

GENERAL INFORMATION SYSTEM
DIVISION: Employment & Transitional Supports

October 18, 2006

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TO: Commissioners, Employment Coordinators, TA Directors, WMS Coordinators

FROM: Russell Sykes, Deputy Commissioner, Division of Employment and Transitional Supports

SUBJECT: Hours of Participation in Work Activities Reported for Safety-Net Assistance (SNA) Cases without Dependent Children

EFFECTIVE DATE: Immediately

CONTACT PERSON: Welfare-To-Work Technical Advisor @ 1-800-343-8859, ext. 6-6106

The purpose of this message is to inform districts that the State participation rate reporting logic will consider only **actual** hours of participation in unpaid work activities for Safety Net Assistance cases without dependent children effective with the October 2006 participation rate report. Districts must ensure that actual hours for participation during October are entered on the Welfare-To-Work Caseload Management System (WTWCMS) no later than November 15, 2006. The New York City Human Resources Administration must ensure that only actual hours of participation are reported on the New York City Work, Accountability and You (NYCWAY) system for all participation occurring on or after October 1, 2006. Many districts already report actual hours of participation. This policy is consistent with the requirement to report actual hours for households with children as outlined in 06-LCM-10.

Districts may continue to apply the work activity definitions which were previously approved by the Office as part of each district's employment plan for **SNA households without dependent children** unless otherwise notified by the Office.

Hours of Participation in Paid Employment

Consistent with current policy, participation reports will use hours of work based upon either the Automated Budgeting and Eligibility Logic (ABEL) or WTWCMS entries, whichever is most recent as determined by the "from date" of the temporary assistance budget or WTWCMS schedule.

Hours of paid employment, such as unsubsidized or subsidized employment and paid On-the-Job Training (OJT) positions which are entered on ABEL or WTWCMS must be based on current documentation received from the employer and may be projected for no more than six months, with updates provided whenever a change in the number of hours worked is reported.

Absent other documentation of the hours of employment for self-employed individuals, districts may document the number of hours of work for a self-employed individual by dividing the individual's net income after subtracting business expenses (this is the amount budgeted before disregards in the ABEL system) by the federal minimum wage. If hours other than the net income divided by the federal minimum wage are reported as hours of work, then alternate documentation other than self-attestation must be maintained to verify the hours of work reported.

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Hours of Participation in Work Activities other than Paid Employment

Only actual hours of participation (including excused absences) in countable unpaid work activities will be considered towards the calculation of the participation rate. Hours of excused absence include those instances where the participant was already enrolled in the respective work activity and had been scheduled to participate during the period that the participant was absent with good cause. Hours the individual was scheduled to participate in a countable work activity, but the worksite was closed due to holiday may also be reported as an excused absence until WTCMS is modified to accommodate discrete reporting of holiday time which will be included as countable participation.

In those instances where the district has determined that a SNA recipient in a household without children is determined needed in the home full-time to care for an incapacitated household member and assigned an employability code of 38, the State participation rate reporting logic will continue to deem such individuals as participating in community service for 40 hours per week and consider such participation as actual hours of participation, unless the district reports actual hours of participation via the WTCMS which are different than the system derived hours. Therefore, districts should only enter hours of participation for SNA recipients who have been assigned an employability code of 38 when the individual is actually providing care for less than 40 hours weekly.

Required Action

Districts must review attendance policies for work activities other than unsubsidized, subsidized employment or paid OJT to ensure that mechanisms are in place to document and report actual hours of participation and excused absences from work activities in a timely manner.

Districts must ensure that hours of participation reported on the WTCMS and NYCWAY reported data for hours of participation on or after October 1, 2006 are consistent with the requirements outlined above and that actual hours are supported by documentation which is maintained, either as part of the district's records or if entered by the provider as part of the provider's records. Actual hours of participation for the month of October must be entered on WTCMS no later than November 15, 2006 and NYCWAY must report actual documented hours of participation effective with the participation occurring on or after October 1, 2006.