



**Human Resources
Administration**

Department of
Social Services

**Family Independence
Administration**

Robert Doar
Commissioner

Matthew Brune
Executive Deputy
Commissioner

180 Water Street
New York, NY 10038

212 331 6180

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Lori McNeil, Director of Research and Policy
Urban Justice Center
123 William Street, 16th Floor
New York, NY 10038

Dear Ms. McNeil:

Thank you for the opportunity to meet on May 2 to discuss the release of the Urban Justice Center's report *Case Closed: An Examination of Exclusion in New York City's Public Assistance Programs*.

In the meeting, we expressed some concerns about the research methodology employed in the report. It has several limitations that affect the generalizability of the findings to the thousands of clients who receive Human Resources Administration (HRA) benefits and services. The report is largely based on data from small samples of the Homelessness Outreach and Prevention Project (HOPP) clients and, therefore, the findings are not representative of the experiences of HRA clients. In addition, although the report utilizes administrative data from a larger sample of HOPP clients, the sample suffers from selection bias because the cases were not selected at random and the analysis failed to control for other factors that might have affected the results. Although we find the conclusions of the report to be based on flawed research, we welcome the opportunity to review the data that were collected on these small number of HRA clients as part of our routine and on-going efforts to evaluate the provision of services and benefits.

As an outcome of its findings, the Urban Justice Center has put forth the following 10 recommendations in its report. Below is HRA's response to each recommendation.

Eliminate duplicative documents and appointments

HRA has continuously focused on its administrative processes to maintain the accuracy and timeliness of its eligibility determinations.

For instance, individuals and families who apply must establish their identity with State approved forms of documentation. This documentation will be scanned into

HRA's OneViewer and will be available to staff for the duration of these cases. Since documentation for proof of income will likely change periodically, updated information will need to be provided to ensure that a recipient's case is properly budgeted and that the correct amount of benefits is being issued.

This recommendation states that, for example, requiring an individual's Social Security number and finger image for "identification and citizenship purposes" is duplicative and that the more expensive of these two processes should be eliminated. A Social Security card cannot be used as a primary means of verifying identity or citizenship/alien status; it is used by HRA as a secondary means of verifying identity. Finger imaging fulfills a different but allied purpose: it is an integrity measure to prevent the issuance of duplicative benefits. It is required at application and is not required again as long as the case remains active.

With respect to appointments, HRA's time-tested approach to rapidly attach applicants and recipients of Cash Assistance to employment is accomplished through an intensive engagement process that begins during the application phase. The emphasis on job search by our Job Center staff and the contracted Back-to-Work (BTW) vendors is intended to enable applicants and recipients to potentially avoid the necessity of long-term Cash Assistance and to promote self-sufficiency.

Audit the errors and problems in public benefit receipt

Our response speaks in more detail below on the HRA programs in place to ensure that HRA operates with accuracy and integrity. The agency's operation requires interfaces with multiple systems that support our participants, our staff, and our vendors. These considerations inform our decision to utilize the best technology available based on the resources available to the Agency in order to meet the need to accurately record a considerable daily volume of actions in order to fulfill the Agency's core functions.

Establish standards for sanctions and fair hearings

Standards exist and are periodically reviewed and revised as necessary under the direction and guidance of the New York State Office of Temporary and Disability Assistance (OTDA).

Perform a systematic review of agency accuracy

HRA has several program units to ensure that the Agency operates with integrity and accuracy.

The Office of Audit Services (OAS) audits HRA programs and vendor organizations, and coordinates with outside auditors such as the State and Federal government to ensure that HRA's services are being delivered efficiently and in conformance with the governing rules. OAS is comprised of three areas: 1) the Bureau of Audit Coordination (BAC) coordinates with external auditors and makes sure HRA is implementing any necessary action plans; 2) the Bureau of Audit Review and Contracting (BARC) contracts with auditing firms when necessary to ensure the integrity of HRA's vendor organizations; and, 3) the Bureau of Internal Audit (BIA) audits internal Agency processes. Another program area, the Office of Quality Assurance and Fiscal Integrity (OQAFI) ensures that the Family Independence Administration's (FIA) Food Stamp and Cash Assistance programs are accurate and compliant with regulatory and other legal requirements.

Finally, the Investigation, Revenue and Enforcement Administration (IREA) conducts eligibility verification reviews of applicants for Cash Assistance benefits and investigates allegations of fraud committed by clients or service providers in all programs. Last year, IREA saved the Agency a combined total of approximately \$1 billion in cost avoidance and recovered payments.

Simplify evidence packets

HRA has undertaken several quality assurance initiatives in fair hearing to ensure that the policy and procedures in place that guide the preparation and presentation of evidence packets are accurate and comprehensible. In the May 2 meeting, several suggestions were made that I look forward to continuing to discuss with the Urban Justice Center.

Revise the withdrawal codes for fair hearings

An explanation of the codes used for fair hearing withdrawals exists and are revised and modified as necessary under the direction and guidance of New York State OTDA.

Facilitate file access

HRA's current procedure provides clear guidance to staff on handling case record requests. It also specifies that each center must designate a worker who is not only responsible for providing access to electronic files but who will assist the applicant or

participant and/or his/her representative in viewing the contents of the case record and printing requested documents.

Expand escalated outreach procedures

The recommendation to send additional notices and make telephone calls for up to 10 days in an attempt to reach FIA recipients prior to applying a sanction discounts the well-defined process in which participants have opportunities to address and resolve potential sanctions prior to their imposition.

Increase training and education opportunities to the level that New York State allows

The New York State TANF program is based on a work-first approach. While many participants express a preference to seek immediate employment, HRA's Training Assessment Group (TAG) interviews participants who have indicated that they are enrolled in training or are interested in training. TAG assesses the training program to ensure that it falls within HRA guidelines. Additionally, TAG ensures that, where appropriate, those in training are fully engaged by assigning them to other concurrent activities when their training is less than 35 hours.

Incorporate flexibility into work requirements

Requiring participants to be engaged for 35 hours per week is comparable to a normal work week and is an integral component of HRA's successful employment model. The Back-to-Work vendor resources include over a dozen ways to enable clients to find a job. There are workshops and computer labs that allow for employment searches and resume development as well as employment specialists who have nurtured relationships with employers who have openings. It is essential then that participants work closely with the BTW vendors in order to be matched to job opportunities and interview for them as soon as they are identified. The BTW vendors partner through the Community Partnership Program with the Workforce1 Career Centers and public libraries for job openings, job fairs and other resources. Outside of the 35-hour week, we certainly encourage participants to continue to search independently for employment.

Additionally, since BTW vendors operate under performance-based contracts in which obtaining employment for participants is the basis for payment, this measure would not result in savings by engaging participants in fewer hours with the BTW vendors.

In closing, thank you again for the opportunity to review the report and appending this response to it.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Brune". The signature is stylized with a large initial "M" and a long horizontal flourish at the end.

Matthew Brune