

Section 385.9 - Work Activities and Work Requirements

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Part A - The Regulations

- a) Social services districts may provide, and require applicants for and recipients of public assistance to participate in a variety of activities, including but not limited to the following:
- 1) unsubsidized employment;
 - 2) subsidized private sector employment;
 - 3) subsidized public sector employment;
 - 4) work experience in the public sector or non-profit sector, (including work associated with refurbishing publicly assisted housing) if sufficient private sector employment is not available as determined by the social services official. The maximum number of hours a recipient or applicant may be required to engage in this activity is limited to the number which equals the amount of assistance payable with respect to the public assistance household of such individual (inclusive of the value of food stamps received by the public assistance household of such individual, if any) divided by the higher of (i) the Federal minimum wage, or (ii) the State minimum wage. The limitation of the number of hours of work experience to which a participant may be assigned is a calculation of allowable hours in a work activity and does not mean that such participant is receiving a wage for the performance of such activities. The participant is not working off the grant, but is engaged in work activities as an element of his/her plan to become self-sufficient;
 - 5) on-the-job training;
 - 6) job search and job readiness assistance, as time limited by Federal law, provided that job search is an active and continuing effort to secure employment, configured by the social services official;
 - 7) community service programs provided, however, the number of hours a participant in community service activities authorized pursuant to this section may be required to work in such assignment shall not exceed a number which equals the amount of assistance payable with respect to the public assistance household of such individual (inclusive of the value of food stamps received by the public assistance household of such individual, if any) divided by the higher of (i) the Federal minimum wage, or (ii) the State minimum wage. No participant shall be assigned to a community service activity that conflicts with his/her bona fide religious beliefs. The definition or parameters of this activity shall be set forth in the local plan submitted by the social services district, provided that an individual needed in the home because another member of the household requires his/her presence due to a verified mental or physical impairment shall be deemed to be engaged in community service to the extent such person is actually providing care for such member of the household. The limitation of the number of hours of community service to which a participant may be assigned is a calculation of allowable hours in a work activity and does not mean that such participant is receiving a wage for the performance of such activities. The participant is not working off the grant, but is engaged in work activities as an element of his or her plan to become self-sufficient. For purposes of calculating the participation rate, recipients who are acting as foster parents for children are deemed

- engaged in community service to the extent they are actually providing care for such children;
- 8) vocational educational training as time limited by Federal law and pursuant to subdivision (c) of this section;
 - 9) job skills training directly related to employment;
 - 10) education directly related to employment, in the case of a recipient who has not yet received a high school diploma or a certificate of high school equivalency;
 - 11) satisfactory attendance at secondary school or 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 certificate;
 - 12) provision of child care services to an individual who is participating in community service;
 - 13) job search and job readiness assistance once the individual has exceeded the six week limit set in Federal law;
 - 14) educational activities pursuant to subdivision (c) of this section; and
 - 15) other activities set forth in a local district plan.

b) Additional Provisions:

- 1) No participant shall be required to provide child care services as a work activity described in this part unless the participant expressly requests in writing to provide such services.
- 2) Social services districts may enter into agreements with public and private employment agencies to assist recipients of public assistance to find jobs.
- 3) No participant shall in any case be required to engage in assigned activities for more than forty hours in any week.
- 4) A non-graduate degree student who is participating in a work-study, internship, externship, or other work placement that is part of the curriculum of a student approved for participation by the City University of New York (CUNY), the State University of New York (SUNY), another degree granting institution, or any other education, training or vocational rehabilitation agency approved by the state or social services district, shall not be unreasonably denied the ability to participate in such program as a work activity assignment made in accordance with the provisions of this Part. A social services district may deny such participation based upon consideration of factors including, but not limited to:
 - i) the determination that the student voluntarily quit a job or reduced earnings to qualify for initial or increased public assistance as determined in accordance with section 385.13 of this Part;
 - ii) that a job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public, or not-for-profit sector;

- iii) that the student is not maintaining a cumulative C average (or its equivalent), which may be waived by the district for cases of undue hardship based on the death of a relative, the personal injury or illness of the student or other extenuating circumstances as determined appropriate by the district;
 - iv) failure of the institution or student to monitor and report to the social services district monthly, or as otherwise reasonably required by the district, information regarding the student's attendance and performance related to the work placement. Failure of the institution to monitor and report student attendance and performance shall be cause for the district to reasonably deny approval of the student's participation in such programs as a work activity;
 - v) failure of the student to progress toward the completion of a course of study without good cause as determined by the social services district; and,
 - vi) that the student had previously enrolled in a work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the social services district.
- 5) When a social services district assigns a non-graduate student participating in a social services district approved work-study, internship, externship or other work placement to work activities in accordance with the provisions of this Part, the district shall make reasonable efforts to assign the student to such activities during hours that do not conflict with his or her academic schedule.
- 6) The hours of participation by an individual in a work-study, internship, externship or other work placement that is part of the student's curriculum and that has been approved by the social services district shall be included as a work activity within the definition of unsubsidized employment, subsidized private sector employment, subsidized public sector employment or on-the-job training pursuant to subdivision (a) of this section.
- 7) In no event shall the programs and activities enumerated in this Part be deemed the sole activities that a social services district may provide and require applicants for and recipients of public assistance to engage in. Any program or activity that meets the goals of this part and is consistent with the requirements of the Labor Law and Social Services Law shall be allowed.
- 8) Any social services district that establishes and provides a program or activity not herein enumerated shall set forth the requirements and structure of such program or activity in its local plan pursuant to the provisions of this Part.
- 9) The social services district retains the right to determine, consistent with statute and regulations, the activity or activities to which an applicant or recipient is to be assigned.
- 10) No particular assignment or opening for any activity need be created except on the determination and consent of the social services district.

c) Educational activities and Vocational Education Training.

- 1) A social services official shall make available vocational educational training and educational activities in accordance with an assessment conducted and the employability plan prepared pursuant to the requirements of sections 385.6 and 385.7 of this Part. Such activities may include, but need not be limited to:
 - i) vocational educational training, which may include but not be limited to organized educational programs offering a sequence of courses which are directly related to the preparation of individuals for current or emerging occupations requiring other than a baccalaureate or advanced degree. Such programs may include competency-based applied learning which contributes to an individual's academic knowledge, higher-order reasoning, and problem-solving skills, work attitudes, general employability skills, and the occupational-specific skills necessary for economic independence. Such term may also include applied technology education;
 - (a) When a social services district contracts with a proprietary vocational school to provide vocational educational training to individuals assigned in accordance with the provisions of this section, not more than 25 percent of the duration of such program can be devoted to preparation for a high school equivalency or to English as a second language;
 - (b) Instructors employed by proprietary schools to prepare individuals for a high school equivalency certificate shall meet experience requirements established in regulation by the Commissioner of Education;
 - (c) Individuals in need of basic literacy programs shall be referred to basic and remedial education rather than to vocational proprietary schools;
 - ii) high school education or education designed to prepare a participant for a high school equivalency certificate;
 - iii) basic and remedial education;
 - iv) education in English proficiency;
 - v) no more than a total of two years of post-secondary education (or the part-time equivalent, if full-time study would constitute an undue hardship);
 - (a) Such post-secondary education must be necessary to the attainment of the participant's employment goal, as set forth in the employability plan required pursuant to sections 385.6 and 385.7 of this Part. Such goal must relate directly to obtaining useful employment in a recognized occupation;
 - (b) Enrollment may be in the following types of educational institutions:
 - (1) community colleges and two-year colleges;
 - (2) four-year colleges; provided, however, that the course of instruction for which an individual is enrolled is limited to a two-year degree granting program;

- (3) licensed trade schools; or
 - (4) registered business schools.
- 2) Except as otherwise provided in this subdivision and as resources permit and pursuant to a local plan prepared in accordance with the requirements of section 385.10 of this Part, a social services official must assign to educational activities an individual who has not attained 20 years of age and who has not obtained a high school diploma or its equivalent.
 - 3) Notwithstanding the requirements of this subdivision, an individual between the ages of 16 and 18 years of age may be excused from school attendance requirements if:
 - i) the decision not to require school attendance is based upon an individual assessment which indicates that further attendance is unlikely to result in attainment of a high school diploma or its equivalent based upon consideration of the individual's aptitude and other factors such as grade completion; and
 - ii) he/she participates in either another educational activity other than one which would lead to the attainment of a high school diploma or its equivalent or in job skills training appropriate to and designed for youths.
 - 4) Notwithstanding the requirements of this subdivision, the social services official shall assign individuals 18 and 19 years of age to activities other than those described in this subdivision if such official makes a determination, based upon an assessment and employability plan that educational and vocational educational activities are not appropriate or if such individual has failed to make satisfactory progress in educational activities.
 - 5) An individual who is assigned to educational activities consistent with the employment goals identified in the employability plan developed pursuant to sections 385.6 or 385.7 of this Part shall not be assigned to any other activity that might interfere with attendance at class; provided, however, that a social services official may periodically reevaluate an individual's employment plan and having given due consideration to the individual's progress in the current, and if applicable, prior program make assignments to other activities in order to meet participation rates established in accordance with the provisions of section 385.8 of this Part.
 - 6) For individuals assigned by the district to participate in educational activities pursuant to this section and consistent with the individual's assessment and employability plan, the district may report supervised homework time and up to one hour of unsupervised homework time for each hour of class time, provided that the total homework time reported for participation does not exceed the hours required or advised by the respective educational program.
 - 7) An adult member of a two-parent family may be required by a social services official to participate in education activities consistent with the employment goals contained in his/her employability plan.
 - 8) Nothing in this subdivision shall be construed to supersede the eligibility requirements of teen parents as set forth in this Title.

d) Work Experience

- 1) Work experience programs meeting State and Federal requirements may be established by social services districts.
- 2) Work experience programs may include the performance of work for a Federal office or agency, county, city, village or town or for the State or in the operation of or in an activity of a non-profit agency or institution.
- 3) A recipient may be assigned to participate in such work experience program only if:
 - i) appropriate Federal and State standards of health, safety and other work conditions are maintained;
 - ii) the number of hours an individual assigned to work experience activities authorized pursuant to this section may be required to participate in such assignment shall not exceed a number which equals the amount of assistance payable with respect to such individual's household (inclusive of the value of food stamps received by such household, if any) divided by the higher of (a) the Federal minimum wage or (b) the State minimum wage;
 - iii) such recipients are provided appropriate workers' compensation or equivalent protection for on-the-job injuries and tort claims protection on the same basis, but not necessarily at the same benefit level, as they are provided to other persons in the same or similar positions, while participating in work experience activities under this section;
 - iv) the project to which the participant is assigned serves a useful public purpose in fields such as health, social services, environmental protection, education, urban and rural development and redevelopment, welfare, recreation, operation of public facilities, public safety and child day care;
 - v) such assignment would not result in:
 - (a) the displacement of any currently employed worker or loss of position (including partial displacement such as reduction in the hours of non-overtime work, wages or employment benefits) or result in the impairment of existing contracts for services or collective bargaining agreements;
 - (b) the assignment of a participant or the filling of a position when any other person is on layoff from the same or any equivalent position or the employer has terminated the employment of any regular employee or otherwise reduced its workforce with the effect of filling the vacancy so created with a participant assigned pursuant to this section;
 - (c) any infringement of the promotional opportunities of any current employed person;
 - (d) the performance, by such participant, of a substantial portion of the work ordinarily and actually performed by regular employees;
 - (e) the loss of a bargaining unit position as a result of work experience participants performing, in part or in whole, the work normally performed by the employee in such position; or

- (f) such assignment is not at any work site at which the regular employees are on a legal strike against the employer or are being subjected to lock out by the employer.
- 4) Public employers participating in work experience programs (or the social services official, pursuant to an agreement established between any such employer and the social services official) shall publish on a monthly basis a report summarizing the employer's work experience program for the month.
- i) Such monthly report shall include, at a minimum, summary information regarding the agencies or departments where participants are assigned, work locations, job duties and assignments, hours worked and period worked and shall be provided to the certified collective bargaining representative of public employees at such employer and may not be disclosed to any other party.
 - ii) Such certified collective bargaining representative shall take reasonable steps to protect the confidentiality of such information and shall take reasonable steps to prevent disclosure of same to non-authorized persons.
 - iii) Reports provided pursuant to this section shall contain a warning against re-disclosure and asserting the confidentiality of the information therein provided.
- 5) In assigning to work experience a recipient who is a non-graduate student attending CUNY, SUNY or other approved non-profit education, training or vocational rehabilitation agency, the social services district shall:
- i) after consultation with officials of CUNY, SUNY or other non-profit education, training or vocational rehabilitation agency, assign the student to a work experience site on campus where the recipient is enrolled, if a work experience assignment approved by the social services official is available. Where such work experience assignment is not available, the social services district shall, to the extent possible, assign the student to a work experience site within reasonable proximity to the campus where the recipient is enrolled. Provided, however, in order to qualify for a work experience assignment on-campus, or in close proximity to campus, a student must have a cumulative C average, or its equivalent. The social services district may waive the requirement that the student have a cumulative C average or its equivalent for undue hardship based on:
 - (a) the death of a relative of the student;
 - (b) the personal injury or illness of the student; or
 - (c) any other extenuating circumstances;
 - ii) not unreasonably assign the student to participate in work experience during hours that conflict with the student's academic schedule.

e) Job Search Activities

- 1) Each applicant for or recipient of public assistance shall, upon request of the social services official, demonstrate that he or she is engaged in an active and continuing effort to achieve self-sufficiency.
- 2) Such effort shall include but not be limited to an active and continuing search for employment, or for persons otherwise exempt in accordance with sections 385.2 and 385.3 of this Part, and where deemed appropriate by the social services official, activities that foster preparation for employment.
- 3) Each such applicant or recipient shall have an affirmative duty to accept any offer of lawful employment in which he or she may engage.
- 4) The failure of a social services district to assign applicants and recipients to activities pursuant to this Part shall not relieve such persons from the requirements of this subdivision.
- 5)
 - i) An applicant who fails to comply with the requirements of this subdivision shall be ineligible for public assistance; for purposes of this subparagraph, the term applicant shall mean the entire applicant household.
 - ii) A recipient who fails to comply with the requirements of this subdivision shall be subject to sanction in accordance with the provisions of sections 385.11 and 385.12 of this Part.
- 6) Supervised job search activities shall be described in the local plan.

f) Subsidized Public Sector Employment Programs

- 1) A social services official may establish subsidized public sector employment programs for public assistance recipients including, but not limited to, grant diversion programs, which may be supported wholly or in part with public assistance funds. Such programs shall be established through agreements between social services districts and employers; provided, however, that, if appropriate, the Office may act on behalf of one or more social services districts in establishing such agreements.
- 2) Programs may include, but need not be limited to, on-the-job training programs which reimburse employers in part or in whole for the cost of training public assistance recipients through wage subsidies.
- 3) The social services official or the Office is authorized to transfer public assistance funds to employers through written agreements developed and executed in accordance with Office regulations.
- 4) A recipient may be assigned to a subsidized public sector employment activity only if:
 - i) the conditions of employment including such factors as the type of work, geographical region and proficiency of the participant are appropriate and reasonable;

- ii) the recipient is deemed an employee for purposes of the applicable collective bargaining and labor laws and receives the same benefits and protections as existing employees similarly situated (working a similar length of time and doing similar work) receive pursuant to the provisions of law and any applicable collective bargaining agreement or otherwise as made available to such existing employees;
 - iii) The social services official shall ensure that any such program agreement contains adequate provisions for the prompt resolution of disputes concerning participation in the program and the obligations and benefits associated with it;
 - iv) Nothing contained in this section shall be deemed to affect, modify or abridge a participant's right to a fair hearing pursuant to Part 358 of this Title or representation thereof by counsel or, if applicable, the participant's collective bargaining representative.
- 5) A participant employed by an employer subject to the Civil Service Law or subject to rules consistent with such law shall be appointed to an appropriate classified position. Notwithstanding any other provision of law, rule or regulation, such position shall be deemed to be in the non-competitive class of the classified service only while such participant is serving in the position.
- 6) No employee of the participating employer may be displaced by any recipient employed pursuant to this subdivision. For the purpose of this subdivision, the term displacement shall include partial displacement, such as a reduction in the customary hours of work (including overtime), wages, or employment benefits.
- 7) No participant shall be employed:
 - i) if any other employee of the employer is available for reinstatement, recall or reemployment following a leave of absence, furlough, layoff or suspension from the same or any substantially equivalent job;
 - ii) when the employer has terminated the employment of any regular employee or otherwise reduced its work force with the intention of filling the vacancy or vacancies so created by hiring a participant whose wages are subsidized under this program; or
 - iii) when the employee organization representing employees of the employer is engaged in a strike against the employer or such employees have been locked-out by the employer; or
 - iv) where such employment results in the loss of a bargaining unit position as a result of assigned individuals performing, in part or in whole, the work normally performed by the employee in such position.
- 8) No position may be created that will infringe in any way upon the promotional opportunities of currently employed individuals or individuals currently engaged in an approved apprenticeship training program.
- 9) No participant shall remain in a position if another employee is eligible for promotion from an eligible list to that position. An employer shall, at least 10 days prior to filling a position with a participant, notify any employee organization that represents

employees of the employer who are engaged in similar work or training in the same or substantially equivalent job as that in which the placement is to be made, that it intends to make a placement pursuant to the terms of this subdivision.

- 10) Where an employee organization represents employees of the employer who are engaged in similar work in the same or substantially equivalent job as that proposed to be funded under this program, an opportunity shall be provided for such organization to comment on the proposed placement of the participant or the administration of the program and the social services official shall respond to such comments within 10 days of receipt of such comments.
- 11) Employers are prohibited from using public assistance funds to encourage or discourage membership in, or participation in the activities of, any employee organization, and each employer shall provide to the social services district assurances that no such funds will be used for such purposes.
- 12) Nothing herein shall be construed to affect, modify, or otherwise abridge any provision of the Civil Service Law.

g) Subsidized Private Sector and Not-For-Profit Employment Programs

- 1) A social services district may establish subsidized private sector employment programs for public assistance recipients including, but not limited to, grant diversion programs, which may be supported wholly or in part with public assistance funds. Such programs shall be established through agreements between social services districts and employers, including not-for-profit employers; provided, however, that, if appropriate, the Office may act on behalf of one or more social services districts in establishing such agreements.
- 2) Programs may include, but need not be limited to, on-the-job training programs which reimburse employers in part or in whole for the cost of training public assistance recipients through wage subsidies.
- 3) The social services official or the Office is authorized to transfer public assistance funds to employers through written agreements developed and executed in accordance with Office regulations.
- 4) A recipient may be placed in a subsidized private sector or not-for-profit employment activity only if:
 - i) the conditions of employment including such factors as the type of work to be performed, the geographic location of the job, and the qualifications of the participant are appropriate and reasonable;
 - ii) the recipient is deemed an employee for purposes of the applicable collective bargaining and labor laws and receives the same benefits and protections as an employee similarly situated (working a similar length of time and doing similar work) receives pursuant to the provisions of law, an applicable collective bargaining agreement or otherwise as made available to the employees of the employer;

- iii) no employee of the participating employer is displaced by any recipient hired pursuant to this subdivision. For the purpose of this subdivision, the term displacement shall include partial displacement, such as a reduction in the customary hours of work (including overtime), wages, or employment benefits;
 - iv) no participant is hired:
 - (a) if any other employee of the employer is available for reinstatement, recall or reemployment following a leave of absence, furlough, layoff or suspension from the same or any substantially equivalent job; or
 - (b) when the employer has terminated the employment of any regular employee or otherwise reduced its work force with the intention of filling the vacancy or vacancies so created by hiring a participant whose wages are subsidized under this program; or
 - (c) when the employee organization representing employees of the employer is engaged in a strike against the employer or such employees have been locked-out by the employer; or
 - (d) when such hiring will result in the loss of a bargaining unit position as a result of assigned individuals performing, in part or in whole, the work normally performed by the employee in such position;
 - v) no job is created that will infringe in any way upon the promotional opportunities of current employees or individuals currently engaged in an approved apprenticeship training program;
 - vi) no participant shall remain in a job if another employee is eligible for promotion to that job. An employer shall, at least 10 days prior to filling a position with a participant, notify any employee organization that represents employees who are engaged in similar work or training in the same or substantially equivalent jobs as those on which the placement is to be made, that it intends to make a placement pursuant to the terms of this section.
 - vii) where an employee organization represents employees of the employer who are engaged in similar work in the same or substantially equivalent jobs as those proposed to be funded under this program, an opportunity is provided for such organization to comment on the proposed placement of participants or the administration of the program and the social services official or his/her designee shall respond to such comments within 10 days of receipt of such comments;
 - viii) employers are prohibited from using public assistance funds to encourage or discourage membership in, or participation in the activities of, any employee organization and each employer shall provide to the social services district assurances that no such funds will be used for such purposes.
- 5) The social services official shall require every private or not-for-profit employer that intends to hire one or more assigned individuals to certify to the social services district that such employer has not, in the past five years, been convicted of a felony or a misdemeanor the underlying basis of which involved workplace safety and health or labor standards. Such employer shall also certify as to all violations issued

by the State Department of Labor within the past five years. The social services official in the social services district in which the participant is placed shall determine whether there is a pattern of violations sufficient to render the potential employer ineligible. Employers who submit false information under this section shall be subject to criminal prosecution for filing a false instrument.

Part B - Department Policy

The work activities described in 18 NYCRR 385.9 include those listed in federal TANF legislation. The list represents a variety of work-related activities and programs which are intended to offer recipients of Temporary Assistance (TA) and SNAP employment opportunities to help them advance economically.

Among the activities listed in 18 NYCRR 385.9 are the work activities which count toward the federal and state participation rates. OTDA has defined each work activity consistent with federal requirements while providing flexibility where possible. Districts should refer to 18 NYCRR Part 385.8 for information regarding how each definition counts towards the work participation rate. In order for these activities to be considered countable, the participant must be engaged in the activity for a minimum hourly requirement per week, averaged monthly, depending on case type. It is important to remember that the hours required represent a minimum for meeting participation rates only and should not be considered as the standard number hours needed to ensure a successful transition into unsubsidized, full-time employment. In all instances, the activities to which an individual is assigned must be those that the individual is capable of participating in, contribute to the individual's efforts to obtain employment or enhance current employment efforts. The local district may assign a TA recipient to participate in activities for up to 40 hours per week unless the individual is unable to work such hours due to medical or other work limitations. One such limitation is that the number of hours a recipient is assigned to work experience or community service must not be greater than the sum of the TA grant and SNAP benefits divided by federal or State minimum wage, whichever is higher. This formula is used for calculating the statutorily maximum allowable hours a recipient may be assigned to this activity. Districts are not required to assign individuals for the total number of hours derived by the calculation but may assign individuals to other activities in combination with work experience to meet participation rate requirements.

The non-displacement provisions in 18 NYCRR 385.9(d)(3)(v) place certain restrictions on the nature of activities that may be performed as a work experience assignment. Subparagraph (a) indicates that an assignment cannot result in the "loss of a position." This statement refers to a position existing at the time of placement and not the potential existence of a position in the future. Similarly, subparagraph (e) refers to the "loss of a bargaining unit position" and means only positions existing at the time of the work activity assignment placement. In subparagraph (d), the term "substantial portion of the work ordinarily and actually performed" means work performed by an individual in a position which is potentially subject to loss as described in subparagraphs (a) and (e).

Work activities should be assigned to each individual based on their needs. These needs will be documented in an individual's employment plan as described in Sections 385.6 and 385.7 of this Manual. When assigning work activities districts must consider an individual's preferences, to the extent possible and also be consistent with the individual's assessment and the district's need to meet federal and State work participation requirements. If the district is unable to accommodate such preferences, they must record the reason in the employment plan. Districts

may reassign an individual to other activities as needed, with consideration given to keeping with the expectations and desired outcomes of the employability plan.

Work Activities

Unsubsidized employment - Full or part-time employment in the private, public or nonprofit sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Self-employment and paid internships are included in the definition of unsubsidized employment, if approved by the district. Paid internships would be of the type required of all students to fulfill the education requirements and not a requirement due to the receipt of TA.

- Districts may report projected actual hours of unsubsidized employment participation for up to six months based on current, documented actual hours of work. Any time the district receives information that the participant's actual hours of work have changed, or no later than the end of any six-month period, the district must re-verify the participant's current, actual average hours of work and may report these projected actual hours of work for the succeeding six month period, unless a change in the number of hours worked which is expected to continue is subsequently reported which must be acted upon by the district in a timely manner.
- The number of hours that may be reported for an individual participating in self-employment may be determined by dividing the individual's net income after subtracting business expenses (this is the amount budgeted before disregards in ABEL) by the federal minimum wage. Districts may secure alternate documentation of self-employment hours including statements from supervisors, business contacts or customers to verify hours of self-employment. For example, districts may document and verify hours of work by an informal child care provider based upon time records used to authorize child care payments or based upon statements from the parent of the child for whom the client is providing care.
- Hours of unsubsidized employment may include the hours that the individual is paid by his/her employer to attend a training program or to participate in supportive activities, such as substance abuse treatment, mental health treatment, and rehabilitation activities.

Subsidized Private Sector Employment - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP) and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be

subsidized for the length of time as determined appropriate by the State or social services district.

Subsidized Public Sector Employment - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the social services district and approved by the State.

Districts are reminded that income from paid work study may not be budgeted to determine the family's TA eligibility since the income may be treated as a grant.

Subsidized public sector employment does not include OJT programs where employers are subsidized to offset the costs of training. There is tremendous flexibility with these programs. For instance, part-time positions may be funded; grant diversion or program funds may be used to cover benefits other than wages or to cover training costs, and local districts are able to establish agreements with employers to better match the needs of the individual.

- Districts may report projected actual hours of employment participation for up to six months based on current, documented actual hours of work. Any time the district receives information that the participant's actual hours of work have changed, or no later than the end of any six-month period, the district must re-verify the participant's current, actual average hours of work and may report these projected actual hours of work for the succeeding six-month period, unless a change in the number of hours worked which is expected to continue is subsequently reported which must be acted upon by the district in a timely manner.
- Hours of subsidized private sector employment may include the hours that the individual is paid by his/her employer to attend a training program or to participate in supportive activities, such as substance abuse treatment, mental health treatment, and rehabilitation activities.

Work Experience - Unpaid work performed at a public or not for profit organization to enable participants who cannot find unsubsidized employment to improve their employability. Work experience provides participants with an opportunity to acquire the general skills, training, knowledge and work habits necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a

government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.

In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. Work experience participants must be supervised by a work site supervisor/sponsor, or other responsible party, on an ongoing basis, no less frequently than daily.

- As established in SSL 336-c, the maximum hours an individual may be required to participate in work experience is limited to the number of hours derived by dividing the household's TA deficit amount (from the TA budget) and SNAP allotment amount for the respective month by the higher of the federal or applicable State minimum wage. To calculate the maximum number of hours weekly the monthly from the calculation described above would be further divided by 4.333 and rounded down to the nearest whole number to calculate the number of hours weekly.
- An individual participating in work experience for the maximum number of hours permitted by the above limitation will be considered to have fulfilled the 20 core hours of work participation (or 30 for two-parent households or 50 for two-parent households receiving federally subsidized child care) required for participation rate purposes even if the resulting hours of participation are less than would otherwise be required. If an individual is required to work more hours than the core work hour (i.e., 30, 35 or 55) to count toward the work participation rate, the individual must participate in another countable work activity to fulfill those hours for work participation rate purposes.
- Districts are authorized to assign individuals to additional work activities that are not limited to the minimum wage calculation for up to 40 hours weekly unless the individual is unable to work such hours due to medical or other work limitations.
- New York State statute requires that work experience placements are provided workers' compensation coverage.
- Hours of participation in work experience may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular work experience assignment.
- Any work component that is required as part of a treatment program for an individual participating in a residential treatment program and which is consistent with the definition of work experience may be reported as participation in work experience for those actual hours documented by the district or treatment provider that the individual participated in such work component.

On the Job Training (OJT) - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in

productive work that provides the knowledge and skills essential to attain full and adequate performance of the job. Supervision of recipients in OJT will be provided in a manner determined appropriate by the employer.

- OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant.
- A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant.
- Positions will be subsidized for the length of time determined appropriate by the State or district.
- OJT is distinct from subsidized employment due to the fact that the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.
- Districts may report projected actual hours of employment participation, including any paid OJT employment position, for up to six months based on current, documented actual hours of work. Any time the district receives information that the participant's actual hours of work have changed, or no later than the end of any six month period, the district must re-verify the participant's current, actual average hours of work and may report these projected actual hours of work for the succeeding six month period, unless a change in the number of hours worked which is expected to continue is subsequently reported which must be acted upon by the district in a timely manner.
- Hours of OJT may include the hours that the individual is paid by his/her employer to attend a training program or to participate in supportive activities, such as substance abuse treatment, mental health treatment, and rehabilitation activities.

Job search - The act of seeking or obtaining employment, or preparing to seek or obtain employment, looking for suitable job openings in a group or individual setting, making contact with potential employers, preparing to or applying for and interviewing for jobs and related activities. Participants must be supervised on an ongoing basis no less frequently than daily. For job search, daily supervision may include access to a case manager or district worker for the participant to report on progress or seek additional guidance as needed before the next regularly scheduled contact. Contact between the district worker (or program provider) and the participant must be no less frequent than weekly and can be by phone, in person, or electronically. Actual hours of participation in job search will be reported and may include time participating in job search activities under the direct supervision of the program provider as verified through attendance records or other statements from the program provider and/or based on client logs of the time required to complete such activities.

- Actual hours of participation in job search may include travel time between job interviews, but not the time associated with travel from home to the first employer or from the last employer to home.
- Hours of participation may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular job search assignment.
- Districts and program providers must contact a sample of employers periodically to verify that the participant actually contacted the employer about a job. Such a review is not required in those instances when the district determines that conducting such direct employer contact for documentation would jeopardize current or future job entry efforts by other temporary assistance clients. This determination may be made based upon an assessment of specific employers or as a district policy for all employers.

Job search and job readiness training assistance count toward work participation rate requirements for only 120 hours for single parent households with a child under the age of 6/180 hours for all other households in the preceding 12-month period, with no more than four weeks of which may be consecutive. Districts may require that program participants continue to engage in job search beyond the time limit.

Job Readiness Training (JRT) - Participation in programs that include seeking and preparing for work. JRT assistance includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and, (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary. Hours of participation may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular job readiness training assistance assignment.

- Traditional JRT assistance activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking and life skills essential to workplace success incorporated within the curriculum including time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, and parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.
- In households with dependent children, JRT will also include treatment and rehabilitative services that are required for individuals unable to work or individuals whose employability and employment retention requires such services. Such services reported as JRT will include:

- physical health treatment and rehabilitation services including attending necessary physical therapy and doctor appointments. Such treatment will include medical, behavioral, including those associated with domestic violence, and treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance. This activity should be reported distinctly within the WTCMS system and NYC reporting platforms; and
- health services including therapy, counseling, and other services to address documented mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment. This activity should be reported distinctly within the WTCMS system and NYC reporting platforms.

Actual hours spent by a participant in a JRT activity will be reported and may include time participating in JRT under the direct supervision of the program provider as verified through attendance records or other statements from the program provider. Districts may record individuals in an "intensive residential rehabilitation services" program, as defined in 14 NYCRR §819.2, as participating for up to eight hours per day, not to exceed 40 hours per week, so long as the district documents that the individual was at the facility under the supervision of the treatment provider during the days such participation was reported.

Participants must be supervised on an ongoing basis no less frequently than daily. Daily supervision of a job readiness training participant must include access to a case manager or other district/employment services provider worker for the participant to report on progress or seek additional guidance as needed before the next regularly scheduled contact. Contact between the district worker (or program provider) and the participant must be no less frequent than weekly and can be by phone, in person, or electronically. Job readiness training assistance counts toward work participation rate requirements for only 120 hours for single parent households with a child under the age of 6/180 hours for all other households in the preceding 12-month period, with no more than four weeks of which may be consecutive. Districts may require that program participants continue to engage in job readiness training assistance beyond the time limit.

Community Service - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations in accordance with paragraph (g) of section 336 of SSL. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community Service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment.

- Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who

is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.

- Community service programs must involve structure and supervision by a work site sponsor, or other responsible party, on an ongoing basis, no less frequently than daily.
- Hours of participation may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular community service program.
- Community service programs do not include activities that meet the definition of another allowable TANF work activity (e.g., vocational education, JRT).
- For households without dependent children, community service includes participation in substance abuse treatment programs, mental health and family violence counseling, life skills classes, job readiness training assistance classes and caring for a foster care child or disabled household member. Substance Abuse Treatment and Mental Health/Physical therapy should be reported distinctly within the WTWCMS system and NYC reporting platforms.

Districts must report work activity participation in an activity that meets the Work Experience definition as Work Experience and reserve Community Service for the two instances noted below:

- Participation that is truly **volunteer** in nature including unpaid work performed at a school, Head Start program, religious or faith-based institutions, government or nonprofit agency, or as a volunteer in programs such as Americorps or Volunteers in Service to America (VISTA) but will also include such mandated participation when court ordered. These placements would be distinct from Work Experience in that due to the voluntary nature of the participation the hourly participation would not necessarily be limited to the number of hours derived by dividing the amount of the household's temporary assistance and SNAP benefits by the higher of the federal or State minimum wage. However, a social services district cannot mandate that a recipient perform community services for more hours than the number derived by the grant calculation described above. Participation in a voluntary self-initiated community service activity must be evaluated by the district to determine that such participation provides workplace experience and is expected to improve the employability of the participant. This evaluation would be based upon a review by the district of the tasks involved with the placement and the extent to which those tasks and routine attendance can reasonably be expected to improve the participant's employability. In these instances, a participant could choose to no longer participate in such activity without penalty but would then be subject to an alternate assignment by the district; therefore, districts may want to require that these participants verify such participation on a more frequent basis than monthly.

- Participation otherwise comparable to a work experience placement but categorized as community service to enable the district to use the corresponding federal activity “Providing Child Care to a Community Service participant” for another program participant who is providing child care for the community service participant. In this instance, the placement would need to meet the definition of community service and would not be supported by or system derived to be eligible for the deeming provision. The Welfare Reform Tracking System (WRTS) will not automatically deem an individual as meeting the core work requirement if the individual is participating for the number of hours allowed by grant divided by minimum wage for community service participants when this is less than 20 hours.

Vocational Education - An organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training. Such programs shall include, but not be limited to, competency based applied learning which contributes to an individual’s academic knowledge, higher-order reasoning and problem-solving skills (e.g., Certified Nurses Aide training), work attitudes, general employability skills, and the occupational-specific skills necessary for economic independence. Vocational education may also include applied technology education. Vocational education does not generally include basic or remedial education or ESL but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF-funded/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one-half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.

Vocational education training may include placement in any educational program up to four years of post-secondary education that is intended to lead to attainment of a college certificate or institutional certificate that designates the individual as having attained the competencies necessary to become employed in any occupational category or otherwise be comprised of educational and skills training designed to prepare individuals for employment in current or emerging occupations. Districts are required to determine that the vocational training is preparing the participant for employment in an occupational field in which he or she can reasonably expect to obtain employment.

Districts may offer education or a course of instruction in financial literacy and personal finance which includes instruction on household cash management techniques, career advice to obtain a well-paying and secure job, using checking and savings accounts, obtaining and utilizing short and long term credit, securing a loan or other long term financing arrangement for high cost items; or participation in a higher education course of instruction or trade school as an allowable educational activity. Districts are reminded that to count toward federal work participation requirements as vocational education/job skills training, the education program must directly relate to a specific occupation or job. Additionally, no more than 30 percent of all countable

participants may count toward the federal work participation rate calculation due to participation in vocational education or teen parents participating in high school or other education.

- Participation in vocational education counts toward work participation rates no more than 12 months during the individual's lifetime receipt of assistance.
- Actual hours of participation in vocational education will count toward the hours reported as work, not to exceed the federal limit. Hours of participation in a vocational education program must be documented by the provider through attendance rosters or other supporting documentation developed by the district or the provider.
- Hours of participation may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular vocational education assignment.
- Actual hours of participation in vocational education may include supervised homework/study time and up to one hour of unsupervised homework/study time for each hour of class time, provided that the total number of hours of homework/study time does not exceed the documented hours expected by the educational provider.

In instances, when the colleges or institutions do not submit the requested documentation of the hours to the district, the district will require ongoing contact with the participant to establish adequate evidence that the participant is maintaining satisfactory attendance and making satisfactory academic progress. Vocational Education, like all unpaid activities must be supervised daily. Daily supervision means that a responsible party has daily responsibility for oversight of the individual's participation, not necessarily daily, in-person contact with the participant. District case managers must document all client contact in the case record. While daily supervision must be provided, a minimum of a biweekly review of the case record is required with documentation supporting that the caseworker has spoken with the client about their education progress. Regular communication must be no less frequently than bi-weekly and can be by phone, in person, or electronically, to discuss attendance, along with such issues as progress in the educational activity, supportive service needs, and career planning. In addition, all participants will be required to submit documentation of their grade point average (GPA) and final grades at the end of each semester as a condition of their continued enrollment as being considered as an approved TANF work activity in the instructional program and consistent with the individual's employment plan. Individuals who fail to demonstrate satisfactory progress using this method will be required to submit signed attendance sheets for any subsequent educational enrollments.

Job Skills Training Directly Related to Employment - Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.

Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.

- Must be supervised on an ongoing basis no less frequently than daily;
- Actual hours of participation in job skills training will count toward the hours reported as work for hours above the core work requirement. Hours of participation in a job skills training program must be documented by the provider through attendance rosters or other supporting documentation developed by the provider;
- Hours of participation may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular job skills training assignment;
- Actual hours of participation in an educational activity which meets the definition of job skills training may include supervised homework/study time and up to one hour of unsupervised homework/study time for each hour of class time, provided that the total number of hours of homework/study time does not exceed the documented hours expected by the educational provider.

Education Training – Education training related to employment in the case of a recipient who has not received a high school diploma or certificate of high school equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, English as a Second Language (ESL) instruction and education leading to a High School equivalency (HSE) diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.

- Where required by an employer or determined necessary to improve the participant's job opportunities with potential occupations, includes education leading to a general educational development (GED) or high school (HS) equivalency diploma;
- Must be supervised on an ongoing basis no less frequently than daily;

- Actual hours of participation in education directly related to employment, except as noted below, will count toward the hours reported as work for hours above the core work requirement. Hours of participation in education directly related to employment must be documented by the provider through attendance rosters or other supporting documentation developed by the provider;
- Hours of participation may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular educational activity that meets this work activity;
- Actual hours of participation in an educational activity which meets the definition of education directly related to employment may include supervised homework/study time and up to one hour of unsupervised homework/study time for each hour of class time, provided that the total number of hours of homework/study time does not exceed the documented hours expected by the educational provider;
- Teen parents or minor child head of households participating in this activity for at least 20 hours averaged weekly count fully toward work participation rate requirements.

Satisfactory Attendance at Secondary School - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other institution leading to a HSE, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.

- Must be supervised on an ongoing basis, no less frequently than daily;
- Actual hours of participation in such activities, except as noted below, will count toward the hours reported as work for hours above the core work requirement. Hours of participation in such activities must be documented by the provider through attendance rosters or other supporting documentation developed by the provider;
- Hours of participation may include the actual hours that an individual is engaged in an on-site background check or assessment to determine an individual's suitability for a particular secondary school or equivalent program assignment;
- Actual hours of participation in an educational activity which meets the definition of satisfactory attendance at secondary school or in a course of study leading to a certificate of general equivalence, in the case of a recipient who has not completed secondary school or received such a certificate may include supervised homework/study time and up to one hour

of unsupervised homework/study time for each hour of class time, provided that the total number of hours of homework/study time does not exceed the documented hours expected by the educational provider;

- Teen parents or minor child head of households who maintain satisfactory attendance at secondary school or the equivalent count fully toward participation rate requirements.

Provision of Child Care for Individual Participating in Community Service -

Providing unpaid child care to enable another Temporary Assistance (TANF/MOE funded) recipient to participate in a community service program.

- Participants must be supervised on an ongoing basis no less frequently than daily. Supervision may include access to the parent/guardian of the child through a telephone or other mechanism to seek guidance and clarification.
- Does not include providing child care to a TANF or SN-MOE recipient participating in any activity other than community service.

Other Work Activities - Districts should ensure that all local activities meet the definitions included above, to the extent possible, but are permitted to enroll individuals in other work activities that do not count toward work participation rates. These other work activities must be outlined in the district's Temporary Assistance and SNAP Employment Plan and can be assigned when necessary to improve a participant's employability.

SNAP

Districts may operate any work activity authorized under 18 NYCRR 385.9 that is included in a district's local biennial employment plan as part of the district's SNAP E&T program. These work programs operate in accordance with federal and State statute and regulations governing SNAP and TA work programs and are guided by the goal of helping each SNAP participant obtain paid employment. Districts must provide case management services to all non-exempt TA/SNAP recipients and NTA/SNAP recipients who are assigned to one or more SNAP E&T work activities by the district in accordance with Section 3.4(d) of the district's biennial employment plan. Case management services include the completion of an employment assessment, the development of an employment plan, monitoring the individual's progress in the assigned SNAP E&T activity component, and coordination with service providers.

The following program components will be operated as part of NYS's SNAP E&T program:

- Supervised Job Search
- Job Readiness Assistance

- Career and/or Technical Education Programs or Other Vocational Training (including job skills training)
- Education Training
- Work Experience
- Subsidized Employment (private or public sector and on-the-job training)
- Community Service

All program requirements are consistent with those available through TA work activity programs. However, for SNAP E&T purposes the supervised job search component is defined as seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.

Individuals who are concurrently receiving TA may be assigned to work activities up to 40 hours per week. If a TA recipient is concurrently assigned to a SNAP work activity, up to 30 hours weekly of each week's required hourly assignment is considered a SNAP assignment and the balance is considered a TA assignment. In addition to receiving case management services as part of their SNAP E&T work activity assignment, SNAP E & T participants may also receive job development and placement services, participant reimbursements, and job retention services (subject to the limits described in Section 385.3) that are necessary for the individual to participate in assigned work activities.

Part C - Questions and Answers

Q.1 Can districts approve two-year and four-year college programs as an employment activity?

A.1 Yes. Districts may approve any work activity that meets the individual's need for moving toward self-sufficiency. Participation in up to four years of post-secondary education is included in the definitions of vocational education and job skills training to the extent such activities are consistent with federal and State requirements. Any enrollment in post-secondary education beyond a twelve month (lifetime) period must be combined with no less than twenty hours of participation averaged weekly in paid employment, other core work activities or community service when paid employment is not available.

Q.2 Can districts assign an individual to more than one countable activity in order to meet the minimum requirement of hours per week in the participation rate calculation?

A.2 Yes, unless the individual is unable to work such hours due to a documented medical or other work limitations.

Q.3 Do we have to notify clients of the combined hours assigned to PA work experience activity and the SNAP E&T work experience activity? If noncompliance occurs, how should the notice be written?

A.3 Yes, the client must be informed that they are being assigned to two activities (SNAP E&T work experience and TANF or Safety Net Work Experience). The client must be informed these are separate programs with separate consequences for noncompliance.

Q.4 Can districts assign individuals to financial literacy and person finance instruction programs?

A.4 Yes. Districts may offer education or a course of instruction in financial literacy and personal finance which includes instruction on household cash management techniques, career advice to obtain a well-paying and secure job, using checking and savings accounts, obtaining and utilizing short and long term credit, securing a loan or other long term financing arrangement for high cost items; or participation in a higher education course of instruction or trade school as an allowable educational activity. Financial literacy and personal finance related activities may also be reported under Job Readiness Training.