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MISSED OPPORTUNITY:

How New York City Can Do a Better Job of Reconnecting Youth on Public Assistance to Education and Jobs

The Community Service Society Reports



MISSED OPPORTUNITY: How New York City Can Do a Better Job of Reconnecting Youth on Public Assistance to Education and Jobs

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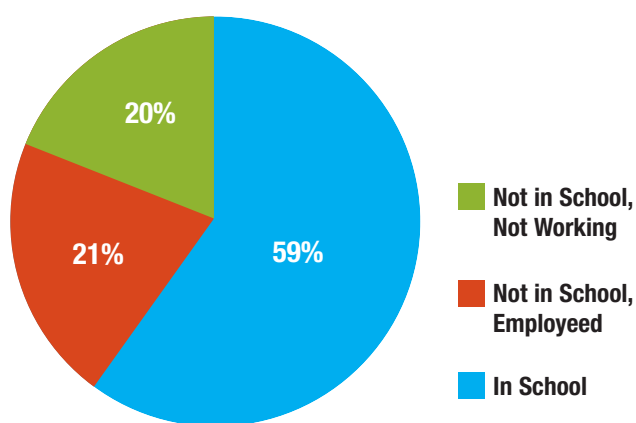
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EXECUTIVE SUMMARY AND KEY FINDINGS

Far too many young people have become “disconnected” from educational and employment opportunities at the very stage in their lives when they should be gaining the skills and experience that will put them on a path to becoming productive, self-sufficient members of society. In New York City alone, one in five persons between the ages of 17 and 24—an estimated 173,000 young people—is neither in school nor in jobs. One-third of New York City’s disconnected youth lack a high school diploma and are thus profoundly disadvantaged in terms of their short- and long-term employment prospects and their chances of avoiding a life marked by poverty.¹

Figure 1: School and Work Rates of 17-to-24-year-olds in New York City, 2009



Most disconnected youth have grown up in economically disadvantaged households, and often find themselves in financial crises of their own as they transition into adulthood. Low-income youth ages 17 and older are eligible to apply for cash benefits if they are considered “independent.” Individuals apply for cash assistance (also known as public assistance [PA]) from the New York City Human Resources Administration (HRA) through a network of neighborhood-based offices called Job Centers, where eligibility is determined. Federal and state policy requires some cash assistance recipients to participate in work-related activities while they receive benefits, and most New Yorkers fulfill this work requirement by participating in “Back to Work”—an HRA program that provides job search assistance and some training.

At the same time, a series of federal, state, and local regulations encourage or require HRA to place youth and

other individuals who lack a high school diploma in educational programs to fulfill their work requirement. While there has been some debate in the past about “work-first” vs. “education-first” strategies, it is generally agreed that young people and those without high school or equivalent diplomas will not succeed in the labor market without a strong foundation in basic skills and an appropriate level of educational attainment.

In New York City, when economically disadvantaged youth seek cash assistance from the HRA, an opportunity arises to connect (or reconnect) these youth to effective educational and career development services. Were the City of New York to capitalize on the opportunity this point-of-connection offers, we would be looking at a scenario whereby young people enter an HRA Job Center to apply for benefits and, as part of the application process, are directed to age-appropriate programs that can help them complete their education, build their skills, and get help in finding a job. Those deemed eligible for cash assistance would be given access to benefits and allowed to fulfill their work requirements by participating in educational and workforce development programs tailored to meet their needs. Other cities successfully use their welfare systems to do just this for their youth, as detailed in Appendix B.

The Community Service Society joined forces with the Resilience Advocacy Project to conduct research that would shed light on what actually happens when young people apply for public assistance in New York City. We spoke to scores of randomly selected young people as they entered and exited HRA Job Centers in Manhattan, Brooklyn, and the Bronx to apply for or recertify their cash assistance benefits; a total of 77 youth met our criteria for entry into the study. We also conducted more in-depth interviews with 23 additional young people who had applied for public assistance in the recent past to learn about their experiences with HRA’s work requirement programs. Respondents were asked about their education and career goals, the nature of their conversations with HRA staff, the programs to which they were referred in order to fulfill the work requirements, and their experiences in these programs.

Our findings suggest that HRA is missing an opportunity to reconnect young people to education and other meaningful services that can prepare them for successful careers. In some cases, there appears to be a wide divergence between HRA’s stated policies and the day-to-day implementation of these policies. In other cases, the policies themselves seem flawed.

“Young people without high school diplomas find themselves at the epicenter of the many negative trends in our labor market.”

Highlights of our research findings include:

- **Young people are sometimes discouraged from applying for cash benefits, wrongfully denied such benefits, and/or given incorrect information about their eligibility.** In five instances, study respondents were incorrectly told that they had to be 21 years of age to apply for cash assistance, when in fact eligibility begins at the age of 17.

“At first, they told me that I needed to be 21 to get Public Assistance, even though I was homeless and living in a shelter with my child.”

– Amanda (age 18)²

- **The youth we interviewed who were applying for public assistance want to complete their education and start working.** The youth we spoke with articulated clear goals associated with educational attainment and/or employment—a level of interest and motivation that represents a strong opportunity to reengage them in education and work. In street interviews, half of our respondents did not have a high school diploma. Of these, 84 percent said that their priority was to pass the test of General Educational Development (GED). Young people who already had their high school diploma also sought opportunities to develop skills and enter the workforce.

“I want to get my GED, and be a home health aide. [HRA] asked me what I wanted, whether it was school or work. I said school for my GED, but they ignored it. They gave me benefits but just sent me to [the] Back to Work [program]. Eventually, they cut off my PA because I didn’t last long at Back to Work.” – Asia (age 18)

- **HRA often does not engage young people in meaningful assessments or conversations about their educational or career goals.** Instead, as a matter of course, most youth are placed in HRA’s “one-size-fits-all,” adult-focused Back to Work program, regardless of the young person’s age, education level, interests, or aspirations. We were able to determine the work requirement placement of 70 of our respondents. Forty-six of the 70 did not have a high school diploma, yet 39 of these 46 were placed in the Back to Work program. This includes 16 individuals under 21 years of age, for whom the law requires or strongly encourages participation in an educational program.

“When I met with an [HRA] worker, she asked me about what I wanted to do. I said, ‘School, for my GED.’ She said that was fine, but then she sent me to Back to Work (BTW). I didn’t understand. They made it seem like there was no other choice but BTW.”

– Lashawn (age 18)

- **In several cases, young people reported being pulled out of the educational programs in which they were already enrolled, including programs approved by HRA as suitable for fulfilling the cash assistance work requirement.**

We met with eight young people who participate in a GED and job training program called Opportunities for a Better Tomorrow (OBT), participation in which is approved by HRA as fulfilling the cash assistance work requirement. OBT receives federal workforce and literacy funds, and has consistently met or exceeded its contractual performance-based outcomes with youth in each of these areas. OBT is located right across the street from HRA’s Thornton Street Job Center in Brooklyn—the agencies’ entrances are no more than 50 feet apart. Yet every young person we spoke to from OBT who applied for cash benefits at the Job Center was told they would have to attend a Back to Work program assignment, even if they had explained to their interviewer/case worker that they were already enrolled at OBT to pursue their GED and receive job training.

- **Most youth who have participated in the Back to Work program claim that it does not help them develop their skills or find work.** Young people report that the program, which consists largely of job search activities, is not appropriate for them given their lack of workforce experience.

“It was sort of like job training but the classes didn’t make a lot of sense to me. It’s called Back to Work, but I have never had a job.”

– Juana (age 18)

“I was there one or two weeks. It was nothing. They let us do resumes. But if I never had a job, what was my resume going to look like? BTW was a waste of time. Covenant House [her current program, which is not connected to HRA] is much more helpful. They are getting me into a GED program and helping me find a job at the same time. HRA needs to show more effort to help us out. They don’t let us know anything about GED or school.” – Lashawn (age 18)

- **Young people meet with staff at HRA who lack the training to work with young people in transition.** Youth come to HRA at times of crisis, and should meet with caring adults who are trained to engage them and provide them with proper assistance. In the street interviews we conducted outside of HRA Job Centers, 52 of 77 respondents said they did not feel comfortable with how they were treated by their HRA worker.

“They did not ask me anything about education. They were not interested in my future. They were mean to me. The worker asked me, ‘Was my mom proud of me when I had a kid so young?’ I said yes. They said that my mom was stupid, then.” – Amanda (age 18)

New York City’s approach to serving young people who apply for cash assistance fails on several levels. In terms of public policy, it represents a missed opportunity to reconnect our youth to educational services and job training. It also represents a poor use of precious public funds that should be dedicated to the purposes of providing meaningful opportunities to promote self-sufficiency and break the intergenerational cycle of poverty in New York City. With regard to legal compliance—a topic discussed later in this document—although New York City may not be violating the letter of the law, it is certainly acting counter to its spirit. Moreover, it seems clear that the manner in which HRA interacts with young people seeking its assistance in moments of crisis is likely to further alienate these young people from the all-important institutions of education and work.

Three Reforms:

We propose reforms to three areas of current HRA practice—none of which would require any change of existing legislation regarding welfare policy in New York City..

1. Openness and Accountability:

HRA needs to adopt a new mindset. By viewing the crisis that drives young people to HRA as an opportunity to constructive engagement and reconnection to education and job training, HRA can become a significant force for good in promoting a brighter future for tens of thousands of New York City’s low-income youth. Along with shift in mindset, efforts must be made to ensure that all young people who enter HRA Job Centers receive correct information about their eligibility and options to fulfill their work requirement. As part of this

effort, HRA should be more transparent about how it serves young people, tracking and publishing data on the demographic makeup, work requirement experiences, and outcomes of all its applicants.

2. Access, Assessment, and Youth-Appropriateness:

Under New York State Law and the Davila decision, HRA is required to conduct a comprehensive assessment of each applicant that takes into account that individual’s educational and employment history, as well as their abilities and preferences. HRA should partner with youth development experts and organizations to integrate youth-appropriate questions, language, and processes into the existing assessment structure. Options to accomplish this could include a Youth Liason model within HRA Job Centers.

3. Education and Training:

The Back to Work program, in which most cash assistance recipients are currently placed, is not a suitable option for young people, many of whom have not yet held a job. We recommend that HRA offer rigorous, youth-specific programs targeted to the needs of each young person. This includes educational and formative career development programs based on the young person’s age and educational status, as delineated below. New York City has already developed several strong program models for this population—we believe these should be expanded to serve HRA clients using resources currently supporting BTW.

- Youth ages 17 to 21 who are without a high school or equivalent diploma should be placed in high school or GED programs within the New York City Department of Education’s Learning to Work initiative.
- Youth ages 22 to 24 who are without a high school or equivalent diploma should be placed in adult education programs toward GED attainment before job placement.
- Youth ages 17 to 24 who possess a high school or equivalent diploma should join an expanded Young Adult Internship Program (YAIP), an existing and successful youth-oriented transitional job program, developed by the Mayor’s Commission on Economic Opportunity and administered by the Department of Youth and Community Development.

BACKGROUND: DISCONNECTED YOUTH IN NEW YORK CITY



The Problem of Youth Disconnection

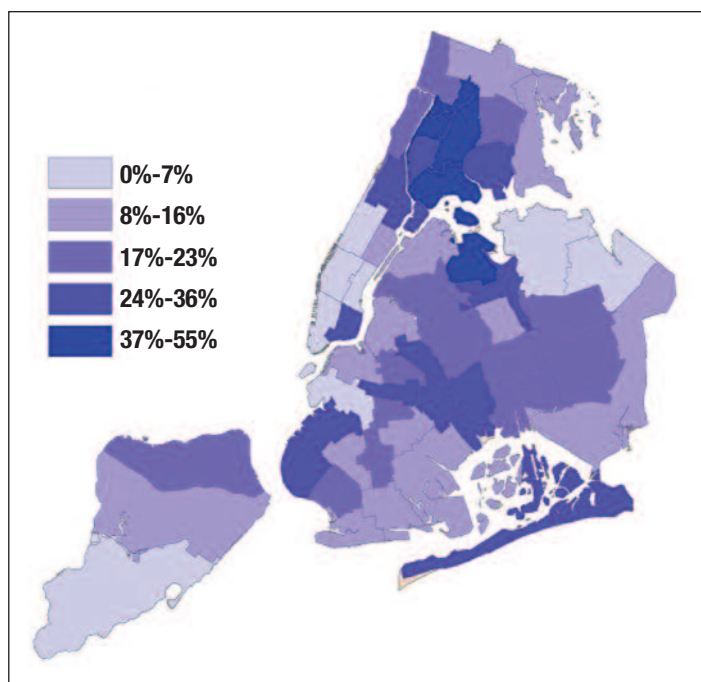
New York City is home to 173,000 youth and young adults, ages 17 through 24, who are neither in school nor working—18 percent of the overall youth population. Of these, nearly 61,000 are unemployed—looking for work but unable to find it. Another 112,000 are not in school, nor in the labor force; for a variety of reasons, they are not even actively seeking work, nor have they worked in the recent past.³

In 2003, New York City experienced an unprecedented spike in the numbers of youth who were neither working nor in school due to simultaneous decreases in school enrollment and labor market participation.⁴ Since then, school enrollment has steadily increased at both the high school and college level. By contrast, employment has remained very weak for young adults, even during the period of economic growth in the middle of the decade.⁵ The recent recession saw employment among 16-to-24-year-olds worsen further, from a rate of 15 percent (in 2006) to 21.5 percent (in 2009)—a job loss rate far higher than that experienced by other age groups.⁶

Despite the improvements in school enrollment over the past eight years, New York City still has a large population of young adults who have left school without obtaining a high school diploma. Each year, 10,000 to 13,000 young people leave high school before graduating, adding to the pool of nearly 1.25 million adult, out-of-school New Yorkers without a high school diploma. Not surprisingly, this population faces major challenges in a labor market that continues to demand ever more sophisticated skills. Between 2000 and 2007 (before the current recession), jobs grew for individuals at all skill levels except for those without a high school diploma, for whom they decreased significantly.⁷ During the recession, these trends were exacerbated—persons without high school diplomas suffered more job loss than other groups.⁸

Young people without high school diplomas find themselves at the epicenter of the many negative trends in our labor market. Lack of job experience and lack of basic skills place these youth at the back of the line when it comes to finding a job, much less starting on a career path. As a result, such youth comprise a disproportionate percentage of the out-of-school, out-of-work population. The map in Figure 2 shows the levels of high school non-completion among disconnected youth in the five boroughs of New York City.

Figure 2: Percentage of Out of School, Out of Work Youth without High School Diplomas, 2009



In affluent areas, as the map shows, young people who are out of school and out of work are generally more educated, and the extent to which they are not employed is more likely to be due to personal choice or short-term weaknesses in the labor market. For example, in Manhattan Midtown West and Brooklyn's Park Slope/Carroll Gardens neighborhoods, only five percent of out-of-school youth lack a high school diploma. As the economy improves, the out-of-work young people in these communities are far more likely to be able to find employment. Disconnected youth from New York City's poorer communities, who are generally much less educated, face deeper challenges to their ability to get jobs, now and in the future. In the South Bronx communities of Mott Haven and Hunts Point, 55 percent of out-of-school youth lack a high school diploma. These young people are more likely to need significant skill development, beginning with basic skills and passage of the test of General Educational Development (GED) to be successful in the labor market.

“Studies show that young people, especially those who struggled early in life, have the best chance of success in reconnection programs that provide a range of support for their cognitive, social, and emotional development.”

The Need for Action

The scope of the issue is sobering: one of five New York City residents aged 17 to 24 is not engaged in school or work, and in many communities the rate is substantially higher. Given the breadth and depth of the problem, it is clear that investing in young adults is good public policy.⁹ Research has shown that individuals who do not have a successful workplace experience by age 25 face sharply diminished chances of enjoying financial stability over their lifetimes.¹⁰ Such is the “path dependent” nature of employment: early job experience is the best predictor of later workforce success. Reengaging a young person before age 25 can have a significant impact on his or her future.

Education is the best way to prepare young people to succeed in the labor market—lifetime earnings increase significantly as individuals attain higher levels of education.¹¹ Studies show that young people, especially those who struggled early in life, have the best chance of success in reconnection programs that provide a range of support for their cognitive, social, and emotional development.¹² Economists and education experts argue that strong basic skills of literacy and numeracy—in addition to the “new basic skills” of communication, problem-solving, and computer literacy—constitute the critical foundation that all young people will need to be successful.¹³ Effective program models to reconnect youth link education to real-world work experience; offer monetary incentives or stipends for participation; provide comprehensive case management; and give young people sufficient time to master skills to gain credentials and become employable.¹⁴

There are dozens of programs to guide New York City’s out-of-school youth into alternative education and successful jobs, but the capacity falls far short of the demand for these services.¹⁵ For youth still connected to the public school system, the New York City Department of Education’s Office of Multiple Pathways to Graduation has developed a range of strong programs to reengage high school students at risk of dropping out.

Given the tens of thousands of young New Yorkers who are disconnected from school and work, the city needs to act now, with a focus on effective interventions delivered at ready-made points-of-contact (such as HRA’s neighborhood-based Job Centers) to connect young people with the fewest skills and the greatest need for educational reconnection with the services they need to avoid a lifetime of poverty and dependence on public benefits.

PUBLIC ASSISTANCE IN NEW YORK CITY

This report focuses on two cash assistance programs that are part of the safety net of public benefits available to poor New Yorkers: Family Assistance (FA) and Safety Net Assistance.¹⁶ Both programs are overseen by the New York State Office of Temporary and Disability Assistance (OTDA) and are administered in New York City by the Human Resources Administration (HRA). Individuals apply for cash assistance (also known as public assistance [PA]) through a network of neighborhood-based offices called Job Centers, where all information is reviewed to determine eligibility. See **Appendix A** for more information about cash assistance in New York City.

Youth and Eligibility for Cash Assistance

HRA does not provide exact figures on how many young people seek cash assistance as a result of their inability to find work, but the numbers are likely substantial. Individuals over age 16 can receive public assistance on their own if they are independent and meet guidelines based on need. In general, the eligibility rules for cash assistance do not distinguish between minors over the age of 16 and adults. The exception is pregnant or parenting adolescents: federal and state law identify specific eligibility rules for teen parents. Adolescents who are neither pregnant nor parenting receive no special treatment under federal and state law.

Youth and Work Rules

New York City's welfare system is guided by a strict work-first philosophy—reinforced by aspects of state and federal law—that shapes its development and enforcement of eligibility and engagement rules. Most public assistance recipients must engage in some kind of HRA-approved work activity for at least 35 hours per week as a condition of eligibility. This may include paid or unpaid work, as well as training and education.¹⁷

HRA's primary program for providing welfare-to-work services is called "Back to Work" (BTW). The program serves over 100,000 cash assistance applicants and recipients annually. HRA contracts with private vendors to provide a mix of training and job search programs. Public assistance applicants are referred to the BTW vendor that corresponds to the Job Center where they applied for cash assistance. Individuals must report to their assigned vendor five days a week from 9 a.m. to 5 p.m. for job search and job readiness activities while they wait for their PA application to be approved. Once the application is approved, the PA recipient will receive a work assignment from his or her BTW vendor, or continue to attend the program until a suitable work assignment is identified.

Individuals who request education and training as their work assignment, or for whom education is deemed legally required or most appropriate, are supposed to be referred to the Training Assistance Group (TAG) within HRA, rather than to BTW. TAG is charged with evaluating a participant's request to participate in a stand-alone training or educational program in lieu of his/her full engagement requirements.

Most participants fulfill their work requirement by participating in BTW. The program has changed since its development in 2005. BTW first operated with managed enrollment, whereby new cash assistance recipients would wait to join the program at the beginning of the next program cycle. HRA leadership has recently enforced open and rolling enrollment, in which new cash assistance recipients enter BTW as soon as they are receiving benefits. This dynamic makes for a relatively unstructured program—it is hard to have a beginning, middle, and end of a program when new participants join every day. A 2008 study of BTW by Community Voices Heard has claimed that for this and other reasons, BTW is extremely

“When young people apply for cash assistance, there is a clear opportunity for the City of New York to reengage them in a programmatic intervention that will build their skills and chances for success.”

ineffective in helping its participants gain skills and find work. The report found, among other things, that most participants drop out of the program (and thus forfeit their cash benefits) before finding a job through BTW, and that only three percent of those who enter BTW hold a job for six months after placement. The report argues that this is less the fault of the non-profit contractors who operate the program, but due to the contract parameters, such as open enrollment, set forth by HRA.¹⁸

A strong argument can be made that state law makes the education of young people, including those receiving cash assistance, a clear priority.¹⁹ This priority is strongest for young people under the age of 18. New York Social Services Law §131(18) states that recipients who are under 18, not married, have a child older than three months, and do not have a high school diploma or the equivalent, must be required to participate in educational activities leading to a high school diploma or some alternative approved education or training program. Social Services Law also directs local Departments of Social Services to prioritize education in work assignments for all cash assistance recipients under 18 who have not yet completed high school or received a GED at the time of their application for assistance.²⁰ State regulations extend this provision to individuals up to age 20.²¹

Although New York State Law gives case workers some discretion to determine that education is not appropriate for a particular recipient, state law requires that any recipient under age 18 who is not in a secondary school program be assigned to some activity designed to lead to the attainment of a diploma or its equivalent.²² In addition to New York State Social Services law, which pertains to cash assistance recipients, Article XI of New York’s Constitution mandates that the legislature provide for the creation and maintenance of the public school system for all children in the state. It can be argued that the legislature implemented this guarantee through the enactment of New York Education Law §3202, which states that: “[a] person over five and under twenty-one years of age who has not received a high school diploma is entitled to attend the public schools maintained in the district in which such person resides without the payment of tuition.” New York State could interpret this legal right to public education

for persons age 21 and under as a solid justification for education as a work requirement.

How Can Public Assistance Policy Be Used to Reconnect Youth?

There is substantial leeway under current law to utilize the PA system to support youth in reconnecting to education and work while providing them with cash assistance they need to survive. Many examples from other cities—as detailed in Appendix B—offer excellent models for combining short-term benefits with youth-focused supportive services that promote long-term self-sufficiency.

Studies have shown that education and training programs for welfare recipients can provide strong positive outcomes in helping individuals move off of the welfare rolls to economic independence. This is particularly true of educational investments: in a national evaluation of welfare-to-work programs, individuals who attained a GED in their work requirement activity showed substantial benefits in terms of employment, earnings and self-sufficiency.²³ GED attainers in these programs also increased their likelihood of attending college,²⁴ which brings even stronger results: 87 percent of welfare recipients who receive a two-year degree never return to the welfare rolls. Those who earn a bachelor’s degree remain off of public assistance nearly 100 percent of the time.²⁵

The federal government’s rules regarding Temporary Assistance to Needy Families (TANF) offer several opportunities to expand access to basic literacy, vocational training, education and career guidance for TANF recipients. Basic education, English for Speakers of Other Languages (ESOL), high school, or GED programs can count directly toward work requirement fulfillment. In addition, any recipient can participate in “vocational education” for up to 12 months, which can include postsecondary education, basic education and ESOL.²⁶ Training can continue to be counted under job skills training after these first 12 months, as long as it is combined with unsubsidized or subsidized work (including work-study). Furthermore, any paid training—off-site or at the work site—meets the definition of on-the-job training.²⁷

There are also clear opportunities within New York State guidelines for work requirements related to youth and educational activities, as outlined previously.²⁸ In October 2009, the

New York State Office of Temporary and Disability Assistance (OTDA) enacted new guidelines to more explicitly emphasize education. The revised guidelines stipulate that any individual (regardless of age) who has not achieved a basic literacy level (defined as a 9th grade reading level) must be encouraged or may be required to participate in a basic literacy program, high school equivalency program or other educational program in combination with other work activities and consistent with an employment plan. (Data from the New York City Department of Education and the Mayor's Office of Adult Education suggests that the majority New Yorkers without a high school diploma have below a 9th grade reading level.)²⁹ If an individual has achieved basic literacy but lacks a diploma, that person must be offered the option or may be required to participate in education designed to improve literacy and/or prepare the individual for attainment of a diploma or the equivalent in combination with other work activities and consistent with an employment plan.

Other Cities Effectively Link Cash Assistance with Youth Reconnection

As detailed in Appendix B, several programs in various parts of the country employ successful strategies to reengage youth who seek assistance through the welfare system. These programs deliver a range of services that help youth address their financial needs while at the same time supporting their social, cognitive, and emotional development. Consistent with successful model programs that reengage youth, these programs provide young people with educational and vocational services as a work requirement for cash assistance.

The City of New York has a powerful opportunity to leverage the public benefits system as a point-of-contact for reengaging vast numbers of disconnected young adults. In New York City, 200,000 17-to-24-year-olds live in households that fall below the federal poverty line. Many of these young people would qualify for cash assistance—indeed, New York City is home to approximately 63,000 17-to-24-year-olds who are not in school, not working, and who live in households under the federal poverty line (which serves as a broad proxy for eligibility). Of these 63,000 youth, approximately 25,000 dropped out of high school before getting their diploma. The opportunity to make a substantial impact on these youth should not be squandered.

What Would We Hope to See from New York City's Public Benefits System?

Young people seek public assistance at HRA Job Centers at difficult periods in their lives. Of the respondents who told us about their living situations, only five percent said that they were living with their parents. Over half gave us responses that are consistent with the legal definition of homelessness: living in a shelter, being “homeless,” “couch-surfing,” or “staying with friends,” and seven reported staying with a family member who is neither their parent nor their legal guardian (e.g., cousins, grandparents, aunts, uncles, etc.).

Our in-depth interviews brought forth many troubling stories of young people in desperate straits. Rashida, a single mother who was 19 when she applied for PA told us, “I was pregnant. I had been kicked out of the house by my mother, and was living in a shelter. I needed help.” Lisa, a 21-year-old who grew up in foster care, said, “I was looking for work and could not find a job. I was told [by potential employers] that I was not experienced enough. I went to HRA for PA because I was down on my luck. I'm a very positive person but I was starting to lose hope.”

When young people apply for cash assistance, there is a clear opportunity for the City of New York to reengage them in a programmatic intervention that will build their skills and chances for success. There are ample economic, social, and moral imperatives for the public sector to seize this chance. This is particularly true for young people with low skill levels, who face the greatest barriers to employment success and are thus most likely to become ever more reliant on public benefits as a means of survival. To illustrate: individuals with a high school or equivalent diploma are a net fiscal benefit to New York City of nearly \$200,000 over their lifetimes, in tax revenues. By contrast, an individual without such educational attainment costs New York nearly \$125,000 in public benefits and institutional costs. In short, there is a nearly \$325,000 benefit to New York when we succeed in transitioning an individual from one category to the other, yet it costs much less to do so.³⁰ These are investments that we cannot afford *not* to make.

RESEARCH DESIGN

We sought to conduct research that would provide us with robust, representative findings about young people's experiences with HRA as they applied for cash assistance. A summary of the research plan is below. See Appendix C for an in-depth description of the research design.

Research Questions

The research for this project was designed to answer the following question: *"To what extent is our cash assistance system used as an opportunity to get struggling young New Yorkers reconnected to education and work?"* Our analysis focused on three areas of public policy:

1 Access and Reconnection

- Are young people allowed to access cash assistance in accordance with the law?
- Does New York City recognize this opportunity to reconnect our youth?

2 Education and Training

- Are young people encouraged to pursue education, and given good information about their options for fulfilling the requirements in return for which they may receive cash benefits?
- Is New York City making good policy choices as to how it uses its work requirements when it comes to young people?

3 Youth-Appropriateness

- Do young people who seek cash assistance meet with staff trained to work with youth in transition?
- Do the experiences young people have with HRA staff and contractors contribute positively to their development and reconnection?

Research Design (in brief)

We designed a research plan to answer these questions. Our design included:

Analysis of HRA program data: We sought to examine information from the Human Resources Administration about the numbers of young people who apply for cash assistance, their education levels and employment experiences before application, their referrals to work requirement programs, the outcomes associated with attending those programs, and relevant policy directives within HRA pertaining to young people, education, and/or training, especially for individuals without a high school or equivalent diploma. Despite repeated attempts—first through informal means and then via formal requests through the Freedom of Information Act—HRA did not provide us with any data that could be used for this project because, according to the agency, “HRA does not track data based on age.”³¹

“Real cross-system collaboration requires the use of existing funds to ensure that young people receive services designed for them from systems and organizations that can provide specialized services.”

Collection and analysis of primary data, including:

- **Exploratory focus groups** with 14 young people who had previously applied for cash assistance in order to develop research hypotheses and data collection instruments to test those hypotheses.
- **Street surveys** with young people (N = 77) as they entered and exited the HRA Job Centers to apply or get recertified for cash assistance. These surveys were conducted to obtain data from a robust and representative sample of young people about their experiences applying for cash assistance.
- **Follow-up in-depth interviews** with nine young people who had applied for cash assistance—to obtain deeper information and better illustrate the findings of our survey research.³²

In total, we spoke to 100 young people between the ages of 18 and 24. We provided small cash incentives (\$10) to survey respondents to ensure a high response rate and prevent a selection bias; as a result, an overwhelming majority of young people we approached were willing to participate in our surveys. Figure 3 provides a brief profile of our respondents.

Figure 3: Respondent Profile

	Number of Respondents	Age		Education Level		Work Requirement ³³		
		18-20	21-24	No HSD	With HSD/GED	Referred to BTW	Educational Program	Other or No Response
Initial Focus Groups	14	7	7	11	3	12	0	2
Street Surveys	77	22	55	38	39	42	5	30
Additional Focus Groups	9	9	0	8	1	9	0	0
	100	38	62	57	43	63	5	32

RESEARCH FINDINGS



What Happens When Young People Apply for Cash Assistance?

1. Young people are sometimes discouraged from applying, wrongfully denied benefits, and given incorrect information about their eligibility.

Some youth appear to receive incorrect information from HRA about their eligibility for cash assistance. For example, we spoke to five young people who reported that HRA staff told them they needed to be 21 to apply for PA, when the actual age of eligibility is 17.

2. Youth applying for PA want to reconnect to education and work.

Despite undergoing hard times, young people who apply for cash assistance often have clear goals for themselves—goals that represent an opportunity for their reengagement in education and work. In street interviews, we asked 77 youth about their objectives in the areas of education and work.³⁴ We found that, in an overwhelming number of cases, the study respondents wanted to complete their education. Those without a high school diploma perceive the GED as their most important next step. Of the respondents, 38 of 77 had not achieved their high school diploma; 32 of these said that getting a GED was their primary goal. Of the 39 youth with high school diplomas, 31 expressed a desire to go to college—of the 31, 25 knew of

a specific major or college program they wanted to attend. In addition, many of the young people we spoke to had clear visions for specific jobs that they wanted in the near future, as well as “careers” they hoped to have in the long term.

3. HRA often does not engage young people in meaningful assessments or conversations about their educational or career goals. Instead, as a matter of course, most youth are placed in HRA’s “one-size-fits-all,” adult-focused Back to Work program, regardless of the young person’s age, education level, interests, or aspirations.

The HRA interviews for cash assistance are valuable opportunities to try to connect young people to education and work. The best way to do so is to engage these young people in activities aligned with their own educational and employment-related goals. As we have seen, youth who enter Job Centers seeking cash assistance have clear goals in terms of education and work. However, overall, it does not appear that HRA staff, across the various Job Centers, engages young people in the assessments and conversations that are supposed to be its policy, in order to make appropriate referrals.

All survey and focus group respondents were asked whether the HRA worker had explored their educational and career goals. Only eight percent said that they were asked about their goals; 92 percent said that they were not asked, or gave

Young People Share Their Stories

“The first time that I went they told me that I had to be 21.”

– Lashawn, age 18 when she applied for benefits at a Job Center

“At first, they told me that I needed to be 21 to get PA, even though I was homeless and living in a shelter with my child.” – Amanda, age 18

“Is it their job to make us feel like we can’t apply?” – Rosemarie, age 19

responses such as “Yes, but like a joke.” Respondents were also asked whether the HRA worker they met with seemed interested in helping them achieve their goals; 85 percent said no.

Eight of the 100 young people we spoke to reported that HRA workers seemed interested in helping them meet their goals. Some young people were unhappy about their placements, but grateful that HRA caseworkers sought to ensure they could meet their financial needs:

- “Yes, they were helpful, especially in getting me benefits. But they talked about jobs, not careers or education.”
– Tynisha, age 21
- “They weren’t interested in my going back to school, but they are trying to help me pay my rent, and that’s good.”
– Amalia, age 19
- “They did not ask me about my education, but I just needed to get a job as soon as possible, so I was happy to go to a work program.” – Ulysses, age 22

We were able to determine the work requirement placement of 70 respondents. Forty-six of the 70 did not have a high school diploma, yet 39 of these 46 were placed in the Back to Work program—this includes 16 individuals under age 21, for whom the law requires participation in an educational program. The following responses were received during the street survey (and do not include names or ages):

- “The worker emphasized work over getting my GED. They said that you have to find schools on your own – they didn’t talk about the GED as important.”
- “I wished they talked more about GED.”
- “They gave me no recommendations for programs or schools; they just sent me to BTW. It seemed business-like.”
- “The worker showed no interest in my future. They said go to BTW. They made it seem like BTW was my only option.”

- “The worker was not interested in my goals. They just want to put you in Back to Work.”
- “They just wanted me to get a job or go to BTW.”
- “I don’t like being placed in BTW. I would rather get my education than be 21 and in a work program. I need an education!”

Of the 23 interview and focus group respondents, 21 were placed in Back to Work. All 21 of these respondents said that they were led to believe that BTW was their only option to fulfill their work requirement activity.

- “They said that if I wanted PA I would have to go to the Back to Work program. I said that I wanted to go to school, and they said that if I wanted to do that, I would have to get a school to give me proof that I was there for the same hours (9-5) as BTW. They did not help me get any information about schools for me.”
– Juana, age 18, no high school diploma
- “When I finally met with a worker, they asked me about what I wanted to do—I said school for my GED. She said that was fine, but then she sent me to BTW. I didn’t understand. They were rude to me. They said I shouldn’t have two kids at my age. They made it seem like there was no other choice but BTW.”
– Lashawn, age 18, no high school diploma
- “They asked me what I wanted, whether it was school or work. I said school, but they ignored it. They gave me benefits but just sent me to Back to Work. Eventually, they cut off my PA because I didn’t last long at BTW.”
– Asia, age 18, no high school diploma
- “They gave me PA and told me that I had to do BTW. I went for two weeks and left—it was awful. They never asked me about school or career. They just said that I had to go to BTW if I wanted PA. What if you want to go to school?” – Rashida, age 19

- *“I have diagnosed anxiety related to my experiences growing up in foster care...that is why I have been out of work. They didn’t care. HRA never made it seem like I had any options other than BTW, like school or training. I want to finish my education.” – Lisa, age 21*
- *“They referred me to BTW; they made it seem like I had no other option. There are other options?” – Amanda, age 18, no high school diploma*

4. Young people are sometimes even pulled out of education programs in which they are already enrolled—some of which are already approved by HRA as fulfilling the cash assistance work requirement.

In several cases, Job Center staff ignored the fact that young people were already actively engaged in programs to build their skills and prepare them for college and/or work. We met with ten young people for whom this was the case. We spoke to eight young people who are participants in a GED and job training program called Opportunities for a Better Tomorrow (OBT), which is approved by HRA as fulfilling the cash assistance work requirement. OBT receives federal workforce and literacy funds, and has consistently met or exceeded its contractual performance-based outcomes with youth in each of these areas. OBT is located across the street from HRA’s

Thornton Street Job Center—their front doors are no more than 50 feet apart. Yet every young person we spoke to from OBT who applied for cash benefits at the Job Center was told they would have to attend a Back to Work program assignment, even if they mentioned to their interviewer/case worker that they were already enrolled at OBT and pursuing their GED and getting job training.

- *Enrique, age 23, and Jacqueline, age 18, both told their Job Center workers they were enrolled full-time in OBT. Regardless, they were still sent to a full-time (9 a.m.-5 p.m.) Back to Work (BTW) program.*
- *Charles, age 22, is a homeless youth who was enrolled in a full-time GED and job training program at The Door, a youth-focused education and job training program. He was told at this interview for cash assistance that if he was not employed, he would have to go to BTW. He was told neither The Door nor any other education program would suffice for his work requirement, despite the fact that he did not have a high school diploma. According to Charles, “They made it seem if I didn’t do Back to Work, and the specific assignment they gave me, I wouldn’t get anything.”*

Young People Share Their Stories

“I want to get my GED, and be a home health aide. In the long term, I would like to eventually work in and get my own hair salon. They asked me what I wanted, whether it was school or work. I said school for my GED, but they ignored it. They gave me benefits but just sent me to Back to Work. Eventually, they cut off my PA because I didn’t last long at BTW.”

– Asia, age 18 when she applied for cash assistance, is a single mother who left high school during the 9th grade.

“In some cases, there appears to be a wide divergence between HRA’s stated policies and the day-to-day implementation of these policies. In other cases, the policies themselves are flawed.”

- *Briana, an 18-year old, single-mother applicant from the Bronx was attending CUNY Prep, an HRA-approved program for students to attain their GED and prepare for college, at the time she entered a Job Center to apply for cash benefits. Yet she was told by staff at the Job Center she visited that she needed to leave the school in order to receive cash assistance—instead, she would have to attend a Back to Work program assignment.*

5. Most youth who have participated in the Back to Work program claim that it does not help them develop their skills or find work.

Young people report that the program, which consists largely of job search activities, is not appropriate for them given their lack of workforce experience. In focus groups, we spoke to 21 young people who had participated in Back to Work. Fully 18 of the 21 did not complete the program. Of those who did complete BTW, only one young person was able to find a job through the program, for which he was grateful. Another young person who did not find work felt that the job developers did their best to help her find a job.

- *Ulysses, age 22, was able to find a job through BTW—a job that he still has, which has helped him get up to date on paying his rent.*

Many youth questioned the program model, reporting that it did little to help them meet their educational or career-related goals. All who had gone to BTW reported that youth and adults were placed together (not separated by age or experience level), which made many of the young people feel uncomfortable. Young people also wondered about the effectiveness of the programming approach, whereby new participants enter every day. In many cases, youth had such negative experiences in BTW that they were willing to give up cash assistance rather than continue in the program. This was even true for individuals with serious needs for financial assistance, such as single mothers living in shelters.

- *“I was there 1-2 weeks. It was nothing. They let us do resumes. But if I never had a job, what was my resume going to look like? BTW was a waste of time. Covenant House [her current program, not connected to HRA] is much more helpful. They are getting me into a GED program and helping me find a job at the same time. HRA needs to show more effort to help us out. They don’t let us know anything about GED or school.” – Lashawn, age 18*
- *“I went to BTW. It was miserable. It’s okay for old people, but it’s just a bunch of sitting around in the back of the room.” – Joshua, age 21*
- *“My BTW program was like a bad version of OBT.” – Cindy, age 23*
- *“They just had me sitting there watching white people on TV tell me about how to get a job. They do your resume for you. They don’t teach you how to do it, which would have been helpful. I went for 1-2 weeks. I would just sit there and sleep. They wanted me to get a job but I was pregnant. Who was going to hire me the way that I was looking? So they just let me sit there. Here [at Covenant House] they talk to you—they use the time to make a real connection to you. Covenant House helped me enroll in a GED program; I start on Monday.” – Asia, age 18*
- *“I went to BTW. It was terrible. You just sit there. I took a class on how to make organic baby food, something that I was never going to open a business in. Then they asked me to walk around and hand people newspapers on the street. I didn’t want to—I was pregnant. BTW is not appropriate for young people. They should have a separate program for youth. Any place is better than HRA. They think that since you are getting free money, you have to work for it—even if it makes no sense. They need to make programs based on your needs. We are not all the same.” – Ashley, age 18*

- *“I sat around all day [at BTW]—they didn’t help me. Covenant House is much more helpful—they let us know about programs and schools. HRA needs to give us information about those types of programs.”*
– Amanda, age 18
- *“There should be an adult HRA and youth HRA. When I went to BTW [when I was 20], there were just a bunch of grown men playing around. It was not for me.”* – Charles, age 22
- *“It was sort of like job training but the classes didn’t make a lot of sense to me. It’s called Back to Work, but I have never had a job.”* – Juana, age 18

These young people’s opinions about Back to Work are supported by adult professionals in the field. Elizabeth Garcia is a Program Director for Good Shepherd Services, a youth development organization. She manages the Chelsea Foyer, a transitional living program for homeless young adults and youth aging out of foster care. According to her, “Young people are hesitant to attend the Back to Work program because they do not want to spend eight hours of their day in a room looking through job ads. They need something more dynamic. Some start the program and quit out of frustration.” She adds that an ideal program for youth would include an educational component, a stipended training for specific jobs, placement in internships, and, eventually, once the youth is ready, job placement.³⁵

6. Young people meet with staff that lacks the training to work with young people in transition.

Youth come to HRA at periods of crisis, and should meet with caring adults who are specifically trained to reengage them. In street interviews, 52 of 77 respondents said they did not feel comfortable with how they were treated by their HRA worker. Several of the young mothers we interviewed reported their case workers made judgmental and even inappropriate comments to them about being pregnant or having children at a young age. One young woman was even told to stop breastfeeding and use baby formula.

- *“Jacqueline was told she was not allowed to live in her boyfriend’s household as an independent and had to live with her parents, even though she is 18. She was also told that HRA might investigate her boyfriend for statutory rape (even though statutory rape in New York only applies to individuals under age 17).”*
- *“Job developers [at BTW] treated me funny because I was young. They called me a ‘rookie’ in a derogatory way, because I had no experience looking for work. I was amazed that they let you sit there all day and do nothing if you wanted.”* – Lisa, age 21

Young People Share Their Stories

“I want to get a GED then go to college. I want to go to John Jay to study law and work in the criminal justice system. I want to be a criminal lawyer or a corrections officer.”

– Amanda, age 18, who left high school in 11th grade

ANALYSIS AND CONCLUSIONS



New York City's approach to serving young people who apply for cash assistance fails on several levels. In terms of public policy, it represents a missed opportunity to reconnect our youth to educational services and job training. It also represents a poor use of precious public funds that should be dedicated to the purposes of providing meaningful opportunities to promote self-sufficiency and break the intergenerational cycle of poverty in New York City. With regard to legal compliance—a topic discussed later in this document—although New York City may not be violating the letter of the law, it is certainly acting counter to its spirit. Moreover, it seems clear that the manner in which HRA interacts with young people seeking its assistance in moments of crisis is likely to further alienate these young people from the all-important institutions of education and work.

Ineffective Policy

Most youth we surveyed were sent to the Back to Work program, an inappropriate action given that few of these youth have ever held jobs and lack even basic workplace survival skills. As one young person perceptively remarked, “Why are they sending me to ‘Back to Work’ when I’ve never had a job?”

Young people who lack high school diplomas need to be placed in a high school or youth-oriented GED program, where they can build skills that lay the foundation for success in entering an ever-more competitive workforce. According to the best practices for youth in transition, such programs would include extensive case management and life-skills development. Programs of this kind would also provide introductory contact with the world of work via training, subsidized employment or internships, and career exposure. Young people with diplomas who are seeking to enter the workforce should enter a program that is based on developing formative job experience in an appropriate introductory setting—in an internship, for example—rather than immediate job placement in whatever job is available.

New York City spends tens of millions of dollars on youth in HRA's workforce development programs. The best interests of New York City's fiscal health, the general public, and young

people themselves will be well served by ensuring that our public dollars are invested in effective programs. New York City has already developed several effective public programs—including the Learning to Work initiative and Young Adult Internship Program—to help young people reconnect to education and the workforce. Investing further in these models would represent a better use of limited resources.

While New York City appears to be in compliance with the letter of the law, it does not seem to be complying with the spirit of the law. HRA capitalizes on loopholes in the law that give individual case workers some discretion to determine that education and training are not appropriate for young people ages 16-19.³⁶ These loopholes permit HRA to avoid aligning its educational and employment objectives for young people with what seem to be clear legislative priorities favoring education for undereducated minors receiving cash assistance. Compliance with the spirit of the law, which in many different areas encourages the use of public benefits funds for education and training, especially for young people, would look very different from the picture we see today.

Although young people ages 20 to 24 can be legally treated as adults, in keeping with the previously-cited research about the period before age 25 as being one where reconnection investments bring the greatest returns, we are convinced that the state guidance prioritizing education and training should be extended through age 24. Federal law allows individuals without a high school diploma of any age to use education as their work requirement. The best way to prepare young people to be responsible for themselves and their families is to vest them with skills that empower them to compete in the labor market. It is simply good policy to use young people's connection to the cash assistance system as an opportunity to ensure that they receive the basic skills they need to succeed.

Access to benefits—and the barriers to doing so—are also of serious concern. Although the law is clear that every individual has the right to apply for public assistance,³⁷ Job Center workers often make it difficult for young people to file their applications. In addition, young people seeking assistance may confront a complicated and byzantine set of eligibility requirements. Entitlement itself and the level of assistance available



may vary considerably based on whether the young person is under 21 years of age, under 18 years of age, has a child, or lives with a parent or other caretaker relative. Moreover, eligibility may also depend on whether the young person is in school and, if so, the grade of attendance. All of this frequently leads to confusion about, and misapplication of, eligibility rules by case workers at the HRA Job Centers.

Keeping Youth Connected

Given the disproportionate number of economically disadvantaged youth who have had extremely negative experiences in school and in the workplace, HRA is coming into contact with young adults who are likely to be struggling with the difficult transition to adulthood. At the very least, we would expect that young people interfacing with HRA would be served by workers who are trained to conduct themselves in a responsible, professional, and respectful manner that includes the dissemination of accurate information and that aligns with the developmental and practical needs of this vulnerable population.

To the detriment of all concerned, instead of reconnecting our youth, the public benefits system appears to turn them off even further from a formal system that has failed them already. New York City gives its poorest youth incorrect information about their eligibility for public assistance, discourages them from completing their education as part of the fulfillment of their work requirements, interacts with them in inappropriate and disrespectful ways, and places them in adult-focused program environments where they feel out of place and are doomed to fail. As a result, our most disadvantaged youth are pushed even farther into the margins of the society by the very services intended to provide a pathway out of chronic poverty.

RECOMMENDATIONS FOR REFORM

What Should We Do to Reform This System?

We propose reforms in three areas of current HRA activity: Openness and Accountability; Access, Assessment, and Youth-Appropriateness; and Education and Training.

We offer specific suggestions under each area, with an eye toward feasibility, fiscal efficiency, and building on or expanding existing successful city-developed programs. We hope to work with City Hall and HRA on implementing these recommendations. These recommendations are guided by several propositions:

- Real reform requires a shift in organizational culture that goes beyond policy directives and one-time employee trainings. Our hope is that HRA will adopt a new way of doing business in dealing with youth and young adults who apply for cash assistance.
- Line staff and contractors should not be blamed for systemic shortcomings. Our findings were consistent across various Job Centers and BTW program vendors, suggesting broader issues at play. Requirements placed on the BTW program operators, such as open enrollment and performance-based payments that include no incentives for training or education, make it difficult for them to run effective programs for young people.
- These problems cannot be solved only by promises of more information-sharing and referral without an increase in program capacity. We cannot correct for the failures of a funded system by sending youth to other underfunded systems (such as community-based education programs) and counting on the dedication of community-based

organizations to do right by our youth. Real cross-system collaboration requires the use of existing funds to ensure that young people receive services designed for them from systems and organizations that can provide specialized services.

- Youth and young adults need to be in developmentally appropriate programs—that is to say, programs designed for their age and stage of emotional and cognitive development. Attempts to reconnect them to education and the workforce through adult-oriented programs will not be effective.

It is important to note that all the recommendations expressed below are fully within current law—none would require any changes in legislation. Additionally, they could be accomplished using existing resources now devoted to Back to Work. The per-participant costs of the solutions proposed below are all similar to those of BTW.³⁸

1. Openness and Accountability

As a first step, HRA should routinely provide more information about its youth and young adult applicants and recipients. This will require HRA to track and publish data about the number of youth receiving benefits (independently and as part of other cases); their ages; their education levels; the work requirements they are participating in; and, most importantly, their outcomes within the work requirement programs. It is critical that service providers, advocates, and the city itself be made aware of what is happening to young people who apply for cash assistance. Without this information, it is impossible to assess the effectiveness of the tens of millions of dollars—

“Real cross-system collaboration requires the use of existing funds to ensure that young people receive services designed for them from systems and organizations that can provide specialized services.”

more than is spent by any other city agency—earmarked within the welfare system for workforce development. To accurately assess the return on these investments, and to hold HRA accountable for them, HRA needs to become much more transparent about its services for youth.

2. Access, Assessment, and Youth-Appropriateness

Improve Access

Young people who are eligible for benefits must not just be able to access such benefits, but should be encouraged to use their participation in the cash assistance system as a passageway to economic independence. HRA should implement policies that ensure that youth who enter Job Centers receive correct information and support navigating the complex agency processes.

A simple way to improve access would be to issue a comprehensive policy directive on eligibility and other rules applying to teens and young adults. From there, it will be important to require that HRA train and monitor its staff on these rules. Advocates have long requested that HRA issue such a policy, clarifying the rules for workers and thus leading to more accurate information being provided to teens and young adults. Were these materials to be presented in a clear, user-friendly manner, youth themselves could use the policy to better understand and navigate the welfare system.

Develop Youth-Specific Assessments

It is recommended that HRA develop employability assessment questions that take into account the unique needs of adolescents and young adults. Every day, HRA's frontline case workers are faced with the challenge of meeting the unique economic, educational and employment needs of younger applicants. The particular needs and barriers young people face are not identified or addressed because of HRA's “one-size-fits-all” approach to assessment and employment. However, the assessment is a critical stage in a young person's engagement with HRA. It lays the foundation for the employability plan, which is supposed to serve as a guide for the type of work assignment that the recipient is given. To the extent that the assessment fails to accurately capture the relevant experiences, needs, challenges, and preferences of young

people, HRA squanders its opportunity—and falls short of its responsibility—to connect young people to appropriate educational opportunities.

Since HRA is legally required to conduct a comprehensive assessment that takes into account each individual's educational and employment history, abilities, and preferences,³⁹ the agency should partner with youth development experts and organizations to integrate youth-appropriate questions, language and processes into the agency's existing assessment structure. Such integration would represent a cost-efficient strategy for ensuring meaningful assessment processes that result in meaningful outcomes.

Develop a Youth Liaison Position

HRA should develop an internal Youth Liaison position. HRA's Youth Liaisons would be trained in the legal provisions concerning young people and would be capable of accurately determining eligibility. The liaison would also be trained to understand the unique needs and challenges of young adult applicants and recipients, providing a single reference point to clarify program rules, explain youth rights, and help connect young people to critical services and supports to help ensure compliance. In addition to helping youth applicants navigate the application process, these liaisons, as experts on cash assistance rules related to youth, would also be uniquely qualified to identify and respond to particularly vulnerable young people.

Youth Liaisons have been shown to be effective elsewhere. Illinois and California have employed “Teen Specialists” to improve access to assistance, decrease sanction rates, and increase access to education for young people.⁴⁰ A local liaison model that, although not youth-specific, can serve as a model, is the Domestic Violence Liaison Unit (DVLU). Domestic Violence Liaisons are social workers stationed in HRA Job Centers who handle claims of domestic violence from cash assistance recipients and ensure that victims are not put at risk in complying with cash assistance requirements. Any individual who self-identifies as a domestic violence victim is referred to the specially trained liaison, who arranges for a work requirement activity that is suitable given the individual's recent traumatic experiences. It may not be appropriate for HRA

staff themselves to provide the direct interactions with young adults. There are several organizations in New York City that are strong in the use of positive youth development approaches to reengage older youth. Staff from any of these organizations could be contracted to provide youth-specific assessment and referral services.

3. Education and Training

As this report clearly demonstrates, the Back to Work program is not an appropriate venue for enabling youth and young adults to fulfill their work requirements. Young people between the ages of 17 and 24—most of whom have little or no work experience—should receive separate services, in programs designed to meet their educational and workforce development needs, within a youth development framework. Education must be the clear priority for youth, especially those who have yet to attain a high school or equivalent diploma. This can be done using existing funds. Currently, \$54 million goes into the Back to Work program, and as recently as 2008, the Begin Employment Gain Independence Now (BEGIN) program, through which HRA has previously provided educational services (but which is now being phased out), was funded at \$17 million. At the least, HRA should carve off the portion of these funds that corresponds to the percentage of its caseload that is between ages 17 through 24.

The New York City Department of Education (NYCDOE) and the Mayor's Center for Economic Opportunity (CEO) have been successful in assisting the disconnected youth population. The Learning to Work (LTW) program has dramatically improved educational outcomes for youth who have fallen behind or left high school. The Young Adult Internship Program (YAIP) is a strong example of a targeted program for young adults who need a formative, transitional employment experience. The smaller Young Adult Literacy Pilot (YALP) offers robust programming to low-skilled young people who need intensive service to build their basic skills.

We recommend that the CEO work with NYCDOE, the Mayor's Office of Adult Literacy, and the CBOs that make up the portfolio of Out-of-School Youth programs funded through the Department of Youth and Community Development (DYCD) to design a new model for program referral that uses HRA funds currently used for BTW.

We recommend that programming in the areas of education and training be segmented based on age and educational status, as follows:

- Youth ages 17–21, without a high school diploma
- Young adults 22–24, without a high school diploma
- Youth and young adults 17–24, with a high school diploma

Youth ages 17-21, without a high school diploma:

Redirect existing HRA training funds into an expanded Learning to Work Program

An ideal option for the reallocation of resources would be to expand the Learning to Work program to include young adults on public assistance. LTW was developed and adopted by the NYCDOE to reengage high school students who had fallen significantly off track toward graduation. LTW is a contract given to an organization that supports the educational programming in a Transfer High School, Young Adult Borough Center (YABC), or GED program. LTW services consist of intensive youth development counseling and case management, job readiness training, and subsequent placement in a paid internship program. LTW supports and incentivizes youth to stay on track in their educational program. Young people in LTW complete high school and get their GED at rates much higher than comparable youth who are not in LTW.⁴¹

In both name and concept, the notion of “Learning to Work” makes far more sense than “Back to Work” for a young

person with no significant workforce experience. The LTW program model is designed to succeed with youth. It focuses on the development of fundamental job skills through world-of-work training and a part-time internship experience—interventions more appropriate for young people than BTW’s adult-focused activities. Significantly, LTW is connected to school, the most important predictor of future economic success for young adults.

Youth ages 21 and under are currently eligible to participate in Learning to Work if they are enrolled in a participating Transfer High School, YABC, or ACCESS GED program run by the Department of Education. Youth who apply for cash assistance and are willing to reenter a Department of Education program should be encouraged and assisted to enroll in a LTW-supported school option. For those who have become alienated from the NYCDOE and seek other options, the current LTW program should be expanded to include an additional community-based educational venue. New York City should use existing BTW resources to expand contracts with CBOs that already offer LTW programs to serve PA recipients.

Young Adults ages 22-24, without a high school diploma

Develop a program with the Mayor’s Office of Adult Literacy

Young adults who are too old to be eligible for the youth programs of the NYCDOE still need the opportunity to build their skills and pass the test of GED before attempting to compete in the labor market. HRA should assist these young people in entering the adult education programs of the Department of Education (through its Office of Adult and Continuing Education) or community-based adult education programs.

Given that the CBOs that offer adult education have already seen drastic funding cuts in recent years, these referrals must be supported with HRA resources. HRA should work with

the Mayor’s Office of Adult Education to develop a funding mechanism from HRA’s existing resources that would support a new program to help young adults 22-24 to build their skills, pass the GED, and prepare to make the next step to college or a career. These programs should focus on educational outcomes while incorporating career exploration and job readiness as a program component. Individuals and organizations should be held accountable for participating and meeting educational attainment outcomes.

Some young people in the 22-to-24-year-old age group may not wish to pursue an educational path. Such individuals should be guided toward the Young Adult Internship Program discussed below.

Youth and Young Adults ages 17-24, with a high school diploma

Redirect HRA funds into an expanded YAIP program.

Young adults with high school diplomas should enter the Young Adult Internship Program (YAIP), a program developed by the Center for Economic Opportunity for precisely this population. YAIP is a four-month program for out-of-school, out-of-work youth ages 16 through 24. It provides career development services and a paid full-time internship to enable young people to learn skills, build their resumes, and make workplace connections. The Mayor’s CEO is rigorously evaluating the program, whose early successes in program completion and subsequent job placement have won it national acclaim and federal investments.⁴² Since YAIP is an existing model of a high quality, formative, transitional job program for young adults, we strongly recommend that HRA simply fund an expanded participation in YAIP rather than “reinventing the wheel” by spending money on a separate program of unknown quality and efficacy.

APPENDICES

Appendix A: Rules and Policies Regarding Youth and Cash Assistance

Family Assistance (FA) is New York's Temporary Assistance for Needy Families (TANF) program. FA is a primarily federally-funded cash assistance program for families with dependent children, and provides recipients with a monthly cash grant and an allowance for housing. A cornerstone of the FA program is the limit on benefits to a total of five years in an individual's lifetime. There are certain exceptions to this rule for youth receiving cash assistance. For example, assistance does not count towards the 60-month lifetime limit when it is received by a minor dependent child—i.e., as part of a parent's or guardian's assistance case;⁴³ or when assistance is paid to a foster parent instead of to the minor parent.⁴⁴

The Safety Net Assistance (SNA) program is a state- and locally-funded program that offers cash and non-cash assistance to individuals and households that are ineligible for the federal FA program. This includes individuals without children (including most adolescents living alone) and families with children that have "timed out" of the FA program. There is a two-year lifetime limit on receipt of cash assistance through SNA. Families that use up their five years of FA aid, or SNA-cash households that use up their two years of aid, should be eligible for non-cash assistance through the Safety Net Assistance program. This program does not have a time limit. Called Safety Net-Non-Cash, this program provides direct vendor payments for rent and utilities.

Young Parents: Federal and state law require minors who are pregnant or parenting to be married or living with a parent, legal guardian, or another adult relative in order to be eligible for their own public assistance case. Failure to comply with this requirement results in the minor's ineligibility for PA. There are three general exceptions to this rule. The minor will not be required to live with a parent or guardian if no parent or guardian is available to live with; the minor or the minor's child are, have been, or are at risk of being, subjected to serious physical or emotional harm or sexual abuse in the parent or guardian's home; or it is considered in the best interest of the minor's child to not live in the minor's parent or guardian's home.⁴⁵

Federal law also requires unmarried custodial teen parents to participate in school or an approved training program from the time the child is 12-weeks old, in order to be eligible for cash assistance.⁴⁶ Teen parents ages 18-20 who are living with a parent or guardian may be exempt from this rule if HRA determines that school is not appropriate for the minor. In that case, the minor will be required to comply with HRA's regular work requirements.

Non-Parenting Youth: Unmarried, non-parenting teens are considered dependents of their parents or guardians until the age of 18 as long as they are living at home. As such, they receive PA as part of their parents' or guardians' household. These teens may be eligible for their own PA case if they move out of their parents' home, HRA determines them to be emancipated, and they meet income eligibility requirements.⁴⁷ Minors between 18 and 20 who are not pregnant or parenting and who live on their own may be eligible for their own PA case if they meet income eligibility requirements. They do not need to meet the standards of emancipation.

Appendix B: Successful Programs that Combine Public Assistance with Education and Training to Reconnect Youth

The following are descriptions of several types of programs that use federal welfare funds to successfully support youth reconnection. In each example, youth receive cash assistance while participating in education activities, many of which also include career development services.

The Oregon JOBS program provides assessment, preparation, and placement services to TANF recipients who are employable; addresses any barriers that may limit clients' employment opportunities; and places clients in jobs. Teen parents without a high school diploma or GED must participate in the basic education component of the JOBS program. Life skills services for youth in transition include resources for health, child development, parenting, nutrition, and household management services. Job preparation and entry for teens offer basic education, life skills, and employment preparation.

Appendices

Parents aged 20 and over who participate in the JOBS program may participate in full-time basic education component if their personal employment goals require a literacy level higher than 9th grade. Services for youth and children utilize partners and preventive services to help young people to complete secondary education, gain life skills, and make the transition to economic independence. Employment preparation and education services are offered by local Workforce Investment Act (WIA) Youth Program agencies and community colleges, the Employment Department, the business community, faith-based organizations and Community Action Agencies. The JOBS program is supported by TANF funds.⁴⁸

The California CalWORKs program provides temporary financial assistance and employment services to TANF recipients. Employable parents are required to participate in the CalWORKs Greater Avenues for Independence (GAIN) employment services program. CalWORKs allows TANF participants to attend a California community college program for 18 to 24 months. GAIN activities include employment, job search, assessment, education and training, community service, substance abuse treatment, mental health services, and domestic violence counseling. GAIN activities must be a minimum of 32 hours per week for single parents. Two-parent families must participate 35 hours per week. Children attending a secondary or vocational school full-time and custodial parents 18 or 19 years of age who are participants in Cal-Learn (described below) are exempt from work requirements.

Cal-Learn is a mandatory program for CalWORKs participants who receive cash assistance and are under 19 years of age, are pregnant or parenting, and have not yet completed their high school education. Cal-Learn requires participants to enroll in high school or an equivalency program, necessary to earn a high school diploma or its equivalent. Participants who reach the age of 19 while in the Cal-Learn program may choose to remain in the program until they receive their high school diploma or equivalent, or turn 20. Cal-Learn offers a variety of services, including child care, transportation, some costs associated with school expenses and intensive case management. CalWORKs is supported by the CalWORKs Proposition 98 funds and TANF funds.⁴⁹

The Career Pathways of the State of Arkansas partners with two-year colleges and technical centers at four-year colleges. The Career Pathways is available to TANF and non-TANF (up to incomes at 250% of the federal poverty level) participants. The program allows participants to enroll in associate, vocational, and GED programs. Support services include cash assistance, child care, and transportation. Participants receive case management assistance through a program counselor. Participants' educational activities are counted under TANF vocational education, work-study, internships, job skills training. The Career Pathways program is supported by TANF funds.⁵⁰

Ready to Work of the State of Kentucky partners with two-year and technical colleges. The Ready to Work program is available to TANF recipients. Participants can enroll in associate, vocational, and GED programs. Participants are required to complete the program in 24 months. The program provides case management through program coordinators. Support services include cash, child care, transportation, tutoring, career counseling, job placement, and post-graduation follow-up. Ready to Work of the State of Kentucky is funded through the State Work-Study Fund (Federal Work-Study and TANF Work-Study).⁵¹

The Parents as Scholars (PaS) program of the State of Maine is part of ASPIRE (Maine's Welfare to Work program). Parents as Scholars is available to TANF eligible individuals. Participants must be matriculated in a two- or four-year college seeking to obtain an associate or bachelor degree. Case managers provide assistance to program participants. Support services include cash, child care, transportation, car repairs, auto liability insurance, eye and dental (not covered by Medicaid), books and supplies, clothing and uniforms, tuition and school fees (some instances), occupational expenses, and other services. The PaS program is funded through the State's TANF Maintenance of Effort (MOE).⁵²

Appendix C: Research Design, In Detail

Research Design

We designed a data collection and analysis plan to answer the research questions listed in Section IV. Our design plan included:

Analysis of secondary data, including:

- **HRA data:** We sought to examine information from the Human Resources Administration about the numbers of young people who apply for cash assistance, their education levels and employment experiences before application, their referrals to work requirement programs, the outcomes of those programs, as well as any policy directives within HRA relating to young people, education, and/or training, especially pertaining to individuals without a high school or equivalent diploma.

Collection and analysis of primary data, including:

- **Exploratory focus groups** with young people who had previously applied for cash assistance: These were held to develop research hypotheses and data collection instruments to test those hypotheses;
- **Street surveys** with young people who were in the process of applying or recertifying for cash assistance: To obtain data from a robust and representative sample of young people about their experiences applying for cash assistance; and
- **Follow-up, in-depth interviews** with young people who had applied for cash assistance: To obtain in-depth information to better illustrate the findings of our survey research.

HRA data

We made several attempts to obtain data from HRA, with no success. First, we requested data informally, through contacts within HRA and the state-level Office of Temporary and Disability Assistance (OTDA). These attempts were unsuccessful. We then submitted two separate official requests through the Freedom of Information Act (FOIA), with detailed questions

about how HRA was serving young people between the ages of 16 and 24 who apply for cash assistance. After several delays, HRA finally informed us that they were unable and not required to provide us with the information that we requested, because they do not collect or track data by age. By law, FOIA requests do not need to be filled if the public agency does not already gather the data in question in the format that is being requested, even if it would only require the agency to query its own database in a different way.

Initial focus groups

In order to learn about young people's experiences at HRA Job Centers, we conducted interviews with young people who have applied for cash assistance. Initially, we conducted focus groups with young people in education and/or workforce development programs at community-based organizations. We conducted three focus groups with 14 young people. These youth provided us with in-depth information about their experiences in applying for cash assistance at HRA Job Centers, as well as their subsequent program referrals. Despite collecting substantial data, we became concerned that the organizations we worked with to organize these focus groups may have selected individuals for us who had a particular type of experience when applying for cash assistance. As a result, we developed methods to develop a more representative sample of young people.

Street interviews

Over a period of two months, we conducted brief interviews with dozens of young people who entered and exited HRA Job Centers as they applied for cash benefits. To ensure that we did not speak only to young people who were more likely to provide us with feedback, we offered small cash incentives (\$10) for each survey. As a result, our response rate was extremely high. Most young people applying for cash assistance are in a period of financial crisis and were unlikely to turn down the cash stipend we offered. As a result, we believe that we were able to avoid any type of systematic selection in our interview respondents and we felt confident in the representativeness of our sample.

Appendices

Our interviewers were trained to approach any individuals who might be within our age cohort of interest (18 through 24). (To ensure that respondents were of appropriate age, we quickly asked for their year of birth after asking their age; this filtered out many older individuals who said they were 23 or 24 in the hopes of receiving the cash incentive for the survey.) We only interviewed individuals who were unaccompanied. Some young people may apply for benefits with the help of a family member, friend, or advocate; we wanted to understand the experience of a young person who is not receiving assistance in applying for benefits so as to better judge the HRA process as experienced by young persons who are not overly informed. We also required respondents to provide an email address or phone number to permit follow-up contact if necessary.

We only interviewed individuals applying for non-emergency cash assistance. Where possible, we interviewed individuals who were submitting their first application twice: before they entered the Job Center for the meeting to apply for benefits, and upon exiting the Job Center after meeting with a worker. Respondents who we had met before they entered who were not able to submit their application and have a meeting with a worker (because their application materials were not sufficient) were not included in our sample. We also interviewed individuals who were entering and exiting Job Centers for recertification of their benefits. These individuals were already receiving benefits but were required to attend a meeting at the Job Center in order to maintain their benefits status—many of these youth had already participated in Back to Work.

We conducted a total of 95 street interviews, of which only 77 were included in our final sample. Most of the interviews we discarded were initial conversations with youth that we spoke to before they entered a Job Center, but who were not allowed to submit their application and meet with an HRA worker. In a few other cases, individuals provided inconsistent information that did not appear reliable enough to include in our sample.

Our survey instrument included a range of questions designed to understand the experiences of young adults seeking cash assistance as they interact with HRA. This included questions in the following areas:

- **Demographics and background information:** Age, race/ethnicity, highest level of education, current living situation, whether they were applying for new benefits or to re-certify for benefits they were already receiving.
- **Recent history:** Educational involvement in the past 12 months, employment in the past 12 months, and any program engagement toward these.
- **Personal goals:** We asked each young person about their short- and long-term goals in terms of education and careers.
- **Application experience:** We asked youth how many times they had visited Job Centers to apply for benefits; how long they waited at reception and for interviews; what paperwork they were given from HRA.
- **Interview and assessment experience:** We asked youth specific questions about their meeting with HRA workers to determine their benefits approval and their work requirement. These included close-ended questions, about whether they were asked their educational goals, their career goals, and what program they were referred to for their work requirement. We also asked young people to describe the nature of these conversations: whether they felt the worker tried to find a work requirement that was aligned with the young person's education and/or career goals, as well as how comfortable the worker made the young person feel in those conversations.
- **With those young people who were seeking re-certification and had already participated in a work requirement program,** we asked about their experiences in that program.

For the most part, after an initial wariness, young people were very eager to speak to us about their experiences. As the results of our data collection show, many felt that they did not have a voice in the HRA process and enjoyed the opportunity to speak about themselves and their experiences. Many expressed surprised at the nature of our questions. In addition to queries about their current situation and their short-term goals, we asked young people to voice their long-term hopes and dreams. As our findings show, the HRA process appears to be targeted to a more short-term period in their lives.

Follow-up in-depth interviews

The data gleaned from the street interviews enabled us to develop hypotheses that we hoped to understand at a deeper level. (Street interviews are a brief format survey method lasting, in most cases, between five and ten minutes.) In order to spend more time with a subset of youth who could compare their experiences with HRA to other program experiences, we organized two focus groups at organizations that serve homeless youth—a sub-population with a high likelihood of applying for cash assistance. We asked staff from these organizations to allow us to speak to any youth who had previously applied for cash assistance, and spoke in-depth to nine young people who had done so.

In this document, we have changed the names of survey and interview respondents whose first names are very distinctive, so as to protect their identity and not jeopardize any relationship they might have with HRA in the future.

ENDNOTES

¹ Data for all tables comes from CSS analysis of the 2009 American Community Survey. For other citations of data highlighted in the Executive Summary, please see the comparable references in the main narrative and their associated endnotes.

² We have changed the names of all respondents whose first names are highly distinctive to protect their identities and ensure that any future relationship they may have with HRA is not jeopardized.

³ The Community Service Society Analysis of the 2009 American Community Survey (ACS). According to this analysis, New York City is home to approximately 871,000 persons between the ages of 17 and 24.

⁴ Mark Levitan, “Out of School, Out of Work... Out of Luck?” The Community Service Society, 2005.

⁵ Ibid and Mark Levitan, “Unemployment and Joblessness in New York City, 2006: Recovery Bypasses Youth” The Community Service Society, 2007.

⁶ Michelle Holder, “Unemployment in New York City During the Recession and Early Recovery—Young Black Men Hit the Hardest,” The Community Service Society, 2010.

⁷ Presentation by Paul E. Harrington, Center for Labor Market Studies, Northeastern University, to the New York City Dropout Summit, March 6, 2009. These figures are based on 2005–07 data from the American Community Survey.

⁸ Michelle Holder, “Unemployment in New York City During the Recession.” The Community Service Society, 2010. According to this report, males without high school diplomas also saw a rise in unemployment from just under 11% to just over 14%.

⁹ Edward Glaeser, “How Some Places Fare Better in Hard Times”, *The New York Times*, March 24, 2009.

¹⁰ Andrew Sum, “Leaving Young Workers Behind,” National League of Cities Institute for Youth, Education and Families, 2003. Andrew Sum et al, “Confronting the Youth Demographic Challenge: The Labor Market Prospects of Out of School Youth” Sar Levitan Center, Johns Hopkins University, Baltimore, MD, 2000. Also, Besharov, D.J., and Gardiner, K. “Preventing Youth Disconnectedness”, in Besharov, D.J., editor, *America’s Disconnected Youth: Toward a Preventative Strategy* Washington, DC. CWLA Press, 1999.

¹¹ The New York State Department of Labor Education Calculator publishes the median weekly earnings at each level of education: <http://www.labor.ny.gov/stats/cen/calcl.asp?reg=fin> For greater detail, see: <http://www.labor.ny.gov/stats/PDFs/Why-Go-to-School.pdf>

¹² Nancy Martin and Samuel Halperin, “Whatever It Takes, How Twelve Communities are Reconnecting Out-of-School Youth.” American Youth Policy Forum, Washington DC, March 2006.

¹³ Richard J. Murnane and Frank Levy, “Teaching the New Basic Skills: Principles for Educating Children to Thrive in a Changing Economy,” 1996.

¹⁴ Laura Wyckoff, Siobhan M. Cooney, Danijela Korom Djakovic and Wendy S. McClanahan “Disconnected Young People in New York City” Public/Private Ventures, 2008.

¹⁵ Lazar Treschan and Christine Molnar, “Out of Focus: A Snapshot of Public Funding to Reconnect Youth to Education and Employment” The Community Service Society, 2008.

¹⁶ This report does not deal with other public benefits, such as Medicaid, food assistance, or child care, which are generally exempt from work requirements.

¹⁷ According to federal Temporary Assistance for Needy Families (TANF) law, which covers cash assistance to parents, approved work requirements include: unsubsidized employment; subsidized private employment; subsidized public sector employment; work experience program; on-the-job training; limited job search and job readiness; community service; vocational educational training; job skills training; education directly related to employment for a recipient lacking a high school diploma or equivalent; satisfactory attendance in high school or a GED program for recipients who lack a diploma or equivalent; provision of child care for the children of adults who are doing community service; job search and job readiness beyond six weeks; and educational activities (vocational educational training, high school or equivalent, basic and remedial education, education in English proficiency, up to two years of post-secondary education). The corresponding law for individuals without children (childless individuals are not covered by federal law) is New York State Social Service Law 336-1 (4). State law work requirements vary greatly by age and are discussed in greater depth later in this section and in Appendix A.

¹⁸ Alexa Kasdan and Sondra Youdelman, “Missing the Mark: An Examination of NYC’s Back to Work Program and Its Effectiveness In Meeting Employment Goals for Welfare Recipients,” Community Voices Heard, November 2008.

¹⁹ New York Social Services Law, §335(2)(b) and §336-a; HRA Policy Directive 07-17-EMP.

²⁰ Ibid and NY Social Services Law §336-a(4); Title 18 of the NY Code of Rules and Regulations, §385.9(c)(2). NY SSL 336-a(4).

²¹ Specifically, Title 18 of the New York Code of Rules and Regulations NYCRR, §385.9(c)(2) states: “Except as otherwise provided in this subdivision and as resources permit and pursuant to a local plan prepared in accordance with the requirements of section 385.10 of this Part, a social services official must assign to educational activities an individual who has not attained 20 years of age and who has not obtained a high school diploma or its equivalent.”

²² NY Social Services Law §336-a(4)(a) states: “[Any] participant who is under age eighteen shall be required to attend educational activities designed to prepare the individual for a high school degree or equivalency certificate.

²³ Johannes M. Bos, Susan Scrivener, Jason Snipes, and Gayle Hamilton, “Improving Basic Skills: The Effects of Adult Education in Welfare-to-Work Programs.” MDRC, March 2002.

²⁴ Ibid.

²⁵ Bich Ha Pham and Jill Poklemba, “The State of New York’s Social Safety Net for Today’s Hard Times, Federation of Protestant Welfare Agencies, 2009.

²⁶ It should be noted that states and localities are permitted to use TANF funds on higher education expenditures.

²⁷ Elizabeth Lower-Basch, “Education and Training for TANF Recipients: Opportunities and Challenges under the Final Rule”, Center for Law and Social Policy, 2008.

²⁸ The Community Service Society, Benefits Plus Manual, Cash Assistance: Right to Educational and Training Activities.

²⁹ There is currently no dataset that provides a completely accurate assessment of skills levels, but support for this estimation comes from various sources, including: the New York City Department of Education’s Office of Multiple Pathways to Graduation, “Summary Findings of Research and Development Work on Overage Under-Credited Youth in New York City,” October 25, 2006 (this report notes that most students who leave high school are more than two years behind in the literacy and math skills); and statistics from the NYC Mayor’s Office of Adult Literacy (which show that only seven percent of the 70,000 people enrolled in adult education courses in New York are at the GED preparation level; the other 93 percent are in Adult Basic Education or English as a Second or Other Language classes).

³⁰ Presentation by Paul E. Harrington, Center for Labor Market Studies, Northeastern University, to the New York City Dropout Summit, March 6, 2009.

³¹ Letter from Paul Ligresti, Associate General Counsel, Human Resources Administration, June 17, 2010. The full text of the letter is as follows: “I write in response to your FOIL [Freedom of Information Act Law] request and recipients dated April 15, 2010 in which you seek detailed information regarding applicants of Family Assistance and Safety Net Assistance under the age of 24 years. Please be advised that after a diligent search there are no responsive materials. According to our records, HRA does not track data based on age.”

³² We found our 23 respondents for our initial focus groups and additional in-depth interviews by asking youth-serving organizations that provide education, employment, and/or housing services to identify young people in their programs who had applied for cash assistance within the past year, regardless of the outcome of their applications.

³³ Some respondents were referred to other activities for their work requirement, including WeCare, a program for individuals with disabilities. In some cases, we were unable to establish what the referral was due to a lack of paperwork or the respondent’s uncertainty about their situation.

³⁴ If a youth responded with “go back to school,” or “get a good job” we asked them to be more specific.

³⁵ Interview with Elizabeth Garcia, February 8, 2011.

³⁶ Title 18 of the New York Code of Rules and Regulations, §385.9(c) (4), states that the social service district is shall assign individuals 18 and 19 years of age to activities other than education and vocational training activities if such official makes a determination, based upon an assessment and employability plan that educational and vocational educational activities are not appropriate or if such individual has failed to make satisfactory progress in educational activities.

³⁷ Title 18 of the NY Code of Rules and Regulations, Section 350.3(a)

³⁸ It is difficult to adequately judge the per-participant costs of Back to Work, but HRA provides contractors with approximately \$3,700 per person. The per-participant costs of our recommendations range from \$3,000 to \$5,500 per participant.

³⁹ New York Social Services Law §335(1) states that “Each social services official shall ensure that each recipient of public assistance who is a member of a household with dependent children and is eighteen years of age or older, or who is sixteen or seventeen years of age and is not attending secondary school and has not completed high school or a high school equivalency program, receives an assessment of employability based on his or her educational level, including literacy and English language proficiency, basic skills proficiency, child care and other supportive services needs; and skills, prior work experience, training and vocational interests.” §335-a provides for individuals *without* dependent children to receive assessments.

⁴⁰ Lacinda Hummel and Jodie Levin-Epstein, “A Needed Transition: Lessons from Illinois about Teen Parent TANF Rules 7”, Center for Law and Social Policy, 2005.

⁴¹ Manuel Gutierrez, et al, “Evaluation of New York City’s Learning to Work Initiative for Over-Age and Under-Credited High School Youth: Student Outcomes (2005–2008).” Metis Associates, 2010.

⁴² “Evaluation of the Young Adult Internship Program (YAIP): Analysis of Existing Participant Data.” WESTAT and Metis Associates, 2009.

⁴³ New York State Social Services Law §345

⁴⁴ New York State Temporary Assistance Source Book (Section 9-2)

⁴⁵ Title 18 of the New York Code of Rules and Regulations, §369.2(i)

⁴⁶ Title 42 of the United States Code, §408(a)(4); Title 18 of the New York Code of Rules and Regulations, §351.2(k)

⁴⁷ In New York State, there is no special procedure for a minor to “become” emancipated. Emancipation is determined by the facts in an individual case. Typically, a minor is emancipated if he or she is (a) married; (b) in the armed services; (c) has established a home and is economically independent; or (d) has parents who have failed to provide parental support and the minor seeks emancipation (including the case of homeless youth). If the minor wishes to continue the parent-child relationship and receive support, s/he may do so at any time. 18 N.Y.C.R.R. § 349.5(a)

⁴⁸ The JOBS Program Policy Manual: Employment and Self-Sufficiency Services <http://afsmanuals.hr.state.or.us/EligManual/03-TOC.htm>

⁴⁹ The California Work Opportunity and Responsibility to Kids (CalWORKs) <http://www.ladpss.org/dpss/calworks/default.cfm>

⁵⁰ CLASP, TANF Education and Training: The Arkansas Career Pathway (2010) <http://www.clasp.org/admin/site/publications/files/Arkansas-Career-Pathways.pdf>

⁵¹ CLASP, TANF Education and Training: Kentucky’s Ready to Work Program (2010) <http://www.clasp.org/admin/site/publications/files/RTW.pdf>

⁵² Josh Bone, “TANF Education and Training: Maine’s Parents as Scholars Program” CLASP, July 2010.

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