



On the Move?

*A County by County Review of
Welfare Transportation Policies in New York State*

— by Amanda Hiller —

GREATER UPSTATE LAW PROJECT INC.

— MARCH 2001 —

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The Greater Upstate Law Project (GULP) is a not-for-profit statewide legal services support center. As such, GULP provides legal expertise and assistance to legal aid and legal services offices throughout the state.

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THIS REPORT

This review of local employment plans was undertaken as part of GULP's Due Process Project. These efforts are made possible by the generous support of the Robert Sterling Clark Foundation, the New York Foundation and the Butler Family Fund.

The policy recommendations presented and the opinions offered are those of the Greater Upstate Law Project, Inc. and not necessarily those of the funders.

ACKNOWLEDGEMENTS

The Greater Upstate Law Project, Inc. would like to thank The Innovative Resources Group, Inc. for the design of the report and report cover. GULP would also like to recognize and thank Nancy Krupski for her patience in dealing with our many drafts and Michael Leonard of the Welfare to Work Division of the New York State Department of Labor for making county employment plans available to us.

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EXECUTIVE SUMMARY

In 1996, Congress enacted and the President signed the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA). This new law replaced the long-standing Aid to Families with Dependent Children (AFDC) program with a new Temporary Assistance to Needy Families (TANF) program. The TANF program has given states extraordinary flexibility to implement their welfare programs in ways designed to best meet the needs of their low income citizens.

One area where TANF offers enormous opportunities to target funding and craft effective policies is in the area of transportation. Transportation issues represent one of the most significant barriers to stable employment, second only to child care needs. Many of New York's social services districts have taken advantage of the flexibility afforded by TANF in crafting their transportation policies. Most, but not all districts use a combination of different transportation strategies to meet the individual transportation needs of TANF participants, including public transportation, paratransit services, and privately owned vehicles. Unfortunately, many districts have not availed themselves of TANF's flexibility or have done so in ways that themselves pose barriers.

The following recommendations result from an analysis of the employment plans prepared by each of the 57 social services districts outside the City of New York in order to see how districts have chosen to structure transportation services, as well as to identify innovative strategies and key areas of weakness in these plans.

RECOMMENDATIONS

ASSESSMENTS

New York State should specifically require local districts to assess the transportation needs of work participants, and to address those needs in the resulting employability plans.

Local districts should incorporate specific questions in their assessment instruments to ascertain each participant's short- and long-term transportation needs.

WORK ASSIGNMENTS

New York State should clarify to local districts that they must try to make work assignments close to a participant's home whenever transportation is a direct barrier to participation in work activities.

Local districts should make affirmative efforts to assign participants to worksites that are accessible to them.

Local districts, when considering the availability of public transportation, should consider the availability of such transportation near a participant's home, not just the availability of transportation to the worksite.

Local districts using alternative work assignments, such as mobile work crews, should also assist work participants in meeting long-term transportation needs necessary to enable these participants to transition into more stable employment situations.

WALKING DISTANCE

New York State should establish maximum distances districts can require participants to walk, with specific guidelines for participants with health limitations and for those who must walk young children to child care.

Local districts with walking requirements should amend those requirements to provide exceptions for participants with health limitations or who must walk with young children.

PUBLIC TRANSPORTATION

Local districts should consider providing public transportation assistance in advance, such as by providing transit passes.

Local districts should reimburse participants promptly for public transit expenses they have incurred.

Local districts, when determining whether public transportation is an appropriate option for a participant, should consider hidden costs of public transportation, such as the length of time devoted to the public transit commute, child care transportation needs, and the like.

Local districts should assist participants with transportation to and from child care providers as well as to and from work activities.

PARATRANSIT

Local districts using paratransit transportation providers should also assist work participants in meeting long-term transportation needs necessary to enable these participants to transition into stable employment.

PRIVATELY-OWNED VEHICLES

New York State should establish a uniform mileage reimbursement rate for work participants using privately-owned vehicles.

New York State should provide guidance to local districts regarding provision of assistance with car repairs or insurance to reduce wide program disparities.

Local districts should consider providing mileage assistance in advance, such as through gas vouchers, in order to increase participants' transportation flexibility.

Local districts should not limit repair and insurance assistance to participants with jobs or job offers.

Local districts should allow repair and insurance assistance in circumstances where it is not the least costly means of providing transportation assistance to and from work activities in order to meet participants' long-term needs.

Local districts should allow repair and insurance assistance for a vehicle owned by a relative or household member of the participant in order to meet the participant's transportation needs.

Local districts should consider establishing car ownership programs to help meet participants' long-term transportation needs.

Local districts should assist participants to obtain or restore drivers' licenses.

RELOCATION

New York State should clarify to local districts that participants cannot be required to relocate in order to participate in work activities.

TRANSITIONAL TRANSPORTATION ASSISTANCE

New York State should require districts to provide transitional transportation services for one year after a participant leaves public assistance, including assistance with daily transportation expenses.

DIVERSION

New York State should provide specific guidance to local districts regarding the use of TANF funds to assist public assistance applicants in order to avoid the need for long-term public assistance.

NOTICE TO PARTICIPANTS

New York State and local districts should ensure that applicants and participants are given notice of the availability of transportation assistance at the time of initial application, assessment, assignment to work activities, and of any transitional transportation services that might be available.

INTRODUCTION

In 1996, Congress enacted and the President signed the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA).¹ This new law replaced the long-standing Aid to Families with Dependant Children (AFDC) program with a new Temporary Assistance to Needy Families (TANF) program. In creating the TANF program, Congress identified four key purposes:

1. To provide assistance to needy families with children
2. To end dependence of needy parents by promoting job preparation, work and marriage
3. To prevent and reduce out-of-wedlock pregnancies
4. To encourage the formation and maintenance of two-parent families²

Pursuant to PRWORA, states must establish programs to effectuate these goals. Under these programs, states are required to maintain a certain level of welfare spending³ and to assign recipients to work activities at increasing rates,⁴ among other requirements.

Congress also sought to increase state flexibility in the design and operation of state welfare programs. Under TANF, states are empowered to establish new categories of assistance with different eligibility criteria and to provide different types and levels of assistance to eligible individuals.⁵ In addition, states can now invest federal welfare dollars to establish or expand service delivery systems to meet the needs of welfare recipients.⁶ As noted by the Department of Health and Human Services, TANF “has expanded the opportunities States have to develop and implement creative and innovative strategies and approaches to remove families from the cycle of dependency.”⁷

The TANF program has given states extraordinary flexibility to implement their welfare programs in ways designed to best meet the needs of their low income citizens.⁸ However, this new-found flexibility comes at the price of a five year limit on an individual’s receipt of federally funded cash assistance.⁹ The new time limits have created new urgency for states to move recipients off the welfare rolls. States are doing this either by moving recipients into the workforce or removing them from assistance through the sanction process.

One area where TANF has offered enormous opportunities to target funding and craft effective policies is in the area of transportation. In recent years it has become clear that the availability of reliable transportation is essential for low income families, particularly welfare recipients seeking to enter the workforce. Two thirds of all new jobs are located in suburban areas,¹⁰ while three-quarters of all welfare

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¹ Personal Responsibility and Work Opportunity Reconciliation Act of 1996, Public Law 104-193.
² Personal Responsibility and Work Opportunity Reconciliation Act of 1996 §103(a)(1), codified at 42 U.S.C. § 601 *et seq.*. See also U.S. Dep’t of Health & Human Svcs., *Helping Families Achieve Self-Sufficiency: A Guide on Funding Services for Children and Families through the TANF Program*, available at www.acf.dhhs.gov/programs/ofa/funds2.htm [hereinafter *Helping Families Achieve Self-Sufficiency*].
³ States are required, under TANF, to meet annual “maintenance-of-effort” (MOE) spending requirements. See *Helping Families Achieve Self-Sufficiency*, *supra* note 2.
⁴ Personal Responsibility and Work Opportunity Reconciliation Act of 1996 §103(a)(1), codified at 42 U.S.C. § 407. State participation requirements have risen from 25% in FY 1997 to 45% for FY 2001 and 50% for FY 2001 and thereafter. See 45 CFR 261.21, 261.23; 64 FR 17885 (4/12/1999).
⁵ *Helping Families Achieve Self-Sufficiency*, *supra* note 2.
⁶ States have even greater spending flexibility with regard to the use of their Maintenance of Effort (MOE) funds in that they are permitted to provide benefits to families not otherwise eligible for TANF benefits. See *Helping Families Achieve Self-Sufficiency*, *supra* note 2.
⁷ *Helping Families Achieve Self-Sufficiency*, *supra* note 2.
⁸ “The TANF program provides extraordinary flexibility for funding a wide variety of employment and training activities, supportive services, and benefits that will enable clients to get a job, keep a job, and improve their economic circumstances.” *Helping Families Achieve Self-Sufficiency*, *supra* note 2.
⁹ See 42 U.S.C. § 608(a)(7)(A); Liz Schott, et al., *Highlights of the Final TANF Regulations*, Center on Budget and Policy Priorities (Apr. 29, 1999).
¹⁰ National Conference of State Legislatures, *Job Access and Reverse Commute Program*, Aug. 3, 1998, available at www.ncsl.org/statedef/welfare/atj.htm (citing the Transportation Equity Act for the 21st Century (TEA-21), Pub. Law 105-178).

recipients live in urban or rural areas.¹¹ Nearly 40 percent of people living in rural areas are not served by public transportation, while another 28 percent have very limited public transportation services.¹² But, “[e]ven in metropolitan areas with excellent public transit systems, less than half of the jobs are accessible by transit,” according to the National Conference of State Legislatures.¹³

It is not clear that New York State, or its local Departments of Social Services (LDSSs), has taken full advantage of the flexibility that TANF affords with regard to the structure and delivery of transportation services. There are 58 different social services districts within New York State, each operating its own employment program. As a result there are 58 different strategies for meeting the transportation needs of work activity participants. To date there has been no comprehensive analysis of these different strategies. This report provides such an analysis, examining the transportation programs and policies identified by local districts as part of their biennial employment program planning process.¹⁴ This report analyzes the employment plans¹⁵ prepared by each of the 57 social services districts outside the City of New York to see how districts have chosen to structure transportation services, as well as to identify innovative strategies and key areas of weakness in these plans. New York City’s employment program transportation policies have not been studied here since the City relies upon its extensive public transportation system, which is unique in the state.

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DISTRICT STRATEGIES FOR MEETING TRANSPORTATION NEEDS

There are three traditional means of meeting the transportation needs of public assistance recipients: public transportation, alternative transportation mechanisms provided for the recipients, and privately owned vehicles. New York’s local social services districts have adopted some or all of these strategies in their efforts to meet the transportation needs of public assistance participants in their districts.

ASSESSING TRANSPORTATION NEEDS

The first step in meeting work participants’ transportation needs is identifying the barriers each participant must overcome in order to participate in work activities. Social services districts are required under the Social Services Law to conduct “assessments” of work participants to determine their levels of employability.¹⁶ Districts are required to assess a TANF recipient’s employability “based on his or her education level, including literacy and English language proficiency, basic skills proficiency, child care and other supportive services needs; and skills, prior work experience, training and vocational interests.”¹⁷ In addition, districts are required to review recipients’ “family circumstances” as part of the eligibility process.¹⁸

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¹¹ U.S. Dep’t of Health & Human Svcs., *Temporary Assistance to Needy Families Policy Announcement: Use of TANF, WtW, and Job Access Funds For Transportation*, TANF-ACF-PA-00-2 (May 26, 2000) [hereinafter *TANF Policy Announcement*].

¹² Sarah Dewes, *Transportation in Rural Communities: Strategies for Serving Welfare Participants and Low-Income Individuals*, Rural Welfare to Work Strategies Initiative, U.S. Dep’t of Health & Human Svcs. (April 2000) (citing G. Rucker, *Status Report on Public Transportation in Rural America*, 1994, Rural Transit Assistance Program, Federal Transit Administration (1994), available at www.ctaa.org/ntrc/rtap/pubs/status).

¹³ National Conference of State Legislatures, *Job Access and Reverse Commute Program*, Aug. 3, 1998, available at www.ncsl.org/statefed/welfare/atj.htm (citing the Transportation Equity Act for the 21st Century (TEA-21), Pub. Law 105-178).

¹⁴ Social Services Law § 333 requires local social services districts to submit biennial employment program plans, including plans for the provision of supportive services for work participants. SSL § 332-a includes transportation assistance within the required supportive services. These plans detail the operation of employment programs for Family Assistance (TANF), Safety Net (state general assistance), and Food Stamp recipients.

¹⁵ Local District Employment Plans are on file at the NYS Department of Labor. For simplicity and clarity, references to a district’s plan will be to the 2000 Employment Plan on file at the Department unless otherwise noted. These plans are available from the Greater Upstate Law Project’s Albany office.

¹⁶ N.Y. Social Services Law §§ 335(1), 335-a(1) (McKinney 1992 & Supp. 2000).

¹⁷ *Id.* § 335(1). Districts are required to conduct assessments of TANF participants within the first 90 days after a recipient was found eligible for public assistance benefits. *Id.* Safety Net participant assessments are similar and must be conducted within one year of application. *Id.* § 335-a(1).

¹⁸ *Id.*

Although districts are generally required to consider “supportive services needs” in their employability assessments, they are not specifically required to assess a recipient’s transportation needs. Fewer than half (25) of the district work plans¹⁹ identify transportation issues as a subject for assessment generally or in their assessment instrument.²⁰ Of those districts that do assess transportation needs, many do so only superficially. These districts use forms that simply ask recipients whether they “have transportation” or “have a driver’s license.”

Seven districts use a similar set of questions in their assessment instruments, asking whether public transportation is available, whether the participant owns a car or has access to one, whether the participant has a valid driver’s license, and whether the participant has any health problems that would interfere with driving.²¹ Only one district, Chenango, asks detailed questions regarding the availability of transportation, such as the distance to the nearest public transportation stop, and whether a car is currently registered.²² The Suffolk County LDSS assesses the availability of transportation to and from a participant’s child care provider,²³ while the Otsego LDSS goes so far as to inquire whether the participant is considering a move out of the district.²⁴

The transportation barriers facing work participants are complex. It is essential that local districts assess the specific needs of individual participants in order to develop employability plans that are designed to overcome these barriers. Unfortunately, it appears that few of New York’s social services districts explore the transportation needs of their participants in a manner designed to elicit specific issues, or identify individual needs and barriers. As a result, the employability plans developed based upon these assessments may not fully address the transportation needs of individual participants. Local districts should re-evaluate the extent to which their assessment instruments elicit transportation information, and should consider incorporating specific transportation-oriented questions, such as the Model Transportation Assessment Instrument,²⁵ into their assessment processes.

WORKSITE ASSIGNMENTS

“Close to Home”

The simplest means of addressing transportation barriers facing work activity participants is to avoid them by assigning participants to activities they can participate in without transportation assistance. New York’s social services districts may accomplish this by assigning participants to activities near their homes, to worksites that provide transportation, or to mobile work crews that pick up and drop off participants.

Under New York’s Social Services Law, local districts are required to “make a reasonable effort to assign [an] individual to an appropriate work activity at a site in closest possible proximity to such individual’s residence” when lack of transportation is a “direct barrier” to participation.²⁶

Thirty-one local districts specify in their employment plans that they will make efforts to assign individuals to worksites near their homes.²⁷ Of these districts, six state that they will endeavor to make assignments within “reasonable walking distance” of a participant’s home.²⁸

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¹⁹ Assessment options and instruments are detailed in Section 3.3 of local district Employment Plans. Although districts are not required to include copies of their assessment instruments in their Employment Plans, many have done so.

²⁰ Albany, Chenango, Columbia, Erie, Fulton, Hamilton, Herkimer, Jefferson, Lewis, Livingston, Madison, Monroe, Montgomery, Orange, Otsego, Putnam, St. Lawrence, Saratoga, Schenectady, Suffolk, Sullivan, Tompkins, Ulster, Warren, and Wyoming Counties.

²¹ Hamilton, Herkimer, Jefferson, Montgomery, Putnam, Saratoga, and Tompkins Counties.

²² Chenango County.

²³ Suffolk County.

²⁴ Otsego County.

²⁵ The Model Transportation Assessment Instrument (Appendix 1) was developed by combining transportation-related questions used by different districts across the state.

²⁶ N.Y. Social Services Law § 332(2) (McKinney 1992 & Supp. 2000).

²⁷ See Table 1.

²⁸ Clinton, Columbia, Franklin, Livingston, Onondaga, and Yates Counties.

Only one district plan specifies that it will not base work assignments on proximity to a participant's home. Chemung County asserts in its plan that every worksite is accessible via public transportation. However, the district acknowledges that some participants live in remote areas not served by public transportation. Rather than make assignments with regard to the participant's residence, the Chemung plan provides that an "assignment to a particular worksite will depend on the needs and availability of slots at a work-site, not necessarily on the proximity to the individual's home."²⁹ Instead, the district will provide transportation reimbursement and "counseling on the necessity of removing barriers to employment." Despite statutory and regulatory guidance directing districts to put forth "a reasonable effort" to make assignments close to home whenever transportation is a direct barrier to employment, Chemung is deeming the recipient's living arrangement a barrier to employment that the recipient is responsible for overcoming.³⁰

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Walking Distance

Whether a participant will require transportation assistance to and from a worksite depends, in part, on the local district's policy regarding permissible walking distances. Those participants assigned to worksites within a district's walking distance will not be given transportation assistance under the theory that none is required. Twenty-four districts require work participants to walk some specified distance to their assigned worksite or to the nearest bus stop.³¹ These districts will not provide transportation services for activities within this "walking distance," which ranges from one mile³² to one hour (or four miles)³³ each way. Only four districts reduce the "walking distance" when the participant must transport children to and from child care.³⁴ Only seven of the twenty-four districts that address walking requirements provide exemptions for participants with medical problems.³⁵

There clearly is a wide disparity between districts in terms of required walking distances. Not only do districts vary considerably with regard to the distance healthy adults are required to walk, but few districts consider the needs of children or medically limited adults when establishing this requirement. For example, one local district required a work participant to walk 6-8 miles to a worksite³⁶ while another required a participant with a seizure disorder to walk several miles to a bus stop.³⁷ Uniform statutory or regulatory guidelines as to the maximum walking distance that can be required would ease these disparities.

Other Work Assignment Strategies

Some districts make work assignments that do not pose transportation barriers for participants. Nine districts operate mobile work crews that pick up and drop off participants.³⁸ Nine other districts state in their plans that some or all of their worksites provide transportation for participants.³⁹ However, thirty-nine districts report in their employment plans that they make work activity assignments for remote sites, while seven districts report that they have no remote sites in their districts.⁴⁰

Operation of remote sites can be a mixed blessing for participants. For those participants who live in more populated areas, assignments at remote sites may pose significant transportation challenges. At the same time, for participants living in remote areas, remote work sites in proximity to their homes

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 Chemung County Employment Plan § 4.3 (2000).
³⁰ N.Y. Social Services Law § 332(2) (McKinney 1992 & Supp. 2000), N.Y. Comp. Codes R. & Regs. tit. 12, § 1300.4 (1999).
³¹ See Table 1.
³² Allegany, Erie, Lewis, Oneida, and Onondaga Counties.
³³ Saratoga County.
³⁴ Chautauqua (1999 plan), Chemung, Oneida, and Putnam Counties.
³⁵ Cortland, Herkimer, Madison, Oneida, Onondaga, St. Lawrence, and Ulster Counties.
³⁶ See *Matter of W.*, Fair Hearing #2936840M (9/15/1998) (available from the Greater Upstate Law Project's Fair Hearing Bank at www.gulpny.org).
³⁷ See *Matter of D.*, Fair Hearing #2846458R(6/3/1998) (available from the Greater Upstate Law Project's Fair Hearing Bank at www.gulpny.org).
³⁸ Allegany, Cattaraugus, Delaware, Livingston, Orleans, Oswego (1999 plan), Schuyler, Seneca and Steuben Counties.
³⁹ Cayuga, Columbia, Fulton, Lewis, Madison, Niagara, Rensselaer, Ulster, Wayne
⁴⁰ See Table 1.

may be the only feasible assignments. One district states in its plan that it will develop remote sites if necessary to meet the needs of remote participants.⁴¹ Other, more urban, districts emphasize the availability of remote sites to serve rural participants.⁴²

Several districts employ other strategies for participants with difficult transportation barriers.⁴³ Two districts allow work participants to engage in work activities at home.⁴⁴ Two other districts allow participants to develop their own activities or worksites, presumably with fewer transportation barriers than posed by district sites.⁴⁵ Rensselaer County will train participants to become home daycare providers so that transportation does not pose a barrier.⁴⁶

PUBLIC TRANSPORTATION

The most common approach to providing transportation for public assistance recipients is public transportation. Public transportation systems can be characterized as open-door systems since they operate on fixed routes and provide transportation services to all persons willing to pay the fare.⁴⁷ Another key feature of public transportation systems is that the cost of operating any particular route is fixed regardless of rider-based revenue.⁴⁸ In this regard, the availability of public transportation is not dependent upon usage by public assistance recipients. Instead, broader investments in public transit systems benefit both welfare recipients and other riders.⁴⁹

Forty-three districts indicate in their plans, either directly or by implication, that there is at least some limited public transportation service available in their counties.⁵⁰ Of these districts, twenty-five provide bus passes or tokens to work participants for use on these services. Six districts will only provide reimbursement for public transportation expenses already incurred. Of these, Ontario County will reimburse participants a maximum of \$6 per day, while Madison County will reimburse public transit expenses on a monthly basis.

Rather than providing passes or reimbursement, Erie County provides a transportation allowance to work participants, which can be used for public transit. This gives Erie County participants greater flexibility in arranging transportation than passes, reimbursement, or some combination of the two. In addition such up-front payment has the advantage of meeting participants' immediate needs, rather than forcing participants to budget for these expenses out of their benefit checks and then wait for reimbursement.

There are problems with reliance on public transportation to meet the transportation needs of public assistance recipients. Public transportation systems often operate on limited routes or for limited hours. Many of the jobs and worksites available to work participants are remote or at times when public transportation services are limited or non-existent.⁵¹ In addition, even when public transportation is

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⁴¹ Broome County.

⁴² *E.g.*, Albany County.

⁴³ *See* Table 7.

⁴⁴ Albany County may assign participants to in-home counseling programs, while Greene County will assign work that can be completed at home.

⁴⁵ Ontario County allows participants to develop their own worksites, while Allegany County allows participants to submit community service plans.

⁴⁶ Rensselaer County Employment Plan § 4.3 (2000).

⁴⁷ Margy Waller & Mark Alan Hughes, *Working Far From Home: Transportation and Welfare Reform in the Big Ten States*, Progressive Policy Institute (Aug. 1, 1999).

⁴⁸ *See id.*

⁴⁹ For example, Monroe County has been using TANF transportation funds to expand its public transportation network in order to better serve TANF recipients. The Rochester-Genesee Transportation Authority was allocated \$2 million in FY 2000-01 TANF funds for this program. In addition, the FY 2000-01 budget allocated \$5 million in TANF funds to support a new "Wheels to Work" initiative through the NYS Department of Labor.

⁵⁰ *See* Table 2.

⁵¹ It should be noted that many local governments are using non-TANF funding streams to expand public transportation services in their communities. For example, the Transportation Equity Act for the 21st Century (TEA-21), Pub. Law 105-178, authorized funding for Access to Jobs and Reverse Commute projects around the country to help expand transportation services to meet the needs of families with incomes below 150% of the poverty line. *See* Dewes, *supra* note 12.

cost-effective, it may not be time effective: it is not uncommon for an inexpensive public transportation journey to take several hours while a slightly more expensive car ride would take a fraction of that time. Furthermore, public transportation may not meet the multiple transportation needs of a public assistance household, which may include transportation to child care, shopping for groceries and other essentials, or medical appointments.

PARATRANSIT

“Paratransit” is a term used to describe transit services provided by a public or private entity that is not open to the public at large, and is instead operated to meet the specific transit needs of individuals.⁵² Common examples of paratransit systems include transportation networks for elderly or disabled individuals, and school bus systems.⁵³

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Reliance on paratransit does not give participants the resources necessary to meet long term transportation needs.
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Paratransit services are offered by a number of New York’s social services districts. Eighteen districts indicate in their plans that they directly operate vans or shuttle services to transport work participants to and from their worksites.⁵⁴ Several other districts use private vendors to provide transportation services for their participants. Essex County contracts with a private vendor to provide van services for their participants.⁵⁵ Four other districts indicate in their plans that they contract with private vendors to provide other transportation services.⁵⁶ Six districts indicate they will use taxis when necessary to provide transportation for participants.⁵⁷

Three districts use “Dial-a-Ride” programs to provide transportation on an as-needed basis.⁵⁸ In addition, eleven districts rely on other existing transportation systems to transport some of their work participants. Five districts use buses operated by local schools or BOCES programs to transport participants.⁵⁹ Two districts utilize their local Head Start programs for participant transportation.⁶⁰ Four districts have coordinated with other local transportation programs for transportation of their participants.⁶¹

Paratransit may be a good solution for meeting the immediate needs of individual public assistance recipients. It also lends itself to micro-enterprise opportunities. However, reliance on these mechanisms does not give participants the resources necessary to meet long-term transportation needs. The availability of paratransit options for individuals is dependent upon ongoing public assistance eligibility. Once participants find employment and transition off assistance these transportation options are no longer available. As a result, these former recipients will be once again forced to overcome transportation barriers in order to maintain their jobs.

PRIVATELY OWNED VEHICLES

The use of a privately owned vehicle offers the best chance of meeting long-term transportation needs for some, and perhaps most, public assistance recipients. Availability of personal cars is important for recipients living in rural areas and areas not served by public transportation. In addition, privately owned vehicles are important for urban and suburban recipients with complex or non-traditional trans-

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⁵² Waller & Hughes, *supra* note 47.

⁵³ *See id.*

⁵⁴ *See* Table 3.

⁵⁵ Essex County Employment Plan § 4.3 (2000).

⁵⁶ Delaware, Genesee, Schenectady, and Tompkins Counties. Genesee County indicates that it contracts with a private bus company to provide transportation for its participants.

⁵⁷ Jefferson, Orleans, Putnam, St. Lawrence, Sullivan, and Ulster Counties.

⁵⁸ Allegany, Ontario and Orange Counties.

⁵⁹ Allegany, Otsego, St. Lawrence, Warren and Wayne Counties.

⁶⁰ Otsego and Warren Counties.

⁶¹ Erie County uses its Rural Transit System; Franklin County relies on its local Office for the Aging transportation system, Herkimer County has coordinated with the Herkimer area Resource Center System, and St Lawrence relies upon the transportation services operated by its local Association for Retarded Citizens. In addition, Ulster County uses town vehicles, rather than county vehicles, to transport some participants.

portation needs. One statistic sharply illustrates the importance of car ownership: “twice as many welfare recipients with cars [are] working than those without cars.”⁶²

The transportation flexibility afforded by recent welfare reform initiatives is most powerful with regard to private automobile ownership. Prior to New York’s 1997 welfare reforms, applicants who owned automobiles with a fair market value over \$1500 were not eligible for public assistance benefits.⁶³ Vehicles worth less than this were exempt from consideration in eligibility determinations.⁶⁴ In effect, welfare applicants were forced to sell cars worth more than \$1500 in order to qualify for benefits. Essentially this meant that those welfare recipients who did own vehicles were likely to have vehicles in poor condition and in need of repair.

New York increased the allowable vehicle exemption as part of its implementation of TANE. The 1997 implementing legislation allowed households receiving public assistance to own one car with a Fair Market Value of up to \$4650.⁶⁵ However, this increased resource exemption was still not enough to assure that welfare recipients had access to reliable transportation. Recognizing this ongoing barrier, New York increased the vehicle exemption again in 1999. The current law doubles the allowable exclusion when the vehicle is needed for job search activities, to travel to and from employment, or to participate in work activities.⁶⁶ As a result, private vehicle ownership is now a realistic possibility for many recipients.

Mileage Reimbursement

Nearly all of New York’s local social services districts provide mileage reimbursement to work participants who use their own vehicles for transportation to and from work activities.⁶⁷ However, the rate of reimbursement varies greatly: from a low of 10¢ per mile to a high of 32.5¢ per mile.⁶⁸ Ten districts reimburse mileage at the public transportation rate for their districts, while seven districts provide reimbursement at the rate used for district employees.⁶⁹ Several districts cap the amount of mileage expenses that will be reimbursed,⁷⁰ while a few require verification of miles⁷¹ or attendance.⁷² There does not seem to be any rationale for this wide disparity between districts. This is another area where statutory or regulatory guidance would be appropriate.

The mechanism for providing mileage assistance may be crucial for many participants: when mileage expenses are provided on a reimbursement basis, participants must “front” the money from their limited public assistance grants in order to participate in assigned work activities. The vast majority of districts providing transportation assistance for private vehicles do so on a reimbursement basis.⁷³ Only a few districts provide advance assistance to participants. Four districts will provide gas vouchers to participants,⁷⁴ while two districts provide assistance in the form of monthly transportation allowances.⁷⁵

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When mileage expenses are provided on a reimbursement basis, participants must “front” the money from their limited public assistance grants in order to participate in assigned work activities.
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⁶² *TANF Policy Announcement, supra* note 11 (citing data from the Urban Institute’s National Survey of American Families).
⁶³ This federal requirement was codified in New York at N.Y. COMP. CODES R. & REGS. tit. 18, § 352.23(b)(2).
⁶⁴ The pre-TANF AFDC program “denied benefits to anyone with a car worth more than \$1,500.” See Waller & Hughes, *supra* note 47.
⁶⁵ Welfare Reform Act of 1997, 1997 N.Y. Laws 436, pt. B, § 16. Under this section, the vehicle exemption is keyed to the food stamp resource exemption, which is adjusted annually for inflation.
⁶⁶ 1999 N.Y. Laws 389, § 1.
⁶⁷ However, Greene County provides mileage reimbursement only as diversion from on-going assistance.
⁶⁸ See Table 2.
⁶⁹ See *id.* In addition, three districts use the annual AAA operating cost figure as their reimbursement rate, while two districts use the Medicaid transportation rate.
⁷⁰ Two counties have set daily caps: Nassau—\$20/day; and Oneida—\$12/day. Three other counties have set monthly caps: Cortland—\$30/mo.; Erie—\$42/mo.; and Tioga—\$20/mo. (only for job search). Otsego County limits reimbursement to a maximum of 45 miles each way, while Livingston and Steuben Counties allow only one round-trip per day.
⁷¹ Chautauqua and Ulster Counties.
⁷² Livingston County.
⁷³ Forty districts reimburse mileage expenses. See Table 2. Chenango County will not reimburse expenses until the 20th of the following month.
⁷⁴ Allegany, Clinton, Orange, & Wyoming Counties. Wyoming will provide this assistance only if the participant is the owner of the car.
⁷⁵ Erie and Sullivan Counties. In addition, Ontario County will provide funds up front with prior approval.

The unavailability of advance assistance for private vehicle mileage expenses in most districts may be a substantial barrier to use of these vehicles to meet participants' transportation needs.

Car Repair & Insurance Assistance

The expenses associated with vehicle ownership extend well beyond direct mileage-based operational expenses. Often it is the episodic expenses such as car repairs and liability insurance that pose the greater barriers preventing participants from using their own vehicles for transportation. Recognizing the importance of this type of assistance, nearly all of New York's social services districts will provide assistance to participants in meeting these expenses. Fifty-one districts will provide assistance with car repairs, ranging from \$250 one-time payments to \$1500 once per year.⁷⁶ Forty-eight districts will assist with car insurance expenses, also ranging from \$250 one-time payments to \$1500 once per year.⁷⁷

.....
By assisting with repairs or insurance expenses, districts may meet participants' long-term transportation needs, as well as giving participants greater flexibility in terms of work hours and job location.
.....

Many districts impose additional requirements on their provision of repair or insurance assistance. A number of districts will assist with vehicle repairs or insurance expense only when this assistance is necessary for a participant to get or keep a job.⁷⁸ Oneida County will provide both car repair and insurance assistance, but only to participants who have been offered permanent jobs working at least 25 hours per week at the minimum wage. Furthermore, in sixteen districts car repair and/or insurance assistance must be the least costly means of meeting a participant's transportation needs.⁷⁹ This requirement may be a significant hurdle: rarely will a significant repair expense be less costly than providing short term public or para-transit assistance. However, by assisting with repairs or insurance expenses, districts may meet participants' long-term transportation needs, as well as giving participants greater flexibility in terms of work hours and job location.

Many districts require the participant to prove ownership of a vehicle before they will provide repair or insurance assistance.⁸⁰ Only three districts will provide assistance in cases where the participant has use of a vehicle owned by a spouse, relative or household member.⁸¹ This is unfortunate in that it forces participants to pass up possible means of meeting long-term transportation needs.

Car Ownership Assistance

Several districts have programs to assist participants in acquiring their own cars. A number of districts operate loan programs to provide financial assistance to participants so they can purchase cars.⁸² The programs offer below-market loans or provide loan guarantees to participants. Delaware and Schoharie Counties make donated used cars available to participants.⁸³ Several districts provide other assistance associated with vehicle ownership, such as assistance with title and registration fees.⁸⁴ Still other districts will assist participants to obtain (or reinstate) driver's license.⁸⁵ Districts can contract with local Legal Services organizations to provide legal assistance to participants with these and other barriers to employment.⁸⁶ Five districts even providing assistance with driver training.⁸⁷

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⁷⁶ See Table 4.

⁷⁷ See Table 5. Eleven districts limit the period for which they will provide insurance assistance, ranging from a 3 months to one year.

⁷⁸ Ten districts will assist with repairs only when necessary to get or keep a job, while two will do so in order for a participant to get a job or participate in work activities. See Table 4. Eleven districts limit insurance assistance to cases where necessary in order for the participant to get or keep a job. See Table 5.

⁷⁹ See Tables 4-5.

⁸⁰ Chautauqua, Fulton, Dutchess, Nassau, Wayne, and Rensselaer Counties will only assist with repairs to vehicles owned by participants. Chautauqua and Fulton Counties will only provide insurance assistance for vehicles registered in participants' names, while Dutchess, Nassau, and Orange Counties require actual ownership before assistance with insurance expenses.

⁸¹ Jefferson, Monroe, and Oneida Counties.

⁸² Dutchess, Genesee, Schoharie, Seneca, Sullivan, and Wyoming Counties.

⁸³ See Table 6.

⁸⁴ Ten districts provide this type of assistance, although Montgomery County will only do so if the vehicle will be titled and registered in the participant's name. See Table 6.

⁸⁵ Thirteen districts will assist with obtaining driver's licenses. Putnam County will assist with the payment of fines in order to reinstate a driver's license, while Oswego County will provide \$200 for this purpose as a loan subject to recoupment.

⁸⁶ For example, Southern Tier Legal Services has contracted with Steuben and Cattaraugus Counties to provide legal services to public assistance recipients who have legal barriers to employability using federal Welfare-to-Work funds.

⁸⁷ Broome, Delaware, Dutchess, Fulton, and Sullivan Counties.

It is important to note that local districts may be operating vehicle ownership programs that have not been included in their employment plans. For example, Chautauqua County operates, but did not include, the nationally recognized EARN-A-CAR program. Under this program, participants "who have demonstrated reliability of work effort and have a driver's license learn basic car maintenance by repairing a donated car. Employed graduates of the class may purchase a donated car and a local bank helps to work out manageable loan payments."⁸⁸ The Steuben-Allegany BOCES program operates a similar program, combining work assignments repairing donated cars with a loan guarantee program.⁸⁹ Programs of this type have the dual advantages of building marketable skills and meeting long-term transportation needs.

Carpooling

For many workers, carpooling can be an efficient and cost-effective means of transportation to and from work. Sixteen social services districts encourage carpooling by participants using private automobiles as a means of transportation to work activities, but do not otherwise assist in making these arrangements. However, one district states that "[c]lients may carpool but the agency doesn't recommend this policy."⁹⁰

OTHER TRANSPORTATION STRATEGIES

Relocation

One of the standards that changed as a result of New York's implementation of TANF is the ability to sanction recipients who lack transportation to and from work assignments. Under the rules in place prior to implementation of TANF, a recipient was exempt from participation in work activities if s/he lived in a location "so remote that effective participation . . . is precluded."⁹¹ Participation was considered "precluded" if a round trip of more than two hours, excluding transportation to and from child care, was required, or, if the normal trip was more than two hours, if the "round trip would exceed the generally accepted community standard."⁹²

Under the new rules, a lack of transportation is no longer considered "good cause" for failure to comply with work requirements.⁹³ Instead, a participant has "good cause" based on lack of transportation only when s/he has refused an offer of employment because the location would require "unreasonable" travel from the participant's home.⁹⁴ As a result, recipients can be sanctioned for failure to participate in assigned work activities regardless of the transportation barriers they face.⁹⁵

Under current law district must "make diligent efforts to assist individuals in overcoming transportation problems."⁹⁶ According to NYSDOL this may include supportive services or relocation assistance.⁹⁷ Nonetheless, a district can assign a participant to an activity even if it knows the participant does not have transportation and will be unable to participate.

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Recipients can be sanctioned for failure to participate in assigned work activities regardless of the transportation barriers they face.

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⁸⁸ See *TANF Policy Announcement*, *supra* note 11. This Chautauqua County program is one of the "promising initiatives" highlighted in this comprehensive federal guidance document.
⁸⁹ See *Wheels to Work Demonstration Project Request for Proposals (RFP)*, available at www.labor.state.ny.us/html/wtw/wheel.pdf. This program was not discussed in The Allegany or Steuben County plans, although Allegany did identify an apparently different loan guarantee program.
⁹⁰ See Warren County Employment Plan § 4.3 (2000).
⁹¹ N.Y. COMP. CODES R. & REGS. tit. 18, § 385.2(b)(5) (Dec. 15, 1996). In addition, a participant had "good cause" for rejecting an offer of employment if the location required "unreasonable" travel or transportation was "unavailable." N.Y. COMP. CODES R. & REGS. tit. 18, § 385.19 (July 1997).
⁹² N.Y. COMP. CODES R. & REGS. tit. 18, § 385.2(b)(5) (Dec. 15, 1996).
⁹³ N.Y. COMP. CODES R. & REGS. tit. 12, § 1300.12 (Apr. 30, 2000).
⁹⁴ See *id.* "Unreasonable" is measured in terms of "the standards of the community," echoing the pre-TANF language. See text accompanying note 87.
⁹⁵ NYS Dept. of Labor, *Employment Policy Manual, Questions and Answers on 12 NYCRR 1300.4* (June 20, 2000), [hereinafter *Questions and Answers*] ("remoteness is no longer an allowable reason for failing to comply with work activities").
⁹⁶ N.Y. Social Services Law § 332(2)(a) (McKinney 1992 & Supp. 2000).
⁹⁷ *Questions and Answers*, *supra* note 95.

Several local districts explicitly state in their employment plans that recipients who live in remote areas will not be exempt from work requirements. One district, Greene County, will transport remote recipients for 3 months with the expectation that those recipients will have resolved their transportation issues by the end of that 3 month period.⁹⁸ Other districts, including Chemung, Monroe and Tioga Counties, assist recipients in eliminating these barriers through counseling and planning processes.⁹⁹ Still others, such as Ulster County, offer relocation assistance to remote recipients.¹⁰⁰

According to the NYS Department of Labor, public assistance recipients living in remote areas cannot be required to move in order to participate in work activities or improve job prospects.¹⁰¹ However, Madison County’s employment plan provides that recipients will “be offered, and may be required to accept, housing relocation assistance to address” transportation barriers.¹⁰² And several districts, such as Livingston, Niagara and Schoharie Counties, simply state in their employment plans that they will not exempt recipients based upon remoteness.¹⁰³

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New York state should remove the 90 day limit on transitional transportation assistance and instead use financial eligibility guidelines.

TRANSPORTATION AS A TRANSITIONAL SERVICE

In New York’s system, transportation assistance is provided as a supportive service to allow public assistance recipients to participate in work activities. Under Social Services Law §332-a, local social services districts are authorized to provide transitional supportive services for 90 days after a participant leaves the welfare rolls for paid employment.¹⁰⁴ Districts may, but are not specifically required, to provide transportation assistance as a transitional supportive service. Often this assistance does not include reimbursement for daily commuting costs under a theory that workers should pay routine expenses out of their own pockets. Essentially this means that welfare recipients are given assistance until they find jobs, but not to keep them.

Fifty New York districts discuss the possibility of providing transitional transportation assistance, although twenty-six of these districts do not detail their transitional transportation policies in their plans.¹⁰⁵ Some districts, such as Albany County, provide mileage reimbursement,¹⁰⁶ while others do not provide mileage but will provide other types of transitional assistance, such as car repair.¹⁰⁷ Several districts provide assistance for periods less than 90 days,¹⁰⁸ including Franklin County, which phases out transitional assistance over the course of thirteen weeks.¹⁰⁹ Thirteen districts may provide transitional vehicle repair and insurance assistance.¹¹⁰ However, three districts specify in their plans that they will not provide transitional transportation assistance to participants leaving their welfare rolls.¹¹¹

Next to child care, transportation may be the most significant barrier to employment for many participants. New York State requires local districts to provide transitional child care assistance to former participants who meet financial eligibility guidelines for up to 12 months after leaving public assistance for paid employment.¹¹² New York State should adapt this model for transitional transportation assistance by removing the 90 day limit and instead using financial eligibility guidelines as the basis for

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⁹⁸ See Greene County Employment Plan § 4.3 (2000).
⁹⁹ See, e.g., Chemung County Employment Plan § 4.3 (2000); Monroe County Employment Plan § 4.3 (2000); Tioga County Employment Plan § 4.3 (2000).
¹⁰⁰ See Table 7.
¹⁰¹ *Questions and Answers, supra* note 95.
¹⁰² Madison County Employment Plan § 4.3 (2000).
¹⁰³ See, e.g., Livingston County Employment Plan § 4.3 (2000); Niagara County Employment Plan § 4.3 (2000); Schoharie County Employment Plan § 4.3 (2000).
¹⁰⁴ N.Y. Social Services Law § 332-a (McKinney 1992 & Supp. 2000).
¹⁰⁵ See Table 7.
¹⁰⁶ See Albany County Employment Plan § 4.2 (2000).
¹⁰⁷ Allegany, Cattaraugus, and Chenango Counties.
¹⁰⁸ Herkimer County: until first paycheck; Onondaga: 30 days or until first paycheck; and Otsego: mileage reimbursement for up to four weeks.
¹⁰⁹ See Franklin County Employment Plan § 4.2 (2000).
¹¹⁰ In addition, Broome County will provide insurance assistance but will not assist with vehicle repairs.
¹¹¹ Greene, Wayne and Westchester Counties.
¹¹² See Social Services Law § 410-w (McKinney 1992 & Supp. 2000).

determining eligibility for transitional transportation assistance.

TRANSPORTATION SERVICES AS DIVERSION

Several local social services districts provide limited assistance to applicants in order to help them maintain their jobs and stay off the welfare rolls. This type of assistance is often called “diversion,” because applicants are “diverted” from potentially long stays on the welfare rolls through provision of short-term, often one-time, assistance.

New York has not explicitly authorized any diversion programs under its statutes. Instead, it appears these services are authorized under provisions requiring delivery of services to public assistance applicants. New York’s Social Services Law requires districts to provide supportive services to enable individuals to participate in work activities.¹¹³ “Participant” is defined under the law as an applicant or recipient of public assistance “who volunteers or is required to participate in work activities.”¹¹⁴ Since unsubsidized employment is an allowable work activity under the statute,¹¹⁵ an employed applicant could be considered to be participating in work activities, and thus eligible for supportive services.

Guidance for local districts can be found in the regulations implementing the Welfare Reform Act of 1997. These regulations state that:

The Social Services official may provide any other supportive services which he/she deems necessary to allow individuals to participate in work activities, assist individuals at risk of needing public assistance to improve their opportunities for employment or to maintain their employment, or to assist employed public assistance recipients to improve their opportunities for employment which will move them to self-sufficiency.¹¹⁶

The New York State Department of Labor has provided additional guidance for local districts in the form of a series of Questions and Answers on this regulation. In response to the question: “Can I repair an applicant’s car in order to enable the applicant to continue working?” the Department answered as follows: “Supportive services can be used as a diversion in a front door program. You may use the assessment process as a front door activity and determine that repairing the car enables the applicant to continue his/her employment and prevents the applicant from needing assistance.”¹¹⁷

Four New York districts indicate in their plans that they will provide assistance to applicants in order to avoid the need for public assistance. Two districts, Cayuga and Greene Counties will provide assistance to meet immediate transportation needs in the form of gas vouchers or mileage/public transit assistance.¹¹⁸ These counties will also provide assistance for one-time car repair or insurance needs, as will Clinton County.¹¹⁹ Seneca County will assist working applicants with the purchase of a vehicle in order to maintain employment.¹²⁰

The availability of TANF funds for diversion greatly expands local district flexibility to meet applicant needs. However, the key to the success of any diversion program is awareness: unless applicants are made aware that diversion assistance is an option, few may express their needs during the application process in a manner that triggers such assistance. For example, an applicant who has lost her job because her car broke down may not mention her car problems during the application process, and thus never receive diversion assistance for needed car repairs. It is not clear from district plans how diversion

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¹¹³ N.Y. Social Services Law § 332-a (McKinney 1992 & Supp. 2000).
¹¹⁴ N.Y. Social Services Law § 330(4) (McKinney 1992 & Supp. 2000).
¹¹⁵ N.Y. Social Services Law § 336(1)(a).
¹¹⁶ N.Y. Comp. Codes R. & Regs. tit. 12, § 1300.4 (1999).
¹¹⁷ *Questions and Answers, supra* note 95.
¹¹⁸ *See* Cayuga County Employment Plan § 4.1 (2000); Greene County Employment Plan § 4.1 (2000).
¹¹⁹ *Id. See also* Clinton County Employment Plan § 4.1 (2000).
¹²⁰ *See* Seneca County Employment Plan § 4.1 (2000).

programs are publicized to applicants. Districts operating diversion programs should ensure that each applicant is made aware of the availability of this limited assistance.

CONCLUSION

Many of New York’s social services districts have taken advantage of the flexibility afforded by TANF in crafting their transportation policies. Most, but not all, districts use a combination of different transportation strategies to meet the individual transportation needs of work participants. Several districts have even taken advantage of new opportunities to provide diversion services to applicants to help working families stay employed.

Unfortunately, too many districts have not availed themselves of these opportunities or have done so in ways that themselves pose barriers. Most districts rely upon public transportation as the primary means of transporting participants. However, many of these districts require participants to pay these expenses up front out of limited budgets, while still others have no public transportation services available. Several districts use various forms of paratransit to meet participant transportation needs, but these services stop when participants enter the workforce. Others reimburse mileage or otherwise assist participants to maintain and insure private vehicles, but impose rules that limit the usefulness of these programs. Other districts have ignored the law, and are implementing assignment and relocation policies that are inconsistent with state statute, regulations, and policy guidance.

There is a more significant way in which New York can take advantage of the flexibility afforded by TANF. The TANF program allows states to structure their programs differently in order to provide a broader range of work supports to low income families. One of the provisions of TANF allows states to provide services to low income individuals outside of the 5 year time limit. Under TANF, the time limits run whenever the state provides “assistance” to meet one of the first two goals of TANF, namely meeting the needs of needy families or providing services to reduce dependency.

“Assistance is narrowly defined under the final TANF regulations, allowing states to provide supportive services to employed families who are not recipients of TANF, such as low-income working families.¹²¹ States can establish separate programs for low income working families, with separate eligibility criteria, that do not count as “assistance.” In addition, states can provide short-term benefits to meet episodic needs for up to 4 months, and more than once per year, separate and apart from TANF “assistance.” This type of assistance is not subject to the time limit restrictions placed upon cash assistance to TANF-eligible families. By taking advantage of this flexibility states can now use federal TANF funds to assist a population of low-income individuals not previously eligible for services.

New York has begun to use TANF funds to provide benefits to needy individuals outside the TANF definition of “assistance.” In FY 2000-01, the New York State Legislature appropriated a significant portion of the available TANF funds to assist “needy” individuals—those with incomes under 200% of the federal poverty line.¹²² Several transportation initiatives have been funded using these TANF dollars, including the Wheels to Work Program and the Community Solutions for Transportation (CST) program.

The Wheels to Work program will distribute a total of \$10 million to local districts.¹²³ In its Request for Proposals, the New York State Department of Labor stated that it seeks to assist “eligible persons with the purchase, repair, financing and/or insuring of personal vehicles which are necessary to obtain or maintain employment or to participate in other allowable work activities,” with eligible per-

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¹²¹ *TANF Policy Announcement*, *supra* note 11. According to this guidance document, “child care, transportation, and other supportive services provided to families that are employed” are not considered “assistance” under TANF.

¹²² For a discussion of these new funding programs see Susan C. Antos, *TANF: It’s Not Just for Family Assistance Anymore*, LEGAL SERVICES JOURNAL (Greater Upstate Law Project, July 2000), available at www.gulpny.org.

¹²³ The Wheels to Work program was allocated \$5 million in current year funding and \$5 million in funds reappropriated from the prior year.

sons defined as persons with income under 200% of the federal poverty line.¹²⁴ Although the Department has made clear that these funds will not be limited to car ownership programs,¹²⁵ the bulk of the RFP and related materials is devoted to this option.¹²⁶

The Community Solutions for Transportation Program will distribute a total of \$24 million in TANF funds for transportation projects that will “fill current gaps in service” that prevent eligible persons, those with incomes under 200% of the federal poverty line, from getting or keeping jobs.¹²⁷ These funds can be used for public transportation projects, such as implementing new service, expanding existing capacity, or providing transit passes; for paratransit projects, such as establishing cooperative transit programs or vanpool programs; or to facilitate private vehicle ownership by, for example, providing driver training or making used cars to eligible individuals.¹²⁸

Through these initiatives, and others, New York State has begun to take advantage of some of the programmatic flexibility available under the federal TANF regulations. These state initiatives, in turn, increase the range of options available to local social services districts as they seek to meet the needs of needy individuals in their communities. Local districts have already begun to develop innovative strategies to meet the transportation needs of TANF benefit recipients. By learning from and building upon these strategic choices, local districts now have the opportunity to broaden the reach of their programs to better meet the transportation needs of needy families in their communities.

This expansion in the range of transportation program options available to local districts increases the need for clear coordination of programs and benefits in each local district. It is essential that local districts implement different transportation programs in ways that improve the overall availability and accessibility of transportation services for low income families in their communities. It is equally essential that public assistance recipients and other low income families are informed about the availability of transportation assistance through their local social services districts: unless the intended beneficiaries of these programs are made aware of the availability of assistance all will be for naught.

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¹²⁴ See *Wheels to Work Demonstration Project Request for Proposals (RFP)*, available at www.labor.state.ny.us/html/wtw/wheels.pdf.

¹²⁵ See *Wheels to Work Demonstration Project Bidder’s Conference Questions and Answers*, available at www.labor.state.ny.us/html/wtw/wheelsqa.htm.

¹²⁶ See *id.*; *Wheels to Work Demonstration Project Request for Proposals (RFP)*, available at www.labor.state.ny.us/html/wtw/wheels.pdf.

¹²⁷ See *Community Solutions for Transportation Application Package*, available at www.labor.state.ny.us/html/wtw/cstapp.pdf.

¹²⁸ See *id.*

APPENDIX 1: MODEL TRANSPORTATION ASSESSMENT INSTRUMENT

Do you need transportation to get to a job? YES NO

Do you need transportation to take your children to and from child care? YES NO

If yes, where is your provider located? _____

How far do you live from the nearest town, village, or city? _____ miles from

What do you use for transportation now (for shopping, to get to appointments, etc.)?

own vehicle vehicle in household borrow vehicle get rides bus/taxi other

Is public transportation available to your home? YES NO

If not, how far is it to the nearest stop? _____

Do you have a valid driver's license? YES NO

If yes, please indicate class _____

license number _____ state _____ expiration date _____

If no, have you ever had a license? YES NO

If yes, why don't you have a license now? _____

Do you have your own car? YES NO

If yes, year/model _____ registered? YES NO

Whose name is the vehicle registered in? _____

insured? YES NO

reliable? YES NO

If no, do you have access to a vehicle? YES NO

Whose vehicle? _____

Do you have a physical impairment that requires special transportation? YES NO

Please explain _____

Are you considering moving from this area? YES NO

If yes, specify location _____

APPENDIX 2: PROPOSED LEGISLATION

AN ACT to amend the social services law, in relation to the provision of transportation services to employment program participants

The People of the State of New York, represented in Senate and Assembly, do enact as follows:

Section 1. Section 332-a of the social services law, as amended by chapter 436 of the laws of 1997, is amended to read as follows:

A social services district shall, subject to the availability of federal and state funds, provide such supportive services, including but not limited to transportation, work related expenses, child care for children up to age thirteen, case management, and medical assistance in accordance with regulations of the department, to enable an individual to participate pursuant to this title. Social services districts may continue such services for persons who lose eligibility for public assistance if funds for the activity are obligated or expended, or for up to [ninety days] one year if necessary or appropriate to assist individuals to become self-sufficient. In accordance with [paragraph (f) of subdivision five of section one hundred thirty-one-a] section four hundred ten-w of this chapter, each district shall guarantee child care to each individual participating in work activities who requires child care to participate in such activities, attending orientation or an assessment in accordance with the requirements of this title. Case management shall be provided for pregnant adolescents, adolescent parents and at-risk youth under eighteen years of age as required by title four-B of article six of this chapter. To the extent that resources permit, case management also shall be provided (in order of priority) to: persons identified in department regulations as at-risk youth, persons in the target populations defined in section three hundred thirty of this title, persons whose employability plan indicates a need for two or more concurrent activities and persons with limited English proficiency.

§ 2. Subdivision 1 of section 334 of the social services law, as amended by chapter 436 of the laws of 1997, is amended to read as follows:

(a) education, employment and training opportunities available under the local plan, including educational and training opportunities available at no cost to the participant as well as the responsibilities associated with the repayment of student financial aid;

(b) supportive services as prescribed by section three hundred thirty-two-a of this title, including availability of transportation assistance and other supportive services for persons whose for assistance has terminated; child care pursuant to section four hundred ten-u of this chapter for persons whose eligibility for assistance has terminated; and applicable medical assistance;

(c) the obligations of the district regarding the activities and support services to be provided;

(d) the rights, responsibilities and obligations of the participant in the program including, but not limited to, participation and the consequences of failure to par-

ticipate in work activities without good cause;

(e) the types of transportation assistance available to participants, as well as the types of transportation assistance available to persons with incomes up to two hundred percent of the state income standard who are no longer eligible for family assistance;

(f)(1) the types and settings of child care services which may be reasonably accessible to participants and how such services shall be provided and financed;

(2) the assistance available to help participants select appropriate child care services; and

(3) the assistance available upon request to help participants obtain child care services.

§ 3. Subdivision 1 section 335 of the social services law, as amended by chapter 214 of the laws of 1998, is amended to read as follows:

1. Each social services official shall ensure that each recipient of public assistance who is a member of a household with dependent children and is eighteen years of age or older, or who is sixteen or seventeen years of age and is not attending secondary school and has not completed high school or a high school equivalency program, receives an assessment of employability based on his or her educational level, including literacy and English language proficiency, basic skills proficiency, child care, transportation and other supportive services needs; and skills, prior work experience, training and vocational interests. This assessment shall include a review of family circumstances including a review of any special needs of a child. Such assessment shall be completed within ninety days of the date on which such person is determined eligible for public assistance. An applicant for or recipient of public assistance may be assigned to work activities prior to completion of such assessment.

§ 4. Subdivision 2 of section 335 of the social services law, as amended by chapter 436 of the laws of 1997, is amended to read as follows:

2. (a) Based on the assessment required by subdivision one of this section, the social services official, in consultation with the participant, shall develop an employability plan in writing which shall set forth the services that will be provided by the social services official, including but not limited to child care, transportation and other services and the activities in which the participant will take part, including child care, transportation and other services and shall set forth an employment goal for the participant. To the extent possible, the employability plan shall reflect the preferences of the participant in a manner that is consistent with the results of the participant's assessment and the need of the social services district to meet federal and state work activity participation requirements, and, if such preferences cannot be accommodated, the reasons shall be specified in the employability plan. The employability plan shall also take into account the participant's supportive services needs, available program resources, local employment opportunities, and where the social services official is considering an educational activity assignment for such participant, the participant's liability for student loans, grants and scholarship awards. The employability plan shall be explained to the participant. Any change to the participant's employability plan required by the social services official shall be dis-

cussed with the participant and shall be documented in writing.

§ 5. Subdivisions 1, 2 and 6 of section 335-a of the social services law, as amended by chapter 436 of the laws of 1997, are amended to read as follows:

1. To the extent resources are available, the social services official shall, within a reasonable period of time not to exceed one year following application and not to the exclusion of the assessment requirements of section three hundred thirty-five of this title, conduct an assessment of employability based on the educational level, including literacy and English language proficiency; basic skills proficiency; transportation and other supportive services needs; and the skills, prior work experience, training and vocational interests of each participant. This assessment shall include a review of family circumstances.

2. (a) Based on the assessment required by subdivision one of this section, the social services official, in consultation with the participant, shall develop an employability plan in writing which shall set forth the services that will be provided by the social services official and the activities in which the participant will take part, including transportation and other supportive services and shall set forth an employment goal for the participant. A local social services district may assign recipients in households without dependent children to any activity. The employability plan also shall take into account the participant's supportive services needs, available program resources, local employment opportunities, and where the social services official is considering an educational activity assignment for such participant, the participant's liability for student loans, grants and scholarship awards. The employability plan shall be explained to the participant. Any change to the participant's employability plan required by the social services official shall be discussed with the participant and shall be documented in writing.

6. Nothing in this section shall be construed to prevent a social services official from providing an assessment more detailed or comprehensive [~~that~~] than the requirements set forth in this section.

§ 6. This act shall take effect on the first day of July next succeeding the date on which it shall have become a law, except that any rule or regulation necessary for the timely implementation of this act on its effective date shall be promulgated on or before such date.

TABLE 1: DISTRICT WORK ASSIGNMENT AND WALKING POLICIES

	Assign Close to Home?	Remote Sites?	Distance must walk	Health exception	Child(ren) exception	Other
Albany	"reasonable distance"	some sites outside city	---	---	---	
Allegany			1 mile to bus route			
Broome	"close proximity"	will develop if needed	---	---	---	
Cattaraugus	"match" sites	some sites in remote areas	---	---	---	
Cayuga	"as close as possible", on or near pub. trans route	yes	2 miles			encourage carpooling; concurrent assignments for 2-parent households
Chautauqua (1999 plan)			1.5 miles		1 mile if pre-school age children	encourage carpooling
Chemung	no	no – all accessible via pub. trans.	2 miles		yes	counseling re removing barriers
Chenango	"as close as possible"	yes	1.5 miles			encourage carpooling
Clinton	within "reasonable" walking distance (2-3 miles)	yes	2-3 miles			
Columbia	within walking distance if no pub. trans.	yes	---	---	---	
Cortland		yes	2 miles	yes		
Delaware	"as close as possible"	yes	---	---	---	many worksites provide trans.
Dutchess	"reasonable effort" to assign as close as possible	es	2 miles to pub. trans			many worksites provide trans. walking exception if work hours when no pub. trans.
Erie	"as close as possible"	yes	1 mile			
Essex		yes	---	---	---	encourage carpooling; trans. as comm. svc.
Franklin	within reasonable walking distance	yes	---	---	---	encourage carpooling
Fulton		yes	---	---	---	one site provides trans.
Genesee		yes	---	---	---	encourage carpooling
Greene			---	---	---	
Hamilton		yes	---	---	---	encourage carpooling
Herkimer	"as close as possible"	yes	2 miles	yes		
Jefferson	"in proximity" whenever possible	yes	---	---	---	some sites provide trans.; encourage carpooling
Lewis	"closest possible"		1 mile			some sites provide trans.
Livingston	"within walking distance" if possible	yes	2 miles			
Madison	"close" to home		2 miles	yes		
Monroe		no	---	---	---	

	Assign Close to Home?	Remote Sites?	Distance must walk	Health exception	Child(ren) exception	Other
Montgomery	"as close as possible"	no	---	---	---	encourage carpooling
Nassau		no	---	---	---	
Niagara	"diligent efforts" to assign close to home	yes	---	---	---	some sites provide trans.
Oneida		yes	1 mile	yes	young children	encourage carpooling, friends, neighbors
Onondaga	"diligent efforts" to assign w/in walking dist.	yes	1 mile or 10 blocks	must be documented		will develop remote sites if nec.
Ontario	nearest to home "when possible"		2.5 miles			
Orange		yes	---	---	---	
Orleans	close to home "when feasible"	yes	---	---	---	
Oswego (1999 plan)	as close as possible	yes	---	---	---	encourage carpooling
Otsego	as close as possible	yes	2 miles			encourage carpooling
Putnam	as close as possible	yes	3 miles		1.5 miles	walking exceptions on case by case basis
Rensselaer		yes	---	---	---	encourage carpooling
Rockland		no	---	---	---	
St Lawrence	closest available worksite	yes	2 miles	yes if documented by physician		encourage carpooling
Saratoga	in proximity to home		1 hour or 4 miles			
Schenectady		yes	---	---	---	walking assessed on case by case basis
Schoharie		yes	---	---	---	encourage carpooling
Schuyler		yes	---	---	---	
Seneca			---	---	---	
Steuben	"when possible"	yes	2 miles			
Suffolk			---	---	---	
Sullivan		yes				must walk if "feasible"
Tioga		yes	---	---	---	
Tompkins			---	---	---	encourage carpooling
Ulster		yes	2 miles	implied		
Warren	close proximity if possible	yes	---	---	---	
Washington	as close as possible	yes	---	---	---	
Wayne		only remote site provides trans.	2.5 miles			
Westchester		no	---	---	---	
Wyoming	whenever possible	no	---	---	---	

	Assign Close to Home?	Remote Sites?	Distance must walk	Health exception	Child(ren) exception	Other
Yates	"within reasonable distance"	yes	---	---	---	

TABLE 2: DISTRICT PUBLIC TRANSPORTATION AND MILEAGE REIMBURSEMENT POLICIES

	Public Transit Routes	Reimburse Public Transp.?	Mileage Rate	Reimburse or Up-front Mileage	Child Care Transp.?	Other
Albany	fed/st trans grant => new routes & extended hours	bus passes through fed/st trans grant	public trans rate or district rate	reimbursed	implied but unclear	
Allegany	new public trans as of Jan. 2000	tokens	.19/mi	reimbursed, gas vouchers or tokens		not for subs. or unsubs. employment
Broome	yes		public trans rate or district rate up to .32/mi	reimbursed, or bus tokens / passes	yes	
Cattaraugus	No pub. trans. in county		.15/mi	reimbursed, incl. cab / bus fare		
Cayuga	yes		.325/mi	reimbursed	yes	one time car ins. /repairs, & gas / pub trans. expenses for diversion
Chautauqua (1999 plan)	yes	reimbursed	public trans rate or .28/mi		yes	must verify cost & miles
Chemung	yes	yes	public trans rate			if employed, only until to 1 st paycheck
Chenango	yes		.10/mi	when prior request in writing; reimbursed after 20 th of next mo.		
Clinton	yes	tokens or reimbursed	.325/mi or public trans rate	reimbursed, gas coupons or tokens		
Columbia			.10/mi			
Cortland	yes	bus vouchers	.10/mi. up to \$30/mo.	reimbursed or bus vouchers; pre-approval		
Delaware	no pub. trans in county		yes	reimbursed		
Dutchess	yes	bus passes	.26/mi			if employed, only until to 1 st paycheck
Erie	yes	trans. allowance	\$42/mo	trans. allowance		
Essex	no pub. trans in county		.10/mi			
Franklin	no pub. trans in county			reimbursed		
Fulton		bus tickets	.10/mi	reimbursed or bus tickets		
Genesee			county rate	reimbursed	yes	
Greene	no pub. trans in county		no			reimb. for 1 st 2 weeks for diversion
Hamilton	no pub. trans in county		.29/mi			
Herkimer		bus passes	co. rate	reimbursed on monthly basis; bus passes		taxis on case by case basis
Jefferson		bus tickets or reimb. bus fare	.11/mi; AAA rate	reimbursed monthly, bus fare /tickets		
Lewis		direct payment to taxi or vol. driver	.15/mi	reimbursed; direct pay to trans. provider	yes	not for employed recips.
Livingston	yes		Medicaid rate	reimbursed monthly if attendance verified		one round trip per day

	Public Transit Routes	Reimburse Public Transp.?	Mileage Rate	Reimburse or Up-front Mileage	Child Care Transp.?	Other
Madison		reimbursed on monthly basis		reimbursed		must have pre-approval
Monroe		unlimited ride bus passes	district rate	indirect or direct payment	yes	cash only if no pub trans or other reason
Montgomery		bus passes for city travel	.14/mi	reimbursed		
Nassau	yes	Metrocard	.25/mi or \$20/day	Metrocard		
Niagara	yes	bus passes / tokens	AAA rate or district rate (.31/mi)	reimbursed or bus passes / tokens		
Oneida	yes		.31/mi or \$12/day	reimbursed on monthly basis		
Onondaga	yes	reimbursed, bus pass or tokens		reimbursed, bus pass / token		reimb. only if owned & registered + dr. license
Ontario	yes	reimbursed up to \$6/day	.10/mi	reimbursed 2x/mo., up front w/ approval		
Orange	yes	tokens or vouchers	.31/mi	reimbursed, tokens or vouchers	yes, incl to camp	
Orleans	no pub. trans in county		.15/mi	reimbursed		
Oswego (1999 plan)	yes		.10/mi	reimbursed, bus tokens / vouchers	yes	
Otsego	yes		.29/mi or public trans rate, up to 45 miles one way	reimbursed	yes	
Putnam	yes		.30/mi	reimbursed	yes, incl. to camp	
Rensselaer	yes	bus passes	.21/mi	reimbursed or bus pass		
Rockland	yes	bus tickets	"local rates"	mileage or bus tickets		
St Lawrence	no pub. trans in county		.11/mi	reimbursed, .325/mi for vol. drivers		
Saratoga			pub trans rate or .10/mi			
Schenectady	yes	bus tokens or passes	.20/mi	reimbursed, bus tokens / passes		
Schoharie	yes	bus tokens		reimbursed or bus tokens		
Schuyler	yes		.30/mi	reimbursed	yes	
Seneca	no pub. trans in county		.10/mi			
Steuben	yes	reimbursed	pub trans. or Medicaid rate	reimbursed if prior approval		one R-T per day, no reimb. for assess. or job search
Suffolk	yes		.30/mi or district rate	reimbursed on monthly basis	yes	
Sullivan	some	bus tickets	"daily travel allowance"			
Tioga	yes	bus tokens / passes	.10/mi; \$25/mo for "supported job search"	reimbursed, bus tokens / passes		
Tompkins	yes	bus tokens	.10/mi	reimbursed, bus tokens		
Ulster	yes	reimbursed, bus tokens, cash stipend	.325/mi			must verify mileage
Warren	yes	bus tokens, tickets	pub trans rate or .10/mi	reimbursed	yes	

	Public Transit Routes	Reimburse Public Transp.?	Mileage Rate	Reimburse or Up-front Mileage	Child Care Transp.?	Other
Washington	most of co. lacks pub. trans	bus tokens		reimbursed or bus tokens		
Wayne	yes		pub trans. or AAA rate (.11/mi)	reimbursed, bus tokens		
Westchester	yes	reimbursed	.325/mi	reimbursed	yes	
Wyoming	yes	bus passes	.15/mi	gas vouchers if owned, reimbursed if owned by another		
Yates	no pub. trans in county		.25/mi	reimbursed		must be verified

TABLE 3: DISTRICT PARATRANSIT SERVICES

	Alternative Public Trans?	District Vans?	Mobile Crews?	Other
Albany	no	no	no	TANF \$\$ for Access Transit Office (trans. broker service)
Allegany	Dial-A-Ride; school buses to BOCES	county-owned vehicles	yes	
Broome				
Cattaraugus		yes (using Work Now \$\$)	yes	
Cayuga				pickup/dropoff arranged by some sites
Chautauqua (1999 plan)				
Chemung				
Chenango				
Clinton		no		
Columbia				2 contract worksites provide trans.
Cortland		yes		
Delaware		yes	yes	contract provider for limited trans.
Dutchess				
Erie	Rural Transit Service			
Essex		yes, by contract		
Franklin	Office for the Aging transport. system	yes		
Fulton				one site provides trans.
Genesee		yes		contract w/ bus cos.
Greene		shuttle services		
Hamilton				
Herkimer	Herkimer Area Resource Ctr system			
Jefferson				taxi service may be provided
Lewis				pickup by some sites
Livingston		yes	yes	
Madison				transport by remote sites
Monroe				
Montgomery				
Nassau				
Niagara				pickup by some sites
Oneida				Job Access grants to improve trans. system
Onondaga				
Ontario	Dial-a-Ride			
Orange	"Dial-a-Bus"	yes		

	Alternative Public Trans?	District Vans?	Mobile Crews?	Other
Orleans		yes	yes	taxis
Oswego (1999 plan)		yes	yes	
Otsego	school buses, Head Start			
Putnam				district trans or taxi up to 30 days
Rensselaer				pickup by some sites
Rockland				
St Lawrence	BOCES bus, ARC bus			taxi
Saratoga				
Schenectady		yes		private vendors when needed
Schoharie		yes		
Schuyler			yes	
Seneca		yes	yes	
Steuben		yes	yes	
Suffolk		several		
Sullivan		yes		taxis
Tioga				district trans on as needed basis
Tompkins				contract providers
Ulster	town vehicles	yes		cabs, some sites provides trans.
Warren	school buses, Head Start			
Washington				
Wayne	school buses			only remote worksite provides trans
Westchester				
Wyoming				
Yates				

TABLE 4: DISTRICT CAR REPAIR ASSISTANCE PROGRAMS

	Cap	Estimates	Ownership	Employed / Job offer?	Other
Albany	---	---	---	has obtained or to maintain job	
Allegany	\$500	---	---	---	
Broome	lesser of \$500 or car value per eligibility period				must be least costly trans.
Cattaraugus	\$750 if cost effective				
Cayuga	---	---	---	to maintain employment	non-recurring payment for diversion
Chautauqua (1999 plan)	lesser of \$500 or book value per eligibility period	2 estimates from established garages	must be registered in client's name		must be least costly trans.
Chemung	\$500			has obtained or to maintain job	must be least costly trans.
Chenango					as transitional service
Clinton	up to \$750			has obtained or to maintain job or for work activity	also available as diversion
Columbia					no details
Cortland	up to \$500 (or book value), incl. insurance				max \$500 for both car repair & insurance
Delaware					no details
Dutchess	up to lesser of \$1000 or NADA		must own vehicle	has job or offer or for work activities	must pass inspection after repairs
Erie					no details, case by case
Essex	up to \$1000, incl. insurance				least costly trans.
Franklin					no details except as transitional
Fulton	\$500		title & reg. in client's name		
Genesee					if cost effective
Greene	\$500			to obtain / keep job	in lieu of assistance
Hamilton	\$500				
Herkimer	---	---	---	---	
Jefferson	\$500		participant or spouse in same household		
Lewis	up to \$1500 or retail value	2 written estimates			
Livingston	not specified			to obtain / keep job	one time only
Madison	up to \$850 or NADA value	3 written estimates			
Monroe	\$500		may be owned by a relative		can be more on case by case basis
Montgomery	up to \$350 or value of car				
Nassau	up to \$600, incl. insurance		owned by participant		costs must be "reasonable"
Niagara	---	---	---	---	
Oneida	\$500	2 estimates	recipient or household member	permanent job offer min. 25 hrs /wk	

	Cap	Estimates	Ownership	Employed / Job offer?	Other
Onondaga	---	---	---	---	
Ontario	\$500	2 written estimates from NYS repair shops			must be pre-approved + least costly trans.
Orange	up to lesser of \$1000 or book value				
Orleans	up to \$500, \$100 if applicant				must be least costly trans.
Oswego	lesser of \$500 or car value per elig. period				must be least costly trans.
Otsego	up to lesser of \$500 or car value				
Putnam	up to lesser of \$1500 or car value				
Rensselaer			yes		on case by case basis
Rockland	reasonable			must be employed or have job offer	must be least costly trans.
St Lawrence	up to lesser of \$500 or car value				
Saratoga	lesser of \$500 or car value per elig. period				must be least costly trans.
Schenectady	up to \$500 per elig. period				
Schoharie	---	---	---	---	
Schuyler	up to lesser of \$500 or car value	3 quotes			must be least costly trans
Seneca					no details
Steuben	\$250 one time payment				must submit receipt
Suffolk	up to lesser of \$1500 or car value/yr				
Sullivan	up to lesser of \$500 or car value				
Tioga		3 bids		verified job offer	
Tompkins					no details
Ulster	reasonable				must be least costly trans
Warren	up to \$500/yr			to accept or maintain employment	
Washington				to accept or maintain employment	
Wayne	up to lesser of \$500 or car value		owned by participant		must be least costly trans
Westchester	lesser of \$500 or car value per elig. period				
Wyoming					no details
Yates	one time payment up to \$500				

TABLE 5: DISTRICT CAR INSURANCE ASSISTANCE PROGRAMS

	Cap	Period	Estimates	Employed /Job Offer?	Other
Albany	---	---	---	has obtained or to maintain job	
Allegany	one time only payment	minimum period of insurer	---	---	
Broome	\$1000 per eligibility period				must be least costly trans.; up to 90 days after entry to employment
Cattaraugus					no details
Cayuga				to maintain employment	non-recurring payment for diversion
Chautauqua (1999 plan)	up to \$1000 once per eligibility period	minimum period up to 6 mos.	2 written estimates		must be least costly trans.; registered in client's name
Chemung	\$500			has obtained or to maintain job	must be least costly trans.
Chenango	---	---	---	---	
Clinton		up to 3 mos		to obtain or maintain job	also as diversion
Columbia					no details
Cortland	up to \$500, incl. repairs	one month at time for up to 3 mos.			max \$500 for both car repair & insurance
Delaware					no details
Dutchess	up to lesser of \$1000 or min. down payment	annual			excluding comp. & collision; must own vehicle
Erie					no details, case by case
Essex	up to \$1000, incl. repairs				least costly trans.
Franklin					no details except as transitional
Fulton		3 mo.			title & reg. in client's name
Genesee					if cost effective
Greene	\$500	6 mo		to obtain / keep job	in lieu of assistance
Hamilton	\$1000				
Herkimer	---	---	---	---	
Jefferson	\$1000	6 mos			

	Cap	Period	Estimates	Employed /Job Offer?	Other
Lewis	one time initial down payment or scheduled payment		2 written estimates		
Livingston				to obtain / keep job	one time only
Madison	up to \$850		3 written estimates		pre-approved
Monroe	\$1000				can be more on case by case basis
Montgomery		3 mos.	estimates from 2 carriers		no high-risk drivers or excessive premiums
Nassau	up to \$600, incl. repairs				must be owned by participant
Niagara	---	---	---	---	
Oneida	up to \$400	3 mos.	2 estimates	permanent job offer min. 25 hrs /wk	
Onondaga	---	---	---	---	
Ontario	\$1000/yr				must have prior approval & be least costly trans.
Orange	up to \$1000				must be owned by participant & be least costly
Orleans	---	---	---	---	
Oswego (1999 plan)	up to \$1000		3 estimates		must be least costly trans.
Otsego	up to \$500 per eligibility period				must be least costly; won't pay charges for convictions
Putnam	up to \$1000				if cost effective
Rensselaer	---	---	---	---	
Rockland				employed or job offer	must be least costly trans
St Lawrence	up to \$1000				must be least costly trans
Saratoga	up to \$1000 per eligibility period				must be least costly trans
Schenectady	up to \$500 per eligibility period				
Schoharie	---	---	---	---	
Schuyler	up to \$1000 per eligibility period				must be least costly trans
Seneca					no details

	Cap	Period	Estimates	Employed /Job Offer?	Other
Steuben	\$250 one time, \$500 as diversion			to maintain / keep employment	
Suffolk	\$1500/yr				must be least costly trans
Sullivan	up to lesser of \$1000 or book value				
Tioga			3 bids	must have verified job offer	when necessary
Tompkins					no details
Ulster	reasonable				must be least costly trans
Warren	up to \$500 per eligibility period				
Washington				to accept or maintain employment	
Wayne	up to \$500	3 mos.			must be owned by participant & be least costly
Westchester	up to \$1000 per eligibility period				
Wyoming					no details
Yates	---	---	---	---	

TABLE 6: DISTRICT VEHICLE OWNERSHIP PROGRAMS AND RELATED ASSISTANCE

	Loans / Loan Guarantee	Donated Cars	Registration / License Fees	Driver Training	Other
Allegany	through Accord Corp.		---	---	
Broome	---	---	yes	yes	
Delaware		yes	registration fees, permit & driver's license	5 hour course	
Dutchess	up to \$1500 or \$2500 if repairs also needed		registration fees, driver's license	6 hour class, if needed to get/keep job	car must pass inspection; must have license & job or job offer
Fulton	---	---		yes	
Genesee	\$3000 loans underwritten by CARE program		---	---	
Greene	Get to Work program planned for 6/00		---	---	
Hamilton	---	---	driver's license		
Jefferson	---	---	driver's license		
Lewis	---	---	driver's license / registration		
Montgomery	---	---	yes if title/ reg in client's name		
Oswego (1999 plan)	---	---	\$200 as loan for driver's license/fines		
Otsego	---	---	up to \$75 ea. for driver's license/ permit & regis /title		
Putnam			fees / fines for driver's licenses		grant up to \$1500 to purchase used car if deemed cost effective
Schoharie	reduced cost & long-term payment plan	purchase donated cars	driver's licenses/ regis.		
Seneca	loan guarantee as diversion		---	---	
Sullivan	low-interest loans if bona fide job offer		driver's licenses, regis.	yes	must meet county conditions (eg no DWI)
Ulster					"considering" a program
Wayne					provides list of affordable used cars
Wyoming	"Work Now" loan program		driver's licenses		

TABLE 7: OTHER DISTRICT TRANSPORTATION-RELATED SERVICES

	Alternative Assignments	Relocation Assistance	Moving Expenses	Transitional Trans for 90 days
Albany	in-home case mgmt	---	---	Mileage reimb. on case by case
Allegany	can submit comm. serv. plans	---	---	yes, but not mileage reimb or gas vouchers
Broome				supp. svces "deemed necessary"
Cattaraugus		---	---	car repair / ins. if needed to maintain employment
Cayuga	flexible hour worksite assignments	---	---	yes
Chautauqua (1999 plan)				yes
Chemung		yes		yes
Chenango	flexible hour worksite assignments	yes -- outside county when job secured		car repair & expenses to/from paid employment
Clinton		yes, incl. security deposit		car repair, insurance, gas or pub trans reimb. to maintain employment
Columbia		yes	yes	yes
Cortland		"may need to consider relocating"		yes if to maintain unsubsidized employment
Delaware			yes	yes
Dutchess		referral to housing		yes
Erie		---	---	to keep employment, incl. car rep. / ins.
Essex		up to \$1000 with proof of employment		gas
Franklin		yes		phase-out reimb. over 13 weeks; car rep./ ins
Fulton				yes
Genesee		---	---	yes, incl. cost effective car rep. / ins.
Greene	at home assignments if no trans.	---	---	no
Hamilton				yes, incl. car repair up to \$500
Herkimer		"encourage"		on case by case basis until 1 st paycheck
Jefferson		yes		yes
Lewis			yes	yes
Livingston		---	---	yes
Madison		yes		
Monroe		yes		yes
Montgomery		yes		
Nassau		yes		yes
Niagara		---	---	yes
Oneida		yes		
Onondaga		---	---	for up to 30 days or 1 st paycheck if over 1 mile
Ontario	recipient can develop own worksite	---	---	car repair /ins.: direct pay to provider

	Alternative Assignments	Relocation Assistance	Moving Expenses	Transitional Trans for 90 days
Orange		---	---	yes
Orleans		---	---	\$500 car repair, 6 mo insurance
Oswego (1999 plan)				yes
Otsego				4 weeks mileage, car rep / ins
Putnam				yes
Rensselaer	training to become home daycare provider	---	---	yes
Rockland		---	---	bus tickets
St Lawrence		yes	if verified employment	gas vouchers, car repair, 1 mo car ins
Saratoga		---	---	yes
Schenectady		---	---	yes
Schoharie				yes under "Prudent Person Theory"
Schuyler		---	---	
Seneca		---	---	yes
Steuben		---	---	yes
Suffolk		---	---	yes
Sullivan				yes
Tioga		---	---	yes on case by case basis
Tompkins		yes		on case by case basis
Ulster		yes		car repair / ins. or other non-recurring costs
Warren		---	---	yes
Washington		---	---	yes
Wayne		yes		no
Westchester		---	---	no
Wyoming				yes
Yates		---	---	on case by case basis

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