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Local Commissioners Memorandum

Section 1

Table with 2 columns: Field (Transmittal, To, Issuing Division/Office, Date, Subject, Contact Person(s)) and Value (23-LCM-14, 23-OCFS-LCM-17, Social Services District Commissioners, OTDA Employment and Income Support Programs, August 31, 2023, 2023-24 Flexible Fund for Family Services (FFFS), OTDA: FFFS Plan, TANF Services and Employment Projects - Emily Maher, OCFS: Budget - Shonna Clinton)

Attachments: Attachment 1 - FFFS 2023-24 District Allocations, Attachment 2 - Grandfathered COPS FFFS Dedications, Attachment 3 - FFFS 2023-24 Child Welfare Thresholds, Attachment 4 - FFFS System District User Manual, Attachment 5 - FFFS 2023-24 Desk Reference Guide

Section 2

I. Purpose

The purpose of this Local Commissioners Memorandum (LCM) is to provide districts with funding allocations, information, and procedures necessary to implement the Flexible Fund for Family Services (FFFS), including requirements for submission of performance and accountability information for the 2023-24 FFFS Plans.

FFFS has been enacted in the State Fiscal Year (SFY) 2023-24 Budget in the amount of \$1,738,247,000. This amount provides both a "bridge" allocation of \$774,247,000 and an allocation of \$964,000,000 for 2023-2024. The 2023-24 FFFS Plan is a separate Plan from the 2023 Bridge Plan. OTDA released 23-ADM-05 on July 6, 2023, which provided guidance for the period April 1, 2023, through September 30, 2023 (2023 Bridge). All FFFS programs have now been aligned to the same FFY. The new 2023-24 FFFS Plan begins October 1, 2023 and runs through September 30, 2024. This LCM provides districts with funding allocations, information, and procedures necessary

to implement the Flexible Fund for Family Services (FFFS), including requirements for submission of performance and accountability information for the 2023-24 FFFS Plans.

## II. Background

FFFS is designed to provide districts with flexibility in determining how best to respond to identified local needs for services based on their caseload compositions, local labor markets, and other unique factors. Each district may use its FFFS allocation as described in the following categories.

FFFS funds are allocated by the State to each district to support a range of services to address the needs of low-income families consistent with local priorities. The programs/services that may be funded by FFFS are:

- Allowable non-assistance Temporary Assistance for Needy Families (TANF) employment programs (such as employment preparation, placement, and retention services)
- TANF services
- D-1 case management services provided to TANF eligible families
- Child welfare services
- Emergency Assistance to Families (EAF), foster care maintenance, administration and tuition costs if authorized under prior law
- Persons in Need of Supervision (PINS)/Preventive Services
- Pregnancy prevention
- Substance Use Disorder (SUD) assessment and monitoring
- Domestic Violence (DV) screening and assessment
- EAF PINS foster care and related costs
- EAF juvenile delinquent (JD) and related costs only if authorized under prior law
- Districts' administrative costs for TANF-related activities
- Other allowable programs/services that meet a TANF purpose
- Districts may also transfer funds from FFFS to Child Care, and/or Title XX services (TANF-funded portion)

Please refer to [23-ADM-05](#), sections IV. and V. A for a complete description of FFFS background and components.

## III. Program Implications

### TANF FFFS Eligible Programs and Services

All programs funded directly through the FFFS must serve at least one of the following four TANF purposes:

1. Provide assistance to needy families so that children may be cared for in their own homes or in the homes of relatives.
2. End the dependence of needy parents on government benefits by promoting job preparation, work, and marriage.
3. Prevent and reduce the incidence of out-of-wedlock pregnancies.
4. Encourage the formation and maintenance of two-parent families.

Allowable services supported with FFFS must meet the federal definition of non-assistance. Districts should ensure that current local procedures include information on the use of non-assistance diversion payment codes, as appropriate, for families who apply for Temporary Assistance (TA), are categorically eligible for TANF-funded services and whose situation meets the circumstances required to be eligible for diversion assistance, as described in [03-INF-35](#). This will also prevent such families from being included in the participation rate calculation.

FFFS may be used to provide assistance only for expenditures made as a result of transferring FFFS funds to:

- Title XX (Title XX below 200 percent) or to the Child Care Development Block Grant (CCDBG),
- EAF PINS foster care and related costs,
- EAF JD and related costs only if authorized under prior law,
- EAF foster care administration, maintenance, or tuition costs funded directly with FFFS and/or transportation services for Family Assistance (FA) recipients.

Assistance for federal TANF purposes consists of any payment or benefit designed to meet ongoing basic needs – food, clothing, shelter, utilities, household goods, personal care items, and general incidental expenses. Assistance also includes supportive services such as transportation or child care provided to unemployed individuals. Assistance paid to a household is counted toward the 60-month state time limit. Payment types defined as assistance (see [09-ADM-04](#)), when paid to a trackable individual in a trackable case type, will trigger time limit counts, be reported to the U.S. Department of Health and Human Services (HHS) as assistance, be reimbursed with assigned child support collections, and include the case in the calculation of the federal work participation rate.

In accordance with [00-LCM-20](#) and federal TANF regulations at 45 CFR 206.31, ongoing transportation benefits are generally considered assistance, and only meet the definition of non-assistance if provided to an employed family or provided on a short-term nonrecurring basis to meet a specific episode of need that will not extend beyond four months. A transportation benefit that is necessary to enable a TANF-eligible TA applicant to participate in applicant job search is not considered assistance but is identified as a diversionary payment. Therefore, FFFS funds can be used only to provide transportation benefits when the payment meets the definition of non-assistance (for employed or short-term, as described above including applicant job search) or provided to those already receiving ongoing TANF-funded TA. Other transportation costs, including ongoing transportation benefits to families and childless couples receiving Safety Net Assistance (SNA), cannot be funded with FFFS and would need to be claimed as SNA Non-Maintenance of Effort (Non-MOE) cost.

In addition to the services described above, FFFS funds cannot be used for medical services or treatment. FFFS funds also cannot be used for juvenile justice services that were not authorized under prior law. The only juvenile justice services for which FFFS funds may be used are those authorized under prior law which are funded through EAF Assistance/Non-Assistance. As an example, expenditures for residential care as well as assessment or rehabilitative services, including services provided to children in the juvenile justice system, do not meet any of the purposes of the TANF program. In these instances, the principal purpose for placement is to protect the child or to protect society because of the child's behavior, not to care for the child in his or her own home (TANF Purpose 1). Since the focus is to address the child's needs, expenditures to care for the child in these living situations does not end the dependence of needy parents on government benefits by promoting job preparation, work, and marriage (TANF Purpose 2). TANF purposes 3 and 4 also do not apply in these situations.

FFFS-funded services may be provided only to TANF-eligible recipients of TA, and to individuals and families not in receipt of TA who meet TANF eligibility requirements as outlined in [00-LCM-20](#), including having income at or below 200 percent of the federal poverty level. The exceptions to this rule are EAF child welfare services; EAF PINS foster care costs; EAF JD costs authorized under prior law; EAF foster care maintenance, administration, and tuition costs; pregnancy prevention purposes; and PINS/Preventive Services.

The income standards for June 2023 – May 2024 are outlined in [GIS 23TA/DC016](#).

Districts were advised of their 2023 Summer Youth Employment Program (SYEP) allocations in [23-LCM-08](#). In addition, please refer to [23-ADM-05](#) for additional guidance on transferring the 2023 SYEP allocation to FFFS.

FFFS is designed to provide districts with flexibility in determining how best to respond to identified local needs for services based on their caseload compositions, local labor markets, and other unique factors. Please refer to [23-ADM-05](#), sections IV. and V. A for a complete description of FFFS background and components

### **Child Care and Title XX**

In addition to the FFFS, the enacted budget included separate federal and state allocations for child care services to assist low-income families. OCFS issues a separate LCM that sets forth each district's child care allocation and the rules governing those funds. Districts may transfer a portion of their FFFS funds to the CCDBG to supplement their child care allocations.

District block grant transfers should remain within the following percentages against the \$964,000,000 FFFS appropriation for the 2023-24 FFFS Plan.

- 30 percent to CCDBG, or
- 25 percent to the Title XX block grant, or
- 30 percent combined to the CCDBG and Title XX block grant.

A review of the statewide total amount of the transfers will be completed when all Plans are submitted, and exceptions to the above percentages may be considered on an individual district basis.

Please refer to [23-ADM-05](#), section V. A. for specific information regarding employment services/work supports, including the Summer Youth Employment Program, Child Care/Title XX transfer, and program outcomes.

### **Child Welfare Services Threshold**

Districts need to be aware of their portion of the \$382,322,341 statewide child welfare services threshold when determining their FFFS dedications. Under the threshold, to the extent that districts have eligible claims, they must meet the "Child Welfare Services Threshold" through child welfare services expenditures under FFFS and FFFS funds transferred to Title XX to receive 62 percent state child welfare services funding for any child protective services, child preventive services other than COPS; after-care services, independent living services, adoption services, and administration costs. Additionally, a district needs to be aware of the performance or outcome-based requirements for child preventive services (see below) when determining how much of its FFFS allocation it wishes to transfer to Title XX or to use directly for child welfare services.

The following are counted towards a district's threshold:

- Child Welfare (EAF or 200 Percent) Program
- Child Welfare (EAF or 200 Percent) Administration
- Child Welfare Services Directly Funded Under FFFS
- Title XX Below 200 Percent Child Welfare
- Title XX Below 200 Percent COPS (up to the amount dedicated in the Title XX Under 200 Percent COPS for SFY 2010-2011 as of March 31, 2011 (See Attachment 2.)

Each district's 2023-24 threshold is set forth in Attachment 3. The methodology for determining the threshold is based on an apportionment using SFY 2019-20 district threshold shares. The

methodology also applies a ceiling, which prevents a district's threshold from exceeding 50 percent of its total FFFS allocation. A district meeting its threshold may be eligible for 62 percent state reimbursement after available federal funding for its eligible child welfare services expenditures, other than COPS. The threshold time frame is October 1, 2023, through September 30, 2024, to be counted towards the district's 2023-24 threshold.

The following example has been developed to demonstrate how the threshold applies:

Pearl County's Gross Child Welfare Services claims for 2023-24 totaled \$11,000,000. Pearl County's Child Welfare Services threshold is \$3,100,000. The chart below reflects three scenarios:

- Pearl County meeting the threshold
- Pearl County exceeding the threshold
- Pearl County not meeting the threshold

	Meeting Threshold	Exceeding Threshold	Not Meeting Threshold
<b>A. Gross</b>	11,000,000	11,000,000	11,000,000
<b>B. Other Federal</b>	3,500,000	3,500,000	3,500,000
<b>C. Dedicated to Threshold</b>	3,100,000	4,000,000	2,000,000
<b>D. Net of Federal = A-B-C</b>	4,400,000	3,500,000	5,500,000
<b>E. State 62%</b>	2,728,000	2,170,000	0
<b>F. Local</b>	1,672,000	1,330,000	5,500,000

In the last example, the district would NOT receive state reimbursement since it had sufficient child welfare claims and did not dedicate enough of its FFFS allocation to its threshold.

#### Performance or Outcome-Based Provisions for Child Preventive Services

In addition to the "Child Welfare Services Threshold", Part H of Chapter 57 of the Laws of 2007 enacted performance or outcome-based provisions for preventive services provided by districts, which require performance or outcome-based provisions for SSL §409 (a) preventive services beginning January 1, 2008. The applicable OCFS regulations are set forth in 18 NYCRR 423.5. In the absence of meeting performance or outcome provisions, OCFS may limit any increase in reimbursement over the amount claimed by the district for the period of October 1, 2005, through September 30, 2006 (as claimed through March 31, 2007).

#### Child Care

A district may only fund child care service costs with FFFS funds by transferring those funds to the Child Care Development Block Grant (CCDBG). Any FFFS funds that are transferred to the CCDBG are governed by the federal and New York State Child Care Block Grant (NYSCCBG) rules for such funds, including the 5 percent cap on funding for administrative activities. Eligibility is determined and expenditures are reported and claimed in the same manner as NYSCCBG Claims.

#### State-Administered Programs/Contracts

The districts opting to support State-administered contracts with FFFS funds identified on line 9 of the Plan must complete the Revenue Intercept Authorization. The Revenue Intercept Authorization will be provided to the district for completion following a Plan submission that includes an allocation and contract name on line 9. The authorization must list the programs, provider, and the amount of funding to be reserved for each contract. The completed authorization must be provided back to OTDA for Plan approval. Please refer to [23-ADM-05](#), section V. A. for additional guidance on State-administered contracts.

## Administrative Costs and the TANF 15 Percent Rule

Districts may use a portion of their FFFS allocation for administrative costs but must ensure that costs are allocated to benefiting programs when more than one program is involved in a particular activity and when the services are provided to individuals who are not TANF-eligible, whether done by district staff or contractor staff. If districts choose to engage contractors to provide services, they are reminded that they need to obtain assurances from providers that the costs being charged to TANF are done pursuant to an appropriate and acceptable cost allocation methodology. Cost allocation rules are contained in the [Fiscal Reference Manual](#), Volume 3.

They can also be found in the Office of Management and Budget (OMB) Uniform Guidance. (The Uniform Guidance publication supersedes OMB A-21, A-50, A-87, A-89, A-102, A-110, A-122, and A-133.)

The maximum amount the state can spend on administration against the TANF block grant after transfers to other block grants is 15 percent. For 2023-24, based on the total projected administrative costs against TANF, districts may budget a maximum of 25 percent in administration against their FFFS Plans. As the federal fiscal year closes, should it be determined that additional TANF administrative costs can be allowed, the districts will be notified.

Administrative expenditures should be scrutinized to ensure that they are properly classified as a program cost or an administration cost for TANF purposes. The [Fiscal Reference Manual](#) Volume 3, Chapters 5 and 10, contain additional information related to the distinction between TANF program and administration. Districts are reminded that employment activities need to be broken out between program and administrative activities in the Combined TANF Allocation submittal and when claiming employment activity costs. Many employment activity costs and contracts would be excluded from the definition of TANF administration. Please refer to [23-ADM-05](#), section V. A for additional guidance regarding administrative costs.

## TANF Maintenance of Effort (MOE) Requirements

In order to assist OTDA with projecting TANF MOE expenditures, districts are required to show the gross amount allocated to each project funded with FFFS in the “Gross Amount” column in the FFFS Plan. The gross amount includes MOE countable state and local share along with the federal share. The “Gross Amount” column should accurately reflect the total commitment to each program. The locally funded and state-funded portions of the following programs are eligible to be MOE countable:

- TANF services and employment programs
- Child care (however, not for contingency funds)
- Administration (up to 15 percent)
- SNA for former FA recipients who exceed the 60-month state time limit and SNA for aliens who lost eligibility solely due to PRWORA changes to the law.

Please refer to [23-ADM-05](#) section V. B. for additional guidance on TANF MOE requirements.

## IV. Claiming Instructions

Districts must report their expenditures via the RF-2, RF-2A, and the RF-17 Claim Package for Special Project Claiming in the Automated Claiming System. Claiming instructions are contained in the [Fiscal Reference Manual](#), Volumes 2 and 3. The FFFS ceiling reports are available in the Ceiling Reports folder within the [BFDM County Report Library](#). Please refer to [23-ADM-05](#) section VI. C for additional guidance claiming instructions.

### Child Welfare Services Settlement

The “2023-2024 Child Welfare Services” settlement is based on child welfare expenditures made from October 1, 2023, through September 30, 2024, and claimed by March 31, 2025. The amount a district dedicates out of its FFFS allocation for Title XX below 200 percent child welfare services, EAF child welfare services, and child welfare TANF direct services will be applied to eligible expenditures claimed by March 31, 2025. Other available federal funds for the child welfare services settlement include Independent Living, Title IV-E, Title IV-B Subpart 1 and 2, where the expenditure has been deemed eligible. After the appropriate federal funding is applied against the district’s expenditures for these services from October 1, 2023, through September 30, 2024, that are claimed by March 31, 2025, these expenditures are eligible for 62 percent state share reimbursement, subject to the threshold and performance or outcome-based provisions for preventive services.

### Additional Foster Care Services and Other TANF-Eligible Programs

Any 2023-24 FFFS funds dedicated to EAF JD/PINS, EAF Foster Care Maintenance and Tuition, EAF Foster Care Administration, Child Welfare Administrative Costs, and Non-Residential Domestic Violence are to be used to reimburse expenditures made from October 1, 2023, through September 30, 2024, and claimed by March 31, 2025. After March 31, 2025, no changes to the amount of FFFS allocation dedicated to EAF foster care maintenance and/or tuition can be made. Please refer to [23-ADM-05](#) section V. A. for additional guidance on these specific programs.

### Child Care

A district may only fund child care services costs with FFFS funds by transferring those funds to the CCDBG. Any FFFS funds that are transferred to the CCDBG are governed by the federal and New York State Child Care Block Grant (NYSCCBG) rules for such funds, including the 5 percent cap on funding for administrative activities. Eligibility is determined and expenditures are reported and claimed in the same manner as NYSCCBG Claims.

FFFS funds transferred to the CCDBG from a district’s 2023-24 FFFS allocation may be used for expenditures for the period October 1, 2023, through September 30, 2024 (Federal Fiscal Year (FFY) 2024). Any FFFS funds transferred to CCDBG FFY 2024 will be subject to the FFY 2024 NYS CCDBG claim deadlines.

A desk reference guide is provided as Attachment 5, which provides programs, claiming reimbursement criteria, RF-17 project labels, dates for claiming, and Plan revision submission dates for the 2023-24 Plan.

## V. Required Action

### Plan Submission

OTDA will continue to support the web based FFFS System for FFFS Plan processing. Districts’ staff will use the FFFS System to complete, submit, revise, and view their respective 2023-24 FFFS Plan. OTDA and OCFS staff will use the FFFS System to release the initial Plans for the 2023-24

Plan year, receive, review, and approve or return to districts Plans that require further clarification. The FFFS System houses resources such as ADMs, the FFFS user manual and legacy TRACS 2 data. The FFFS System is also used for the districts' reporting requirements and districts' reports.

Basic Plan information, including the districts' allocations, has been entered on each district's Plan. The Plan contains a Fiscal Data Entry (FDE) screen for district information, allocations, and a listing of state-administered contracts. The Project Details screen for TANF Services, Non-Recurrent and TANF Employment projects must be completed prior to Plan submission. Instructions for completing the FFFS Plan are contained in Attachment 4 – FFFS System District User Manual. Districts should use these instructions when completing, submitting, and revising the 2023-24 FFFS Plans.

The districts must submit their 2023-24 FFFS Plans via the FFFS System by September 30, 2023.

Plan development and submissions for OCFS-related costs are made through integrated county planning or consolidated service planning requirements found in [21-OCFS-LCM-06](#). For questions on OCFS Plan issues, please contact the appropriate OCFS regional office contact individuals noted on the first page of this LCM.

### **Subrecipient Monitoring**

Districts who use FFFS funding to contract with providers for services must ensure that the activities funded are not otherwise available from that provider on a non-reimbursable basis. If not a performance-based contract, districts must include a statement in their contracts that a cost allocation methodology that satisfies Generally Accepted Accounting Principles, as well as the requirements of U.S. Office of Management and Budget Circulars A-122 for nonprofit organizations, and A-21 for educational institutions, or A-87 for State and local governments will be used. Districts must have monitoring procedures in place to maintain appropriate oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

### **District Certification**

As part of the FFFS Plan, each district is required to provide a certification, which constitutes its assurances that the programmatic and fiscal requirements that are necessary for proper program administration and accountability will be maintained. This certification constitutes an acceptance by the district to be bound by the assurances, including the provision of all statutorily required services and activities; and an agreement to bear full responsibility for the implementation of programs in accordance with the applicable federal and state statutory and regulatory requirements. The certification is contained in the FFFS Plan and is completed upon submission of the Plan.

Statutorily required services and activities include, but are not limited to, the following:

- Determining program eligibility
- Providing substance abuse and domestic violence screening and assessments
- Services for victims of domestic violence
- Providing child support referrals
- Meeting employment requirements, including conducting employability determinations and assessments, achieving federal work participation rate requirements, and complying with federal work verification requirements
- Providing proper notices
- Providing conferences and fair hearings
- Meeting regulatory application time frames
- Providing special allowances
- Meeting emergency and immediate needs
- Providing guaranteed childcare services



- Providing foster care services
- Providing mandated child prevention services
- Providing child protective services

## **FFFS Plan Amendments**

The 2023-24 FFFS Plans may continue to be amended through March 31, 2025 as districts need to make service adjustments, subject to the limitations set forth in this document. The exceptions to this provision are the amount of the CCDBG and Title XX transfers may not be adjusted after August 15, 2024.

A district must notify OTDA of any changes to its Plan(s) within 30 days of implementing the change by submitting a revised Plan through the FFFS application. As always, the revised Plan(s) will be reviewed jointly by OCFS and OTDA. Any Plan revision(s) that a district makes to its FFFS Plan allocations also must include any appropriate corresponding updates to the TANF-funded services projects or TANF-funded employment programs within the Project Details section of the FFFS application. A brief explanation for significant (greater than 10 percent) changes should be included within the project details. Please refer to [23-ADM-05](#) section VI. C. for additional amendment and claiming information.

## **Reporting and Accountability**

### **1. 2023-24 Performance and Accountability Requirements**

For 2023-24 FFFS Plans, districts must report the number of individuals/families served monthly supported by FFFS funding for all TANF Services and TANF Employment Projects timely. Districts are also required to report the following:

- The number of TANF-funded and SNA MOE Drug/Alcohol Assessments completed
- The number of SNA Drug/Alcohol Assessments completed
- The number of NCPs participating in FFFS work activities

Districts are required to appropriately define, document and maintain performance goals and measures, and establish proper oversight and monitoring of outcomes for all FFFS funded projects. Established outcomes will be subject to State review, as requested. Districts are also reminded that all projects must meet a TANF purpose and districts must indicate what the most appropriate TANF purpose is in the corresponding field of all projects within the project details screen.

#### **a. TANF-Funded Services Reporting**

As part of the 2023-24 Plan submission, each district that allocates FFFS funds to any services project must enter an estimate of the individuals/families to be served for each project in its 2023-24 Plan. The actual individuals/families served must be entered into the FFFS System by the 15<sup>th</sup> of the month following the reporting month. The system will calculate the actual average individuals/families served per month for each project in the project details section of the FFFS Plan.

Districts must enter the number of families served for each month of the Plan year, under the appropriate category: TA (TANF) and SNA MOE Families or 200 percent of poverty for each TANF Services, Nonrecurrent Cost or TANF Employment project. To have consistent reporting, the number of individuals/families reported each month is to be unduplicated within each project. An individual/family that is served more than once per month in a

project should only be counted one time for each month they are served by that project. If no individuals/families were served, the districts must enter zeroes for the month. Please note that if a project is not operational for any months during a Plan year, the non-operational months can be unchecked within the project details. Reporting is not required for months a project is not operational, as long as the months are indicated as not operational in the project details.

b. Substance Use Disorder (SUD) Assessment and Monitoring

Please note that non-federally funded SNA non-MOE drug and alcohol assessments should be reported in FFFS but are not reimbursable under FFFS.

c. Statutory Domestic Violence Liaison (DVL)

Districts may use FFFS funds for the costs associated with providing at least one trained DVL who will make a determination and assessment of the TA applicant's/recipient's DV claim; determine the need for waivers of specific TA requirements that may place the victim and/or the children at risk or make it more difficult for them to escape an abusive situation; refer the victim to appropriate services depending on their situation; and enter the information into WMS via the DV subsystem. Performance of these tasks is the goal and performance data come from the DV reporting subsystem of WMS.

d. Employment Services Programs

Depending on local needs, districts may direct TANF funding to a variety of employment programs as specified in their FFFS Plans. Please note that each district should include funds budgeted for "Employment Administration" (Line 3.) unless the district fully contracts out the employment function and the contract services are primarily program activities. Each district that allocates funds to those specified TANF-funded employment programs must enter information for each program on FFFS.

Districts must continue to use existing reporting mechanisms (WTWCMS for all districts other than New York City and NYCWAY system for New York City) to report participation in employment programs, including paid and unpaid work activities, for the purpose of calculating the federal participation rate. Requirements for documenting and reporting hours of participation in work activities for households with children are detailed in [08-ADM-07](#) and subsequent policy directives.

Please refer to [23-ADM-05](#) section V. A. for specific information regarding PAMs, TANF-funded Services Reporting, SUD Assessment and Monitoring, Statutory DVL, and Employment Services Programs. Any program questions regarding SUD monitoring and assessment and statutory DVL should be directed to OTDA's TA Bureau at (518) 474-9344.

2. Non-Custodial Parents (NCP) Participating in Work Activities

Section 103 of PRWORA requires states to report, on a monthly basis, the number of NCPs participating in TANF-funded or SNA-MOE-funded federal work activities, as defined in section 407(d) of the Social Security Act<sup>i</sup>. Failure to report this and other data elements in an accurate and timely way can result in large financial penalties that could severely limit the amount of TANF funding the State receives for programmatic purposes. Please refer to [00-LCM-20](#)

As a result of this requirement, districts are required to enter into the FFFS System the monthly unduplicated number of NCPs participating in work programs funded through FFFS. If a NCP is served in more than one month, include them for every month served. If no NCP is served in a month, enter zero for that month. Information on NCP status can be obtained directly from the [LDSS-4726 TANF Services Application/Certification](#), either from the cover sheet or from question F in section 1. In the latter instance, clients may not be required to answer question F if they qualify for services in some other way. Please refer to [23-ADM-05](#) section V. A. for specific information regarding reporting requirements for NCPs participation in work activities.

### 3. Other Reporting Requirements

For programs funded as Title XX below 200 percent, FFFS direct child welfare services, child care, EAF foster care administration, maintenance and tuition and alternatives to detention, the planning requirements will be met through the district's "Child and Family Service Plans". Please refer to [21-OCFS-LCM-06](#) for more information.

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#### Issued By:

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<sup>i</sup> Include non-custodial parents participating in any of the following activities: (1) unsubsidized employment; (2) subsidized private sector employment; (3) subsidized public sector employment; (4) work experience (including work associated with the refurbishing of publicly assisted housing) if sufficient private sector employment is not available; (5) on-the-job training; (6) job search and job readiness assistance; (7) community service programs; (8) vocational educational training (not to exceed 12 months with respect to any individual); (9) job skills training directly related to employment; (10) education directly related to employment, in the case of a recipient who has not received a high school diploma or a certificate of high school equivalency; (11) satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalency, in the case of a recipient who has not completed secondary school or received such a certificate; and, (12) the provision of child care services to an individual who is participating in a community service program.