

HRA'S BIENNIAL EMPLOYMENT PLAN

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



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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 **170,000 households** receiving assistance, about **91,000 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 **23,000 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



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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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.



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**Testimony of Greg Bass, Senior Staff Attorney
National Center for Law and Economic Justice**

**Committee on General Welfare
New York City Council**

**Oversight: Review of Proposed Changes to Human Resources
Administration (HRA) Employment Programs**

October 1, 2014

Introduction

Good afternoon. My name is Greg Bass, and I am a Senior Attorney with the National Center for Law and Economic Justice (NCLEJ), here in New York. The Center works in New York and around the country to advocate for the fair administration of public benefits programs for low-income individuals, in compliance with the law. A primary focus of my work with the Center is on the intersection of these public benefit programs with federal and state disability rights laws.

My comments are directed specifically toward the longstanding troubled history, since its inception in 2005, of the **Wellness, Comprehensive Assessment, Rehabilitation and Employment (WeCARE) program**. WeCARE, as overseen by the Human Resources Administration (HRA) and administered through two private contractors (currently FECS and FedCap) and various subcontractors, has significantly failed to fulfill its laudable goals of assessing the multiple and complex physical, mental health, and substance abuse barriers to employment of the City's public assistance recipients, and providing them with specialized support services to lead them to self-sufficiency.

WeCARE program deficiencies have been documented by a number of sources, including this Committee. Robert Newman, Alix Pustilnik, Committee on General Welfare, New York City Council, *Briefing Paper of the Governmental Affairs Division/Oversight: The Human Resources Administration's WeCARE Program* (Oct.

22, 2007). The Committee's Briefing Paper quoted extensively from two sources: (1) Alexa Kasdan, Sondra Youdelman, Community Voices Heard, *Failure to Comply: The Disconnect Between Design and Implementation in HRA's WeCARE Program* (March 2007), available at [http://www.cvhaction.org/sites/default/files/Failure%20to%20Comply%20FINAL%20Full%20Report%20\(2007\).pdf](http://www.cvhaction.org/sites/default/files/Failure%20to%20Comply%20FINAL%20Full%20Report%20(2007).pdf); and (2) City of New York, Office of the Comptroller, *Audit Report on the Oversight of the WeCARE Program Contractors by the Human Resources Administration* (June 30, 2008).

NCLEJ applauds the reforms already initiated by HRA Commissioner Steven Banks, in his short tenure at the agency. We have met with his staff to discuss needed systemic reforms for WeCARE. While we have not yet had the opportunity to review the new HRA Employment Plan, we hope that the agency's focus on reform also shifts toward WeCARE.

This Committee's exercise of its oversight function regarding the WeCare provisions of the proposed HRA Employment Plan, as well as its monitoring of the FEES and FedCap contracts, which are slated for renewal in July 2015, should include ensuring that the initial promise of WeCARE is fulfilled. Consequently, my testimony will highlight the following three areas of continuing problems of WeCARE service delivery, which I urge the Committee to reference throughout this process:

- (1) Lack of HRA compliance with federal disability rights laws in administering the WeCARE program, leading to high client drop-out rates;
- (2) Lack of consideration of treating provider documentation in the Biopsychosocial Assessment (BPS) process;
- (3) Lack of effective escalating outreach and case management for client assistance, to address missed appointments; and
- (4) Lack of effective monitoring and enforcement of the WeCARE contracts.

Lack of HRA Compliance with Federal Disability Rights Laws

HRA and its contractors are required to comply with the Americans with Disabilities Act, 42 U.S.C. §§ 12101, *et seq.*, and Section 504 of the Rehabilitation Act, 29 U.S.C. § 794(a), in the operation of their programs, services, and activities, including the WeCARE program. These laws, together with their implementing federal regulations, provide a number of protections for WeCARE applicants and recipients with disabling conditions – the client population the program is designed to serve. Key among these protections, with respect to HRA either directly or through its contractors and subcontractors, are:

1. A prohibition against using criteria or methods of program administration that have a discriminatory effect on WeCARE applicants and recipients with disabling conditions. 28 C.F.R. § 35.130(b)(3)(i);
2. A prohibition against using criteria or methods of program administration that have the effect of defeating or substantially impairing the accomplishment of WeCARE program objectives, with respect to applicants and recipients with disabilities. 28 C.F.R. § 35.130(b)(3)(ii);
3. A prohibition against denying applicants and recipients with disabilities the opportunity to participate in or benefit from WeCARE aids, benefits, or services. 28 C.F.R. § 35.130(b)(1)(i); and
4. A prohibition against imposing or applying non-essential eligibility criteria that screen out or tend to screen out applicants or recipients with disabilities or any class of individuals with disabilities from fully and equally enjoying any WeCARE service, program, or activity. 28 C.F.R. § 35.130(b)(8).

Central to these protections is the requirement that HRA and its contractors and subcontractors provide a range of reasonable accommodations and modifications for persons with disabilities in all WeCARE program policies, practices, and procedures which are necessary to avoid discrimination, unless they would fundamentally alter the nature of the service, program, or activity. 28 C.F.R. § 35.130(b)(7). These required accommodations help persons with disabilities navigate the program. For example, HRA must help reduce the number of appointments that clients must attend, if their disabilities make it difficult to attend scheduled appointments and avoid program sanctions for missing them. Clients may need assistance with filling out forms and obtaining third-party verification from medical providers. Required work activities may need to be tailored to clients' disabling conditions. See *Lovely H. v. Eggleston*, 235 F.R.D. 248 (S.D.N.Y. 2006).

The WeCARE program is complex and difficult to navigate, even though it is designed for clients with disabilities who are more likely to have difficulty attending numerous appointments across the city. Many clients with disabilities referred to the program lose or are threatened with the loss of their cash assistance benefits when they miss WeCARE appointments or give up when vocational services are a waste of time.

For example, the WeCARE Biopsychosocial (BPS) Assessment process is structured in such a way as to actively hinder its completion by clients, and lead to program sanctions for missed appointments. As Community Voices Heard demonstrated in its 2007 report, multiple service delivery flaws lead to multiple appointments being scheduled for the assessment process in multiple locations, with limited support and flexibility offered, resulting in missed appointments. This can often lead to clients being sanctioned and faced with the loss of critical public benefits. As

shown by the continuing high numbers of Office of Temporary and Disability Assistance (OTDA) administrative fair hearings involving sanctions due to missed WeCARE appointments, this problem persists to this day.

This means that HRA, its contractors and subcontractors, are not affording reasonable accommodations to WeCARE clients in compliance with the ADA, to enable them to comply with program requirements. Many WeCARE clients miss appointments, drop out of the program, or otherwise cycle in and out. In prior years, HRA testimony before the City Council has indicated that as many as 22,000 individuals, or almost 20% of the total clients referred to WeCARE, did not complete the assessment process. FECS data has previously shown, for the period of June – November, 2009, that more than one-third of the clients referred for BPS assessments did not attend the initial appointment. As of February 2010, more than one-third of clients referred to BPS assessments in 2010 did not attend the initial appointment, despite receiving outreach.

To partially remedy this, the WeCARE contracts with FECS and FedCap state that all components of the medical examination process generally should be conducted at the same location and consolidated into as few visits as possible. *E.g.*, FECS Contract (June 2012), Appendix B, Attachment 2. Thus, as a matter of both contract and ADA compliance, HRA must be held closely accountable for the reasonable accommodation requirement.

Although persistent drop-out rates indicate that the program is not meeting its goals for many clients, to our knowledge, HRA has not taken steps to determine the underlying cause of these problems, including mandating contract compliance with medical examination scheduling. This Committee should direct HRA to undertake a comprehensive study to determine the reasons for the high drop-out rates. This study should include interviews with program participants who have dropped out of the program. The agency should accordingly be directed to make changes to address underlying problems.

Lack of Consideration of Treating Provider Documentation in the Biopsychosocial Assessment (BPS) Report

The WeCARE contracts mandate that the BPS report contain a “review and consideration of all relevant medical documentation presented by or on behalf of the participant.” *E.g.*, FECS Contract (June 2012), Appendix B, Attachment 3. Community Voices Heard, and clients continue to report, that WeCARE medical contractors do not review or consider documents from their treating physicians, despite this contract requirement.

In addition, an October 2009 FECS record review found that close to one-third of the case records reviewed contained “underreported” components of physical exams,

such as cardiovascular, vision, musculoskeletal, pain assessments, and other required assessments. Record reviews have also found that medical contractors frequently omit the recording of the specific nature of clients' work limitations, in the forms used to record assessment results.

The result of this is incomplete assessments for WeCARE clients. This in turn leads to placement in appropriate program tracks, and inadequate outcomes for clients' WeCARE involvement, as well as noncompliance resulting in sanction.

This Committee should mandate that HRA require contractors to note in each BPS and Comprehensive Services (CSP) Plan that they have reviewed clients' medical provider documentation and, if they disagree with the independent diagnoses, what their rationale is for doing so. Contractors should further be required to review BPS and related forms for completeness, prior to Comprehensive Services Plans being developed. If forms are missing information that would affect Functional Capacity Outcome assessments, CSP content, or the WeCARE track clients are assigned to, HRA and its contractors should be required to ensure that the cases are returned to the medical contractors who conducted the evaluations, and instructed to fill in missing information and conduct necessary tests that were not performed.

In addition, the WeCARE contracts require needed client accommodations to be recorded in the BPS report. *E.g.*, FECS Contract (June 2012), Appendix B, Attachment 3. This continues to be non-reported. HRA should be mandated to ensure that this is reported, and that the Comprehensive Services Plans reflect discussion with clients about the contents, as well as client input on substantive requirements and reasonable accommodations needed for program compliance.

Lack of Effective Escalating Outreach and Case Management

In order to address persistent drop-out rates, the WeCARE contracts require FECS and FedCap to provide case management services that fulfill various functions. These include providing "escalating outreach" to clients who are noncompliant with program requirements, in order to "re-engage them." *E.g.*, FECS Contract (June 2012), Appendix B, ¶ V (F). The contract specifies three levels of escalating outreach, including: (1) "letter and/or email"; (2) "phone call and/or email"; and (3) "outreach." HRA determines the duration of outreach attempts.

The express language of the contract, which partially defines escalating outreach to clients as "outreach," is circular, and further, does not identify any sequential order of specific activities the contractor must perform, or how many types of outreach must be attempted.

This Committee should mandate that HRA demonstrate the efficacy of its escalating outreach efforts for clients faced with program noncompliance and possible sanction. Only 12% of the clients surveyed by Community Voices Heard in 2007 stated that anyone from WeCARE ever contacted them if they missed an appointment, and 64% had difficulty reaching WeCARE staff to reschedule an appointment. Client stories demonstrate that this situation has not significantly changed.

The larger issue is the lack of effective, coordinated case management services provided to WeCARE clients. The contracts define a variety of functions as comprising case management. *E.g.*, FECS Contract (June 2012), Appendix B, ¶ V (F). In addition to escalating outreach, these include, *e.g.*, identifying and addressing “barriers to compliance, participation, attendance and progress” and providing reasonable accommodations. These clearly are overarching goals of case management for the WeCARE population – provision of reasonable accommodations to persons with disabilities, to enable them to comply with program requirements and ultimately achieve self-sufficiency.

These activities necessitate adequate case management. Monitoring and assisting clients in complying with program mandates, linking clients with services specified in their Comprehensive Services Plans, and maintaining contact with service providers are critical case management functions. Navigating the WeCARE program is difficult for many clients, particularly those with disabilities than make it difficult to travel, attend numerous appointments, complete complex paperwork, and perform other functions necessary to comply and retain eligibility for subsistence benefits. For clients in the Wellness track, it may be necessary to provide help finding and making appointments with medical providers. For those in the SSI track, it may be critical to provide help in gathering documents in support of an application for benefits.

These goals are thwarted by HRA and its contractors and subcontractors. Community Voices Heard found, and clients continue to state that they are unable to identify any WeCARE staff designated as their case managers. They are provided generic information about WeCARE, but they report that they don’t understand the program’s purposes, which appointments are part of the program, or even, whether they’re actually in WeCARE or not.

HRA may respond that it has received a number of “favorable” client satisfaction survey results, administered over the years to WeCARE clients. These surveys don’t seek information directly related to case management and other supportive services designed to help clients meet program objectives. As a result, they don’t provide a complete picture of the problem.

HRA has announced that it is instituting “robo-calls” to remind clients about scheduled appointments. This is laudable, but insufficient. This Committee should direct HRA to implement and monitor effective case management services that remain in regular contact with clients and provide coordinated services to help ensure program

compliance.

Lack of Effective Program Monitoring

HRA's approach to monitoring the WeCARE program is inadequate. At present, HRA requires FECS and FedCap to submit monthly data and contracts with an outside entity, the New York County Health Services Review organization (NYCHSRO), to inspect program sites and review a sample of clients' biopsychosocial records. Both have serious limitations. The monthly data does not look at the quality of services provided. The monitoring contractor looks only at observable problems at program sites and samples client case records to review discrete WeCARE services, such as whether contractors complied with contract rules in conducting assessments. They do not interview clients to see what actually happened to them, including the appropriateness of the track they were placed into, or the supportive services they received or did not receive. The reports do not look at the fundamental question of whether the conclusions drawn from assessments were correct, or whether clients were placed into appropriate program tracks that demonstrated beneficial outcomes.

This Committee should direct HRA to require contractors to do more analysis of clients as they move through the program. HRA should require independent monitors to examine case records and interview clients as they move through the program. Participant satisfaction surveys should ask clients about their overall experience with the program, including specific provision of services.

Conclusion

Thank you for giving me an opportunity to present these comments.



Testimony of

Louise Feld
Senior Policy Associate for Food and Economic Security
Citizens' Committee for Children of New York, Inc.

Before the
New York City Council
General Welfare Committee and the
Committee on Civil Service and Labor

Oversight: Review of the Proposed Changes to HRA's Employment Programs

October 1, 2014

Good morning. My name is Louise Feld and I am the Senior Policy Associate for Food and Economic Security at Citizens' Committee for Children of New York, Inc. (CCC). CCC is a 70-year-old independent, multi-issue child advocacy organization dedicated to ensuring that every New York child is healthy, housed, educated and safe. I would like to thank Chairman Levin and Chairman Miller, and the members of the General Welfare and Civil Service and Labor Committees, for holding this hearing.

According to New York City's Human Resource Administration (HRA), in August 2014 over 335,000 New Yorkers received Public Assistance (PA).¹ Of those New Yorkers, about 138,000 participated in the Family Assistance Program (FA),² which provides cash assistance to eligible low-income families that include a minor child who lives with one or both parents or a caretaker relative.³ In August 2014, about 31,000 FA recipients were deemed engagable in a work-related activity, which is required for these individuals to receive aid.⁴ As you know, HRA, in their biennial Employment Plan (Plan), details how these Family Assistance recipients, as well as Safety Net Assistance⁵ recipients, will be work-engaged.

We are aware that release of HRA's Plan is imminent. We therefore wish to share our thoughts and recommendations about potential Plan contents that would enable HRA to better help New York Families reach economic stability and self-sufficiency.

In general, we are hopeful that the forthcoming Plan will approach implementation of the work requirement with an understanding that each PA recipient has unique skills and needs. We believe it is of the utmost importance to properly determine each recipient's:

- Education and literacy level;
- Work status and history;
- Physical and mental health status, and the impact of that status on capacity to engage in education, training or work;
- Existence of obligations to care for children, an elderly relative, or a disabled family member; and
- Presence of additional factors that may impact one's ability to comply with the work requirement, such as domestic violence, substance abuse, homelessness, and/or an open child welfare case (protective, preventive or foster care).

¹ New York City Human Resources Administration, *HRA Facts: July 2014*, available at http://www.nyc.gov/html/hra/downloads/pdf/facts/hra_facts/hrafacts_2014/hra_facts_2014_07.pdf. Accessed on September 30, 2014.

² New York City Human Resources Administration, *Cash Assistance Reports*, available at http://www.nyc.gov/html/hra/html/facts/cash_assistance_stats.shtml. Accessed on September 30, 2014. (Hereinafter Cash Assistance Reports.)

³ New York State Office of Temporary and Disability Assistance, *Temporary Assistance*, available at <http://otda.ny.gov/programs/temporary-assistance/>. Accessed on September 30, 2014. (Hereinafter Temporary Assistance.)

⁴ See Cash Assistance Reports.

⁵ The Safety Net Assistance program provides cash assistance to families who have reached the Family Assistance five-year limit on cash assistance, childless adult singles and childless adult couples, as well as to several other groups. See Temporary Assistance.

An assessment that takes all of these factors into account would permit a more targeted, individualized approach to connecting PA recipients to the labor force and to occupations with higher earning potential. For each recipient, consideration of these factors can ultimately inform HRA's determination of:

- The education, training or credential opportunities that would improve employability or earning power;
- The work placement that might improve employability or enhance skill development; and
- Necessary and appropriate work supports, such as child care.

As child advocates, we are particularly concerned that this comprehensive set of factors be considered in implementing the work requirement for parents who receive PA, as they must simultaneously take care of immediate child care needs and parenting responsibilities while attempting to obtain or maintain long-term employment and their family's financial security. We are optimistic that the Plan will reflect our suggested approach, as Commissioner Banks' recent testimony and public statements demonstrate he shares these concerns and priorities.

Three recent HRA policy changes show commitment to this approach, and have already functioned to alter some problematic provisions contained in the previous Employment Plan.

First, HRA discontinued Center 71's functioning as a centralized Intensive Case Services Center where all clients who were on sanction were sent. Center 71 was widely viewed among advocates as an office responsible for massive case closings, many of which were imposed in error and with little meaningful opportunity for clients to remedy sanctions and have their benefits reinstated. Commissioner Banks' statements before a hearing of this Committee in May demonstrate his agreement with this assessment. Specifically, Commissioner Banks testified that Center 71's practices were "counterproductive...result[ing] in unnecessary case sanctions for New Yorkers who were willing to comply with work rules and lead[ing] to substantial numbers of unnecessary fair hearings."⁶ In short, the decision to close Center 71 demonstrates HRA's desire to work closely with clients to cure their sanctions, and ultimately re-engage them in appropriate work-related activities.

Second, HRA supported a State law that offers New York State PA recipients the option to fulfill their work requirement with four-year college coursework, and took necessary steps to ensure the successful implementation of this legislation in New York City.⁷ Education is, of course, essential to improve individuals' employment opportunities, which in turn can increase their families' financial security. HRA's support for this measure shows a true commitment to helping PA recipients develop the skills needed for long-term employment, as well as an understanding of the difficulties that time and resource constraints place on PA recipients' ability

⁶ Testimony of Commissioner Steven Banks, NYC Human Resources Administration/Department of Social Services, 2015 Executive Budget Hearing, Joint Hearing of the New York City Council Financial and General Welfare Committees, available at http://www.nyc.gov/html/hra/downloads/pdf/news/testimonies/2014/may_2014/HRA_Executive_Budget_Testimony_2015.pdf. Accessed on September 26, 2014. (Hereinafter Commissioner's Testimony.)

⁷ These steps include issuing policy directives that permit a limited number homework hours to be counted towards the work requirement and instruct HRA case workers to be mindful of PA recipients' class schedules when arranging appointments.

to attend class, study, work, meet family caretaking obligations, and make mandatory meetings to maintain their benefits. Along a similar vein, we hope that HRA's update of the Employment Plan includes examination of supports for PA recipients' engagement in the other types of education already permitted to satisfy a portion of the work requirement, such as GED programming, vocational and technical education, and two-year college programs.

Third, HRA has reformed its policies to extend the length of time PA applicants are given to secure child care. Without safe, appropriate child care, parents cannot work or attend classes and children lose out on social, emotional, and educational opportunities. It is critically important that efforts be made to help PA applicants secure the child care they need to comply with their work requirement. We are therefore thankful for the policy directive, released in June, that increased the time that PA applicants are afforded for their child care search, from five days to fifteen, with a potential five day further extension.⁸

In addition to expressing our support and appreciation for the policy changes already underway, we look forward to an updated Employment Plan that we hope:

- **Supports PA recipients' efforts to simultaneously meet work requirement and family caretaking responsibilities.**

At the General Welfare Committee Executive Budget hearing held in May, Commissioner Banks testified about several then-in development reforms that would significantly improve PA recipients' ability to both comply with the work requirement and attend to family caretaking obligations.⁹ We support reforms that would permit PA recipients five excused absences from work activities for illness or family emergencies, and reforms that would decrease the number of unnecessary appointments for which PA recipients have to appear. Such policies would enable PA recipients to engage in their required work-related activity and tend to their families' needs, and we therefore hope they are included in the updated Plan.

- **Increases coordination with the Administration for Children's Services and the Department of Education, so that parents are fully educated on the types of child care, early education, and after school supports that are available to them.**

As mentioned above, safe, appropriate, and high quality child care arrangements are essential supports for PA recipients with children. Parents who receive PA must be provided with the information they need about available early childhood options, including Early Learn, child care, child care vouchers, and pre-K, as well as how they can locate and access such programming in their communities. In addition, we hope that there is an effort made to ensure that school-aged children of PA recipients engaged in any work-related activity are participating in after-school

⁸ See Human Resources Administration, Family Independence Administration, *Policy Bulletin #14-69-OPE: Child Care Return Appointment*. Available at <http://onlineresources.wnyc.net/nychra/docs/14-69-ope.pdf>. Accessed on September 30, 2014.

⁹ Id.

programming because they too need safe and productive places to learn while their parents are at their job or educational placements.

- **Provides meaningful education and training opportunities, as well as on-the-job training experiences, and a focus on preparing interested PA recipients for employment in emerging industries and the trades.**

HRA's updating of its Employment Plan provides the agency with the opportunity to examine its current work placements and question how those placements are preparing PA recipients for jobs, especially in expanding industries and the trades. We urge HRA to think aspirationally and creatively about ways to further engage PA recipients in permitted educational activities (including four-year and two-year college, vocational and technical education, and GED programming), and how to shore up on-the-job training at work placements, so that PA recipients will have the needed skills and training to secure employment in stable and/or growing fields.

We also suggest looking to pilot programs that provided low-income New Yorkers with in-demand job skills. For example, the Center for Economic Opportunity's (CEO) Nursing Career Ladders Program, administered with the Health and Hospitals Corporation, prepared participants for careers in nursing. HRA should examine what knowledge can be gleaned from the CEO's experience with this program, and whether such programs targeted at educating PA recipients for specific jobs in growing fields and trades could be created.

In addition, we ask the City to leverage the opportunity that current infrastructure updates present in order to link PA recipients with stable employment in the trades. Currently, the City is continuing to build back from Hurricane Sandy and explore how to address the threat of climate change, which has revealed much-needed improvements to City infrastructure. This presents a real opportunity for training and employment, especially for underemployed or unemployed New Yorkers and residents of impacted neighborhoods. HRA should therefore collaborate with the Mayor's office and other City agencies to determine how to best train interested PA recipients, so that they can transition off of the program and into work in a skilled trade utilized in rebuilding and infrastructure-fortifying efforts.

- **Works with the Department of Consumer Affairs (DCA) to help connect PA recipients to services, tax credits, and programs that promote long-term financial security.**

Notably absent in the current plan are efforts to help former PA recipients build assets, so that they can eventually achieve financial stability for themselves and their families. We therefore urge HRA to collaborate with the New York City Department of Consumer Affairs (DCA), to assist those transitioning off of PA in their attempts to achieve financial stability, and establish and grow savings. This partnership should include the creation of initiatives and policies that help PA recipients: improve financial literacy; get banked and access financial services and platforms needed in order to save; claim tax credits, such as the EITC, for which they are eligible; and reduce debt. DCA could be particularly helpful in determining how to provide these services to PA recipients in their communities, as their Capacity Building Initiative trains community-based organizations to provide financial counseling to their clients.

- **Develops comprehensive professional training opportunities in order to instruct frontline workers on implementation of new and/or updated policies, including those contained in the Employment Plan.**

Finally, the proposed reforms we hope to see included in the Employment Plan will require that HRA issue new policy directives and inform the frontline caseworkers about changes in practice. This is an important point to emphasize, as caseworkers are charged with the difficult task of day-to-day Plan implementation, and the best of policy directives will not make a positive impact if they are not properly administered on the ground. We therefore hope that HRA develops comprehensive training for agency case workers, so that new or altered policies included within the Plan can be successfully incorporated into the agency's daily practice.

In sum, the release of HRA's updated Employment Plan represents an exciting opportunity to further support PA recipients' skill maximization and opportunities for stable, long-term employment. We believe inclusion in the Plan of the suggestions we share today could help achieve these goals. We look forward to the Plan's release and the positive impact that the reforms contained therein can potentially have on families and children.

Thank you for this opportunity to testify.



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Chris Norwood, Executive Director

October 1, 2014

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Attn: City Council General Welfare Committee

Working with HIV/AIDS: The issues for PLWHA thinking about workforce (re) Entry

Client's that were previously considered unable to work due to HIV/AIDS-related illnesses are now able to consider the possibility to (re)enter the workforce in light of their improved health. Despite health improvements, PLWHA have faced numerous obstacles with respect to workforce entry including concerns about future health outcomes, possible loss of welfare benefits, outdated job skills, discrimination, and accommodations for HIV/AIDS-related disabilities. While they struggle to overcome these significant challenges that effect their ability to live independently and return to the workforce, (re)entry is an important aspect of their independence. The benefits of permanent employment for individuals who are able to (re)enter the workforce include decreased depression symptoms and improved peer support.

Reasons PLWHA have when considering employment:

Increased income- for most People living with HIV/AIDS disability income (e.g., social security disability insurance (SSDI), supplemental Security income (SSI) represents only a fraction of their pre-disability income. Living on disability alone represents an ongoing challenge for many PLWHA, if not all disabled/unemployed HIV/AIDS infected individuals.

Increased personal meaning- Many people derive a substantial amount of self-worth from their jobs: a person's self-image is closely linked to the work that they do. Self-worth, or a reason for "existence", can be undermined by disability and unemployment. Therefore, workforce (re)entry may help to restore a sense of personal worth and meaning for many disabled/unemployed HIV/AIDS infected individuals.

Control and Increased Self Efficacy- Employment is a setting in which many people express and gain competence, receive positive feedback, expand abilities, and experience a sense of control and achievement (this can be a uniquely important anchor while dealing with a disease that can be hard to control).

Reduction of family financial burden- Related to the need for increased income and personal financial stability, many PLWHA and others with disabilities feel they have become financial burdens to their families because their disease state necessitates financial support from their families. Employment allows PLWHA reduce financial burden (whether it is real or perceived).

Increase Social Interaction- Employment is a major source of social interaction, in contrast to the isolation experienced by many people living with HIV/AIDS. Employment will help to reduce this sense of isolation.

Making This Work:

Despite compelling reasons that support the importance of work (re)entry for PLWHA, a number of obstacles often make this transition difficult. These obstacles may suggest that the efforts at workforce (re)entry are not worthwhile, or that the costs outweigh the benefits. Concerns related to possible loss or changes in health benefits, fear and anxiety over the possibility of disclosure, the reality of HIV-related prejudice and discrimination, and relative lack of job skills and /or education are the leading factors.

Therefore, work (re)entry programs that we know are effective are crucial. We are pleased by HRA's attention and concerns. We are looking over the proposals we heard today which certainly can be helpful. Equally helpful would be the proper use of existing money.

Two major examples would be to take back the \$1.2 million in funding allocated to GMHC to start an employment Program under the last administration. This was a sole source non-bid contract given at the last minute and does not represent a proper use of city funds for an AIDS employment program. People from the Bronx and Brooklyn who are in most need of employment can't even reach the site. These funds should be put into Community Based Organizations that have experience, and a higher success record for training, educating, and providing social skills needed to attain employment. Over the past 10 years, HASA's own job training program has only resulted in 5-9 people a year actually getting a job. Proper utilization of these funds would require an altered approach. Redirecting these funds into peer programs, which build the social skills necessary for work, would be a worthwhile alternative to explore. Training PLWHA in office related tasks, teaching them to work well with others, and providing educational resources are integral parts of creating successful re-entry.

Finally, when issuing these contracts and planning HIV training and employment programs, it is imperative that organizations can demonstrated a steady record of preparing people who were formerly incarcerated for work and that they actually hire the formerly incarcerated themselves.

In closing, if these funds are placed with organizations that have shown dedication to this work, we can make real progress; if we toss it into non-bid contracts, we sadly will get nowhere.

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\$10.8 Million in New Grants Further Expand GMHC's Core Services for New Yorkers Living with HIV/AIDS

3.12.2014

New York, NY—GMHC is excited to announce two major new grants that will expand our work with low-income New Yorkers living with HIV and AIDS. These grants come on the heels of Governor Cuomo and Mayor de Blasio's historic decision last month to extend the 30% rent cap to more than 10,000 low-income New Yorkers permanently disabled by HIV/AIDS.

Short-Term Rental Assistance Program - Public Health Solutions

Public Health Solutions awarded GMHC \$9.6 million (\$3.2 million/year over 3 years), with federal Ryan White Part A funding provided through the NYC Department of Health and Mental Hygiene, to offer the "Short-Term Rental Assistance Program" to low-income people living with HIV/AIDS who are medically-eligible for benefits through the NYC HIV/AIDS Services Administration (HASA) but not eligible under administrative rules.

For each enrolled family, GMHC will conduct a comprehensive needs assessment, provide service planning and case management assistance, conduct an apartment inspection (to ensure apartment meets livability standards), and make rental assistance payments directly to clients' landlords. GMHC will also offer supportive services to help each client become financially self-sustaining within two years.

Job Training & Placement Program - NYC HIV/AIDS Services Administration (HASA)

HASA awarded GMHC in the amount of \$1.2 million over three years to launch a RISE (Realizing Independence through Support and Employment) job training and placement program for people living with HIV/AIDS who are enrolled as clients of HASA.

The RISE program will help these clients explore their interest in employment, participate in job readiness and training opportunities, and potentially gain and retain sustainable employment.

Only 1,246 (3.8%) of HASA recipients currently earn some income through employment. GMHC believes that many more people who receive HASA benefits are interested in securing meaningful employment.

GMHC anticipates enrolling 400 clients each year for this holistic pilot program, which will provide an opportunity to respond to interest among HASA recipients for opportunities to build skills and explore employment; gather more information about the interests, strengths, and employment barriers faced by HASA recipients; and, refine a program model that could potentially be expanded and replicated.

There are several reasons why many HASA recipients are not employed. Many participants lack educational credentials and work experience, as well as the confidence needed to find employment. Also, some recipients have concerns about their medical conditions, which require daily management and can suddenly change. Even individuals who feel healthy enough to work may be reluctant to transition completely to employment due to uncertainty surrounding their health, as well as the risk of losing access to HASA and other benefits such as housing assistance, food and nutrition, and health insurance. Finally, there are too few sources of employment-related assistance for HASA recipients; existing workforce development programs are not prepared to help them navigate this range of complex barriers.

Janet Weinberg, Chief Operating Officer/Interim CEO commented on the grants: "Housing and jobs are healthcare. Only when people can afford the basics to take care of themselves and stay in their homes can we ensure they are receiving the full benefits of HIV/AIDS treatment. We thank Public Health Solutions and the NYC HIV/AIDS Services Administration for funding these exciting, sophisticated new programs, which will allow us to provide a significant portion of low-income New Yorkers with HIV/AIDS with a better quality of life."

ABOUT HIV/AIDS in NYC

Facts about HIV/AIDS in New York City

114,926 people in New York City living with HIV/AIDS

- 59% have AIDS
- 72% are men
- 77% are Black or Hispanic.
- 36% are men who have sex with men (MSM)

3,141 new HIV diagnoses in 2012

- 21% are women
- 39% are between the ages of 13 to 29
- 20% are heterosexual

1,889 new AIDS diagnoses in 2012

- 57% are age 40 and older
- 56% live in high (20 to <30% below federal poverty level (FPL)) or very high (\geq 30% below FPL) poverty





FEDERATION OF PROTESTANT WELFARE AGENCIES

Testimony prepared for
New York City Council:

Committee on General Welfare
Hon. Stephen Levin, Chair

Committee on Civil Service and Labor
Hon. I. Daneek Miller

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The Federation of Protestant Welfare Agencies (FPWA) is an anti-poverty, policy and advocacy nonprofit with a membership network of 200 human service and faith-based organizations. Each year, through our network of member agencies, FPWA reaches 1.5 million low income New Yorkers of all ages, ethnicities, and denominations. FPWA strives to build a city of equal opportunity that reduces poverty, promotes upward mobility, and create shared prosperity.

We would like to thank the City Council for the opportunity to testify on the proposed changes to Human Resources Administration's (HRA) Employment Plan.

Background

To become a city of equal opportunity, New York City must reduce poverty and advance upward mobility by shoring up the social safety net and ensuring workers receive training and supports. Nowhere is the opportunity for this greater than improving the efficiency, effectiveness and humanity of the HRA. With nearly half of New York City residents poor or near poor, HRA's services could be brought to the forefront of Mayor de Blasio's battle against poverty and inequality.

It has been nearly two decades since welfare reform was enacted. Many of the policies that could have been adopted to provide long-term solutions to address the education, training, employment and service needs of low-income individuals and families, were not undertaken by the previous Mayoral Administrations. Instead, HRA adopted the simple, but extremely detrimental, policies of placing barriers to access, while providing job placement services to a small percentage of individuals— and mostly at low-wage jobs.

Over the years, HRA has been operating with little accountability in terms of accessibility, outcomes and service. Even during the Great Recession years, when economic needs skyrocketed due to the enormous loss of jobs and homes, the welfare caseload remained relatively stagnant. This was particularly shocking given the contrast to the increased caseload for Food Stamps and Medicaid during those years. In the past seven years, the number of individuals on public assistance has declined by 11.4%, with HRA having the lowest caseload level since 1964. While many families across the city faced unemployment, foreclosure and debt, HRA continued its intentional policies to create inaccessibility for its services. One of the greatest examples of this is demonstrated through the rejection and reapplication cycle for those seeking public assistance. An examination of HRA clients deemed eligible to receive benefits showed that one-third had their initial application rejected and were forced to reapply, with 86% having their second application accepted. A majority of these initial rejections were the result of HRA claims that these individuals did not comply with the employment or application process. This delay in receiving benefits has a profound impact on those seeking assistance, including a lack of access to programs and services that connect clients to employment.

Elements of the Employment Plan

With the adoption of the new employment plan, the de Blasio Administration has the opportunity to use the \$200 million that HRA spends annually on employment programs to create pragmatic policies that provide efficient assistance and effective employment services

and supports to those in need. As acknowledged by HRA, the current “one size fits all” approach too often results in a lack of client engagement in meaningful employment programs and the inability to connect clients to long-term employment opportunities. The new employment plan takes care in acknowledging the need for a differentiated approach to meeting the needs of those seeking assistance and recognizes the many factors, including work history, education level, language proficiency, and disability status, that must be addressed in order for a client to be successful in attaining sustained employment.

In focusing on the three overarching principles of maximizing education, training and employment-related services, improving assessments, and eliminating unnecessary punitive and duplicative actions, HRA has developed a plan that fundamentally reforms the manner in which clients engage with the City and ensures improved educational and employment outcomes for many hard working New Yorkers seeking assistance.

Maximizing Education, Training and Employment-Related Services

FPWA supports HRA’s intention to phase out the current Work Experience Program (WEP). We believe that increased access to evidence-based training programs is essential for the long-term success of New York City’s employment plan. Though FPWA strongly supports the utilization of the Career Pathway approach as a means to allow clients to receive education and training that prepares them for careers in high-need sectors, **we encourage HRA to also implement a comprehensive transitional jobs program for clients who may require additional support services.**

Transitional jobs are a particular form of publicly subsidized employment which seeks to help those who are “hard to employ” – long-term unemployed, TANF recipients, disconnected youth and the formerly incarcerated– overcome employment barriers with paid, short-term employment that combines real work, skill development and supportive services. Participants are provided training in both necessary soft skills in the work force and with vocational training in a specific industry/skill. Often, participants are retained for permanent employment in the jobs they had placed into for a subsidized period. Even when they are not, these participants have a much higher chance of finding permanent employment afterward, and they are provided with help in their job search process. **Transitional jobs programs have been proven by several studies to reduce dependence on public assistance for participants and have been shown to largely reduce recidivism among those formerly incarcerated.**

FPWA is pleased to see the inclusion of comprehensive education, training, and employment-related services in the new employment plan. Research demonstrates the heightened earning potential of workers as they increase their educational credentials and the significant barriers to wage increases and career advancement that exist for those lacking access to educational and training opportunities. These new and enhanced programs will serve as a means to provide assistance to those at all levels of education and work experience.

We are encouraged to learn of HRA’s intention to create a new employment strategy for youth, particularly those who are aging out of the foster care system, as well as customized employment strategies for shelter residents and LEP cash assistance recipients. While not all

people living with HIV/AIDS (PLWHA) are able to work, some seek an opportunity to transition into the workforce and develop financial independence. Some research studies have shown that PLWHA who work or participate in vocational rehabilitation are significantly more likely to adhere to their medication and have better physical and mental health outcomes than those who are unemployed. **We encourage HRA to scale up resources to support job training and employment services with the HIV/AIDS Service Administration.** In addition, we encourage HRA to include pre-vocational services such as personal organization, academic preparation and work readiness, as part of the milestones for employment program vendors serving special populations.

FPWA is thankful for HRA's support for the passage of the 4-year college bill that allows full-time education to count toward work participation requirements for the first 12 months of participation and the allowance of internships and study programs to count after the first year. The inclusion of ESL classes as an allowable full-time engagement activity, a major improvement from the part-time program currently offered, will go far in securing access to educational and employment opportunities for clients with limited English proficiency. Additionally, we applaud the additional support services, such as comprehensive advisement, job placement, and tutoring services, which will be expanded to ensure an increase in the number of students who not only attend college, but complete it.

Improving Assessments

FPWA is pleased with HRA's announcement to develop a plan to implement the Modified Mini Screen as a means to identify public assistance recipients who require work accommodations and additional services due to mental health issues. This tool, along with plans to develop additional screenings for those who require travel, workplace, and/or program participation accommodations, will serve to more efficiently and effectively identify those clients who need additional supports in order to be successful in their employment placements.

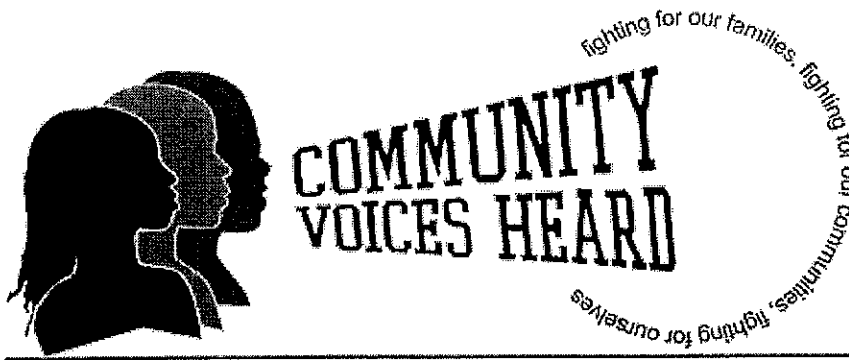
FPWA supports HRA's intention to apply aspects of the Social Security Administration's (SSA) sequential evaluation and grid rules to better identify clients who may be "functional disabled" and may qualify for federal disability benefits by using the Diagnostic Vocational Evaluation (DVE) to focus on their limitations to strengthen a SSI application. HRA's assistance to clients in obtaining SSI would improve the client's quality of life and provide the client with a better income source.

Eliminating Unnecessary Punitive and Duplicative Actions

FPWA is encouraged by HRA's commitment to address counterproductive policies and procedures that too often lead to sanctioning and case closure. According to HRA's own statistics, approximately 12% of the public assistance caseload is either sanctioned or in the sanctioning process at any one time. These sanctions, which are often imposed in error, have a financial cost, not only to the individual, but also to the greater community. Once a sanction is imposed, households have few options to meet their immediate basic needs and can lead to both adults and children in the household going without adequate food, clothing, or other essentials.

We are pleased with HRA's proposal to reduce the engagement requirements for families with children age three or younger from 35 hours to 25 hours. Given that care for infant and toddler in the City is more expensive and harder to find, this action would allow parents of young children increased flexibility to fulfill both child- and work-related demands with reduced risk of unnecessary sanctions.

HRA's efforts to increase program participation through a revamping of their compliance procedures ensures that more public assistance recipients will have access to the supports necessary to be successful in their educational and employment programs. **FPWA is especially interested in the pilot project that will allow up to five days of excused absences per calendar year for those engaged in the work activities.** This will align HRA policy with the City's new paid sick leave law and will provide much needed relief to working families.



www.CVHaction.org

Testimony for NYC Council Hearing on HRA Employment Plan
October 1, 2014

Good afternoon, my name is Joseph Mpa, I am a member of Community Voices Heard. Thank you for holding this hearing about the HRA Employment programs.

The current grouping of HRA Employment Programs is confronted by the simple reality that in a capitalistic society the necessities of having a job are paramount for survival and mere recognition as someone who exists. This being the case, the need for an employment system that functions is akin to saying that without clean air and clean water we will not survive. Can we design a system which provides a wide array of jobs, careers, training, educational and entrepreneurial opportunities for those who have been laden with numerous barriers to employment and lack the current resources to overcome them? Can we be creative enough, resourceful enough and truthful enough to face some hard facts that reflect our history as a society and the future choices of our world? Can we and will we give this topic the type of attention that it merits and acknowledge that yes there are answers, yes real answers to some of the most difficult questions we may ever have to answer.

The employment crisis (it's not a crisis if you already have a job or you don't want one), is rooted in failures of the educational system, the judicial system, the political system, financial system, government and the racial, ethnic, religious, age, sexual and medical biases which permeate our society. Barriers to employment range from the systems mentioned to the utilization of Credit, Background Checks, the HRA Work Experience Program, the Box (Previous Arrest), and Social Media biases.

How can we as a society continue to strengthen the walls against gainful employment and somehow expect that people will magically overcome all the obstacles, the stress and the sense of hopelessness that comes from feeling that no matter what you do, no matter how hard you try, the deck is stacked against you.

The success of Back to Work programs is questionable, job placement numbers do not accurately reflect how many jobs are obtained without any assistance from the program at all. The stress of meeting performance contractual markers can be an incentive for inaccurate

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reporting. In addition, quotas placed on job developers can be responsible for a less than clear picture of their effectiveness.

Let's get back to some integrity. We need to develop a system that first and foremost acknowledges the participant as significant ingredient in the recipe for successful sustained employment which could address the crisis income inequality continues to afflict in this society. Replace ineffective Back to Work Programs with Community Colleges, Universities and Work Force Centers. Permit them to be responsible for Orientation, Testing, Assessment, Placement and Follow Up with HRA providing supportive services and verification of placements. End WEP (Work Experience Program) and replace it with Subsidized Employment (Public and Private Sectors), On the Job Training (Apprenticeships), Community Service, Vocational Education, Unsubsidized Employment, Entrepreneurships, Workers Co Operatives, and Job Skills Training. We must take these services out of the hands of those who do not know, and subsequently continue to fail, and place it with people that sincerely care and will be responsible for the systematic changes necessary to make this help everyone who truly wants to work.



FOR THE RECORD

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FOR BETTER HEALTH AND WELL-BEING

Comments on HRA's Proposed Changes to its Employment Programs
City Council Committee on Civil Service and Labor Jointly with the Committee
on General Welfare
Wednesday, October 1, 2014

VillageCare wishes to thank the City Council for this opportunity to testify on HRA's proposed changes to its employment programs.

VillageCare is a highly regarded, not-for-profit provider of high quality care for people with chronic diseases, as well as older adults and individuals in need of continuing care, rehabilitation and medical services. What started as one nursing home in the West Village in 1977 has grown into a network of services addressing the City's frail and vulnerable population, with VillageCare serving over 14,000 individuals in 2013. Of these individuals, the overwhelming majority are low income, and with the exception of our over clients over 65, would be directly impacted by the changes being proposed by HRA.

HRA's new proposed changes to its employment programs, as outlined in their Biennial Employment Plan, once fully implemented will go a long way towards making real progress in addressing the needs of this City's poorest residents. A fairly rigid system, which allowed little room for error on the part of its beneficiaries, now promises to be redesigned to make more individualized assessments of what is truly needed to provide the skills, tools and resources to achieve what we all want for HRA beneficiaries – to achieve independence through gainful employment. We applaud these and other efforts being outlined today.

The list of proposals announced today are impressive, and VillageCare is pleased to see the following become City policy:

- A major overhaul of how and why individuals end up in sanction status with a goal of reducing unnecessary sanctions and case closings;
- Allow participation in 4-year college and liberal arts degree programs for HRA beneficiaries, including increased supports for cash assistance recipients enrolled in college;
- Elimination of the WEP program and replace it with strategies that promise to provide greater access to gainful employment;
- Changing the required hours of engagement in work related activities to meet the needs of families, individuals actively looking for work and other situations;

Rivington House

VillageCare Rehabilitation
and Nursing Center
16 & Ten

Adult Day Health Care

AIDS Adult Day Health Care

Community Care
Management / Health Home
Home Care

VillageCareMAX

- Customized on-site employment programs within shelter programs;
- Attempts to address the impact that mental health and substance abuse has on HRA beneficiaries and creating strategies to meet the needs of these individuals in non-punitive ways, including harm reduction strategies
- Greater assistance with SSI and SSDI applications

These are just a handful of the changes being proposed by HRA. We truly look forward to working with the City's administration, as well as HRA and City Council to explore strategies that go a long way towards addressing the needs of our City's poorest residents.

We proudly support today's announcement by HRA. Thank you.

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Testimony of The Legal Aid Society
Before the City Council Committees on General Welfare and
Civil Service and Labor
Review of the Proposed Changes to New York City Human Resource
Administration's
Employment Programs
October 1, 2014

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**Testimony of The Legal Aid Society
Before the City Council Committees on General Welfare and
Civil Service and Labor
Review of the Proposed Changes to New York City Human Resource Administration's
Employment Programs**

October 1, 2014

The Legal Aid Society, the nation's oldest and largest not-for-profit legal services organization, is more than a law firm for low-income families and individuals who cannot afford to pay for counsel. It is an indispensable component of the legal, social and economic fabric of New York City – passionately advocating for low-income individuals and families across a variety of civil, criminal and juvenile rights matters, while also fighting for legal reform. The Society has performed this role in City, State and federal courts since 1876. With its annual caseload of more than 300,000 legal matters, the Society takes on more cases for more clients than any other legal services organization in the United States, and it brings a depth and breadth of perspective that is unmatched in the legal profession. The Society's law reform representation for clients also benefits some two million low-income families and individuals in New York City and the landmark rulings in many of these cases have a national impact. The Legal Aid Society does this with a full-time staff of more than 1,800, including more than 1,100 Legal Aid Society lawyers working with nearly 700 social workers, investigators, paralegals and support and administrative staff through a network of borough, neighborhood, and courthouse offices in 26 locations in New York City. The Society's legal program operates three major practices — Civil, Criminal and Juvenile Rights — and receives volunteer help from law firms, corporate law departments and expert consultants that is coordinated by the Society's Pro Bono program.

The Society's Civil Practice provides comprehensive legal assistance in legal matters involving housing, foreclosure and homelessness; family law and domestic violence; income and economic security assistance (such as unemployment insurance benefits, federal disability benefits, food stamps, and public assistance); health law; immigration; HIV/AIDS and chronic diseases; elder law for senior citizens; low-wage worker problems; tax law for low-income workers; consumer law; education law; community development opportunities to help clients move out of poverty; and reentry and reintegration matters for clients returning to the community from correctional facilities. Typically, clients seek assistance from the Civil Practice after exhausting all other avenues for assistance. The Society's Civil Practice is the safety net when all other safety nets fail. During the past year, our Civil Practice worked on more than 46,000 individual cases and legal matters, benefiting nearly 116,000 low-income children and adults.

Through our Public Benefits practice, we represent a large number of clients who are forced to rely upon public assistance to get through difficult times that are often caused by a change of circumstances, such as unemployment, disabling medical and mental health conditions, domestic violence, homelessness or even the need for child care. We also provide legal services to thousands of low-wage workers each year through our Employment Law Unit, working to ensure these workers receive fair wages, fair treatment, decent working conditions, and the benefits to which they are entitled if they lose their jobs. The Society wins over 90 percent of the cases that go to court or administrative hearings.

In the short-term, our clients turn to public assistance as a stop-gap in order to survive: to keep a roof over their heads or end a period of homelessness, and to feed their children. In the long-term, our clients seek a path to a more stable income: by finding a decent job that pays a

living wage, seeking education, training or employment to build the skills to get decent jobs, or securing disability benefits for those who are disabled and unable to work.

We appreciate the opportunity to testify about the New York City Human Resource Administration's Employment Plan and related policies. We applaud the thoughtful approach of HRA's new Employment Plan which appears to be far more grounded in 21st century realities than any previous Plan. We think the policies included in the Plan offer the hope of real job opportunities for our clients. We also appreciate the plan's emphasis on positive outcomes for all HRA clients.

As HRA's Employment Plan was just released today, we have not had much time to delve into the details. So today, we will focus on major observations about the Plan: (1) major areas of positive change; (2) a few areas where we still see room for improvement; and (3) some observations about other reforms that, if adopted, could also have a positive impact on our clients' lives.

As a preliminary matter, we appreciate the candor that HRA has displayed by breaking down the data related to HRA's past performance related to work outcomes and its shift to broaden the type of outcomes considered. As Commissioner Steven Banks has previously testified, HRA took credit for over 92,000 job placements in 2013 but nearly half of these placements for which HRA took credit were simply not related to HRA actions or policies:

- 16% of the placements were for those who were already working and who received a one time grant of emergency assistance;
- 18% were for clients who were not connected to HRA job programs but who were later identified by computer matching as having a job;

- 13% of job placements for which HRA took credit were for clients who were rejected by HRA for ongoing assistance but computer matching found the client had a job.

Simply put – HRA was overstating its successes with respect to work outcomes – even going so far as to take credit for clients it rejected. We appreciate the fact that we have now been told how this prior data was compiled. Going forward, it is important that we are mindful of this prior data and that we create a new baseline by which we measure HRA’s success when they provide us with new, accurate data.

Moreover, we agree with HRA that its employment policies affect clients in ways that go beyond helping them attain a living wage or obtain needed services to address barriers to employment. In the past, some employment policies were implemented in counterproductive ways that hurt clients and we appreciate the agency’s efforts to acknowledge and address these problems. In too many cases the various “work rules” posed obstacles clients were forced to navigate – something many clients could not manage, resulting in sanctions (loss of benefits), and case closings. For instance, in May of this year, of the 56,000 clients subject to work requirements, over 20,000 were either sanctioned or in the sanction process. And in the first six months of 2013, one quarter of children and adults who applied for shelter from the Department of Homeless Services (DHS) were part of a case that was in sanction status. The focus of the Employment Plan on participation rather than sanctions will reduce the potential that a sanctioned family suffers the unintended consequence of homelessness.

Fair Hearing statistics compiled by the State Office of Temporary and Disability Assistance (OTDA) further illustrate two important facts about these sanctions. First, they result in thousands of fair hearings. Approximately 80,000 fair hearings were requested in New York

City on employment issues in Fiscal Year 2013 representing a significant administrative cost to the City and State. Second, a substantial portion of the sanctions at issue in those hearings could not be defended by HRA. Of the hearings held in FY13, nearly 90 percent had a favorable outcome for the client, suggesting that many of those sanctions could have been prevented in the first place. Indeed, believing that New York City needed an incentive to prevent needless and costly fair hearings – specifically, those at which the City ultimately withdraws its threatened action – the Governor's budget this year included legislation that imposes a penalty of up to \$10 million, on the City, triggered when it exceeds a threshold number of withdrawals. The Legal Aid Society expressed our strong opposition to the chargeback, as a punitive measure that was neither necessary nor helpful at this stage given the incoming administration's reform agenda and commitment to end unnecessary sanctions. However, since the chargeback measure was ultimately adopted, there is now an added financial incentive to support the redirection in Employment policies reflected in the plan.

Accordingly, we agree with HRA that it is important for the agency to include reform of those counterproductive policies and procedures that lead to punitive actions such as sanctions that cause extraordinarily negative outcomes, including homelessness. We believe that HRA's plans to implement new policies to emphasize participation while reducing unnecessary sanctions and case closings will lead to overall better outcomes for poor New Yorkers and for the City.

I. NEW POLICIES AND PLAN REPRESENT REAL OPPORTUNITIES FOR LOW INCOME NEW YORKERS

HRA's new Employment Plan includes definite, positive changes that should serve our clients by providing them with real work opportunities which can provide a route out of poverty.

It is important that HRA has acknowledged in the Plan that the City should not lose sight of the kinds of help needed by low-income working New Yorkers to keep jobs. HRA has an important role to play in helping working New Yorkers access key supports such as Medicaid, Supplemental Nutrition Assistance Program (SNAP) benefits, child support and one-time emergency benefits to prevent evictions and utility shut-offs. HRA along with other city agencies also plays a key role in helping low income working New Yorkers overcome and avert homelessness, access quality child care services and pre-kindergarten education and securing Earned Income Tax credits.

We are pleased to see HRA acknowledge that it makes more sense to customize employment requirements based on client needs. Meeting clients' individualized needs will better serve clients and should produce better ultimate outcomes. In the past, the City tended to take a one-size-fits all approach to work activities – directing most clients to the same type of activities regardless of their employment background, skills, or interests. By using a more tailored approach, HRA can achieve better results for clients.

HRA has included plans to phase out the use of the Work Experience Program, known as “WEP,” as an employment activity. We endorse the elimination of WEP. Based on our experience representing clients on public assistance and low income workers, it is clear that WEP fails to move people from public assistance to self support because of the lack of training

and skill development provided to participants. Moreover, WEP harms all workers by displacing paid workers, undercutting union wages and leading to lower labor standards.

We are hopeful that the City will be able to increase paid work slots such as the Parks Opportunity Program and can succeed at linking placements to high growth industries. We appreciate the fact that HRA has announced its willingness to use Individualized Training Vouchers. While these vouchers existed in the past – we found that on the ground, our clients were almost never able to secure them from HRA – so this new positive focus on the vouchers is a welcome change.

A. Commitment to Education

One of the most critical themes apparent in HRA's Employment Plan is its commitment to education. We are pleased to see that the City has a targeted plan for Young Adults ages 18-24. A key part of the focus for these young adults will be education. By not just permitting but encouraging young adults to get a high school education, HRA is increasing the chances that these young people can secure a route out of poverty. This is no small matter. In the past, the agency has not targeted this group and the result is that young people have to fight to be able to stay in school – an outcome that made no sense whatsoever. By permitting these young people to utilize education as a full time activity without artificial 12-month time limits, it is clear that HRA will improve the odds that these young adults can successfully complete their educational programs.

We are similarly pleased to see that HRA has announced sensible administrative programs to implement the new State law that permits clients to complete four-year college

programs provided they comply with state rules. HRA has rightly pointed out that clients who are able to complete college improve their chances of securing higher paying jobs that will keep them off of public assistance.

Finally, HRA has also shifted its educational approach for learners whose primary language is not English – noting that outcomes are better when clients are permitted to participate in English as Second Language (ESL) programs full time.

B. Appropriate Focus On Specific Client Needs And Populations

First, we are pleased to see that HRA has included a focus on clients with disabilities. We have a particular interest in this issue because we are counsel in a lawsuit brought against HRA under the prior administration for its failure to provide accommodations for individuals with disabilities – in particular those in HRA’s WeCARE program. We are very hopeful that in the very near future we will reach a comprehensive settlement in this case which has been pending against HRA since 2005 – *Lovely H. v. Eggleston*. We believe we have the commitment of Commissioner Banks to resolve this case so that the agency will reform its policies to improve access for clients with disabilities and in particular, access to its WeCARE program for people with disabilities.

Of particular note in the Employment Plan is that HRA has committed to do a better job of assessing individuals for disability issues and barriers. We are pleased that HRA has agreed to screen for potential client mental health issues by using a simple State-approved and validated test known as the “Modified Mini.” Many of our clients also have significant cognitive impairments and learning disabilities. Several years ago, under the prior administration, a 50 year old man with a learning disability who could not read or write but who had learned a wide

range of trade skills which had enabled him to get by until the recession was sanctioned – and humiliated - for failing to submit a resume in a so-called “job readiness” program in which no one had bothered to assess whether this task was beyond his capabilities. We understand that that HRA is seriously considering ways in which cognitive impairments and learning disabilities can be identified, assessed and addressed in individualized employment and training plans, and look forward to progress on that front as well.

We agree with HRA that improving its policies to help clients get federal SSI disability benefits will also lead to positive outcomes for clients. In addition, each favorable SSI case leads to savings for the City and State since these clients all leave public assistance for federally-funded SSI benefits, generating enduring savings that continue for many years. These savings can then be better deployed by HRA on meeting the challenges posed by those who have disability-related and other barriers, for whom there is no federally funded alternative.

We are hopeful that HRA’s plans to tailor service for homeless clients will lead to better employment outcomes while at the same time maximizing the ability of the clients to secure permanent housing.

HRA has also included specific protections for victims of domestic violence. By eliminating partial waivers and moving to a system of voluntary placements – HRA will ensure safe participation for clients who are ready to participate.

I. AREAS WHERE THERE IS STILL ROOM FOR IMPROVEMENT TO ENABLE POSITIVE CHANGE FOR CLIENTS AND THE AGENCY

We have highlighted many promising initiatives in HRA's Employment Plan that are likely to lead to better outcomes for clients, their families and the community. There are also a few areas where we hope to see HRA move even further in the future.

First, we note that HRA has indicated that in certain circumstance, it will permit clients to reduce hours of required participation to 30 hours of work activities rather than the current number of 35 hours. We believe the agency should amend its policy to reduce required participation to 30 hours per week across the board – rather than only permitting this in particular circumstances (such as when clients have required ACS activities or children with special needs). As HRA has acknowledged, there is no mandate for 35 hours of participation. In fact, the lower, 30-hour minimum is permitted by Federal and State law. Second, reducing the required number of hours to 30 per week could enable the City to secure child care savings – since there would be fewer hours per week for which clients would need covered child care services. Under such a scenario clients who wish to participate in 35 hours per week of an activity – for example those engaged in paid employment or valuable training activities -- could be allowed the opportunity to opt in to a 35 hours week so that they could secure needed child care or other supports.

Second, HRA could take maximum advantage of the potential child care savings for parents with children under the age of 6. Federal law would permit HRA to reduce the number of hours required of parents with children under the age of 6 to 20 hours per week. HRA has opted to instead permit parents of children *age 3 and under* to participate in 25 hours per week rather than 35 hours per week. While this is a positive development, HRA could likely achieve

better results for clients and their families by adopting the Federal option of requiring 20 hours per week for families with children under age 6. HRA could still provide those parents and caretakers who want to participate in more than 20 hours of employment and training activities the option to do so. Again, we believe that reducing required hours should reduce the overall need for funded child care slots for public assistance recipients, allowing the City to allocate more child care resources to those who are in the work force or have expressed a personal desire to take advantage of available child care to pursue employment and training opportunities.

On a similar front, State law *permits* districts to exempt single parents of infants under one-year old from work requirements. HRA's current plan continues the past practice of limiting the exemption to only those with infants under three months old. Single-parent clients caring for young infants -- and their children -- would be well served were HRA to extend the exemption to include those with infants under the age of twelve months, while allowing those who wish to participate in employment programs the option to do so. Twenty-five states -- including Alaska, Texas, Missouri and Mississippi -- already provide this exemption to single parents of infants up to twelve months old, so it can hardly be considered unprecedented or radical. Our preliminary estimates are that in following suit the City could save on the order of \$20 million in child care and administrative costs. (A similar approach in California generated over \$300 million in savings in child care, programmatic and administrative costs).

Finally, we are looking forward to HRA ending its computer practice known as autoposting in which the agency the agency's computer programs assume that a client did NOT attend an appointment -- and thereby automatically initiate a negative case action such as a case closing or sanction -- unless a worker remembers to post that a client did attend the appointment.

As we have previously testified to the Council, this practice of autoposting results in many cases being closed or sanctioned in error. The burden is on the client to try and explain that it was a mistake as all errors in this system run against the client rather than the agency. Sanctions also happen when HRA sends appointment notices to an incorrect address – even though the client has informed HRA that her address has changed. We continue to believe that this practice results in needless negative case actions that cause clients real harm.

HRA has announced a modification in the autoposting system, but it does not yet reflect the extent of needed reform. Instead of the negative case action issuing automatically within 24 hours, the system will not “post” the infraction for 72 hours. We do not believe this is enough since all errors still run against the client. If HRA wants to continue to automatically post computer actions related to client appointment attendance, we see no reason why HRA could not shift the default of autoposting to assume that a client *did* attend an appointment rather than *failed to* attend an appointment. We are hopeful that HRA will change this practice going forward..

III. ADDITIONAL REFORMS NEEDED WHICH IMPACT EMPLOYMENT OUTCOMES

There are additional agency administrative practices that need reform in order to improve employment outcomes so that clients are able to access benefits and secure help to get good jobs and a route out of poverty. We are mindful that these problems did not arise overnight, but we look forward to seeing the agency implement reforms. We also ask that the Council support the agency in any reasonable requests for resources which may now be needed to redress the decades of neglect by previous administrations, particularly in the area of communications infrastructure.

First, for clients to succeed in HRA employment programs and complying with agency requirements they must be able to communicate with the agency. Unfortunately, HRA's current communications systems do not enable clients to reliably reschedule appointments, drop off necessary documents and inquire about the status of their benefits. Too often clients cannot get through to Job Centers or vendors by telephone; their calls are not returned or they encounter voice mail boxes that are full and do not take messages. HRA's own internal auditing data indicates that in some cases, when auditors phoned several HRA workers at a Job Centers and identified themselves as auditors and asked for a return phone call within 24 hours, not a single phone call was returned. In essence, for some Job Centers their telephone audit performance was 0%. Similarly, the agency does not have reliable procedures to accept documents by means other than clients personally delivering them. Many clients have access to fax machines and some have access to computers. HRA does not yet have reliable systems to enable clients to submit documents by fax or computer. These outdated practices mean that clients must appear in person at Job Centers for much agency business that could be handled without personal visits. Reducing these visits could save HRA staff time, reduce waits at Job Centers and help clients with disabilities for whom traveling to Job Centers can be a hardship.

Second, however good the new policies, implementing these policies will require trained frontline agency staff to thoughtfully interact with clients and apply the new rules correctly and efficiently. It is not enough for agency staff to teach themselves these rules. The agency needs to take a new approach to training and staff capacity building that is more effective than what we have seen in past administrations.

Finally, we also hope to see HRA improve customer service at the agency so that it has the ability to ensure that its staff lives up to its motto of “Courtesy, Professionalism and Respect.” Here, we hope to see all clients treated with respect and dignity regardless of race, religion or gender, including particularly vulnerable clients, those with disabilities, Limited English Proficiency, immigrants and those who are Lesbian, Gay, Bisexual or Transgender. We know that the HRA Commissioner and his executive staff are committed to running an agency that is based on a culture of treating all clients with respect and dignity. We hope HRA will implement ongoing and improved training programs to ensure that this culture change takes root through all of HRA’s operations to ensure that this commitment becomes a reality that clients can experience in their various interactions with agency staff and vendors.

One proven method of assessing how an entity actually treats customers or clients is through the use of testers. It has proven quite effective, for instance, in enforcing fair housing and other civil rights laws in which much of the real interactions between customers and front line staff are verbal and thus otherwise difficult to monitor through traditional means. We suggest that HRA could better monitor its performance through the use of testers. In this way, HRA can get a real sense of how its policies are being implemented on the ground.

CONCLUSION

We are very pleased about the approach of the new HRA Employment Plan: it represents a significant first step in redressing more than a decade of policies and practices which were often ill suited to addressing the real needs of the clients the agency is charged with serving. We look forward to seeing it fully implemented by HRA over the next two years, and we hope that HRA and the Council will seriously consider our suggestions for further improvement.

Public Hearing: **Oversight: Review of the Proposed Changes to HRA's Employment Programs**

The Committee on General Welfare joint Hearing with the Committee on Civil Service and Labor Wednesday, **October 1, 2014 at 1:00 p.m. in the Committee Room, City Hall, NYC**

Testimony submitted by:

Maureen Lane, Co-Executive Director
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Good afternoon, I am Maureen Lane, Co-Executive Director of Welfare Rights Initiative (WRI). WRI is located at Hunter College, City University of New York (CUNY) and organizes students with firsthand experience of poverty through leadership training and legal advocacy to create and defend fair and just policies. On behalf of the staff and student leaders at WRI, we are pleased to be here and we thank the joint committees for this hearing.

WRI values all families including families receiving public assistance and we participated in the focus groups that Human Resources Administration (HRA) Commissioner Banks mentions in his testimony and we are heartened by the plan that he has introduced today.

Commissioner Banks highlights "improving how HRA interacts with all different types of individuals who come to the agency for help."

In the 20 years that WRI students, staff and supporters have been engaged in the policy-making process we have come to understand that change can take time. We look forward to the HRA hearing during the public comment period on this plan and our students will participate to ensure that changes happen with ease and speed.

An important feature of HRA past interactions for our students has been that the HRA process too often arbitrarily adds more stress to crisis situations. We look forward to improvements that dramatically reduce these stress points.

Even right now, low-income families face stark choices. Currently, when WRI students go into a job center, they will either get part of the new information re 4 year college and other approved programs, or not. They may be given new HRA forms that reflect some of the allowable activities, or not, and they will not be told about the homework rule. Still, too many are stuck in no-win situations or are given misinformation that compromise honest attempts to improve their life chances. Many are striving to recover from job loss, family illness, domestic violence, and other circumstances that hold people back from success.

WRI's experience is that families and individuals come to HRA in crisis: health issues, loss of a family member, and loss of job, housing or other loss. Once the family is stabilized, aiding people's employment prospects is an important next step. We cannot emphasize strongly enough "once the family is stabilized". Stabilized is not a family living in a shelter or a student who has no money for food. New York City's (NYC) best practices show that housing, health and food security for its residents are critical for this city's total ability to thrive and prosper.

After a family is stabilized, we highly recommend the proposals that HRA Commissioner Banks spoke of today. Earlier, this year, New York State (NYS) adopted federal regulations by changing NYS law to allow four-year College as a countable activity. We see this law change as a step towards an enlightened social welfare policy in NYS. Having NYC enfold this new law in its plan will enhance the success of thousands of individual's and family's to move out of poverty through self-determination. Liberal arts degree programs build on student's talents for critical and creative thinking and sharpening skills for applied learning that can be taken with the student wherever they travel on their career journey.

WRI will reach out to both HRA and CUNY offering our expertise in design planning for the internship programs that Commissioner Banks mentions in his remarks. We applaud the expansion of basic education, LEP (Limited English Proficiency) and all the educational programs that allow people to develop and enhance their skills and their lives.

HRA's plan for phasing out WEP is a step in the direction of understanding that policy based on shorting human potential does not serve us -NYC families, individuals or communities.

WRI stands ready to work with the council to help community outreach on new college and education rules. Our trainings over the past 20 years and in collaboration with our colleagues at CUNY Law's Economic Justice Project have successfully kept thousands of students in school and aided others in connecting to education for the first time. WRI students graduate college and go on to graduate school at a higher rate than CUNY at large. As CUNY research noted 20 years ago, over 90 % of women with children who graduate with college degrees move permanently from poverty and the ripple effects on younger children in the household is stunning. High school graduations dramatically rose as parents pursue college. Yet in NYC for many decades policy stood in their way.

One WRI alumni reflects, "Since the moment I turned 18, the HRA-call in process has placed so many obstacles in my way to prevent me from going to college. Pursuing a college degree is the only way I can improve my financial situation and it is the only way I can accomplish my goals. Expanding access to benefits for young adults is an excellent idea; however they will still have to choose between their benefits and

higher education, as I did.” Data can support education; but values drives policy and programming.

People enduring economic hardship shouldn’t have to choose between survival and a fighting chance at achieving financial freedom and security. When mandates and misinformation block access to opportunities, public policy undermines the public good. Like the student I just quoted, thousands every day are miss-informed which often leads to leaving school.

Policies and regulations can support, but the way we prioritize our values drives the impact of the services the city provides. That is the force that can make these new changes a success or failure. WRI values human beings. With earnest and enlightened implementation, the City’s plan can make this alumni’s experience a thing of the past.

We look forward to being invited back to review and report on HRA’s implementation of their plan. We thank the committees and staff for all your service to NYC and its residents.



October 1, 2014

**Testimony for the New York City Council General Welfare
Committee RE: Proposed Changes to HRA Employment Policy|
October 1, 2014**

Submitted by: Jennifer Flynn, Executive Director, VOCAL-NY. Contact: jennifer@vocal-ny.org and (917) 517-5202.

Good afternoon. My name is Jennifer Flynn and I am the Executive Director of Voices Of Community Activists & Leaders (VOCAL-NY). VOCAL-NY is a grassroots organization building power among low-income people affected by HIV/AIDS, mass incarceration and the drug war in order to create healthy and just communities. On behalf of VOCAL-NY, I want to thank General Welfare Committee Chair Stephen Levin and the other members of this committee for the opportunity today to provide testimony.

VOCAL-NY began in 1998, as the NYC AIDS Housing Network, along with other groups of poor people desperately fighting back against deadly welfare reform policies. If there is a silver lining, these welfare policies spurred the creation of fierce membership organizations such as Community Voices Heard, Make the Road by Walking, Direct Action for Rights and Equality in Rhode Island and others around the country.

I would like to thank the City Council, and specifically this committee, for decades of leadership, including countless hearings and shouting matches, to try to reign in the terror that was unleashed on NYC's poor.

Giuliani and Bloomberg-era welfare policies have left our welfare system broken and have served to drive people further into poverty and, frankly, have fueled the AIDS epidemic in NYC. The need to create deep reforms to overhaul the overly punitive nature of the agency, and the remove the barriers to support for some of our most vulnerable New Yorkers.

As Mayor de Blasio and Commissioner Banks know, we cannot take a one-size-fits-all approach to employment for New Yorkers receiving assistance from HRA. There must be a customized approach that takes into consideration the individual circumstances of each client. For too long, HRA has been swift to punish people when they fail to meet the agency's requirements, instead of asking why they are failing and providing additional support. The goal should be to link people to appropriate support, not find reasons to kick them off the welfare rolls.

For clients of the City's HIV/AIDS Services Administration (HASA), and other low-income individuals living with HIV/AIDS, we must make certain that if individuals get sick and are no longer able to work, there is a seamless transition back to HRA assistance so that they are able to remain stably housed and have access to appropriate medical care. Falling through the cracks of HRA for people living with HIV/AIDS could literally mean life or death, and any policies related to employment requirements must be extremely safe for them. In order to achieve the end of AIDS, we must expand eligibility for HASA benefits to ALL HIV+ New Yorkers. Using the NYS AIDS Institute's definition of "AIDS" no longer matches the science. We also must follow the law and ensure that people living with AIDS are receiving same day emergency, medically appropriate housing and are provided permanent housing options within the City Council mandated time frame.

As Commissioner Banks has stated, there's more that HRA can do to make sure that people who qualify take full advantage of federal Supplemental Security Income (SSI). There should be improved screening on the part of HRA and extra efforts to assist in the application process. Qualifying for SSI is a win-win – approved applicants get more money in their pocket to stay stably housed and healthy, while the city gets federal dollars to help pay for the cost.

When I heard the rumor that the Commissioner might be announcing the end of the time wasting and immoral Work Experience Program (WEP), tears welled in my eyes. I can not overstate the how the punitive nature of that program has caused in people's lives. Our members tell countless stories of how they lost their home, made choices between food and medication or had to put their kids in unsafe situations in order to maintain the benefits that would allow them to eat. It tore apart lives and we know that it fueled the AIDS epidemic. Make no mistake-providing people with real work experience, supporting access to further education, offering training that turns into careers is desperately needed and is an appropriate role for the City's Human Resources Administration. Mandating unpaid work that provides little to no job training is a waste of time and resources and today will be seen as a historic end to a policy that will be seen by our children as backwards.

In further evolution, HRA's announcement to take a harm reduction approach to clients with substance abuse issues is, frankly, spot on. This means not subjecting clients to sanctions if they are abusing drugs or alcohol, and instead taking a public health approach to make sure their health and safety is paramount. Harm reduction has a proven track record of success in reducing overdose, HIV and hepatitis C infections, and linking individuals to treatment if they choose that path. Referrals to harm reduction agencies are already in place for HASA clients. We are looking forward to seeing more harm reduction integration for all HRA clients.

Finally, with Mayor Bill de Blasio's ambitious affordable housing and resiliency plans, the city has a major opportunity to link people to living wage career-track employment. HRA should play a role in linking their clients to these public works programs, with a special focus on hard to

employ individuals like people with criminal records. With the passage of Executive Order 151 in 2011, city jobs can no longer ask about criminal record history, creating an equal playing field for formerly incarcerated individuals looking for work. HRA should take full advantage of this policy change and do more to link people with criminal records to city jobs, as well as support the Fair Chance Act (Intro 318), city legislation that would expand this policy to private sector jobs as well.

I started my now 20 year career in organizing battling the creation of these policies that nearly destroyed our social safety net. I can not overemphasize how emotional it is for me, and the 8,000 members of VOCAL-NY to hear that there is an end to WEP and an HRA that is committed to helping lift people out of poverty.

Thank you for this opportunity to testify. I look forward to working closely with the City Council and the administration, even if I will miss the inspiring anger and Kafkaesque exchanges that took place between City Council members and the administration over the former harmful policies. All kidding aside, this new, forward thinking, person centered approach will keep families together, lift people out of poverty and contribute towards the end of the AIDS epidemic.

Grant and Associates, Inc. Computer Lab

6/5/14

Grievance

Wendy O'Shields vs. Grant and Associates, Inc.

Manhattan B2W

55 West 125th Street – 9th floor

New York, NY

(646) 783-4800 Phone

(646) 789-5883 Fax

info@grantassociatesinc.com

Let the Record Show

Grant Associates Computer technology at 55 West 125th Street in both Computer Labs are not properly set up or routinely maintained. Their PC's are not conducive for a learning environment and negatively impact the Clients. Please replace the follow equipment and correct the disruptive actions.

- Install Sound Cards & change your specs to include Sound Cards for future PC orders.
 - Clients cannot take valuable free online Software Tutorials without "Sound Cards" installed! This is counterproductive to learning and keeps Clients away from a wealth of free tools, tutorials, and online courses. If the goal of BTW is to increase the Clients marketability then Grant Associates has place a permanent barrier between the Client and the multitude of "Free Educational Resources" online. Why has this been constructed this way? Why has the City of New York's Human Resource Administration allowed this to occur? Will the City of New York's Human Resource Administration allowed this to continue?
 - The BTW population very much needs to improve their skills and raise them above a substandard deficient level in order to compete in a technology driven globe.
 - Require Earbuds and provide Earbuds. No Earbuds, no sound, no free online E-learning for you.
- Download/Install Adobe Suite
 - .pdf's need this Software to open
- Download/Install Google Chrome Browser
 - Many of the population have Gmail accounts
- Replace Mouse
 - Many do not work
- Replace Keyboards
 - Many do not work
- Replace the Chairs that have broken Arms.
- Anchor the right side Floating Tool Bar and reduce the size.
 - This Tool Bar is huge and covers the scroll bar in Word and all other Software programs.
- Anchor the right bottom left Anti-Virus Floating Tools Bar. This Floating Tools Bar pops all of the time.
 - This Tool Bar pops up every ten minute, hovers, and then goes down. An unnecessary interruption.
- Put a stop to Maintenance sweeping, dusting, and general cleaning in the Computer Labs while Clients are present. Clients are prevented from using the PC's while Maintenance is cleaning also they are asked to move from the PC's so Maintenance can clean. There is a certain amount of noise associated with cleaning which disrupts the job search.
 - Clean, sweep, dust, vacuum, the Computer Labs after 5:00 PM to not disturb Clients working.

- The Computer equipment is always dusty. Use Alcohol wipes and thoroughly and properly clean the Computer equipment twice a week.

Grant and Associates, Inc. & The Bachrach Group, Ltd.

6/10/14

Grievance

Wendy O'Shields vs. Grant and Associates, Inc.

Manhattan B2W

55 West 125th Street, 9th floor

New York, NY 10027

(646) 783-4800 Phone

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info@grantassociatesinc.com

Frank Lambert

The Bachrach Group, Ltd.

39 West 37th Street 5th Floor

New York, NY 10018

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FrankL@bachrachgroup.com

Sally,

Let the Record Show

Frank never emailed me the Prove It Excel exam to take. I sent him a reminder email last week, which he ignored. Obviously, he is a Con, a liar, and has no moral character. Frank showed his true colors I will add him to the list of sleaze. Send him the barley GED's, the twenty something's, Ex-Con's, and the Methadone program attendees. Clearly, he discriminated against me because of my age, education, and professional experience.

Grant Associates Inc. has proven to be ill equipped to serve an intelligent woman a College Graduate with twenty-seven years of corporate work history.

As per HRA, I must attend the "Back to Work" program and I most certainly need appropriate employment. The five to six month, temporary, part-time, \$8.00 to \$11.00 jobs are not suitable or a livable wage in New York City 2014.

I do understand once hired the employer receives the "Back to Work" recipients' cash and a NY City, NY State, and Federal Tax reductions, Tax credits, and Tax incentives for recruiting from the Welfare pool. However these jobs are typically, low wage and temporary for most BTW recipients. These jobs are usually counterproductive to alleviating the Welfare process. These jobs often perpetuated the experience of repeat "Back to Work" enrollees and adjunct long-term poverty!

Is the Grant Associates "Back to Work" program exclusively for the uneducated, under-educated, vocational, and or the inexperience employee? Is the Grant Associates "Back to Work" program set up to continually supply Welfare recipients to primarily chain retailers and large employers to only be discarded in five months and three weeks?

Is Grant Associates Inc. in the business of repopulating the City of New York's HRA "Back to Work" program every five months and three weeks? Are Grant Associates and other "Back to Work" Vendors set up for the purpose of repeat business? Why are the "Back to Work" recipients repeating this process three or more times per year? Neither Grant Associates nor the City of New York is asking why are the "Back to Work" recipients unemployed again?

Why aren't the employers committed to retaining their Welfare hirers'? Are employers' avoiding paying full NY City, NY State, and Federal employment taxes? Are employers avoiding offering Medical insurance and other full-time benefits by terminating the Welfare hires prior to six months of employment?

Are the "Back to Work" programs main purposes to continue the cycle of Welfare and disqualify workers for unemployment?

Grant Associates and other "Back to Work" vendors have become a prominent piece of City of New York's Welfare problem. Grant Associates is a profiteer off the backs of indigent New York citizens.

Grant Associates is in "Breach of Contract" with the City of New York Department of Human Resources Administration. Grant Associates is also in Non-Compliance with the City of New York Department of Social Services contract with their citizenry. Certainly, these are willfully criminal acts with malice and without conscience.

City of New York Cancel Grant Associates, Inc. Contract

6/25/14

Grievance

Wendy O'Shields vs. Grant and Associates, Inc.

Manhattan B2W

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New York, NY 10027

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info@grantassociatesinc.com

Let the Record Show

The City of New York should ask Legal to look at all of the "Back to Work" contracts as their remains "Breach of Contract." Consider devoiding, dissolving, and disassociating the City of New York from these sheisty, purposeful and leechy moneymaking operations.

The "Back to Work" vendors abuses are numerous.

As follows, the Grant Associates, Inc. "Back to Work" vendor is consistent with the following flagrant lack of performance:

1. Failure daily to deliver services
2. Failure to deliver training of any substantive value
3. Failure to provide fully functioning computer equipment or computer network to access
4. Failure to provide a computer lab with temperatures under 82 degrees
5. Failure to properly assess the "Back to Work" recipients level of experience and skills
6. A disregard for "Back to Work" recipients differences
7. Not attending to "Back to Work" recipients obvious medical or substance abuse habits
8. Feeding the "Back to Work" recipients to low wage employers only to be terminated typically around five months and three weeks.
9. Rewarding the employers with City, State, and Federal Tax Credits, Tax Incentives, and Tax Reductions.
10. Preventing "Back to Work" recipients from qualifying for Unemployment Benefits.
11. Etc...

The City of New York should Chargeback from the beginning of these contracts to recoup the fraudulently accepted funds. The City of New York should file criminal charges against all of the "Back to Work" vendors and prosecute all BTW employees as they have perpetrate crimes against the City, County, State, and Federal Governments. The Back to Work vendors have profited off the backs of the most vulnerable the indigent Citizens of New York. A very sick scenario!

The current City of New York's "Back to Work" programs are a sham and a glorified creepy babysitter for its recipients!

Instead on siphoning the City's coffers forever consider implementing a program that was successful for the low wageworker the Comprehensive Employment and Training Act of 1973.

http://en.wikipedia.org/wiki/Comprehensive_Employment_and_Training_Act

The **Comprehensive Employment and Training Act (CETA, Pub.L. 93-203)** was a United States federal law enacted by the Congress, and signed into law by President Richard Nixon December 28, 1973 to train workers and provide them with jobs in the public service. The bill was introduced as S. 1559, the Job Training and Community Services Act, by Senator Gaylord Nelson (Democrat of Wisconsin) and co-sponsored by Senator Jacob Javits (Republican of New York).

The program offered work to those with low incomes and the long-term unemployed as well as summer jobs to low income high school students. Full-time jobs were provided for a period of 12 to 24 months in public agencies or private not for profit organizations. The intent was to impart a marketable skill that would allow participants to move to an unsubsidized job. It was an extension of the Works Progress Administration program from the 1930s. The Act was intended to decentralize control of federally controlled job training programs, giving more power to the individual state governments. Nine years later, it was replaced by the Job Training Partnership Act.

???

**Department of Social Services, Human Resources Administration
and the Work Experience Program's Wage Slavery**

7/1/14

Grievance

Wendy O'Shields vs. DSS/HRA
The City of New York Department of Social Services
Human Resources Administration
180 Water Street
New York, NY 10038

Grievance

Wendy O'Shields vs. Waverly #13
12 West 14th Street, New York, NY 10011
212-620-9890 | 212-620-9421
Fax: 917-639-2505 HDU Fax: 917-639-2506
Monday – Friday 8:30am to 5:00pm

Let the Record Show

The City of New York's Work Experience Program is a Wage Slaver! By attaching Compliance with WEP to a minuscule amount of non-subsistence Cash, Food, & Shelter the unfortunate PA Recipients become the Indenture Servant and Slave to the City of New York. The Economically disadvantaged Citizens of New York choose between "Eating" and or being "Domiciled" in order to comply with WEP. The PA Recipients need to remain alive this induces coerced Compliance. A sick inhumane criminal equation.

Clearly, Wage Slavery is present in 2014 in City of New York as WEP. Human Slavery was abolished July 4, 1827 in New York City for all Races. The City of New York's Department Human Resources and Administration are committing Crimes of High Treason against the United States of America and the Citizenry by not enforcing the entirety of our Thirteenth Amendment.

Work Experience Program is an illegal program that has been sanctioned by the City and the subsequent criminal acts have been perpetrated against the most vulnerable and needy Citizens of New York. Noted.

http://en.m.wikipedia.org/wiki/Wage_slavery

Wage Slavery

Wage slavery refers to a situation where a worker's livelihood depends on wages, especially when the dependence is total and immediate. It is a pejorative term used to draw an analogy between slavery and wage labor by focusing on similarities between owning and renting a person. The term *wage slavery* has been used to criticize economic exploitation and social stratification, with the former seen primarily as unequal bargaining power between labor and capital (particularly when workers are paid comparatively low wages, e.g. in sweatshops), and the latter as a lack of workers' self-management, fulfilling job choices and leisure in an economy.

The criticism of social stratification covers a wider range of employment choices bound by the pressures of a hierarchical society to perform otherwise unfulfilling work that deprives humans of their "species character" not only under threat of starvation or poverty, but also of social stigma and status diminution...

<http://educationupdate.com/phyllismurray/2012/07/july-4-1827-slavery-is-abolished-in-new-york.html#.U7LJJ4XD9cs>

July 4, 1827: Slavery was abolished in New York

NB "Emancipation Day in New York: July 4, 1827, Enslaved adult men and women were set free. The children of the same were bound to serve a 25- to 27-year indentured term to their former enslavers." Dr. Sherrill D. Wilson See UPDATE Vol. 2 No. 5 December 1997 Newsletter of the African Burial Ground & Five Points Archaeological Projects...



www.CVHaction.org

Testimony for NYC Council Hearing on HRA Employment Plan

October 1, 2014

Good afternoon. My name is Francine Bates. My experience with Work Experience Program started about three months ago. After applying for HRA benefits, I was told if I wasn't 60 years or older I would have to attend FECS and then eventually the WEP program. During that time, I was told by HRA that I would have to be seen by an HRA case manager on site at the FECS office to select what type of work assignment I would be expected to do. I was told I could pick from MTA, DCAS, or Police department which are all maintenance positions without pay. I asked if there were any clerical positions because my work background is clerical. I was told clerical positions are very rare.

When I went to the orientation for WEP, I was in shock! It was like a cattle call and we were spoken to as though we had no other choice. I was also dealing with personal health issues which meant I had to have major surgery. I was told by WEP I had to produce medical documents supporting why I couldn't continue with this program. It was difficult doing the maintenance work assigned to me because it required lifting trash cans, mopping floors, using chemical based products for cleaning which didn't help my medical situation. I am a cancer survivor and I'm afraid and concerned if I have to go back to this sort of work. I have health concerns. I'm now enrolled in the WECARE Program. WEP should be extinguished. It's demeaning, no pay and very insensitive.

Right now I'm presently in Housing Court because Public Assistance only pays \$215 a month for my rent. How can I look for a job if WEP has my time for three days a week five hours a day! I will probably be evicted from my apartment of 16 years which doesn't help me in my recovery or finances.

I am here today because I wanted to hear the proposed changes to the HRA workforce system. I think it sounds like improvements will be made, I just hope it is soon because I need it to be fixed now.

Thank you.

New York City (main office)

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Yonkers

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www.CVHaction.org

Testimony for NYC Council Hearing on HRA Employment Plan
October 1, 2014

Good Afternoon Chairman Stephen Levin and Council Members, My name is John Medina, Board member for Community Voices Heard and a Decorated Combat Veteran who recently participated in the WEP (work experience program) with the Department Of Aging assisting Seniors in Public Housing.

I want to express my deep appreciation to the committee & all council members passing resolution number 257-A supporting the passage of a bill ending (WEP) as a work requirement in New York State.

When I applied for Public Assistance and Food Stamps for the first time in my life, I never expected to confront the disrespect disconnect the caseworkers have towards the low-income people of color and poor people in general. Numerous times staff at the Human Resource Centers processed my documents without granting me a complete evaluation of my skills and experience for the labor market. Instead I was placed to do a WEP assignment for 20 hours a week to receive my Welfare Benefits.

When you take into account the hours worked divided by the Public Assistance received it calculates to still remaining below the Federal poverty Rate. This is precisely the reason programs like WEP should be eliminated and replaced with other Federal work activities.

The (WEP) program is a broken wheel that needs replacement now. HRA's mission is to break the cycle of poverty with sound employment practices like private and public subsidized transitional jobs for participants on welfare to climb out of despair and low self-esteem. This can be achieved by expanding transitional jobs in (DCAS) Department of Citywide Administrative Services, (HHC) Health & Hospitals Corporation, MTA and non profits. Pathways to permanent employment and skills building on the job training are also critical pieces of the transitioning to permanent self sustainability

Poor people in poverty provided with sustainable employment creates growth in the New York City economy and decreases the tax burden on local residents and reduces waste of Federal Government Social Services fund.

Thank you Chairman and Council members for your time and allowing my testimony for the record on the concerns with the employment services in HRA. We are glad that there is a new proposal of changes and look forward to working with the Administration to implement them. The sooner the better because every day another person is cut off, beaten down and loses hope.

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WHAT COULD REPLACE WORK EXPERIENCE PROGRAMS WHEN BILL PASSES

FACTS

- Public assistance recipients would still have to do work activities. Replacing WEP (unpaid work) supports the step in the right direction that legislators passed in the budget that allows more educational access.
- Each County DSS/HRA would still have control over which of the other work-activity options were available in their county.
- Recipients would have some choice which will help people feel more engaged in the process. DSS/HRA would still have control and oversight, but this Bill allows more active participation by recipients. If everybody buys into it, the program works better.

WHAT COULD REPLACE Work Experience Program:

****Subsidized employment in public sector and private sector**

Employment for which the employer receives a subsidy from TANF or other funds to offset some of the wages. (ie. Transitional jobs like NYC's Park Opportunity Program, Erie County PIVOT)

****On-the job training**

Training in public or private sector that is given to a paid employee while he or she is engaged in productive work and that provides knowledge and skills essential to the full and adequate performance of the job. (ie apprenticeships)

****Community service** participant chooses must be limited to projects that serve a useful purpose and designed to improve the employability of the recipient. Can include work in a school, (ie teacher's aide), work in a religious institution, Americorps & VISTA.

****Vocational Education** (Temporary Assistance for Needy Families recipients up to 12 months)
Educational programs that prepare an individual for a specific trade, occupation or vocation (ie CASAC)

****Unsubsidized employment (including self-employment)**
Can be part time or per diem but also could be supporting people to start a business.

Job skills training directly related to employment

**** Core activities.** If under TANF, Non core activities only count after 20 hours per week participation in core activities

Community Voices Heard (CVH) was founded in 1994 as a member-led organization by low-income people, predominantly women of color, many receiving public assistance and fighting the welfare reform policies that threatened their families. CVH is a member-led multi-racial organization, principally women of color and low-income families in New York State that builds power to secure social, economic and racial justice for all. We accomplish this through grassroots organizing, leadership development, policy changes, and creating new models of direct democracy.
FOR MORE INFO: 212-860-5100, www.CVHaction.org, [www.Facebook.com/CVHaction](https://www.facebook.com/CVHaction), [@CVHaction](https://twitter.com/CVHaction)

**NATIONAL
WORKING
POSITIVE
COALITION**

Contact:

Mark Misrok
President, Board of Directors
National Working Positive Coalition
(646) 403-9821
markmisrok@gmail.com

My name is Mark Misrok, and I'm the board president for the National Working Positive Coalition. We work on expanding access to employment & employment services for people living with HIV, promoting HIV & employment research, providing training & technical assistance on best practices and advocating for the personal and economic wellbeing of PLHIV. We are a co-founding member of the NY HIV Employment Network, standing together to offer assistance to HRA and its essential HIV/AIDS Services Administration, widely known as HASA.

I'm excited by encouraging developments at HRA related to employment, with a particular interest in highlighting the potential of implementing changes at HASA. HASA has been critical to saving the lives of many of us living with HIV in NYC - and it continues to do so. As a program designed to respond to crises and instability threatening the health and welfare of so many of us, it was not developed to match realities related to improvements in HIV treatment and care. It is vitally important that we acknowledge the intense challenges experienced by PLHIV in NYC to develop and maintain stable health, housing, income and food security. It is also true that many who have been helped through HASA to gain newfound stability have found themselves trapped in a poverty lifestyle that itself threatens the health benefits that medical treatment and care can make available.

The first step in considering increasing independence and employment for HASA participants is to seek understanding of what changes may be possible while maintaining or enhancing health and housing stability. For HASA participants to be equipped to make well-informed decisions about making changes related to vocational rehabilitation and employment, they must have and understand the details of policies that define their continuing access to economic, housing, nutrition and healthcare stability. HASA has a Work Opportunities Incentive Program, but its policies and procedures have not been transparent to either HASA participants, or to community service providers assisting PLHIV in considering employment. There has not been consistency in communication or implementation of these policies by HASA workers.

It is inefficient and, I believe, inhumane to entrap HASA participants in circumstances where they feel unsafe seeking to take steps out of poverty, or blindly take risks based on hearsay about what may or may not result. Policies need to reduce the risk to continuing stability of PLHIV if they seek to try to work, and HASA participants have a right to be equipped with information about HASA's employment-related policies, programs and procedures, as well as relevant services and resources in the community. Without these, we are encouraging thousands of NY'ers living with HIV to remain in poverty, and maximally reliant on public resources.

This testimony is submitted on behalf of Legal Services NYC. Legal Services NYC is the largest organization in the nation exclusively devoted to the delivery of free civil legal services to the poor. For over 40 years, Legal Services NYC has provided quality legal representation to low-income New Yorkers through our neighborhood offices¹ and outreach sites located in diverse communities throughout the five boroughs. Each year, our staff helps thousands of clients negotiate the New York City Human Resources Administration's ("HRA") onerous application process and work requirements in order to access and maintain critical public benefits needed to maintain housing, utilities, childcare, employment, basic health and well-being. Legal Services NYC commends the Committee on General Welfare and the Committee on Civil Service and Labor for conducting this oversight hearing regarding proposed changes to HRA's employment programs.

Overall, we believe the agency's proposed changes to its employment plan will dramatically reduce the well-documented sanction epidemic in New York City² and better meet the needs of public assistance applicants and recipients ("A/Rs"). The agency's plan recognizes that while some public assistance applicants either have recent or substantial work experience, many have barriers to employment such as low literacy, limited English proficiency, domestic violence, disabilities and/or may

¹ Our borough-based branch offices and constituent corporations include: Legal Services NYC-Bronx; Manhattan Legal Services, Queens Legal Services, Staten Island Legal Services and our new Brooklyn-wide legal services program, which is in the process of becoming our largest borough-wide program.

² On average approximately 12 % of Public Assistance recipients are in sanction or in the sanction process (for e.g. in March of this year, 20, 000 of 170,00 adult recipients were in sanction status).

be in need of education/training. Accordingly, we support a more customized approach to determining each applicant/recipient's work requirement and commend the agency's steps to increase access to education and training opportunities; work-study and internships; subsidized employment; and community service activities. We are particularly enthusiastic about increased access to basic education for A/Rs up to age 24 and English as a Second Language ("ESL") classes for limited English speaking (also known as "LEP") applicants and recipients; and the expansion of the use of Individual Training Accounts ("ITA"), grants or vouchers to increase access to training. We applaud the agency's discontinuance of its ineffective Work Experience Program ("WEP") and its participation in more effective skills building initiatives aimed at securing higher paying jobs (for e.g. the Mayor's Jobs for New Yorkers).

We encourage the agency to explore allowing job ready applicants and recipients to engage in self-directed job search. However, we believe that the 30/45 day application period, should primarily be used to properly evaluate the needs of public assistance applicants and to connect those clients to appropriate services and activities. In our experience, we find that individuals applying for public assistance are usually facing a myriad of pressing legal, social and medical issues at the time of application. Many are facing eviction and/or utility cut-off; fleeing domestic violence; coping with temporary or long-term illnesses; caring for a disabled household member and/or young children, etc. Some are in need of basic education and training and are simply not "job ready." Rather than immediately requiring these applicants to engage in work activities such as job search prior to receiving any benefits, we believe that the agency should invest more resources into properly evaluating and addressing each applicant household's needs. Applicants with multiple court appearances, medical appointments and young children, are more likely to be denied because of an inability to comply with these requirements during the application period. Accordingly, we believe that HRA should exempt applicants with these kinds of barriers from its job search and work activity requirement during the

application period and limit it to those applicants who are truly “job ready” (recently separated for the labor market) and not in crisis. We urge the agency to craft very careful parameters and broad exemptions to a limited self-directed option for “job ready” A/Rs only.³

Likewise, we support the idea of a customized employment strategy for LEP applicants/recipients and we believe, where possible, it would be good use of agency resources to target and assist older LEP clients who may for Social Security and Supplemental Security Income (“SSI”) benefits. However, we remain concerned about the agency’s inconsistent provision of language services at its local job centers; its poor system of matching qualified bilingual workers with LEP clients; uneven identification and recording of Public Assistance applicants and recipients’ primary written and spoken languages; and, unreliable provision of written translation of letters and notices in the 6 languages⁴ mandated under Local Law 73 (“LL 73”).

While the agency’s *policy* regarding language access may appear adequate, *implementation* remains a problem—partly due to training but in large part due to system weaknesses and poor oversight. Specifically, HRA should re-evaluate and improve its current method of recording clients’ primary written and spoken languages in its computer system, to ensure greater and more accurate worker compliance with LL 73. Further, HRA should undertake ongoing quality assurance measures to ensure that clients are receiving properly translated written notices when appropriate. Poor translation of written documents (for e.g. involving the use of arcane or nonexistent words) and untranslated fields (i.e. partially translated notices) are recurrent problems.

Finally, we support the agency’s increased use of full waivers to the engagement requirement for survivors of domestic violence (“DV”) pursuant the Family Violence Option under the Welfare Reform

³ For example, in Alabama, job search is limited to a minimum of two documented contacts with employers over 40-45 days and registration with a local employment service. Applicants with a child under 1 year of age or a disability or who have been determined not job ready are exempt for applicant job search requirements.

⁴ Arabic, Chinese, Haitian-Creole, Korean, Russian, and Spanish.

Act of 1997 (March 13, 1998).⁵ In addition, we welcome the agency's implementation of the "Modified Mini" mental health screening tool⁶ and, increased client access to reasonable accommodations under the Americans with Disabilities Act of 1990 ("ADA") and Section 504 of the Rehabilitation Act of 1973 ("Rehabilitation Act"). Better screening for DV and disabilities will likely result in increased numbers of clients who will be exempted from the agency's work requirements. Unfortunately, these exempt individuals will then lose access to certain supportive services (most notably, child care and carfare) that are usually only provided to individuals engaging in approved work/engagement activities.⁷ Work limited individuals and individuals needed at home to take care of a disabled household member, may wish to voluntarily engage in some kind of limited engagement activity (for e.g. community service and/or education/training), not only for their own mental and social well-being but to build their skills for the day that they are no longer needed at home or temporarily disabled. Likewise, survivors of domestic violence who are exempted from the work requirement may be interested in pursuing some kind of training or internship opportunity to help in the transition to wellness and self-sufficiency. The agency should develop a means for these clients to access these critically needed supportive services (in particular, child care and carfare) in order to safely pursue these goals.

Key Recommendations

Legal Services NYC thanks the City Council for holding this oversight hearing and urge HRA to implement the following measures to better meet the needs of public assistance recipients.

- HRA should limit self-directed job search option to limited pool of "job ready" recipients and exempt applicants with medical, legal and social barriers to work requirements during the application period.

⁵ See Social Services Law 349-a.

⁶ Validated by the Nathan Kline Institute for New York State's Office of Temporary and Disability Assistance.

⁷ See SSL §332-a and 18 NYCRR §385.4.

- HRA should re-evaluate and improve its current method of recording clients' primary written and spoken languages in its computer system and undertake ongoing quality assurance measures to ensure that clients are receiving properly translated written notices when appropriate.
- HRA should provide supportive services (in particular, child care and transportation) to applicants and recipients who are exempt from work requirements but who voluntarily participate in engagement activities in order to facilitate a gradual and safe transition back to wellness and self-sufficiency.

Respectfully submitted,

Tanya E.M. Wong, Esq.
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www.CVHaction.org

**THE TESTIMONY on HRA Back to Work and WEP ISSUES
October 1, 2014**

Greetings, my name is Eric G. Kelly, and I'm a member of three organizations which include the, Urban Justice Center, Vocal-NY, and Community Voices Heard. And the reason I'm here today is to discuss the problems with the Back to Work Program, and the Work Experience Program known to most people as W.E.P. I've been a participant of both these so-called programs, and WEP does not do anything, but save the City Agencies Money, and the Back to Work Contractors make a profit off the HRA clients. They do not provide the real help and skills you need to actually return to work in your career, and or the job field of your choice. As I'm working with these agencies to help people including myself, secure our rights, help individuals get the proper information to succeed, and informing them of real job centers, such as Workforce 1, and The New York Public Libraries in all of the five boroughs that truly help everyone gain and secure employment.

I'm also here to share with that many other individual clients including myself, are extremely frustrated with HRA as a whole. And there are many clients, who for fear of losing their entire benefits, feel that have nowhere, and no one to turn to, or do not even have a voice.

In one case including myself, HRA had me belonging to two Back to Work Programs at the same time. Well, I am here to tell my fellow clients, that there is someone, and some place you actually go for help, and I'm also hear to tell you Councilman Levin, that I'm also the voices of many of who wanted to be here, but could not be here today, to let you know we are fed-up, of the ever increasing HRA's failure to do what is right and necessary for all of us as clients, and as for many people, they do not realize, they can also wind up in the same situation that we are now facing each and every day.

And I'm asking you Council Members for myself, and all of the other voices who could not be here to please put an end to so-called Back to Work programs, and the unpaid Work Experience Programs, and utilize the resources to create transitional subsidized jobs and keep us all employed. We are fighting like our Elders before us fought, and have done over hundreds of years. Thank you very much Councilman Levin, and everyone for taking the time to listen to my testimony today.

Thank you

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www.CVHaction.org

Testimony for NYC Council Hearing on HRA Employment Plan
October 1, 2014

Hello, My name is Deborah Dunlevy and I am a member of Community Voices Heard. I started on welfare in April 2012. All I needed from a job readiness viewpoint was the re-typing of a restaurant management resume. The Crescent Street We Care site could not and /or would not help with this project. My resume was 2 pages long, because I am a career-changer from accounting to restaurant management; and secondly I was mostly self-taught. I have learned how to cook like a four star chef due to my 40 years of experience and my passion for turning out the best possible food for you to eat.

My passion for wine was developed by 5 years of business travel to Europe for the manufacture of my own wide, comfortable and stylish shoe line. My first shipping season was Fall 2011.

All my orders were cancelled and I lost all my money invested in this project due to 9/11. I returned to working in accounting and was doing fairly well until the financial meltdown of 2008 and 2009. There was no work, job or projects for a person with 35 years of experience. I hobbled a long financially by some small consulting projects during 2009, 2010 and 2011.

But then had to apply for assistance. We Care did 3 days of occupational testing and then they did not give the results of the testing, or any good way of using the information.

My WEP assignments were make work programs of the highest degree. Kehillah in Jackson Heights had 4 or 5 individuals doing a half-person job --if you were writing the check for necessary services - but since you have "free" bodies from We Care WEP you can bloat and freeload the organization because you are not paying any labor cost.

The work site was unsafe from an OSHA viewpoint, but why should that be an issue -It's o.k. for those people on welfare.

I am glad to know there will be changes. We need them now.

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☒ in favor ☐ in opposition

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Name: Emily Miles

Address: 281 Park Avenue South

I represent: Federation of Protestant Welfare Agencies

Address: 281 Park Ave. South

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Name: JENNIFER FLYNN

Address: 80A 4th Ave. BK NY 11217

I represent: VOCAL-NY

Address: Same

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Name: Tanya Wong, Esq

Address: _____

I represent: Local Services NYC

Address: 40 North Street Ste #606

New York, NY 11221

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Date: 11-1-14

(PLEASE PRINT)

Name: Wendy O'Shields

Address: _____

I represent: Self

Address: _____

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Date: _____

(PLEASE PRINT)

Name: ERIC G.A. KELLY II

Address: 491 EMERALD STREET, #2 BROOKLYN, NY, 11208-4709

I represent: COMMUNITY VOICES HEARD

Address: 115 EAST 106TH STREET, NEW YORK CITY, NY, 10029

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I intend to appear and speak on Int. No. _____ Res. No. 257-A

☐ in favor ☐ in opposition

Date: SEPT/1/2014

(PLEASE PRINT)

Name: John Medina

Address: 1695 LEXINGTON AVE 3B NY, NY

I represent: COMMUNITY VOICES HEARD

Address: 106 STREET NY, NY 10029

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Latisha Gibbs

Address: 552 Southern Blvd. Bklyn 10455

I represent: Heath People Community Preventive
Heath Institute.

Address: _____

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☐ in favor ☐ in opposition

Date: 10-1-2014

(PLEASE PRINT)

Name: Edgar Rojas

Address: _____

I represent: Community Voices Heard

Address: 115 E. 106th St

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☐ in favor ☐ in opposition

Date: 10-1-2014

(PLEASE PRINT)

Name: Deborah Dunlevy

Address: _____

I represent: Community Voices Heard

Address: _____

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: Legal Aid Society Kathleen Kelleher

Address: 199 Water St, 3rd floor NYC

I represent: _____

Address: Kelleher legal-aid org.

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☐ in favor ☐ in opposition

Date: 10/1/14

(PLEASE PRINT)

Name: Ellen Levine

Address: ~~100 Water St.~~ NY NY 10008

I represent: NYC HAA

Address: 100 Water St. NY, NY 10008

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☐ in favor ☐ in opposition

Date: 10/1/14

(PLEASE PRINT)

Name: Jennifer Yarrow

Address: Chief of Staff

I represent: NYC Human Resources Administration

Address: _____

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Date: 10/1/14

Name: Daniel Tietz (PLEASE PRINT)

Address: HRA, 180 Water St, NY, NY 10038

I represent: HRA

Address: as above

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☐ in favor ☐ in opposition

Date: _____

Name: Louise Feld (PLEASE PRINT)

Address: _____

I represent: Citizens' Committee for Children

Address: _____

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Date: 10/1/14

Name: Sal Cataldo (PLEASE PRINT)

Address: 21 Stryker St., Brooklyn, NY 11223

I represent: CVH

Address: _____

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Date: October 2, 2014

(PLEASE PRINT)

Name: Joseph M. Mpa

Address: 260 Audubon Avenue NY NY 10032

I represent: Community Voices Heard

Address: 115 East 106th St. NY, NY

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☐ in favor ☐ in opposition

Date: _____

(PLEASE PRINT)

Name: MAUREEN LAWE

Address: _____

I represent: Welfare Rights Initiative

Address: Hunter College

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Date: 10/1/14

(PLEASE PRINT)

Name: Matthew Lesteur

Address: 2050 29th Street Astoria

I represent: Village Care

Address: 120 Broadway, NY NY

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Date: 10/1/14

(PLEASE PRINT)

Name: Mark Misrok

Address: 2222 28th St Astoria 1109

I represent: National Working Positive Coalition

Address: Stuy

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Date: 9/1/2014

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Name: Edgar F. Rojas

Address: 2297 Sedgwick Ave Bx 114

I represent: CUH

Address: 115 East 105th St.

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Name: FRANCINE BATES

Address: 3311 GILES PL #1-G BRONX, NY 10463

I represent: Community Voices Heard

Address: _____

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Date: _____

(PLEASE PRINT)

Name: GREG BASS

Address: National Center on Law & Economic Justice

I represent: _____

Address: 275 7th Ave., NY, NY 10001

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