

DEPARTMENT OF SOCIAL SERVICES

40 NORTH PEARL STREET, ALBANY, NEW YORK 12243-0001

MARY JO BANE  
Commissioner



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**LOCAL COMMISSIONERS MEMORANDUM**

**Transmittal No:** 92 LCM-179

**Date:** November 19, 1992

**Division:** Services and  
Community Development

**TO:** Local District Commissioners

**SUBJECT:** COPE (College Opportunity to Prepare for Employment)

**ATTACHMENTS:** Attachment A - COPE Activity Summary - available on-line  
Attachment B - COPE Budget Summary by Activity -  
available on-line  
Attachment C - COPE Budget Summary by Object of Expense -  
available on-line

The New York State Department of Social Services and the State University of New York announce the creation of a new program called COPE (College Opportunity to Prepare for Employment). COPE will provide colleges with funds to assist LSSD's (local social services districts) to further expand JOBS activities for the ADC JOBS participants. Since federal JOBS funds are being matched at the state level, no local share will be required. Participation in COPE by LSSD's is voluntary. Only those districts interested in developing a COPE Program at this time are requested to submit a proposal.

Approximately \$4 million is available statewide for the first cycle of COPE, which will cover the period 1/1/93 - 6/30/93. A limited number of projects will be selected, with the number of awards dependent upon the size and number of requests submitted.

The Department recognizes the burden and inconvenience which is placed on LSSD's through the existing "piece meal" approach to planning the various interagency segments of the local JOBS program. It is our intent to consolidate the planning for initiatives such as EDGE, Bridge, and COPE, along with the local JOBS Plan, into a comprehensive planning process in the near future.

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Development of the local COPE program will be a collaborative effort between the local social services district (LSSD) and the college. The services provided by COPE should not duplicate services already available. The local COPE program design should include services needed within the local JOBS program which are not currently provided or are not provided at sufficient service levels. The COPE proposal will be submitted by the LSSD to the New York State Department of Social Services. COPE funds will go directly to the college through the State University of New York to provide the services identified in the COPE plan. To reduce any added burden on the LSSD, the COPE proposal, while developed, may be organized and written by the participating college. Proposals will be selected for funding based on the extent to which they meet certain selection criteria as described in Part IV of this LCM.

Two copies of the proposal must be received by **December 18** and mailed to:

Elaine Inman, COPE Coordinator  
Bureau of Employment Programs  
New York State Department  
of Social Services  
40 North Pearl Street, 7B  
Albany, NY 12243

The specific information needed to develop your local COPE proposal, including planning guidelines and forms is attached. If you have any questions you may contact Elaine Inman in the Bureau of Employment Programs at 1-800-342-4100, extension 4-9101.

I. COPE Planning Guidelines

A. Overview and Purpose

The purpose of COPE is to provide resources to local colleges which will assist local social services districts in enhancing their ADC JOBS program. Since New York State's JOBS program began in October 1990, local social services districts (LSSD's) have been required to meet rigorous requirements in delivering services to increasing numbers of ADC JOBS participants. Many programs have since been implemented which have enabled LSSD's and thus the state, to meet and exceed federal participation levels. While continuing our success in this area, we must now shift the focus of our efforts to a more outcome-based approach.

The ultimate goal of COPE is to provide ADC JOBS participants with the training and supports necessary to achieve economic independence through employment. Success in meeting participation rates must translate into success in finding and keeping a job. Thus the COPE program ideally will consist of the types of post secondary and job skills training which will

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lead to permanent employment, the case management to provide the needed support and assistance, and a job development/job placement component to link the participant to the job.

B. Eligible Organizations

COPE programs may be provided by:

Community and 2-year colleges  
Agricultural and Technical Colleges  
4-year colleges offering 2-year degree programs

C. COPE Activities

COPE funds may be used for the following JOBS activities to serve ADC JOBS participants:

Assessment and Career Counseling  
Employability Plan Development  
Education  
Job Skills Training  
Post Secondary Education  
Job Readiness Training  
Job Placement Services  
Case Management  
On the Job Training  
Work Supplementation

COPE also allows creation of a youth demonstration activity which provides an integrated program of high school equivalency, occupational training, work experience and job placement.

D. Program Design

1. Job Placement Focus and Labor Market Tie

In designing a local COPE Program the full range of activities (as listed in **Attachment C**) should be considered. However, particular attention should be placed on assuring that the specific types of training selected are tied to the needs of the local employer community. Direct involvement by employers in the planning and implementation of COPE should improve job placement success. Formation of Public/Private advisory committees is one way of promoting such involvement. Special attention should be given to job development and job placement efforts. Such efforts should include active solicitation of job openings in the business community for program completers.

In addition to increasing the focus on job entries for program completers however, more rigorous efforts must be made to report the entries to employment for non-

completers. This may involve closer tracking of participants and follow-up steps for those who drop out.

2. Remedial Education

To the extent possible, COPE should focus on participants who are most ready and able to enter a college level program. Currently extended periods of time are often required to complete a two-year program when it includes the attainment of a high school diploma or ESL instruction. Our intent is to limit the degree of remediation done at the college if that remediation is available through other local providers such as public schools or BOCES, using EDGE funding, for example. It is appropriate, then, that individuals who are considered for enrollment to a college program, but who lack the academic or language skills necessary to succeed at the college level, be referred to one of the local educational agencies to receive such training prior to enrollment in the college program.

If remediation is to be done by the college and included in the COPE Proposal, justification must be provided why such remediation should occur at the college. Furthermore, such college-based remediation, if necessary, must be time-limited, not to exceed 1 semester of full-time study.

In some cases, the term "remedial" courses is applied to certain prerequisite courses needed for a particular college program, such as high school chemistry for a nursing program. We recognize that such instruction in many cases is only available at the college. The limits described above on college-level remediation do not apply to this type of instruction.

3. Additional Considerations

While a significant level of flexibility will be permitted in the design of the local COPE program to meet the local need, several important considerations must be reflected in the program's design.

a. Target Populations

The program should target services to individuals within the following groups:

- i. individuals who have received ADC for any 36 out of the preceding 60 months;
- ii. custodial parents under the age of 24 who have had little or no work experience in the preceding year or who are not enrolled in or have not completed a high school education or its equivalent; and

iii. members of families in which the youngest child is within two years of being ineligible for ADC by reason of age.

b. 20-hour participation rule

As you many know, the federal JOBS regulations place very specific participation requirements on states to qualify for enhanced federal funds. States are required to meet certain participation rates, or percentages of their ADC employable population who are satisfactorily participating in JOBS components. The term "satisfactory participation" means that an individual is enrolled in a JOBS activity which is scheduled for at least 20 hours per week and the individual actually attends at least 75% of those scheduled hours. Currently the federal participation rate requirement is 11%. However, as of October 1, 1993, this rate increases from 11% to 15% for all states. Moreover, the "scheduled hours" can only include time in activities which are supervised, regularly scheduled, and for which attendance is taken.

In order to meet federal participation rates, every effort must be made to schedule for each COPE participant at least 20 hours per week of participation in activities.

c. Client Identification, Referral, Tracking and Progress

COPE funds may only be used to serve ADC JOBS participants. Thus, all COPE providers must develop a method to clearly identify COPE participants as ADC recipients.

In addition to client identification, a method for selecting, referring and tracking COPE participants must be developed by the LSSD and college staff. The LSSD must secure sufficient client information to maintain employment subsystem records. Client specific attendance keeping procedures as well as a method for measuring and reporting a participant's progress while in a COPE activity must be included, as described in 92 ADM-16. LSSD and college staff must develop specific guidelines for the review and verification of satisfactory progress measures.

II. PACE (PUBLIC ASSISTANCE COMPREHENSIVE EMPLOYMENT) PROJECTS AND COPE

Current State sponsored PACE contracts are scheduled to end on June 30, 1993. Since LSSD's can secure the services currently provided under PACE through COPE, the PACE program will not be continued beyond this date. A college which currently operates

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a PACE program can submit a proposal for COPE funding with the LSSD, but may not operate the two programs concurrently. In this case, the college may participate in COPE as early as January 1, 1993 by exercising the right provided in each PACE contract to unilateral termination.

However a COPE proposal which has been developed in collaboration with the LSSD must be submitted and will be subject to the selection criteria identified in Section IV of this LCM.

### III. SUPPORTIVE SERVICES

#### A. Child Care (IVA - JOBS Child Care)

As with other JOBS participants, the LSSD must provide the necessary child care for COPE participants during activities as well as during breaks in activities, if needed. However, a portion of COPE funding will be available to each participating LSSD to cover some of the cost of COPE child care with no local share required. The level of COPE child care funding available to the LSSD will be based on the size of the COPE award and on the approximate number of individuals to be served. This information will be included in the COPE award letter.

#### B. Other Supportive Services

LSSD's must provide other training related expenses (e.g., lunch, transportation) as outlined in their JOBS plans to COPE participants as needed. However these costs will be reimbursed through normal claiming procedures and are not chargeable to COPE funds.

### IV. CRITERIA FOR SELECTION

COPE proposals will be selected for funding to the extent they demonstrate the following:

1. Involvement by the Employer Community. Proposals will be viewed favorably which demonstrate an involvement by the private sector to assure a strong tie to the local labor market needs.
2. Job Placement as a Primary Focus. At least 20% of the COPE operating budget should be devoted to job placement/job development services.
3. Innovation. SDSS and SUNY will favorably consider new and innovative programs which are within the parameters of the JOBS regulatory guidelines and which can provide evidence of their potential effectiveness.

4. Non-Duplication. The COPE proposal should clearly demonstrate that the activities to be funded will fill a gap in the local JOBS program that is currently unfilled. COPE should not duplicate existing services.
5. Participation by those most ready for college level studies. COPE should focus on participants who are ready and able to successfully complete a college level program. If remediation is necessary every possible effort should be made to utilize other resources in the community, such as local educational agencies, prior to college enrollment. Justification must be provided to show why college-based remediation is necessary if it is part of the COPE proposal. Furthermore, the proposal must clearly describe the level of remediation to be provided if it is to be included.
6. Strong collaboration between LSSD and the college. The COPE proposal should demonstrate a strong collaborative effort between the local social services department and the college. Included in such effort is the identification of a clear client flow from the LSSD to the college and a clearly defined method for data exchange which will ensure compliance with federal JOBS reporting requirements.
7. Moderate cost per entry to employment (approximately \$6000). The cost per entry to employment can be determined by dividing the total projected entries to employment by the total program cost.
8. Current PACE Operators. Currently operating PACE projects which opt to end their PACE contract and apply for COPE funding may be given special consideration if they have demonstrated the ability to meet JOBS requirements regarding the monitoring and reporting of attendance and satisfactory progress.

V. REPORTING REQUIREMENTS

1. Client Specific Information

The federal JOBS requirement for the uniform reporting of individual participant data will apply to COPE. LSSD's in all upstate counties will use the Welfare Management System (WMS) Employment Subsystem to meet this reporting requirement. While the specific information which colleges will be required to provide to LSSD's will vary with the program's design, examples of the data elements which the local district may require include:

- o Literacy level
- o Date of JOBS assessment
- o COPE activities, including start and completion date

- o Scheduled and actual hours of participation (reported monthly on a weekly basis)
- o Date of entry to employment and wage information
- o Periodic information on participant progress

The LSSD and the college must jointly develop a method for gathering the required client specific information and for its timely exchange.

2. Program Summary Information

In addition to the client specific information which colleges will be required to report to the LSSD, COPE programs will also be required to report to SUNY the aggregate information on client enrollment and entries to employment. This information will include both baseline and progress data for all COPE participants. Reports will be required on a monthly basis. The necessary reporting instructions will be distributed to COPE providers under separate cover at a later date.

VI. COPE FUNDING

COPE funds will include both State and federal funds. The federal JOBS (Job Opportunities and Basic Skills Training) program will provide the source for the federal share. JOBS funds, however are predicated on the availability of state matching funds. For COPE, the SUNY FTE (Full-Time Equivalent) will provide this state match. These FTE's must be spent on ADC JOBS participants to cover the cost of their COPE training.

One-year certificate, 2-year degree and non-credit remediation courses generate FTE's at the same rate. An FTE is described by the following:

1 FTE is generated by 450 hours of classroom instruction

Furthermore, while the value of the FTE varies somewhat yearly, for this year, 1 FTE = \$1600

The percentage of federal vs. state funds in a COPE allocation will be based upon the manner in which funds are to be expended. Federal funds may represent either 60% or 50% of the total with the state share (FTE) comprising the rest. The federal JOBS funds are available to states on a reimbursement basis with the rate of reimbursement dependent upon the type of expenditure. The COPE budget should reflect the total projected cost of operating the proposed COPE program, inclusive of the FTE's which will act as the state match.

To determine the relative level of federal and state funds in a COPE allocation, the following guidelines on federal JOBS reimbursement rates must be applied:



Federal reimbursement for COPE expenditures will be available at either a 60% or 50% rate depending on the type of expenditures.

60% Reimbursement: Expenditures reimbursed at the 60% rate include the personnel costs (salaries and fringe) of all full-time staff (not full-time equivalents) working exclusively on the COPE program, including administrative functions. Personnel costs of individuals working less than full-time may also be matched at the higher rate if they are directly performing any COPE activities such as case management or job skills training classroom instruction, for example. The cost of training slots for job skills training is also a 60% cost. Also included in this category are all expenditures made for non-personnel items such as space, utilities, telephone equipment, materials and supplies directly associated with performing COPE activities.

50% Reimbursement: Expenditures reimbursed at the 50% rate would include non-direct costs such as indirect charges and costs related to the general administration and management of COPE not conducted on a full-time basis. Personnel costs of payroll personnel and other general administrative functions are examples of these non-direct costs.

#### VII. THE COPE PROPOSAL

Each COPE proposal must include the following items:

- o Project Narrative
- o COPE Activity Summary
- o COPE Budget Summary by Object of Expense
- o COPE Budget Summary by Activity

##### 1. Project Narrative

This is a complete description of the key components of the local COPE program. Specifically the narrative should include:

- activities to be provided by the college
- assurances that child care and other supportive services will be provided by the LSSD
- referral, tracking and reporting mechanisms
- how 20-hour participation will be met
- target groups to be served
- remediation description, if included

##### 2. COPE Activity Summary

Attachment A is the COPE Activity Summary. This form identifies the proposed number of ADC JOBS participants to be enrolled in each COPE component. It also provides an estimate of the number of participants who will enter employment as a result of COPE participation. Since the enrollment information allows for duplication in these

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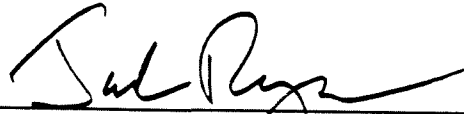
numbers, the actual number of individuals to be served should be indicated at the bottom.

3. COPE Budget Summary by Activity

**Attachment B** is the COPE Budget Summary by Activity. This budget summary should reflect the specific activities on which COPE funds will be spent and the level of expenditure by activity. It also shows the level of 60% and 50% reimbursable expenditures by activity. The totals in each column must match the totals in the corresponding category on the Budget Summary by Object of Expense.

4. COPE Budget Summary by Object of Expense

**Attachment C** is the COPE Budget Summary of Object of Expense. This is a line item budget which reflects how the COPE funds will be spent. All costs must be identified as to the level of federal reimbursement they will be eligible for (50% or 60%). See **Section VI** of this LCM for the guidelines for JOBS reimbursement rates.



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