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| LOCAL COMMISSIONERS MEMORANDUM |  
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Transmittal No: 91 LCM-11

Date: January 24, 1991

Division: Income Maintenance

TO: Local District Commissioners

SUBJECT: The EDGE (Education for Gainful Employment) Program

ATTACHMENTS: Attachment A - Local District EDGE Allocation - not available on-line.  
Attachment B - Directory of Bureau of Employment Programs, County Assignments - not available on-line.  
Attachment C - Directory of SED Regional Field Representatives - Page 1 of 2 available on-line, Page 2 of 2 not available on-line.  
Attachment D - The Application Package - available on-line.

The New York State Department of Social Services and the State Education Department announce the creation of a new program to expand the educational and job skills training opportunities for recipients of ADC called EDGE (Education for Gainful Employment). Through EDGE funding, local educational agencies will assist local departments of social services to meet the additional service needs brought about through the implementation of the recent Job Opportunities and Basic Skills Training Program (JOBS). Federal funds are being matched at the State level: no local share will be required. EDGE Program funds should be seen as supplemental to the resources and services identified in the local JOBS Plan and may not be used to supplant resources already identified and available through other sources.

Attached is a chart which describes your district's EDGE allocation. In some districts, EDGE resources have been committed solely to one or more educational agency(ies). Where EDGE funds have already been committed to a specific agency, the local department of social services should work with the designated educational agency to determine the types of services to be provided. Where EDGE funds are uncommitted, the local social services district will have the discretion of determining the services and recommending the provider agency(ies). In those districts where funds are committed to one or more agencies and an amount is left uncommitted, the local district may combine the uncommitted with the committed funds or may use the uncommitted portion to deliver EDGE activities with another service provider agency.

Uncommitted allocations which are not applied for by local social services districts may be reallocated to other counties. In the absence of an application, committed funds will nonetheless be distributed to the educational agencies to whom funds have been committed; however the services to be provided in such cases will be subject to State approval.

All applications for funding and planned service levels will be subject to the review and approval of the State Department of Social Services with consideration given to recommendations made by the State Education Department.

Each local EDGE Program should be developed cooperatively by the local social services district and the participating provider agency(ies). The actual application will be submitted by the local social services district to the New York State Department of Social Services. Two copies of the application must be received by February 18, 1991 and mailed to:

EDGE Program Coordinator  
Bureau of Employment Programs  
New York State Department of Social Services  
40 North Pearl Street, 7B  
Albany, New York 12243

Following is an overview of the information needed to prepare an application package for EDGE.

If local social services districts have any questions on developing an EDGE application, please contact the technical assistance staff person in the Bureau of Employment Programs who is assigned to the district. If local educational agencies or other providers have questions on EDGE, such agencies are instructed to contact the Regional Coordinators of the State Education Department. Names and telephone numbers of both the technical assistance staff and the Coordinators are included as attachments to this LCM.

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(Education for Gainful Employment)

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EDGE  
(Education for Gainful Employment)

I. OVERVIEW AND PURPOSE

Recent passage of federal and State JOBS legislation places great demands upon local social services districts and educational providers to serve larger numbers of ADC recipients. Local districts will also be required to meet new requirements in the delivery of these services to this expanded population. Such requirements include targeting services to special populations cited in the Family Support Act, increasing hours of program participation, incorporating more comprehensive assessment procedures, ensuring that clients make satisfactory progress, and providing case management services. Furthermore, participation by custodial parents with pre-school age children creates new challenges in the provision of supportive services. Since no local funds will be required to match EDGE funding, local districts should seek to maximize the participation of ADC clients in EDGE.

II. ELIGIBLE ORGANIZATIONS

The Department will channel the funds identified for this program through the State Education Department to a variety of educational agencies for the purpose of providing JOBS activities for ADC recipients. In some cases, the funds have already been committed to one or more educational agency(ies). In these instances local districts will be able to designate the types of services necessary to meet the needs of JOBS participants. In cases where uncommitted funds are available, the local social services district will have the discretion of selecting the services to be provided and designating the agency(ies) to deliver JOBS services.

Agencies eligible for uncommitted EDGE funds are:

- Public School districts
- BOCES
- Community and 2-Year Colleges
- Community-Based Organizations
- Service Delivery Areas (SDA's)
- Educational Opportunity Centers (EOC's)
- Agricultural and Technical Colleges
- Libraries

Secondary educational agencies, public and private not for profit degree granting postsecondary agencies, and public libraries which, in the 12 months prior to making application, have not operated the EDGE-eligible activity(ies) for which they seek funding must:

be able to demonstrate to the satisfaction of the Departments of Social Services and Education that they either operated (a) similar activity(ies) in the 12 month period prior to making application or will employ experienced staff and/or otherwise acquire capacity to perform such activity(ies) successfully in a JOBS program.

Community based organizations which, in the 12 months prior to making application, have not operated the EDGE-eligible activity(ies) for which they seek funding must meet the above requirement and must:

present documentation that the premises in which any JOBS participants are to be served meet local requirements for health and safety applicable to such activities; and

have been incorporated for at least 12 months prior to having made application for EDGE funding.

III. EDGE ACTIVITIES

- A. The primary objective of the EDGE Program is to make resources available for the provision of assessment services, educational instruction and job skills training. However, where these needs can be met through existing resources, EDGE funds may provide other JOBS activities including case management, job readiness training, postsecondary education and job placement services.

EDGE funds may not be used to support the cost of instruction in high school completion or equivalency programs for 16-20 year olds. In New York State anyone without a high school diploma has a right to a free public education until reaching the age of 21. However, special services which are not ordinarily available in these programs, such as case management or job readiness training, can be supported from EDGE funding. EDGE funding can be used to support high school completion and equivalency instruction for persons who are 21 years of age or older.

These funds are not to be used for day care start-up or for payments of any kind to individual participants.

- B. Allowable activities include the following:

1. Assessment and employability planning. This may consist of the client's JOBS assessment and the EP process, or a portion of this process, such as testing.
2. Case management and career counseling.
3. Educational Instruction including high school completion or equivalency programs (for 21 & over), adult basic education, literacy, and English as a Second Language (ESL).
4. Job Skills Training, with emphasis on occupations which lead to self-sufficiency, including non-traditional occupations.

5. Postsecondary Education, up to and including two-year degree programs (or the part-time equivalent if full-time study would constitute an undue hardship). A two-year degree program includes such programs in two-year colleges, community colleges and in four-year colleges.
6. Job Readiness Training, such as Life Skills Training, Critical Thinking, Job Club, etc. Such training may include instruction in job-keeping skills, and information on transitional benefits.
7. Job Development/Placement Services.

IV. PROGRAM DESIGN

While a significant level of flexibility is permitted in the design of each EDGE Program to meet the local need, several important considerations must be reflected in the program's design.

A. Target Populations

The program should maximize services to individuals within the following target groups:

1. individuals who have received ADC for any 36 out of the preceding 60 months;
2. custodial parents under the age of 24 who have had little or no work experience in the preceding year or who are not enrolled in or have not completed a high school education or its equivalent; and
3. members of families in which the youngest child is within two years of being ineligible for ADC by reason of age.

B. 20-hour Participation Rule

In order to meet federal participation rates, every effort should be made to schedule for each participant at least 20 hours per week of participation in activities. Consideration should be given to concurrent enrollment in two or more activities to accomplish this goal.

C. Client Identification, Referral and Tracking

The local education agency, or other provider, must develop a method for clearly identifying EDGE participants as recipients of ADC. Such agencies are likely to routinely serve a wider variety of the economically disadvantaged, such as home relief recipients, food stamp recipients and others. However, EDGE funds may only be used to serve recipients of ADC.

In addition to client identification, the method for selecting, referring and tracking EDGE participants must be developed and incorporated in the program's design. Client-specific attendance-keeping procedures must be included.

D. Satisfactory Progress

A method for measuring and reporting a participant's progress while in an educational or training program must be in place, as described in 90 LCM-109.

V. SUPPORTIVE SERVICES

The local department of social services must provide assurances that child care will be provided by LDSS for EDGE participants during activities as well as during breaks in activities, if needed. In addition to child care, additional training related expenses must be made available by the local social services district to EDGE participants as needed as outlined in the local JOBS Plan. The costs of supportive services are to be funded by the federal IVA or IVF funding streams as appropriate, and not by EDGE funds.

VI. COOPERATIVE RELATIONSHIP AND LETTERS OF COMMITMENT

In order to qualify for funds through this project, the application must demonstrate a strong cooperative relationship between the local department of social services and the provider agency(ies). Coordination is necessary at every stage to ensure the project's success. A letter of commitment by the local district and by each provider agency must be included in the application package. Each agency's letter should clearly identify the agency's role in the proposed EDGE Program.

While no local share is required by the local district in the funding for this project, the district should indicate its commitment to providing the supportive services, particularly child care and training related expenses, for those recipients selected for participation.

VII. REPORTING REQUIREMENTS

Client Specific Information

The federal JOBS requirement for the uniform reporting of individual participant data will apply to EDGE programs. Local social services districts in all upstate counties will use the Welfare Management System (WMS) Employment Subsystem to meet this reporting requirement. In New York City, the Office of Employment Services (OES) will use a separate computer system to report the necessary EDGE participant information. While the specific information which EDGE service providers will be asked to provide to local social services districts will vary with the program's design, examples of the data elements which the local district may require include:

Literacy level  
Date of JOBS assessment  
EDGE activities, including start and completion dates  
Scheduled and actual hours of participation  
Date of entry to employment and starting wages

In addition to the information above, providers of education and training activities must develop procedures to periodically report to LDSS the EDGE participant's progress towards the goals set for them (satisfactory progress concept).

The local social services district and the EDGE service provider(s) must jointly develop a method for gathering the required client specific information and for its timely relay between the provider agency and the local social services district.

Program Summary Information

In addition to the client specific information which Local Education Agencies (LEA's) and other service providers will be required to report to LDSS, they will also be required to report aggregate information on the EDGE Program to the State Education Department (SED). This information will include both baseline and progress data for all EDGE participants. Reports will be required on a semi-annual basis. The necessary reporting forms will be distributed to EDGE providers under separate cover at a later date.

VIII. MAINTENANCE OF EFFORT

EDGE funds may pay for services only to the extent that these services are not otherwise available on a non-reimbursable basis. "Not otherwise available" means that if any services are already available to ADC applicants and recipients by a provider, the provider must maintain that level of service before EDGE funds can pay for similar services from that provider. Services provided on a "non-reimbursable basis" are those services which are available to most eligible residents or to the low income population in a community, including ADC applicants and recipients. The EDGE application must provide assurances that the services levels to be funded by EDGE are not otherwise available on a non-reimbursable basis.

Thus, the funds which are available through EDGE are designed to meet the additional needs placed upon local agencies by implementation of JOBS which are beyond the limit of already available resources.

IX. PROGRAM PERIOD

This program period will extend from January 1, 1991 to September 30, 1991. It is anticipated that a planning package will be developed in mid-1991 for the October 1, 1991 - September 30, 1992 period.

X. NON-UTILIZATION OF FUNDS

Uncommitted funds which are available to a local district but for which an application is not received or for which the application is not approved are subject to reallocation to other districts. Reallocated funds will be distributed based upon demonstrated need.

XI. THE EDGE PROGRAM BUDGET

A. Planning the Budget

Federal reimbursement for the EDGE Program expenditures will be available at a 60% rate providing these expenditures meet specific federal JOBS guidelines. Although federal JOBS regulations do allow for certain types of expenditures to be reimbursed at a 50% rate of federal reimbursement, the EDGE budget may only reflect those costs which are eligible for the 60% rate. This has been done to avoid the need to reduce allocations and to encourage maximum federal financial participation. In general, the 60% levels of reimbursement will be applicable to almost all expenditures, except for part-time administrative personal and non-personal services. A complete description of the specific expenditures which are eligible for 60% federal reimbursement vs those eligible for the 50% level (not applicable for EDGE) is provided in Part B of this section.

An important factor to consider in planning the EDGE budget is whether and how much Employment Preparation Education (EPE) State aid can be generated from the EDGE Program. To the extent that these EPE funds are then devoted to the local EDGE program, they may qualify for additional federal JOBS reimbursement and increase the amount of funds available for EDGE. While the LEA is under no regulatory obligation at this time to spend the EPE generated through EDGE on further EDGE programming, the local district should work closely with the LEA to move toward this goal. A description of which agencies are eligible and how EPE can be generated is provided in Part C of this section.

Lastly, the amount of in-kind contributions made to support the EDGE Program is also important. While such costs have no immediate effect on the EDGE allocation or budget total, the information is requested on the budget summary. The Department is pursuing the possibility of seeking federal reimbursement based on such expenditures.

B. Federal Reimbursement

60% Reimbursement: Expenditures reimbursed at the 60% rate would include the personnel costs (salaries and benefits) of all full-time staff (not full-time equivalents) working exclusively on the EDGE Program, including administrative functions. Personnel costs of individuals working less than full-time may also be matched at the higher rate if they are directly

performing any EDGE activities such as assessment, employability planning, case management, and education instruction, for example. Also included in the 60% category are all expenditures made for non-personnel items such as space, utilities, telephone equipment, materials and supplies, directly associated with the performance of EDGE activities.

50% Reimbursement: Expenditures reimbursed at the 50% rate consist of indirect charges, and costs related to the general administration and management of EDGE not conducted on a full-time basis, e.g., personnel costs of payroll personnel and other general administrative functions associated with the EDGE program. (These costs may not be included in your EDGE budget).

Child care and other training related supportive services expenditures should not be reflected in the EDGE claims since they should be provided and claimed by the local department of social services.

C. Employment Preparation Education (EPE) State Aid:

In those instances where the EDGE provider is a local school district or a BOCES, the EDGE Program Budget Summary must include an estimate of the EPE funds which are likely to be generated and applied to the support of EDGE activities [only the local school district or the BOCES is eligible to claim this State aid]. The amount of EPE to be generated is related to the number of participants in specific activities and the number of contact hours which participants spend in instruction or related activities. While the number of participants can be estimated from the EDGE Program Activity Summary, the number of applicable contact hours must be shown on the EDGE Program Budget Summary. (The only participants who can generate EPE are individuals who are at least 21 years of age and do not have a high school diploma or equivalent.)

The EPE eligible activities are:

Basic Education - instruction in reading, mathematics, oral and written communication and life skills for individuals reading at or below the eighth grade level.

English for Speakers of Other Languages (also called English as a Second Language) - instruction in listening, reading, mathematics, oral and written communication, and life skills for individuals with limited English proficiency.

General Education Development Test Preparation - instruction for students reading at the eighth grade level or above that is specifically designed to prepare them for the General Educational Development Test (high school equivalency test).

Occupational Education - classroom instruction for specific occupational skill.

Life Skills - group instruction in such skill areas as finding a job, resume writing and other employability skills, consumer and homemaking skills, financial management, and group career guidance;

Counseling - group and individual

Additionally, certain nontraditional modes of instruction in which students are not physically present with a teacher for instruction are eligible to generate EPE aid. The currently approved nontraditional modes of instruction include: the External High School Diploma Program; Giving Rural Adults a Study Program (GRASP) (which is a structured course of home-study); "Learn to Read" and "GED on TV" (two televised instructional programs developed by Kentucky Educational Television).

XII. THE SELECTION PROCESS

Each application will be considered for funding to the extent that the application:

contains the required application package elements;

meets a demonstrated local need which cannot be otherwise met;

clearly supplements the resources and services identified in the local JOBS plan;

demonstrates that the agency(ies) selected has (have) the capacity to provide the activities proposed in the application;

reflects the specifications for program design described in this announcement in Section IV A-D; and

reflects strong coordination between the local social services department and the local educational or other provider agency(ies).

The selection of programs to be funded will be made by the New York State Department of Social Services, with consideration given to recommendations made by the State Education Department.

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Oscar R. Best, Jr.  
Deputy Commissioner  
Division of Income Maintenance

## Local District EDGE Allocation

(Sample)

Westchester

The chart below indicates the funding amount committed to local educational agencies in your county.

<u>AGENCY</u>	<u>AWARD</u>
White Plains School District	\$199,896
Yonkers City School District	\$ 98,513
Southern Westchester BOCES	\$ 2,142

In addition, \$62,500 has been set-aside for Mt. Vernon Public Schools to establish a CASSET site beginning on January 1, 1991.

## DIRECTORY OF SED REGIONAL FIELD REPRESENTATIVES

The following are the Regional Coordinators in the Bureau of Continuing Education Field Services that may be contacted about EDGE Applications at (518) 474-3973. Attached is a map which identifies the counties within each region.

Long Island	vacant (please indicate that you are calling from Long Island)
New York City	Robert Purga/Patricia McGuirk/Joseph Bimka
Hudson Valley	Sari Knower
Capital District	Michael McGraw
North Country	Constance Carroll
Mohawk Valley	Thomas Orsini
Central New York	Stephen Mink
Southern Tier	Robert Gallagher
Finger Lakes	Patricia McGowan-Webb
Western New York	Theodore Turone

THE APPLICATION PACKAGEA. Contents:

Each application must include the following items:

1. Project Narrative (1-2 typed pages)
2. Client Flow Chart
3. EDGE Program Activity Summary
4. EDGE Program Budget Summary
5. Letters of Commitment

B. Content Descriptions1. The Project Narrative:

This is a general description of the key components of the EDGE Program which should include:

description of the planned program period, including start and end dates;  
identification of the provider agency(ies);  
description of the recruitment, referral and tracking methods to be used;  
description of the activities to be provided;  
description of how child care and other supportive services will be arranged (e.g., whether on-site child care will be available);  
identification of the target groups to be served;  
description of how the 20-hour participation rule will be met and how data will be exchanged between agencies on a periodic basis.

2. Client Flow Chart

This is a flow chart summary of how clients will move through the EDGE activities.

3. EDGE Program Activity Summary (attached)

This is a summary of the planned enrollments and entries to employment which are expected to result from your EDGE Program. Please complete the form provided in the application package according to the instructions at the bottom of the form. If more than one agency will be providing EDGE activities, a separate Activity Summary form must be completed for each provider agency.

4. EDGE Program Budget Summary (attached)

This is a summary of the planned costs associated with operating your EDGE program. Please complete the form provided in the application package according to the instructions following the form. If more than one agency will be providing EDGE activities, a separate Budget Summary must be completed for each provider agency.

Local Social Services District \_\_\_\_\_  
 Contact Person \_\_\_\_\_ Phone \_\_\_\_\_  
 Provider Agency \_\_\_\_\_

EDGE Program  
 Activity Summary

<u>Activity</u>	<u>ADC to be Enrolled</u>	<u>ADC Entries to Employment</u>
Assessment/EP	_____	_____
Education		
Basic/HS/ESL	_____	_____
Post Secondary Education	_____	_____
Job Skills Training	_____	_____
Job Readiness Training	_____	_____
Job Development/Placement	_____	_____
Case Management	_____	_____
<u>Total</u>	_____	_____

Instructions:

ADC to be Enrolled: For each activity that will be part of the EDGE program, enter the number of ADCs that are expected to be enrolled during the project's duration.

ADC Entries to Employment: For each applicable EDGE activity, enter the number of ADCs that are expected to enter full and part-time employment.

Budget Summary Instructions:

The EDGE Program Budget Summary should reflect the costs associated with operating the EDGE Program. If more than one service provider agency will be providing EDGE activities, a separate Budget Summary must be completed for each provider agency.

- Column 1. Staff Count. Enter the number of staff for each activity on the appropriate line. Equivalent time may be represented in decimals (nearest tenth). All administrative staff should be identified on line 1. Instructional and other staff directly providing EDGE activities should be identified on the appropriate activity line. (Use the guidelines described previously in Section XI, B. Federal Reimbursement, and include only those staff eligible for 60% federal reimbursement in Column 1.)
- Column 2. Personal Services. Enter the salary and fringe costs of those staff identified in Column 1. Place the total on line 9.
- Column 3. Non-Personal Services. Enter the non-salary costs such as postage, telephone, supplies, etc. associated with each activity. Use the guidelines described previously under Section XI, B. Federal Reimbursement to determine which of these costs are eligible for 50% or 60% federal reimbursement and place only those costs eligible for 60% federal reimbursement in Column 3. Place the totals on line 9.
- Column 4. Total. Enter the totals from Columns 2 and 3. Also, place the total on line 9.
- Column 5. In-Kind Contributions. Enter the amount of in-kind contributed to the EDGE program on the appropriate activity line. Place the total on line 9.
- Column 6. Number of Contact Hours. Enter the number of contact hours in those EDGE activities which will generate EPE. Place the total on line 9.
- Column 7. Amount of EPE to be Generated. Enter the estimated amount of EPE aid which will be generated based on column 6 and on the numbers of ADC's to be served from the EDGE Program Activity Summary. Place the total on line 9. This amount reflects the estimated amount of EPE which is potentially available to be devoted to further EDGE programming.
- Column 8. Estimate of EPE to be Spent on EDGE. Enter on line 9 the estimated amount of the total EPE generated by EDGE, as shown in Column 7, which the LEA plans to spend on EDGE.

5. Letters of Commitment

A letter of commitment by the local social services district and by each provider agency must be included in the application package which highlights a commitment to the project. Each agency's letter should clearly identify the agency's role in the proposed EDGE program.