accessible for purposes of running data reports.

The bill calls for reporting on youth who are part of a household where there is an adult case head. Limited data is also not available on the engagement status for members of a household who are not adults on the case. Similarly, employment plans are not developed for youth who are on the case, under the age of 18 and who are not the head of household, so it would not be possible to look at prior work history or employment preferences for this group.

The bill also uses definitions and terms that contradict statute and specific rules of the program. For example, the definition of household and who is considered an applicant are inconsistent. It also lists a series of education outcomes that are not mutually exclusive and would create confusion. Further, there is no distinction in the bill between someone in the “did not graduate high school” category who is a drop out and someone still enrolled in high school who did not graduate yet. In addition, one data element is for those who meet work participation based on full-time participation in post-secondary education even though State does not allow post secondary education to count as full time participation. Similarly, the bill assumes that education and training and employment activities are mutually exclusive while most of our recipients are enrolled in a combination.

As mentioned earlier, we are also constrained by the fact that a significant amount of reprogramming and the creation of new data elements and reports would be required from the state’s WMS system. Any modifications to WMS would require not only State approval but would require the State to actually make the changes. Given that the State has limited available resources, and that WMS is the present state-wide system for multiple programs, significant program changes frequently require prioritization by the State among these programs. This can result in a lengthy delay for any individual project. It is very possible that the State will not agree to utilize their limited resources to update the system, especially to capture additional indicators on topics such as employment and education where there are already indicators in place.

Beyond State costs, HRA would have to update its internal systems at an estimated \$2 million. HRA does not have staff to devote to this task and would need to hire additional staff or further delay or permanently side line present projects. In addition to the significant costs associated with these changes, running systems reports in order to generate a validated quarterly report on over 200 different indicators would require significant resources. Also, as the level of indicators suggested in the report will require altering the application process at the point of worker/applicant interaction, additional training for staff will be needed.

Conclusion

HRA should not be viewed as the “one stop” for youth educational, training, and employment resources. There are multiple agencies that work collaboratively to address the well intentioned purpose of these bills - to help identify available resources in the city that support the education and training needs of youth. We presently have relationships with our colleagues in City government on workforce and education issues facing disconnected youth and are very open to building stronger collaborations and linkages with them.

At this time, I’m happy to answer any questions you may have.