New York State Department of Labor

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Workforce Development System Program Guidance Letter #24-04 October 24, 2024

To: Local Displaced Homemaker Program (DHP) Operators

Subject: Displaced Homemaker Program (DHP) Eligibility and Reporting

Requirements

Purpose

Rescind and replace Displaced Homemaker Guidance No. 1 (September 10, 2012), Displaced Homemaker Guidance No. 2 (September 28, 2012), and Displaced Homemaker Guidance No. 3 (November 6, 2012).

ACTION

1. DHP Operator Requirements

a. Displaced Homemaker Eligibility Definition

For displaced homemaker services provided with State Aid to Localities funding (State Funds), local DHP operators ("Operators") must determine and document that customers meet each of the four (4) required eligibility criteria from the displaced homemaker eligibility definition:

- 1. Has worked in the home, providing unpaid household services for family members; and
- Is unemployed or underemployed per the guidance in Program Guidance Letter (PGL) #22-01; and
- 3. Has had, or would have difficulty in obtaining or upgrading employment; and
- 4. Has been dependent on the income of another family member but is no longer supported by such income, or has been dependent on federal assistance but is no longer eligible for such assistance, or is supported as the parent of minor children by government assistance or spousal support (Article 23-B §826 (1), New York State Labor Laws, Displaced Homemakers Act of 1977).

b. Eligibility Documentation



Operators are expected to maintain eligibility documentation in a customer's file. DHP customers may self-attest to program eligibility and demographic data entered in the One-Stop Operating System (OSOS), with the exception of those receiving public assistance.

Note: Self-attestation is a written or electronic/digital declaration of information for a particular data element, signed and dated by the customer. If self-attestation is used to document a customer's DHP eligibility, the customer must self-attest to meeting all four (4) eligibility criteria. While self-attestation is allowed, other tangible forms of documentation should be obtained when possible. **Self-attestation is not allowed to prove a participant's receipt of public assistance.**

For eligibility criteria in Sections 1(a)1., 1(a)2., and 1(a)3. above, Operators must determine whether a customer is eligible based on information (and documentation, if required) provided by the customer. Any information used for these eligibility determinations must be documented in the customer's OSOS file.

When possible, documentation other than self-attestation should be obtained for eligibility criteria 4. in Section 1(a) above. Documentation may include, but is not limited to:

- Copy of a tax return reflecting the participant as a dependent; or
- Copy of Divorce Decree issued by a court; or
- Other documents, as deemed appropriate by the Operator, reflecting loss of financial support from a family member that was previously relied upon by the customer; or
- Copy of Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or other public assistance eligibility determination; or
- Signed self-attestation to the loss of financial support from the family member that was previously relied upon by the customer.

Acceptable forms of documentation for proving a customer's receipt of public assistance include:

- A screen print of the customer's <u>myBenefits</u> webpage; or
- Letter/documentation from the Department of Social Services (DSS) reflecting eligibility; or
- SNAP budget; or
- Cross match/written verification from a local DSS office.

Note: Verification of a customer's receipt of public assistance must be obtained on a monthly basis from each customer.



c. Service Provision

In addition to conducting outreach and determining customer eligibility, Operators may provide any basic or individualized career service, as defined under the Workforce Innovation and Opportunity Act (WIOA), to the customer. In general, these services include:

- Orientation to available services;
- Initial assessment;
- Job search assistance and placement services;
- Career guidance and planning services;
- Case management;
- Provision of employment statistics information and labor market information;
- Comprehensive assessments of skills levels (thorough diagnostic testing and interviewing to identify barriers to employment);
- Development of individual employment plans;
- Individual and group counseling;
- Provision of and/or referrals to supportive services; and
- Short-term, prevocational training.

d. Reporting

Operators will use OSOS to record customer eligibility, demographic data, services provided, and outcome information. For guidance on entering data in OSOS, review the Displaced Homemaker OSOS User Guide.

In addition, the SNAP Employment & Training DHP form must be completed and submitted in the Statewide Financial System (SFS) on a monthly basis with the voucher submission. Refer to the "SNAP Reporting Requirements" in Section (3)a. below, for details on this form.

2. Expanding DHP Funding Through SNAP Employment & Training (E&T)

NYSDOL has entered into a Memorandum of Understanding (MOU) with the Office of Temporary and Disability Assistance (OTDA) to make federal SNAP E&T funds available to supplement DHP funding. OTDA will provide SNAP E&T funding at a rate of 50% for every dollar of State funds used to serve non-TANF, SNAP recipients. This allows NYSDOL to add SNAP E&T funds to DHP contracts, which may be used to serve any eligible DHP customer. The MOU is renewed each Program Year and continuation of SNAP E&T funding is not guaranteed. Operators may opt-out of receiving SNAP E&T funds by informing their NYSDOL Contract Manager.



a. Requirements for SNAP E&T Funds

In order to receive SNAP funds, all individuals eligible for reimbursement under this SNAP E&T initiative must be:

- Eligible for the DHP program; and
- SNAP applicants or recipients who are work registrants or volunteers.
 - SNAP benefit applicants must verify recipient/applicant status within 30 days from date of application. Any service provided during the period of applicant status is eligible for reimbursement;
 - Participants must continue to receive SNAP benefits during the program; and
 - SNAP applicants or recipients who are at least 18 years of age, or age 16-17 and not in school, are eligible to participate in SNAP E&T-funded services.

Note:

- Individuals in receipt of TANF-funded public assistance are <u>not</u> eligible for consideration for SNAP E&T reimbursement under this program; and
- Any State funds already being used for federal matching purposes are not eligible for reimbursement under this program.

b. Coordination with Social Services Districts

Operators are expected to coordinate with their Social Service District ("District") to ensure program services are consistent with District requirements. Districts may require applicants or recipients of SNAP to participate in employment services. If the target population served overlaps with populations targeted by the District for employment services, providers may need to report attendance information, employment, and any noncompliance or program exit information to the District.

Operators are required to contact the District that covers individuals served by the Operator to identify reporting requirements, if any, and to coordinate services. Operators are expected to accept referrals from the District.

c. Use of SNAP E&T Funds

SNAP E&T funds must be used to support costs associated with operating employment preparation programs that support eligible SNAP recipients. Funds may be used for administrative and programmatic costs including staffing, equipment, and materials directly related to the operation of the program.

The following are allowable SNAP E&T activities for DHP Operators:



- Job search and placement Supervised contact of employers in an effort to obtain a job placement in available, appropriate positions;
- Job readiness assistance Preparation for employment through training in areas such as employer expectations, appropriate work-place conduct, personal appearance, job application and resume writing, job interviewing techniques, and job seeking skills;
- Case Management Includes in-depth employment assessments; crisis intervention; resource navigation; and referrals and assistance with childcare and transportation, as appropriate and necessary, to enable the SNAP participant to enroll in program services;
- Participant Reimbursements Includes Wi-Fi access, laptops and tablets, and other computer equipment, which are reasonably necessary for participation in program services;
 - Note: These items must be claimed separately as a 50% SNAP E&T participant reimbursement.
 - SNAP E&T funds may also be used to purchase laptops or other computer equipment that may be loaned to E&T participants for the duration of their participation in the program. Additionally, SNAP E&T funds may be used to provide for the costs associated with mobile internet connections for SNAP E&T participants engaged in remote learning. However, upon completion of the remote learning program, all loaned equipment must be returned to the District or the E&T provider who purchased and loaned the laptop and/or computer equipment.
- Educational training related to employment Includes literacy training, General Educational Development (GED) Test preparation, or English Language Instruction; and
- Job Retention Provides supportive services for up to 90 days to individuals who have secured employment. Only individuals who have received other employment/training services under the SNAP program are eligible for job retention services.

The following types of expenditures do not qualify for reimbursement with SNAP E&T funds. As such, State funds cannot be used for the following when serving SNAP-eligible displaced homemakers:

- Wage subsidies;
- Supervision of, or materials and equipment necessary to support, individuals participating in an unpaid work experience;
- Medical services of any kind;
- Job retention services for individuals employed at time of enrollment;



- Job retention services beyond 90 days after eligible individuals enter employment;
- Substance use services;
- Activities that exceed 120 hours per month (unless the individual volunteers to participate for the additional hours);
- To supplant non-federal funds supporting basic educational programs; or
- Costs prohibited for federal grants according to the Office of Management and Budget (OMB) <u>Uniform Guidance</u>.

3. Performance Reporting

a. SNAP E&T Reporting Requirements

Operators are required to comply with participant reporting requirements outlined by OTDA and the local DSS office. Information may include, but is not limited to, client demographics, attendance records, work activity, and employment and wage verification.

Operators must also complete and submit **Attachment A:** <u>SNAP Employment & Training DHP Monthly Report</u> through SFS with the monthly voucher reimbursement request.

Note: OTDA must report enrollments by activity to the United States Department of Agriculture (USDA) and entries to employment are a key program performance indicator for the SNAP program. The information provided on the SNAP E&T DHP Monthly Report will be used to meet these federal reporting requirements.

b. Performance

Each DHP contract includes anticipated levels of performance. NYSDOL expects the performance levels identified in DHP contracts to be consistent with previous years' performance expectations, taking funding fluctuations into consideration. Outcomes for the program include:

- Number of participants served;
- Number of participants who enter employment; and
- Number of participants who retain employment for at least three months (90 days).

4. Additional Requirements for Receipt of SNAP E&T Funds

USDA's Food and Nutrition Services (FNS) requires that all State, local DSS, and contracted agency employees or service providers that administer SNAP complete an annual training on civil rights requirements for SNAP. The State-developed "SNAP Civil Rights" course is posted on OTDA's training website, TrainingSpace, for on-demand



access. The 52-minute program addresses all federal and State SNAP Civil Rights and program access requirements, and provides training on effective interviewing techniques and customer service strategies for working with SNAP recipients.

All Operators accepting USDA SNAP E&T funds must ensure any staff working with DHP customers who are also SNAP recipients complete the mandated civil rights training annually. Retention of completion certificates is required to document that staff have completed the training.

Additionally, all Operators must display **Attachment B: "<u>And Justice for All</u>"** poster from USDA in DHP center waiting areas or in areas seen by all participants. The poster must be visible and not covered fully or partially by other postings.

REFERENCES

Article 23-B – §826 (1), New York State Labor Laws, Displaced Homemakers Act of 1977

PGL #22-01: New York State Department of Labor (NYSDOL) guidance and interpretation on the Workforce Innovation and Opportunity Act (WIOA) definition of Dislocated Worker (DW) and recording DWs in the One-Stop Operating System (OSOS)

WDS TA #23-03: Data Element Validation (DEV) for Titles I and III under the Workforce Innovation and Opportunity Act (WIOA), National Dislocated Worker Grants (NDWGs), the Trade Adjustment Assistance (TAA) Program, and the Jobs for Veterans State Grants (JVSG) Program

Office of Management and Budget Uniform Guidance Cost Principles <u>2 CFR Part 200</u>, <u>Subpart E</u>

INQUIRIES

Questions regarding this PGL should be directed to:

- Your Contract Manager for contract questions; or
- Your Program Monitor for OSOS-related questions.

ATTACHMENTS

- A. SNAP Employment & Training DHP Monthly Report
- B. "And Justice for All" poster

