



Human Resources
Administration
Department of
Social Services

TESTIMONY

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

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

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

September 22, 2011

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

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

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

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

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

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

Intro 648

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

Intro 649

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

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

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

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

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

Intro 657

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

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

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

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

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

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

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

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

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

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

Conclusion

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

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

Lazar Treschan
Director of Youth Policy
Community Service Society of New York

Testimony to the Committee on General Welfare
of the Council of the City of New York
September 22, 2011

Issue: Int. No. 648 - In relation to requiring the Human Resources Administration to prominently display all information relating to youths and young adults who apply for public assistance on the agency's website.

Int. No. 649 - In relation to requiring the Human Resources Administration to create a youth and young adult applicant plan.

Int. No. 657 - In relation to collecting and reporting data related to youth and young adult access to public assistance.

Recommendation: Pass these bills and ensure that HRA provides appropriate services to youth and young adults seeking public assistance.

Thank you for the opportunity to speak with you today on the important role of public assistance for young adults. My name is Lazar Treschan and I am the Director of Youth Policy for The Community Service Society of New York (CSS), an organization that is a strong believer in the role of public benefits to support New Yorkers who are trying to get ahead.

Exactly three months ago, I testified before this committee about a report that I had recently written about the plight of young people who apply for public assistance in New York City. That report showed how many young people receive inappropriate services that certainly counter the spirit, and in some cases the letter, of the law, and what's worse, was a clear example of poor public policy. Rather than using the system of public assistance as a way to reconnect young adults, especially those with the greatest barriers to success, our City is pushing them away, by wrongly denying them benefits, or

when they do get benefits, wrongly informing them of their options, and for the most part, placing them into services that do not help them get back on a track to a successful livelihood.

I am honored to sit here just three months later to talk about the proposals that the City Council has generated to help solve this issue. It is affirming to know that our City's legislative leaders have taken such a forceful approach, and I am excited in the knowledge that thousands of young people will benefit from the changes that the Council has proposed.

In our report, we made several recommendations. These included providing better information to young people, so that they can receive the benefits for which they are eligible, and upon receiving those, have the full knowledge of the options available to them to complete their work requirement. In particular, we stressed the importance of education, especially for young people, and especially for those without a high school diploma. Attempts to connect individuals to the labor market without a high school diploma or GED are meaningless and cynical in an age where a job at McDonald's now requires a high school or GED diploma.

We must encourage HRA to understand this. In their testimony and communications with us, HRA has claimed that it allows participation in education for individuals under the age of 20 who do not have a high school diploma. Our interviews with young people and the Council's inquiry of HRA processes proved that this is not the case. HRA is not even following its own directives.

But we must go further. HRA must recognize that young people ages 20 through 24 who do not have a diploma deserve the same opportunities. Putting them in a job

placement program and into a dead-end job will lead them nowhere – except back to reliance on public benefits, or worse. Mayor Bloomberg’s Young Men’s Initiative has loudly articulated the importance of the 16-24 year old age group as the key developmental period in which to ensure that young people get the skills they need to transition to adulthood. Indeed, a report released just this month from the Annie E. Casey Foundation entitled “The Adolescent Brain” provides scientific evidence confirming that the brain continues to develop up to age 25, underlining the importance of positive youth development settings for older youth who have yet to develop strong competencies associated with the responsibilities of adulthood. But HRA continues to resist, by treating young adults with the greatest challenges to healthy development – poverty and disconnection – the same way as older adults.

In our report, we found that HRA is missing an important opportunity to reconnect young people without a high school diploma with GED and other programs that could help them advance. Some youth are denied the chance to apply for benefits. A large percentage of youth who do receive benefits are placed in the adult-oriented, one-size-fits-all Back to Work program (BTW). Most youth do not succeed in building skills or finding work through BTW, and the majority drop out of the program, sacrificing their benefits, and becoming further alienated from school and work.

New York City should be doing everything it can to make sure that low-income disconnected youth are given the assistance they need at this critical point in their lives to set them on a track to productive work rather than derailed into a life of joblessness and poverty. This means making it easy for them to obtain temporary cash assistance and other benefits that will keep them afloat. Our public benefits system should be

incentivizing basic skills preparation programs, especially those that lead to the attainment of a credential such as the GED. The US government recognizes this, and counts any activity toward GED attainment as a suitable experience toward fulfilling welfare work requirements. New York State's Office of Temporary and Disability Assistance has issued guidelines that individuals without high school diplomas, especially young people, should be in education programs.

The three bills that have been introduced by the City Council have the potential to right many current wrongs. We need better information about HRA's services to young people. We need HRA to make sure that young people are given proper information about their eligibility and programmatic options. And we need HRA to realize that youth and young adults require plans that are unique to their age and stages of educational and vocational development. But we also need to encourage HRA to let go of its resistance to federal and state guidance and to the well-established consensus that youth and young adults will not succeed without a basic education. A work-first policy that ignores whether or not they have basic skills and certification is doomed to failure. I urge the Council to pass these bills, and to continue working with the agency to disabuse it of its current attitudes and practices that keep so many young people in the cycle of poverty.

CSS looks forward to working with the Council and Administration to reform how New York City serves youth on PA, so we do not miss these clear opportunities to reconnect them to successful livelihoods. Thank you for the opportunity to testify.



Resilience Advocacy Project

New York City Council Committee on General Welfare Hearing Concerning

Bill Nos. 648, 649, and 657

September 22, 2011

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INTRODUCTION

Good morning. My name is Brooke Richie. I am the Executive Director of the Resilience Advocacy Project (RAP), a child and advocacy non-profit in New York City. I would like to thank Chairwoman Palma and the members of the General Welfare Committee for the opportunity to testify today and we join our colleagues in commending you for your leadership around these critical issues impacting tens of thousands of low-income youth and young adults in New York City.

The Resilience Advocacy Project (RAP) is a child and youth advocacy non-profit providing legal assistance, rights-education and advocacy training to low-income young people throughout New York City. Each year, we ensure that hundreds of low-income youth from the city's most vulnerable communities are able to access the educational, economic, medical, and emotional resources they need to make a healthy transition into adulthood and out of poverty. We also impact thousands more children and young people through our system-level outreach, research, and advocacy, as well as through our capacity building work with policy makers, CBOs, child care providers, youth service providers, educators, and health care providers throughout the State.

My testimony today will be brief. Let me start by saying how excited I am that this committee has taken such leadership around the issue of barriers to benefits and barriers to education for youth within the cash assistance system. As I have testified before, the fact that New York's young people are facing the highest rates of unemployment and homelessness in over half a century only underscores a deeper point¹: The low-income young people who turn to the welfare system for help are truly in crisis. These are, by and large, young people who have limited family resources or community connections to rely upon, and they are seeking assistance because they have no where else to turn. These youth tend to fall into certain populations: homeless youth, youth leaving foster care, teen parents, and youth who are disconnected from school and the workforce. The role of the cash assistance system as a safety net is particularly critical for these populations of young people.

I applaud the Council for continuing to illuminate the issues impacting these vulnerable youth and I want to emphasize that my office, along with many advocacy organizations in the City, very much look forward to working with the members of this committee on these bills moving

¹ According to unpublished data from the New York Labor Department, youth unemployment reached 36.2% in 2009 - the highest that it has been since World War II.

forward. These bills provide a solid structure, and my office is available as a resource as both the substance and implementation strategies for these bills are further developed.

I will briefly discuss each bill, along with some specific thoughts and recommendations.

BILL NO. 657

In previous testimony before this body, I have noted the critical importance of data in holding HRA accountable to the youth that it serves. I am extremely happy that Bill No. 657 seeks to address HRA's appalling lack of information tracking or outcomes assessment for young people receiving cash assistance.

HRA has repeatedly indicated that they do not track applications, assignments, or outcomes by age. This lack of data transparency makes it impossible to evaluate whether or not HRA is fulfilling its mission of providing assistance that helps recipients obtain employment and become self-sufficient. There is simply no way to know what is happening to young people once they walk through the front door of a Job Center.

Additionally, through our work with youth, we continually hear about the nightmare that is HRA. Yet, as advocates we are unable to anything more than provide a stopgap solution, such as escort a young person back into a center and help them obtain an application. Because of the lack of data about what is working and what is not working vis a vis young people, the thousands of young people who do not find their way to an advocate are left without support or assistance.

Bill 657 takes a huge step in the right direction. I am especially happy to see that the bill includes young adults through the age of 24 in its focus, that it seeks to track critical educational and employment outcomes, and that it highlights information about preferences and outcomes. I am also happy to see that it calls for the collection of hard-to-find information, in particular, information about young people's previous work experience, previous wages, and any connections between employment and educational engagement.

Much of this information of should be collected as part of the application and employment assessment process. For example, the application contains questions concerning date of birth, gender, race and home address, which would seem to make it easy to simply organize and sort applications according to answers to these questions in order to collect information about age, gender, etc. In addition, as part of the assessment process, HRA workers are supposed to ask applicants about their educational and work experiences and preferences. Again, because HRA already collects this information, it is not clear why requiring the agency to organize, sort and report on *already existing information* should pose a problem.

I have three specific suggestions:

- (1) Continue to work closely with advocates and community organizations to clarify agency and data terminology (e.g., "successful youth applicant" could simply be "youth recipient"), identify critical areas in which information is needed (e.g., information about adolescent and young fathers), and to clarify desired data categories. For example, consider disaggregating data by race, gender and borough. Information organized into these categories will help illuminate patterns, such as for example, among young black and latino men, or among teen mothers and teen fathers.
- (2) Call for the identification and tracking of milestone outcome through the BTW vendors. HRA's recent changes to its flagship employment program, Back to Work, fail to identify any meaningful educational outcomes at all, much less for young people who go through the program.

- (3) Work closely with advocates to ensure that the data collected is organized and presented in a way that is comprehensible and that can actually be used to assess youth and young adult outcomes. For example, HRA could use its existing Center Stat or Job Stat reports as a model for a Youth Stat document that clearly lays out data and outcomes. Another possibility could be the creation of a dashboard that designates desired outcomes and tracks data against those outcomes.

BILL NO. 649

The power of this bill is that it requires HRA to gather into a single place, all of the laws, policies, manuals, and training materials pertaining to the agency's treatment of youth and young adults. This would be a major step in the right direction. In previous testimony, I have recommended increased oversight of HRA's compliance with Federal and State laws concerning the rights of minors within the welfare system. In order to ensure compliance with the law, and hold the agency accountable, we must understand not just what laws and policies say about the rights of young people, but also - and especially - the internal processes and procedures being used to implement those laws. This means that HRA must share not only the statutes, regulations and policies that it claims to be following, but also the documents, forms and procedures that it uses to comply. This bill begins to establish the framework for this type of accountability.

I am particularly happy to see the designation of a youth liaison identified as a focus of the legislation. A dedicated youth liaison position within a Job Center could help young applicants and recipients understand their rights, understand the application process, and ensure their access to their educational and employment preferences.

I am also happy to see the designation of "youth-specific assessment tools" that HRA uses during the intake, application, and assessment portions of application process. This will be particularly important given HRA's plan to make Back To Work vendors responsible for conducting assessments of the educational needs and priorities of young people who apply for assistance. The development of specialized assessment protocols for young people under the age of 21 will help to ensure that the assessment of the educational and job training needs of young people are developmentally appropriate and will hold vendors and Job Center workers accountable to those protocols.

As with the other two bills, the devil is in the details. For example, the Domestic Violence Liaison position in the Job Centers provides an excellent case study for potential strengths and pitfalls of this model. It will be important to add greater flesh to this element of the bill, including specifying the specific goals, tasks and structure of the liaison position. With respect to the youth assessment, it will be important to clarify essential elements of such an assessment in order to ensure that it has the desired impact on young people's application experience. I would welcome the opportunity to work with the Council you work to flesh out these elements of the bill. RAP has conducted thorough research concerning best practices in many of these areas, and could provide research, and information about best practices, and insights into potential challenges.

BILL NO. 648

There is currently no HRA-sponsored website that provides youth-friendly information about eligibility for benefits, about the application process, or about accessing education. The teen-focused website that HRA does maintain, TeenLink, provides sexual health-related information only, rather than information about benefits. As a result, young people trying to learn about and understand how to navigate the cash assistance system have no where to go unless they are able to find an advocate. Not only is requiring young people to find an advocate for every question or piece of information extremely cost-inefficient, it creates a really barrier to access. Young people simply

cannot always find the adult assistance that they need to guide them through every stage of the eligibility and application process - they are isolated by geography, mobility, and knowledge of how to find an advocate with expertise in this areas.

Which leads to the second gap in information. There are simply not enough advocates with expertise in this area to meet the needs of every young person who has a question or needs help. Young people interact with advocates in other fields, as well as social service providers, teachers, doctors, and a myriad other adults everyday. There is no centralized online location where these adults can find all of the laws, policies and documents that can help them understand the systems and assist their youth.

Although my office - and a number of others - maintains a resource guide containing basic legal rights information, resources and tools for advocates, it is difficult to maintain the most up-to-date references or materials. In addition, we are unable to reach as many people as an agency-sponsored website could were it to contain this same information. By placing the onus on HRA to compile and share benefits information about youth and young people, we again hold them accountable to this population.

I have the following recommendations for the development of this website and I look forward working with the Council to identify critical website goals, content, and structure. Specifically:

- (1) Provide basic information about young people's legal rights concerning eligibility, enrollment, and due process in youth-friendly language, and organized in a way that is accessible to young people. Include youth-friendly brochures or other documents that clearly articulate young people's rights. Many advocacy organizations, such as RAP and the The Door, have developed easy-to-read documents that could easily be compiled and made available through the website;
- (2) Provide information about how to access educational opportunities, including a youth-friendly overview of basic legal rights, as well as access to HRA's Master List of approved programs, and a clear description of application and enrollment processes. For example, HRA is supposed to have a specific system in place that allows individuals who are enrolled in a non-approved educational program to seek approval for that program. Explaining this rule, describing the process, and making the relevant forms available online may make it easier for young people who are enrolled in a program when they apply to remain in those programs;
- (3) Explore youth-friendly web technology that can facilitate the process of determining eligibility or applying for benefits. For example, linking the website to Access NYC could provide young people with the information they need to kickstart the application process; and
- (4) Designate a section of the website for advocates and other individuals who work with low-income youth. In addition to providing relevant State statutes and regulations, and OTDA and HRA policy documents, this section should also contain actual forms (e.g., Fair Hearing documents, applications and instructions), as well as links to adult versions of advocacy resources and tools (e.g., informational brochures, model advocacy letters).

CONCLUSION

The Resilience Advocacy Project thanks you again for taking the lead on these important pieces of legislation, for holding this hearing, and for the opportunity to testify. We look forward to continuing to work with you on these bills, and to pass legislation that will begin to hold HRA accountable to youth.



Testimony of

Louise Feld
Policy Associate for Food and Economic Security
Citizens' Committee for Children

Before the
New York City Council
General Welfare Committee

Hearing on Int. 0648-2011, Int. 0649-2011, and Int. 0657-2011

September 22, 2011

Good morning. My name is Louise Feld and I am the Policy Associate for Food and Economic Security at Citizens' Committee for Children of New York (CCC). CCC is a 68-year-old independent, multi-issue child advocacy organization dedicated to ensuring that every New York child is healthy, housed, educated and safe. I would like to thank Chair Palma, as well as the members of the General Welfare Committee, for holding today's hearing.

New York City has an obligation to serve and support its many youth and young adults who are economically insecure. According to the U.S. Bureau of Census's 2009 American Community Survey, a quarter of all New York City young people between the ages of 16 and 24 – over 200,000 youth and young adults – live at the federal poverty level. A substantial number of these youth are unemployed and/or without educational credentials, and therefore lack the financial means to support themselves if necessary. Often, these young people do not have family or community support systems. Obstacles to accessing public assistance can therefore have disastrous consequences for these youth and young adults, preventing them from pursuing an education, achieving financial stability, and ultimately breaking the cycle of poverty.

The amendments to the New York City Administrative Code proposed in Int. 0648-2011, Int. 0649-2011, and Int. 0657-2011, will help the City assist young people so vulnerable that they must turn to the Human Resources Administration (HRA) for cash assistance. CCC therefore supports these amendments, and offers recommendations to further strengthen them.

Int. No. 648 – to amend the administrative code to require HRA to prominently display all information relating to youth and young adults who apply for public assistance on the Agency's website

Youth and young adults applying for public assistance need a clear and accessible means by which to determine their benefit eligibility, such as the plain-language information proposed to be posted on the HRA website. Young people seeking public assistance are doing so because they are in crisis, and therefore need a means by which they can more easily and efficiently determine where they can turn for help and to what they are entitled. These young people also need information about their rights and available benefits to be presented in easy-to-understand language, as many youth applicants for public assistance are not high school graduates or GED recipients, and thus may lack the literacy skills needed to fully comprehend the often intricate and advanced legal language of relevant application forms and information.

CCC recommends that in addition to the web-based posting proposed in Int. No. 649, this plain-language material should be made available in hard copy at all Job Centers and HRA offices that work with young people, as many low-income youth do not have consistent internet access. CCC also suggests that these materials be provided in languages besides English, both on the internet and in hard copy.

Int. No. 649 – to amend the administrative code to require HRA to create a Youth and Young Adult Applicant Plan

Financially insecure and in a critical transition period, youth and young adults seeking public assistance have unique needs. For example, many youth applicants for public assistance may still be attempting to graduate high school and/or find their first jobs, or may be exiting the foster care system. Further, Job Center and other HRA staff may be unaware of both the rights and needs of this particular population, or of the best ways to approach and engage at-risk youth. CCC therefore supports Int. No. 649, because it requires the creation of a Youth and Young Adult Applicant Plan that prepares HRA staff to recognize and address the particular challenges and concerns of financially insecure young people; creates opportunities to more appropriately and sensitively assess and meet young peoples' needs – including through provisions for educational, vocational, and employment programming; and attempts to ensure that HRA staff and the young people whom they serve are informed about young people's rights and options. In short, the Youth and Young Adult Applicant Plan will help HRA direct disconnected youth to an array of opportunities that will truly help place them on track to self-sufficiency.

CCC asks that this directive provide HRA with enough flexibility to create the much-needed Youth and Young Adult Applicant Plan in a manner that can actually be implemented. HRA, with input and assistance from experts in the field, should be given the opportunity to assess the staffing, capacity, and other resources it needs to best establish and implement a plan to help youth and young adults. If this instruction to HRA is tailored too narrowly it may actually constrict HRA's ability to fully meet the needs of this most vulnerable population.

Int. No. 657 – to amend the administrative code to collect and report data related to youth and young adult access to public assistance

Understanding the serious needs of financially unstable young people, and ultimately serving this population properly, requires data. Information about the how many young people ask for and receive cash assistance, whether they request educational rather than employment programs (or vice versa), and in which programs HRA actually engages them is invaluable. This data can help determine the magnitude of the existing youth and young adult applicant need, as well as whether HRA is meeting that need in the most appropriate manner. CCC therefore supports measures that require the collection of youth data and its publication.

Much of the data requested in Int. No. 657 does not place too onerous a burden on HRA. As demonstrated in the 2011 Mayor's Management Report, the Agency already tracks a great deal of the information sought, such as how many cash assistance recipients are engaged in training, educational, or employment programs, and how many cash assistance recipients have retained employment income after 180 days in a job placement. HRA may be able to find out specific information about youth and young adults from this larger data set without having to figure out how to track completely new data or create a new data collection system.

CCC does caution, however, that the collection of a small portion of the data that Int. No. 657 requests may be complicated, or not feasible. For example, sharing of information about minors under 18 years of age will require not only the consent of the minor, but also the consent of the minor's parent or guardian, which may be difficult to garner. Also, HRA may not have any way to gather information about 6-month employment outcomes of youth and young adult applicants who were deemed ineligible to receive public assistance because those young people, having been denied assistance, are no longer in contact with the Agency. CCC therefore recommends approaches to data collection about this population that consider the utilization of the data that HRA already collect, and the development of a smaller cohort of youth applicants that can be tracked and studied on a long-term basis.

In sum, HRA is uniquely positioned to help young people access cash assistance, and also to gain and build the education and employment skills they need to support themselves as they transition into adulthood. Enacting the amendments proposed in Int. 0648, Int. 0649, and Int. 0657 in a manner conducive to HRA's successful implementation of these vital initiatives will help enable New York City to address and confront the sobering number of young people who are entering adulthood on frighteningly unstable financial footing.

Public Hearing Testimony
Committee on General Welfare on Intro Nos. 648, 649, 657

Thursday, September 22, 2011 at 10:00 a.m.

Submitted by: Roxanna Henry, Legal Advocacy Coordinator
Welfare Rights Initiative
Hunter College 695 Park Avenue, room TH207
NY NY 10065
212-772-4041 www.wri-ny.org

Good day, I am Roxanna Henry, the Legal Advocate for Welfare Rights Initiative (WRI). I am also a senior and this fall is my last semester at Hunter College. On behalf of the staff and student leaders at Welfare Rights Initiative, we are pleased to be here and help the committee make real socially constructive changes to improve the lives of low-income youth and their families and we thank the committee for this hearing. As quick background, WRI is a grassroots, student activist and community leadership training organization located at Hunter College. WRI trains and supports students who have firsthand experience of poverty to effectively promote access to higher education. Since its inception 15 years ago, WRI has assisted over 4000 CUNY students receiving public assistance to continue their pursuit of education and graduate from college.

As a mother receiving public assistance it is extremely hard to try to live on a small budget; it is nearly impossible. For a household of two, the federal poverty level is \$14,710 per year. As a student with a child my public assistance benefits are a little over \$300 per month.

I was employed for 10 years, and like many New Yorker's working in mid-entry level jobs, my position did not offer health insurance or a livable wage salary. I found myself in a health crisis and I applied for public assistance only when my situation became critical. I realized the only way to make sure that I would never find myself in that type of situation again would be to obtain skills and credentials for a livable wage job with benefits. I knew that the only sure way to move myself and my family out of poverty was through obtaining a college education. I am grateful for this city's commitment to higher education and CUNY and there is much room for improvement. Intros 648, 649 and 657 are a start.

WRI has many young students on their parent's budgets or on their own, foster care youth as well who are being told college is not for them. HRA very often notifies them shortly after graduating high school or when turning 18 that they would have to participate in a mandatory 35-hr work week and that FWS (Federal Work Study) and Internships could not count towards that requirement. This is not correct.

Students report being hindered by HRA appointments and work requirements because they have classes, internships and often work study. For senior college students, HRA workers have said they would have to do WEP (Work Experience Program) because 4-year college class hours do not count. The NYS Work Study and Internship Law states that Work Study and Internships/Externships count towards the 35-hr work week requirement no matter if

you are in 2 or 4 year college or other education or training program; and even if your class hours do not count for participation rate, HRA must make a reasonable effort to accommodate your schedule. Student's find that center workers are not informed and students are often given wrong information.

WRI has learned that welfare policies not only affect caregivers or the heads of the household, but they affect the children as well. One WRI student puts it this way, "Since the moment I turned 18, the HRA-call in process has placed so many obstacles in my way to prevent me from going to college. Pursuing a college degree is the only way I can improve my financial situation and it is the only way I can accomplish my goals. Expanding access to benefits for young adults is an excellent idea; however they will still have to choose between their benefits and higher education, as I did."

Intros 648, 649 and 657 can help with the need for current and more accurate information to youth but implementation is key. Even with good law on the books working to build a commitment from the city agencies to deliver our promise to our young people is essential. A slight cause for concern regarding Intros 648, 649 and 657 is in the language that specifies the age groups. For example, Intro 648 states that a young adult can be any person between and including the ages of twenty and twenty-four year old who are applying for public assistances. A youth applicant is a person between and including the ages of sixteen and nineteen. The language that states **between** and **including** of certain ages must be very specific or we will see individuals between the ages of nineteen and twenty fall through the gaps and not be able to connect to the services they need.

From seventeen years of mind-numbing policy experience, WRI has come to see that policy-making processes must include people with first-hand experience of welfare in addition to other stakeholders to build saliency for the issues we are here to discuss. WRI believes dialogue as a process can be designed to develop meaningful policy changes and emerge a shared vision for policy by the dialogue participants: policy-makers, children aging out of foster care and in need of welfare, homeless youth (including gay, lesbian and bi-sexual), state legislators, agency officials, religious leaders, advocates, educators, service providers, philanthropists and people from the community as well as those individuals with firsthand experience of policy impact. We are convinced that dialogue with a mix of stakeholders is key to the opening of minds and hearts to a mutually beneficial policy, which we define as an expansive vision for the future.

I know the value and importance of youth accessing life-saving benefits and connecting to education and training, including a college education and there are others in this room that do as well. All of us can work together for the greater vision of a more equitable NYC. WRI students, staff and alums stand ready to work with the committee to initiate meaningful policy dialogues on the many intersecting federal, state and city policies that impact families like mine.

Thank you.



Testimony of the Legal Aid Society

**Hearing on Int. No.'s 648, 649 and 657
Relating to the New York City Human Resources Administration and
Youth and Young Adult Applicants and Recipients of Public Assistance**

September 22, 2011

Prepared by
The Legal Aid Society
Civil Practice
Juvenile Rights Practice
199 Water Street
New York, NY 10038

Prepared by:
Kimberly Forte, Supervising Attorney, LGBT Law and Policy Unit
Kathleen Kelleher, Staff Attorney, Civil Practice, Law Reform Unit
Susan Welber, Staff Attorney, Civil Practice, Law Reform Unit

Introduction

The Legal Aid Society is pleased to have the opportunity to testify before the New York City Council's General Welfare Committee on the important issue of barriers faced by youth and young adults seeking access to public assistance. We appreciate the Council's leadership in requiring purposeful action by the City's Human Resources Administration (HRA) to adopt better practices relating to providing assistance to youth and young adults.

The Legal Aid Society is the nation's oldest and largest non-profit law firm dedicated to serving low-income families and individuals.

The Society's Juvenile Rights Practice (JRP) provides comprehensive representation as attorneys for children who appear before the New York City Family Court in abuse, neglect, juvenile delinquency, and other proceedings affecting children's rights and welfare in every borough of the City. Last year, JRP staff represented some 34,000 children. JRP's perspective on issues raised in this testimony comes from daily contacts with children and their families and frequent interactions with the courts, social service providers, and State and City agencies. In addition to representing many thousands of children, youth and adults each year in trial and appellate courts, JRP also pursues impact litigation and other law reform initiatives on behalf of our clients.

The Legal Aid Society's Civil Practice has offices in every borough of the City, and worked on more than 43,000 individual legal matters last year winning over 90 percent of the cases that go to court or an administrative hearing. An additional two million individuals benefit from the Civil Practice's pending class action litigation. The Civil Practice works to improve the lives of needy New Yorkers by helping vulnerable families and individuals on issues ranging from health care, housing, homelessness prevention, employment law, education, foreclosure prevention, consumer law, community economic development, public assistance, immigration, family law and domestic violence and disability-related issues.

Through the Society's Public Benefits practice, we represent a large number of clients who are forced to rely upon public assistance to get through difficult times that are often caused by change of circumstances such as unemployment, disabling medical and mental health conditions, domestic violence, homelessness or even the need for child care. Our clients usually have two goals when they seek out public assistance. In the short-term, they seek to obtain and maintain subsistence income so they can keep a roof over their heads or end a period of homelessness and feed their children. In the long-term, they seek a path to a more stable income, whether through acquiring skills and education that will facilitate employment, finding paid employment directly or obtaining a more adequate level of public benefits they may qualify for such as Social Security.

Recommendations

We are pleased to see the Introduction of Bills 648, 649, and 657, and we look forward to working with City Council members and staff on refining the bill language so that the final result will be even more useful to the Council, advocates and young people themselves. For example, Intro 657 could contain a request designed to extract information that would illustrate HRA's

existing capacity to give credit to youth and young adult applicants already participating in qualifying education and training programs without unnecessarily requiring them to attend additional HRA appointments. This would be of great service to youth and young adults because these unnecessary HRA appointments often conflict with school and force young people to choose between subsistence and education.

We also believe that the Youth and Young Adult Applicant Plan called for by Intro 649 would be even better if other City agencies that serve young people were required to contribute to such a plan and if advocates were also involved in the process.

Additionally, as we indicated in our previous testimony regarding these issue, the Society feels strongly that NYC's Administration for Children's Services (ACS) should partner with HRA in the effort to provide better access to public assistance to youth and young adult constituents, and any proposed legislation should include requirements that apply to ACS. For example, Bill 648 which would require HRA to prominently display information for youth and young adults on its website, could also require ACS to display the same information on its website and in its offices, especially in light of the high numbers of youth formerly in foster care who depend on public assistance to survive.

Finally, in addition to the proposed requirements Bills 648, 649 and 657 create, we ask that the Council consider the recommendations from our previous testimony when developing its final proposed legislation:

1. The Council can require HRA to issue a comprehensive policy directive dedicated to eligibility and other rules applying to teens and young adults and require HRA to train and monitor its staff on these rules. Advocates have long requested that HRA issue such a policy, and the agency has yet to do so. Such a policy would clarify the rules for workers and hopefully lead to more accurate information being provided to teens/young adults. Advocates could also use the policy to point HRA workers to their own rules in support of client advocacy efforts. This directive should clearly lay out the options available to teens/young adults when they reach 18 and are no longer required to be a part of the family's public assistance household. HRA should also be encouraged to develop a one page information sheet, written in basic English and available in other languages, that can be distributed to teens/young adults and their families.
2. Regarding youth in foster care who cannot open a case prior to their discharge from care, the Council can require HRA to change the criteria for issuing a presumptive eligibility letter. The criteria should be that if a youth in ACS's care is applying for housing during the requisite period between ages 18 and 21 and that youth has no source of income at the time NYCHA requires proof of income, she will receive a presumptive PA eligibility letter. HRA may argue that this encourages a youth to use PA as default income and to not seek employment. However, ACS is responsible for assisting a youth to find employment and should be doing so until a youth turns 21 years of age. In our experience, the majority of our clients very much want to obtain jobs and be self-sufficient, but are often

unable to do so despite their best efforts.

3. The Council can require HRA to closely examine its call-in policies for teens and report to the Council with a complete list of all appointments to which youths between the ages of 16-21 may be called in during school hours. Where school attendance verification has not otherwise been obtained and is needed to determine whether the teen is exempt from work requirements, teens/young adults should have the option of either signing a release allowing HRA to seek school public school enrollment information from the Department of Education directly or coming in for appointments at HRA Job Centers. When teens and young adults choose to be interviewed in person, HRA should designate special after-school hours appointment times, so teens and young adults do not needlessly miss school. The Council can require HRA to cease calling in teens and young adults whose school attendance is already verified and are therefore exempt from work requirements for unnecessary work-related appointments.
4. The Council can require HRA to revise the call-in notices sent to 18 year olds being called in for finger imaging to say explicitly that such appointments are not mandatory.
5. HRA can be required to include language in its mandatory appointment notices informing teens/young adults and their parents that they have the option of bringing a parent or guardian to their appointment. The Council can also require HRA to include the rules on bringing a parent to the appointment.

Conclusion

We at The Legal Aid Society remain available to answer any questions the Committee may have about the barriers teens and young adults seeking public assistance face. Thank you for this opportunity to present this information based on the experience of our clients.

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New York City Council
Committee on General Welfare
Annabel Palma, Committee Chair

September 22, 2011
10:00 AM

Testimony Of
Michael Williams, Senior Staff Attorney
The Door's Legal Services Center

Good morning. I am Michael Williams, the Senior Staff Attorney at The Door's Legal Services Center. The Door is a nonprofit organization established in 1972 to serve the needs of young people between the ages of 12 and 21 years old. Last year The Door served approximately 11,000 young people, primarily residents of New York City. Door members come to The Door seeking services in the areas of education, career services and work readiness, mental health counseling, legal services, food and nutrition, recreation and arts programming and primary health care.

I have been a staff attorney in The Legal Services Center at The Door since 1998. A major component of my work has been working with young people seeking public assistance, Food Stamps or other public benefits. During my time at The Door I have helped hundreds of young people - minors and young adults - in obtaining benefits to which they are legally entitled.

I thank the Committee on General Welfare for giving me an opportunity to comment on the bills proposed by Councilmembers Brewer, Fidler and Palma. Before addressing the specific bills, I want to applaud

these efforts and support the intent behind all three bills. If these bills become law they would shine a much needed light on the experiences of young people seeking public assistance benefits and help insure that we as a City do not miss the opportunity to engage these young people and point them in the direction of engagement in advancing their educations and preparing to play a productive role in the City's workforce.

As for the specific bills: Regarding **Bill Number 648**, directing the Human Resources Administration (HRA) to make information specifically about young people readily accessible on its website is a great idea. I was surprised to find, for example, that when I search on the HRA website using the search box on the site, there are no results for "minor", and a search for "emancipation" leads to information about child support, but not about the potential eligibility of sixteen and seventeen years old for public assistance benefits. At a minimum, the clients that I have met who are young applicants would benefit from specific information about when people between the ages of sixteen and twenty-four years old can be eligible for benefits.

In this regard I contrast the HRA website with the information available on the New York State Department of Motor Vehicles (DMV) website. If I am a young person and I want to know if I can get a learner's

permit or a driver's license, I can pretty easily on the NYS DMV website find out how old one has to be to get a permit. If you search for "minor" on the DMV website, many results come up, and the first page of results includes relevant information. Even though the vast majority of people who have learner's permits or driver's licenses are not in this age group, the agency makes clear through the accessibility of information on its website that it wants its younger customers to know about their potential eligibility and about procedures most relevant to young applicants. Bill Number 648 simply seeks to bring that type of accessibility of information to HRA's website.

An effective means to communicate relevant information to young people would be a page on the HRA website that addresses specific eligibility questions of young applicants. There should be one place with answers to questions like: if I am 17 years old and don't live with my parents, can I get public assistance? If I am 20 years old and live with my grandfather, but he doesn't give me enough to eat, can I go apply for Food Stamps? As an example I included at the end of my prepared testimony a two-page pamphlet from The Children's Aid Society on public benefits for young people sixteen to twenty years old. This information is available on The Children's Aid Society's website. In a couple of pages the pamphlet

quickly helps a young person assess her or his potential eligibility for Temporary Assistance benefits.

The Door's Legal Services Center has a similar pamphlet, as does The Legal Aid Society and other organizations. I have also seen this information presented in a flowchart format to try to make it as accessible as possible. Beyond just providing links to a series of memos and directives related to young people, I think HRA should be directed to have one webpage that basically sets out the eligibility of young people, and there should be a link for that page in the website's list of services that HRA provides. That webpage could then have links to rules addressing other issues likely to be particularly relevant to young people - child support, going to high school or college while getting temporary assistance benefits, emancipated minor status and so on.

One concern I have about Bill Number 648, though, is the proposed definitions of "young adult" and "youth" - I worry that dividing the groups into sixteen to nineteen years old and twenty to twenty-four year olds may be more confusing than illuminating.

Regarding **Bill Number 649**, the bill's requirements for HRA to specifically plan its services for young people is a wonderful idea, and

would start to address concerns expressed in my prior testimony and that of others before the General Welfare Committee. If we are going to take seriously the ability and need of young people to improve their skills and connect effectively to workforce, especially at a time of deep economic distress, the Human Resources Administration, with the encouragement of the City Council, needs to develop plans to provide services that specifically address these age groups.

In that regard, the requirements proposed in **Bill Number 657** are also vital. If we as a city are going to take seriously the plight of young men and women who are all too often undereducated and underemployed, we need not only to plan on how we will target services to this critical group in our populace, but also how we will measure the effectiveness of those efforts. It's not enough to have, for example, programs designed to provide training for work and refer to statistics about the alleged effectiveness of those programs for applicants and recipients as a whole when those general numbers may be masking critical ways in which Administration initiatives are failing particular subgroups, most notably young adults. Only by insuring that HRA measure and report the impact of its policies specifically on young people to the public can we fairly evaluate whether those programs are actually helping young people proceed on a path towards independence

and engagement in the workforce, or instead are constituting barriers that lead to young people being disengaged while not having their basic needs addressed.

Finally, one specific point that needs to be addressed is how to measure the times when young people are simply turned away at the time of application. At present I don't believe that HRA has a system in place to track when applicants are not even permitted to apply for benefits. My worry is that a person who is turned away before being allowed to submit an application would not appear in statistics about how many applications were successful and how many were unsuccessful. So requiring the agency to track and report unsuccessful young adult applicants may not be enough unless the agency is required in some fashion to record those turned away from applying. Only by this tracking can we fairly evaluate what is happening to young applicants at the City's job centers.

On behalf of The Door's Legal Services Center I thank you again for the opportunity to testify regarding these proposals and I hope that our comments and those of other witnesses today will help these measures or similar ones to become law. Thank you.

Common Questions

If I get welfare, will I have to go to school?

If you are between 16 and 19, unmarried and have not graduated from high school, you will probably have to return to school or enter a GED program in order to receive public assistance. HRA offers the BEGIN Program for parents who need to improve their reading, writing or math skills or who want to learn to speak English.

If I get welfare, will I have to work?

Yes, unless one of these exceptions applies to you:

- You are under age 19 and in secondary, vocational or technical school full time
- You are ill or disabled
- You have a child under 3 months old
- You are a caretaker of an ill or disabled member of the household
- You have no available childcare
- You are more than 8 months pregnant

Remember: the rules about living at home and going to school or work may be different for food stamps or Medicaid. You should continue to apply for both if you are financially eligible.

Will welfare support me if I go to college?

Generally, you may count up to 15 hours a week in an approved school program, such as a two-year college or vocational school, toward the work requirement. Work/study and internships may satisfy the rest of your 35-hour work requirement. As a result of a recent lawsuit, *Davila v. Eggleston*, it is now easier for single parents on welfare to attend college.

What if I can't afford to pay for childcare or transportation to attend school or work?

When welfare assigns you to work and school activities, you are entitled to money for transportation to comply with work assignments, including transportation to and from childcare. You will also be given options for appropriate childcare if you cannot find your own.

For more information about requesting a conference or a fair hearing, see **KNOW YOUR RIGHTS: FAIR HEARINGS & PUBLIC BENEFITS**.

For in-depth information, contact The Children's Aid Society at (212) 358-8930 to get a complete set of **KNOW YOUR RIGHTS** brochures and other legal advocacy publications in both English and Spanish. You may also log onto www.childrensaidsociety.org.



For over 150 years, The Children's Aid Society has been assisting New York City's children and their families without regard to race, religion, nationality or socio-economic status. Children's Aid helps children in every aspect of their lives: from infancy through adolescence, providing guidance and resources to ensure a child's current well-being and future potential. With over 100 programs and 40 locations in New York that touch the lives of more than 150,000 children every year, Children's Aid is one of the country's largest and most innovative child and family social service agencies.

www.childrensaidsociety.org

THE CHILDREN'S AID SOCIETY

KNOW YOUR RIGHTS

public benefits for minors and emancipated youth



If you are 16-20 years old, you may be able to open your own welfare case with the Human Resources Administration (HRA). Welfare can include cash, a shelter allowance, Medicaid and food stamps, depending on your eligibility.

Basic Income Requirements

If you are under 21 and unmarried, welfare will take into account your parent's income to determine if you are financially needy. Most likely, if your parent qualifies for welfare, so will you. If you are legally married, your parent is not liable for your support.

If you are *under 18 and a single parent*, your parent's income is counted as available to you and your child.

If you are *between 18 and 20 and a single parent*, your parent's income is counted as available to you but *not* to your child. So even if you are ineligible for welfare, you may be able to obtain some assistance for the child, depending on your parent's income.

If you are financially eligible for welfare, you still must meet other requirements depending on your age, if you are pregnant or parenting, if you are married and who you live with.

To determine if your living situation is appropriate, HRA takes into consideration your involvement in educational activities, availability of childcare, ability to manage your cash grant and whom you live with.

If you claim that you should not be required to live with a parent or guardian, HRA must investigate your claim and proceed with your welfare application. If they disagree with your claim and you still refuse to live with the adult, your application can be rejected. *You are entitled to request a hearing within 30 days to appeal the decision.*

Requirements for 16 and 17 year-olds

Single and pregnant or parenting

You can only open your own welfare case if you live with a parent or guardian, unless you fit certain exceptions. See below for details.

Single and not pregnant or parenting

If you live with your parent or guardian:

- You cannot have your own welfare case. Instead, you will be on your parent's welfare budget.

If you don't live with your parent or guardian:

- You can get a welfare case if you are an emancipated minor, that is, you are 16 or 17 years old, you were in school until you were 16, you don't need foster care and you don't live with your parent or get money from him or her.

A 16 or 17-year-old single parent does not have to live with his or her parent or guardian if:

- No parent or guardian is available to live with
- No parent or guardian will take you in
- You are or were subjected to serious physical or emotional harm or sexual abuse in your parent or guardian's home
- You or your child would be at risk of serious harm if you lived with your parent or guardian
- For some other reason, it is in the best interest of the child to not live in your parent or guardian's home

If you have one of these exceptions, the welfare center must help you find a supervised living arrangement, such as a maternity home or second chance home, unless your current living situation is appropriate.

Requirements for 18, 19 and 20 year-olds

Single and pregnant or parenting

You can get your own welfare case and do not have to live with a parent or guardian; however, HRA has the right to sue your parent or guardian for the cost of your support.

Single and not pregnant or parenting

If you live with your parent or guardian:

- You can get your own cash grant if your parent is on welfare. You must fill out your own application when you turn 18.

If you don't live with your parent or guardian:

- You can get your own case if your parent or guardian won't let you live in their home or it is not a safe place for you to live. HRA can sue your parent for the cost of your support.

If you are married

Based on your income and financial situation and that of your spouse, you may be eligible for welfare and your parent will not be liable for the cost of your support.



**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Robert Doar, Commissioner

Address: _____

I represent: HRA

Address: 180

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 9-21-11

(PLEASE PRINT)

Name: Kathy Gault

Address: 180 Water St.

I represent: HRA

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Brooke Richte

Address: _____

I represent: Resilience Advocacy Project

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 9/21/11

(PLEASE PRINT)

Name: Louise Feld

Address: _____

I represent: Citizens' Committee for Children

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 9/22/11

(PLEASE PRINT)

Name: Lazar Treschan

Address: _____

I represent: Community Service Society

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 9-22-2011

(PLEASE PRINT)

Name: Kimberly Forte, Legal Aid Society

Address: 199 Water St 5th Fl 10028

I represent: Legal Aid Society

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: 9-22-2011

(PLEASE PRINT)

Name: MICHAEL WILLIAMS

Address: The Door, 121 6 Avenue, NY, NY

I represent: The Door's Legal Services Center

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

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

in favor in opposition

Date: _____

(PLEASE PRINT)

Name: Kimberly Fane & Kathleen Kelleher

Address: 199 Water St. 3rd floor

I represent: The Legal Aid Society

Address: _____

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

I intend to appear and speak on Int. No. 64849 + 659 Res. No. _____

in favor in opposition

Date: 9/22/11

(PLEASE PRINT)

Name: Boxanna Henry

Address: Hunter College (WRI) 695 Park Ave
NY NY 10065

I represent: _____

Address: _____

Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

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

in favor in opposition

Date: _____

Name: LISA FITZPATRICK (PLEASE PRINT)

Address: 180 Water St Rm 2107

I represent: NYC Human Resources Administration

Address: 180 Water St NY NY

180
Please complete this card and return to the Sergeant-at-Arms

**THE COUNCIL
THE CITY OF NEW YORK**

Appearance Card

[]

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

in favor in opposition

Date: 9/22/11

Name: RICHARD SIEMER (PLEASE PRINT)

Address: 15 MTC B

I represent: NYC HRA

Address: _____

Please complete this card and return to the Sergeant-at-Arms