



November 7, 2014

Steven Banks
Commissioner
Human Resources Administration
Department of Social Services

Re: Comments regarding the HRA's Biennial Employment Plan

Dear Mr. Banks,

Thank you for the opportunity to present comments regarding HRA's Biennial Employment Plan (Plan). On behalf of Single Stop USA (Single Stop), we respectfully submit these comments and recommendations for your consideration and exploration.

Single Stop is a national nonprofit organization dedicated to helping low-income families and individuals build economic security by securing access to resources such as free tax preparation, legal services, financial counseling, and public benefits. In addition, Single Stop partners with CUNY community colleges throughout New York City in an effort to harness two of the country's most effective anti-poverty tools: coordinated access to America's safety net and a post-secondary education.

As such, Single Stop truly commends HRA's steps to pass comprehensive employment programs reform. This is a tremendous step to dramatically increase our ability to partner with CUNY and help them use education and training programs as a pathway out of poverty. Specifically, we would like to highlight the importance of the Plan's specific objectives to:

- Allow full-time, post-secondary training for up to the participant's 12-month lifetime limit;
- Partner with CUNY to replace the current Work Experience Program (WEP) assignments with internships, community service, and/or work study assignments that are tailored to each student's field of study;
- Expand and/or replicate CUNY ASAP to provide comprehensive advisement, job development, and tutoring support;
- Develop financial/debt counseling programs for in-school students and expand access to federal work study programs;
- Accommodate the class hours of any participant attending non-graduate education or training, including but not limited to: vocational educational training, basic education, non-vocational two- and four- year college degree programs, and vocational rehabilitation programs; and
- Improve access to short-term, sector-based training opportunities and utilize Career pathways programs.

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We are grateful for these reform proposals and look forward to hearing more specifically how the Plan attempts to achieve these goals in the coming months.

There are, however, a few provisions in the Plan that we believe can be adjusted to provide more families with access to benefits that can provide them with financial security. We offer the following recommendations:

Recommendation # 1: Reduce the work engagement requirement to 30 hours per week for families with children.

Analysis: Data show that Cash Assistance recipients assigned to 35 hours of work activity fail to achieve the 35 hour work requirement. The Plan proposes to maintain the engagement requirement of 35 hours per week for families with children, except in response to continuing challenges where the lower limit permitted by law (30 hours) will avoid unnecessary sanctions. However, federal law permits 30 hours per week of work-related activity, and we encourage HRA to make this the norm in New York City, not the exception.

Recommendation # 2: Reduce the work engagement requirement to 20 hours per week for parents with children under the age of six.

Analysis: The Plan proposes to reduce the engagement requirement for families with children under the age of four from 35 hours to 25 hours per week. However, we recommend that in keeping with federal standards, that this requirement be reduced to 20 hours. We also recommend that HRA expand this proposal to families with children under the age of six rather than four. This action will enable more families with multiple children to remain engaged in work-related activity and avoid unnecessary sanctions.

Recommendation # 3: Reverse the Work Verification Plan's immediate default selection of "unexcused absence" when a client does not show and instead require HRA employees to manually make the selection of "unexcused absence."

Analysis: The default selection of "unexcused absence" makes an assumption that goes against the client's favor. The act of requiring an HRA employee to manually make a selection would provide a safeguard to ensure that an absence is correctly attributed as "unexcused." Because of the adverse consequences to the clients as a result of this designation, this safeguard should be required.

Again, we appreciate the opportunity to comment on the HRA's Biennial Employment Plan.

Sincerely,

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