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TRANSMITTAL: 91 INF-14

DIVISION: ADMINISTRATION

TO: Commissioners of
 Social Services

DATE: February 25, 1991

SUBJECT: TRAINING SESSIONS ON JOBS CLAIMING PROCEDURES:
 QUESTIONS AND ANSWERS.

SUGGESTED
 DISTRIBUTION: ACCOUNTING SUPERVISORS
 STAFF DEVELOPMENT COORDINATORS

CONTACT PERSON: Upstate: Irid Gordon at 1-800-342-3715 ext. 4-7549
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ATTACHMENTS: Attachment A: Local District Questions and Answers
 on JOBS Training. (Available On-Line)

FILING REFERENCES

Previous ADMs/INFs	Releases Cancelled	Dept. Regs.	Soc. Serv. Law & Other Legal Ref.	Manual Ref.	Misc. Ref.
90 ADM-27		385.3(a)	45 CFR Part	FRM 90-10	90 LCM-116
90 ADM-31			205	MB 143b	90 MB-5
90 INF-41					

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The purpose of this letter is to inform local districts of the responses to questions raised at our Regional Training sessions on JOBS claiming procedures and other related topics. These sessions were held on October 31, 1990 through November 9, 1990. Attachment A contains the questions and answers.

John M. Sweeney
Assistant Commissioner
Office of Financial Management

A. LOCAL DISTRICT QUESTIONS AND ANSWERS ON JOBS TRAINING

Q. 1. When will local districts be informed of their 60% & 50% JOBS allocation?

ANS. The districts were sent an Informational Letter 90 INF-41 dated August 22, 1990 notifying them that there will be no county specific allocations established for the Job Opportunity and Basic Skills Program (JOBS) for the Federal fiscal year starting October 1, 1990. For budgeting purposes, the local districts should use as a guideline the expenditure level that has been maintained for the Comprehensive Employment Program.

Q. 2. What formula will be used to determine JOBS allocations?

ANS. At this point, there are no plans to establish allocations for JOBS for the second year.

Q. 3. Would BLFO create a disc for the Employment Forms, so that the local district would just have to enter employee hours, salaries, fringe benefit percentage, all other non-salary costs and contract costs and the disk would calculate the amounts to enter on the DSS-3825?

ANS. At this time, the amount of prime data required to complete the Employment forms is too extensive and far-ranging to make entry on a disk practical.

Q. 4. What is the retention period on the Employment Forms?

ANS. The retention period on the Employment Forms is six years.

Q. 5. What sort of records do Contractors who administer the JOBS program have to maintain to satisfy statistical reporting? Do they have to maintain the same sort of records as the local district, such as time studies? How does the local district require contractors to gather this statistical data after the fact? In other words the contract has already been completed without this requirement, so how does the LDSS enforce it?

ANS. Contractors who administer the JOBS program must maintain the same records as the local district would have to maintain to claim properly and complete the DSS-3825. The contract should contain language or a clause that the contractor is to maintain time reports to determine their payments. The local districts would have to amend their current contracts to provide for this requirement.

Q.6. Where is the DSS-3825 Submitted?

ANS. Local districts are to begin using the revised DSS-3825 in November 1990 for the reporting of expenditures during the month of October 1990. The form is to be submitted within twenty days after the completion of the reporting month to:

Bureau of Data Management 14A
Office of Budget Management
New York State Department of Social Services
40 North Pearl Street
Albany, New York 12243

Q. 7. How are the funds that were advanced for Home Relief - Job Search to be claimed?

ANS. All categories of administrative and supportive services expenditures made to implement and operate Job Search may be claimed against the district allocation. Expenditures made for the Job Search programs are to be claimed on the DSS-3922 - The Financial Summary for Special Projects form in the first instance for 100% reimbursement as described in the Fiscal Reference Manual, Volume II, Chapter 3, pages 249-254.

Q. 8. How are old contracts for employment services (CEOSC, PACE, etc.) being paid after JOBS went into effect on October 1, 1990?

ANS. If these contracts are being continued as part of the Employment Plan submitted for JOBS, these contract costs would be claimed in the same manner as any JOBS non-salary cost and reported on the DSS-3825.

Q. 9. How do we know what lines on the DSS-3825 to report the supportive services that comes from the Schedule A?

ANS. We have been informed that the JOBS supportive services (i.e. uniforms, tools, transportation, car insurance, lunches, etc.) that are claimed for reimbursement on the Schedule A (DSS-187) should also be reported in column 5 of the DSS-3825. The local districts should make the best determination as to which JOBS activities under which these expenditures should be reported on the DSS-3825. If specific identification of the support costs by activity is not feasible, we recommend that these costs be allocated to the twelve activities by using the same percentage you would use to allocate administrative support costs.

Q. 10. Does it make any difference if JOBS expenditures (lunches, tools, uniforms, etc.) are paid as an advance or a reimbursement?

ANS. Direct payments paid to clients in anticipation of the services being performed or the goods being provided is acceptable under JOBS. Indirect payment to vendors should, however, be paid to vendors after the goods or services have been provided.

Q. 11. Must the new general account numbers for the JOBS program be used?

ANS. The use of the newly established JOBS appropriation accounts are entirely optional by the local district. BICS however, will identify the program costs as paid through the new account 6135 on the Abstract produced during check production for JOBS Program assistance payments. To avoid the manual effort of Accounting adding together the JOBS and ADC Appropriation Account from the BICS Abstract, it is suggested the local districts use the established accounts.

Q. 12. Pell Grants - these are Federally funded payments to low income clients who attend community college, for the cost of living expenses. Should these grants be refunded to the local district by employment contractors who provide day care and transportation? Or are the clients allowed to keep these grants in addition to receiving public assistance?

ANS. Department regulation 385.3(a) provides for the payment of allowances to meet the costs of specific needs, such as child care, tuition, books, supplies, lunch and transportation to enable an individual to participate in an approved JOBS activity. These allowances should only be provided when funds from other sources are insufficient to meet the specific needs.

All local districts should follow this reasoning in determining the unmet cost of training related expenses to avoid duplicate payments and to maximize the use of public funds.

Grants and loans may have been received by the student after the semester has started. These grants and loans are intended to cover the costs incurred throughout the semester. Therefore, any grants and loans received should be evaluated for the availability of the entire semester, including the time before receipt of the grants and loans when public assistance allowances were provided to meet the needs.

Q. 13. If a new employee commences work after the completion of the county's quarterly time study (during the first two weeks of quarter), does the new employee need to do his/her own time study or is his/her salary apportioned by an already completed time study?

ANS. New employees need to complete a time study even if they start work after the county's quarterly time study is completed.

Q. 14. If after the completion of the county's quarterly time study (during the first two weeks of the quarter), an employee changes functions within the JOBS program, is this employee's salary still apportioned on the basis of initial activities throughout the balance of this same quarter?

ANS. Yes, the salary of an employee who changes functions within JOBS after the completion of the county's quarterly time study is allocated on the basis of the initial activities recorded.

B. MISCELLANEOUS FISCAL QUESTIONS

Q. 1. ASCU case count lag.

ANS. Because of the delay in the districts receiving the ASCU reports, we have asked that the case counts be offset by one month. The report should have been received on or near September 3, 1990 and would have included case counts for the months of June, July and August. These case counts would be used for October, November and December claims. Because the case counts for the month of June were repeated in this new report the local districts may need to make adjustments to the numbers on the report to reflect the correct beginning inventory amounts which should match the previous quarters' ending inventory as reported on the September 1990 Schedule D-8. This type of adjustment should be done only for the first period that the reports were lagged. The local districts should have received another report on or near December 3, 1990 which would have included case counts for the months of September, October and November to be used for January, February and March claims.

Q. 2. HEAP case counts on WMS.

ANS. The method of allocating a portion of the WMS operational costs to the HEAP program has been in place since October 1984. This method is contained in Chapter 18 of Manual Bulletin 143b and is repeated here.

The local districts may obtain a percentage to allocate WMS costs to HEAP in one of the following two methods.

a. The local district can close the case once it has been counted as an open case on the last day of the current month's WST-002 report. Through this procedure, each month's WST-002 last day of the month report would accurately indicate, for allocation purposes, the activity in the HEAP program for the current month.

b. The local districts can choose to keep HEAP cases open the entire program year and the State will conduct a mass closing at the end of the program year. The use of this alternative requires an additional procedure on the part of the local districts since the open cases accumulate from month to month on the WST-002 report. The local district is to subtract the prior end of the month open HEAP case count from the current end of the month open HEAP case count as provided on the WST-002 report. The result of this calculation will be used on the WMS Worksheet for HEAP open cases. This additional step is needed to accurately reflect HEAP case activity for the month and to avoid excessive costs being allocated to the HEAP program. Since the cases on WMS for the 1989-90 were retained when the 1990-91 HEAP year began, you would need to continue to subtract the prior's month's case counts from the current month's case counts.

Q. 3. When will settlements be incorporated into the Automated Claiming System?

ANS. There is no anticipated start-up date for the inclusion of the settlements into the automated claiming system.

Q. 4. Can BLFO provide training on Consolidated Services Plan?

ANS. Unless a new major project requires our attention, we will include a review of Title XX in next year's training sessions.

Q. 5. Could the payment period be put back on the Composite Roll?

ANS. After exploring the different options with system staff we have determined that it will be possible to include the payment period without increasing the number of lines related to each check on the Composite Rolls. However, all system changes for BICS and all other departmental system changes must be reviewed and endorsed by a special committee and then approved by our executive staff. We will propose this change to the Committee.

Q. 6. Independent Living - RF-4 DFY- How does ACS system handle these costs (in a separate claim?)

ANS. Non-IV-E JD/PINS expenditures for Independent Living should be included on Division of Youth's DFY-10 claim. The IV-E JD/PINS should be claimed through the normal Independent Living, RF-4 claim.

Q. 7. How will we be able to obtain the Employment forms that are contained in Chapter 20 of Bulletin 143b?

ANS. The employment forms that are contained in Bulletin 143b are class C forms and therefore will not be distributed through the normal distribution of forms process. These forms can however, be obtained from the Forms and Publications Unit at the State level through the normal form ordering process. The address for orders is:

New York State Department of Social Services
Forms and Publications Section
40 North Pearl Street
Albany, N.Y. 12243

Please note that Class C forms are not mandated for use by the local districts.

C. QUESTIONS ADDRESSED BY THE FEDERAL GOVERNMENT

ADC JOBS Expenditures matched at the 60% rate. These costs fall into two categories. The first category includes personnel costs of all full time staff working exclusively on ADC JOBS program functions including administrative functions. The second category includes the personnel costs of other JOBS staff directly associated with the performance of the following ADC JOBS activities: orientation, assessment, development of the employability plan, case management, the mandatory JOBS components and the expenditures for non-personnel items such as space, utilities, telephone costs, materials and supplies directly associated with the performance of these activities.

Full-time staff refers to individuals who are working a normal work week as defined by the local district. A normal work week, however, cannot be based on a full-time equivalency for purposes of the JOBS program.

Q. 1. Does the 60% federal matching rate also apply for full -time staff under contract as well as State staff?

ANS. Yes, the personnel costs for full time staff under contract working exclusively on ADC JOBS activities would be eligible for matching at the 60% FFP rate.

Q. 2. Are personnel costs of individuals working less than full-time eligible for reimbursement at 60%?

ANS. The personnel costs of individuals working less than full-time may be reimbursed at 60% if they are working exclusively on JOBS activities in which there is direct client contact.

Q. 3. Is ADC JOBS orientation an activity for which the 60% matching rate applies?

ANS. Orientation is an activity that may be matched at the 60% rate.

Q. 4. What are some ADC JOBS activities which,if performed by less than full-time staff, are not matchable at the 60% rate?

ANS. General ADC JOBS program planning and administration , fair hearing activities related to JOBS, agency staff performing general clerical activities are some of the activities which, if performed by less than full-time staff, are not available for reimbursement at 60%.

Q. 5. When are child care administrative costs available for 60% Federal reimbursement under Title IV-F?

ANS. When child care information and referral services are provided for ADC JOBS participants and child care is approved through the JOBS program, the costs associated with providing these services are matched at 60%. Therefore, the personnel costs of staff who work full-time providing child care information or referral services are eligible for 60% reimbursement under the JOBS program.

Costs related to the assessment of child care needs when the activities are conducted as part of the JOBS assessment, and the costs of information and referral to appropriate services, when provided as part of the employability plan or case management services, may also be matched at the 60% rate under JOBS

ADC JOBS related child care information and referral activities costs may also be matched under Title IV-A. Where these activities are provided to AFDC recipients who are not participating in the JOBS program they can only be claimed under Title IV-A.

All administrative costs related to providing ADC transitional child care information and referral activities are reimbursable only under Title IV-A.

ADC JOBS expenditures matched at 50% FFP rate are those allowable JOBS costs that are not available for match at 60% rate. Generally the costs fall in two categories. The first category includes the costs related to the general supervision and management of the JOBS program not done on a full-time basis, personnel costs of less than full-time staff who are engaged in JOBS activities other than orientation, assessment, employability planning development and case management or not directly providing the various JOBS components and non-personnel costs such as space, utilities and equipment not directly associated with the JOBS activities. The second category includes all supportive services, other than child care, which includes transportation, work-related expenses, and work-related supportive services.

Q. 6. What types of supportive services are available for 50% reimbursement under Title IV-F?

ANS. The type of support services that are available for 50% reimbursement under Title IV-F are explained in the program Administrative Directive 90 ADM-27. Any support services not included in the ADM are not allowable.

Q. 7. What system costs are eligible for matching at the 60% reimbursement rate?

ANS. JOBS systems costs include all ADP equipment, software and hardware, services and supplies that are necessary for information gathering for the JOBS program, whether or not they are linked. These costs are usually matchable at 50% under Title IV-F, however, ADP equipment, including printers and supplies, which are used as training devices for JOBS activities may be claimed at 60% reimbursement.

Q. 8. When are child care information and referral costs for JOBS participants only matchable under Title IV-F?

ANS. Refer to the answer to Question #5 in this section which discusses the conditions under which child care information and referral costs may be claimed under Title IV-F or Title IV-A.

Q. 9. Are costs incurred under contracts to be allocated according to the different JOBS matching rates?

ANS. If a contract is entered into with a provider who provides multiple services with significant indirect costs or overhead expenses, costs under such a contract will need to be segregated. This is true in the case of performance based contracts as well. For contracts where costs are allocated among the different matching rates, the state, not the contractor is responsible for assuring that the costs are segregated properly.

Q. 10. If JOBS orientation is performed by an AFDC eligibility worker, are the costs associated with this activity claimed under Title IV-A?

ANS. Yes, these costs may be claimed as AFDC administrative costs. These costs could alternatively be claimed under the JOBS program and would be reimbursed at the 60% rate. The costs associated with JOBS orientation when performed by a JOBS worker are only reimbursed under Title IV-F.

Q. 11. How are costs associated with JOBS hearings to be claimed?

ANS. For hearings activities for the JOBS program, the hearings procedures established for the AFDC program under Title IV-A are to be used. Costs associated with the existing hearings systems, even if JOBS related, may be claimed under Title IV-A at 50%. If a separate Title IV-F hearings system is established, the costs must be claimed under Title IV-F at 50%. If staff employed in this activity are full-time JOBS staff working exclusively on JOBS hearings or other JOBS activities, the personnel costs for those individuals may be claimed at 60% reimbursement rate.