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ABSTRACT

This report examines the effect that welfare reform in a strongly "work first" setting has had on community college programs for welfare recipients. The report looks at two community colleges in New York: Hostos Community College in the South Bronx and La Guardia Community College in Queens. Research data is drawn from interviews with 27 key program personnel and students, along with program material provided by the institutions. A follow-up survey of all community colleges in New York City was conducted to place the two sites in perspective. Findings indicate that 65% of New York City colleges interviewed have, and track, TANF (Temporary Assistance for Needy Families) recipients among their students, but only 35.3% have support staff dedicated to supervising TANF-receiving students, and host programs for them. The City University of New York (CUNY) developed a special program for welfare students in 1993: College Opportunity to Prepare for Employment (COPE). CUNY works with the city's Human Resources Administration (HRA) to develop educational programming and services for the poor. Federal laws forced COPE to undergo significant changes, however. For instance, the HRA increased the workforce requirement to a 35-hour work week and reduced Training Related Expenses (TRE), which include welfare stipends, childcare, transportation, and lunch expenses, to 12 months. Contains 30 references and 11 tables. (Author/NB)

Innovators Under Duress:
Community College Initiatives in "Work First" Settings

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Introduction–Welfare Reform and Training

Since Congress passed the Personal Responsibility and Work Opportunity Act (PRA) in 1996, scholars and policymakers have tried to predict and document its impact on the long-term career prospects for welfare (now called TANF, or Temporary Assistance to Needy Families) recipients. The PRA shifted the federal employment and training focus to a "work first" approach. It did so by limiting training benefits that welfare recipients can draw on and emphasizing instead quick job placement and workfare activities. For instance, under the federal law, vocational training may substitute for only 12 months of a TANF recipient's work activities (Cohen 3/1998). Each one of the 50 states is given some flexibility under this legislation in determining a balance between education/training and work activities. Therefore, each state may offer a different outcome for its TANF population (see Savner 1996, Cohen 3/1998, 6/1998, and Strawn 1999 for details on this debate).

Two contrasting perspectives inform these experiments. The "work first" school of thought holds that welfare recipients will benefit more over the long run through immediate employment. Welfare recipients are thought to learn more from real jobs than from education. Jobs teach these individuals how to show up on time, balance work and family responsibilities, as well as "hard" skills (e.g., typing and filing) through on-the-job training.

Policymakers holding an alternate perspective argue that "work first" does relatively little to change the long-term prospects of welfare recipients. The majority of single welfare mothers lack high school diplomas (Cohen 3/1998). Without concurrent investment in human capital, recipients will not improve their lifetime earning potential but will be locked in low-skilled, low-paid, and dead-end jobs as well as working poverty. Furthermore, welfare reform—and the "work first" philosophy underpinning it—some argue, will additionally put "welfare-to-school-to-work" programs out of business. Welfare recipients lose doubly when education and training programs geared specifically to meet their needs are no longer available to assist them when they are ready to move up career ladders.

This report sheds light on this debate by investigating the effect that welfare reform in a strongly "work first" setting has had on community college programs for welfare recipients. More specifically, by following two community colleges—Hostos and La Guardia—in the single New York City environment, I aim to answer several questions. How specifically has workfare affected existing education programming for welfare recipients in these two institutions? To what extent do the new federal and state laws impede further development of education and training programs for this population? Have curricular innovations come to a complete halt or have community colleges adapted to the new policy setting? What adaptations appear most effective in combining training with the workfare experience?

Answers to these research questions were sought by conducting case studies of two community colleges in New York—Hostos Community College, located in the South Bronx, and La Guardia Community College, in Queens. Research data is drawn from interviews with 27 key program personnel and students, along with program material provided by the institutions. The colleges were initially chosen from a larger survey of Hispanic-serving community colleges because each offered specific programming for welfare recipients.[1]

A follow-up survey was also conducted of all community colleges in New York City to place these two sites in perspective.[2] This survey showed that the City University of New York (CUNY) institutions are the only ones with significant programming for welfare recipients. Of CUNY's six two-year colleges, Hostos, La Guardia, and two others[3] were selected to pilot the university's COPE program for welfare recipients in 1993—prior to welfare reform. Today, Hostos, La Guardia, and two other CUNY community colleges are developing new programming for TANF recipients in this new welfare-reform context. This means that, citywide, Hostos and La Guardia Community Colleges are the only two-year institutions with an early and

[1] The Gaston Institute at the University of Massachusetts-Boston and the United States Department of Labor sponsored this larger survey and research project.
[2] *Peterson's Guide To Two-Year Colleges* (1999) lists 20 community colleges in New York City. Each of these was contacted for a telephone interview; 17 agreed to be interviewed. The full results of the survey are reported in an appendix to this report.
[3] The other two institutions were the Borough of Manhattan Community College and Kingsborough Community College.

currently prospering stake in offering educational programming for welfare recipients. They have been able to maintain this priority in spite of the training restrictions inherent in the new state and local TANF Program's "work first philosophy." Because of this "success," these two represent the best-case scenario as models in this restrictive context for offering long-term career enhancement to TANF recipients. La Guardia and Hostos also represent, respectively, among the third-largest and the smallest of the CUNY community colleges.

Although both institutions have successfully maintained programs for TANF recipients, I argue that La Guardia has been able to make a larger impact on this population's future job prospects. La Guardia has been able to do this because of its greater organizational flexibility— shown in its unconventional institutional structure and pedagogical philosophy— that has allowed it to behave unlike a traditional academic setting but in a manner that is more conducive to operating in today's welfare reform context. I explain this thesis in the following manner—first, by offering background on CUNY's history educating poor and ethnic students; second, by explaining the specifics of welfare reform in the New York context and its impact on the two institutions. I conclude by outlining the features that explain La Guardia's success at institutional innovation.

Background–Community Colleges in the CUNY System and in New York City

Besides being part of the larger CUNY system, Hostos and La Guardia share other similarities that facilitate a comparison of their experiences. I describe their common institutional setting in this section. I also compare the experience with TANF-related programming of Hostos, La Guardia, and the other CUNY community colleges with all community colleges in this city.

The CUNY System. Both Hostos and La Guardia Community Colleges were founded around 1970, out of the Open Admissions Policy that CUNY adopted in this period. Hostos and La Guardia join four other community colleges and 11 senior colleges in comprising New York City's publicly funded CUNY system. Through its Open Admissions Policy, which guarantees a spot in the CUNY system for any local high

school graduate, CUNY has served as "the social engine of the city," as Julius Edelstein—a former CUNY senior vice chancellor calls it—in giving the poor and immigrants a pathway into middle class occupations (Arenson 5/8/98:1). CUNY's overall student body reflects this role. For example, 44 percent of its community college freshmen belonged to households earning less than $15,000 a year (in 1995) compared with 16 percent nationally. About half of these freshmen (in 1997) were born outside the United States mainland[4] and another 21 percent, while born on the mainland, had one or both parents born offshore (CUNY 1997).

Within CUNY, Hostos and La Guardia serve even greater numbers of poor, foreign-born, and welfare-receiving students (see Table 1). In addition, both offer extensive instruction in English-as-a-Second-Language (ESL) and basic skills remediation. In other words, both Hostos and La Guardia work to level the playing field for students with a variety of educational barriers, on their way to a two-year Associates degree. Besides these general services, both have also operated CUNY's special program for welfare recipients—College Opportunity to Prepare for Employment (COPE)—since its initiation in 1993 before the adoption of national, state, and local welfare reform legislation. These similarities allow me to compare each institution's experience with workfare requirements and the relative effectiveness of their strategies for combining education with work for welfare recipients in a "work first" setting.

However, within CUNY, Hostos and La Guardia offer unique pedagogical programming to their students. Hostos' mission is to provide "educational opportunities leading to socioeconomic mobility for first and second generation Hispanics, African Americans, and other residents of New York City who have encountered significant barriers to higher education" (Hostos /overview/hostosintro 1999:1). It accomplishes this, in part, through a bilingual educational model that focuses on Hispanic adult learners with limited English proficiency. The College estimates that 50 percent of each freshman class needs to learn in a bilingual environment (Hostos/oaa/BilingModel 1999). Support services for this aspect of the

[4] In these statistics, the U.S. mainland includes Alaska and Hawaii, but excludes Puerto Rico even though Puerto Ricans are American citizens. Data on birth location was also missing for 17 percent of the total class (CUNY 1997).

College include: bilingual administrative functions, college orientation, counseling and advising, tutoring and instruction, cultural activities, and library materials.

La Guardia has a mission similar to Hostos, but carries it out differently. La Guardia is the only cooperative education college within CUNY. The co-op model allows the College to create a stronger link between the classroom and workplace. The College views this approach "as a particularly effective learning strategy for a New York City open enrollment institution; essentially minority, low income and recent or first generation immigrants" (La Guardia Coop 1999:1). This approach helps students explore different career options and apply classroom concepts to work situations. Hence, it makes the transition from education to employment more successful for students. The Co-op Program accomplishes this through the use of internships. Full-time students must complete a related introductory course and two internships, as part of their degree programs.

Another key educational innovation at La Guardia is the widespread use of "learning communities" or "clusters" throughout the College. Clusters involve combining two or more courses for a group of students to take together. La Guardia staff started pairing ESL students together into their other non-language courses in the 1980s. Since then, the idea has spread to the whole College. Staff has found that students in clusters get better grades than if they were to take the course alone. This happens because students, who take the same classes with each other, can study together as well as offer peer support and advice on personal issues. Faculty members in such courses also plan their courses together and integrate what they are teaching so that information offered in one class supports that in another. The staff (faculty and counselors) forms clusters by combining students with similar educational interests (e.g., into a Human Resources cluster, an Accounting cluster, and so forth).

In the 1980s and early 1990s, CUNY's central offices worked closely with the city's Human Resources Administration (HRA)—which administers public assistance programming—to develop educational programming and services for the poor. Both CUNY administrators and HRA staff recognized that they

served the same population, so they began programs such as the following. The central CUNY office established the Center for College Options, which played a support and liaison function with public assistance recipients wanting to enter CUNY. The Center offered workshops on preparation for placement tests, financial aid and educational loans, the college application process, and other related issues for first-time college students. The Center also helped recruit students for a jointly run basic skills summer Immersion Program held by HRA and CUNY at Baruch College. In addition to these programs, in 1993, CUNY created the COPE program—its brainchild to encourage AFDC-recipients to gain college credits and skills as a means to achieve eventual financial independence with the close cooperation of the HRA. HRA intake staff readily referred appropriate welfare recipients to CUNY colleges for enrollment. The COPE program especially supplied these students with academic counseling and schooling, along with case management, personal counseling, tutorial help, and job search and job placement assistance.

Today, CUNY's students still present healthy needs for such support services, like remediation and/or ESL instruction. For instance, in 1997, 78 percent of its first-time freshmen had some need for remediation, having not passed one or several of CUNY's reading, writing, and math skills assessment tests. About 16 percent (in 1995) stated they were more comfortable with a language other than English (CUNY 1997). However, CUNY's Board of Trustees, now consisting primarily of appointees of Republican Governor George Pataki and Mayor Rudolph Giuliani, has voted to significantly transform the system's past position toward remediation and open admissions. Starting in 2000, the Board has tightened admissions standards by channeling all remedial instruction (and students requiring it) to the system's community colleges exclusively, even though they are currently short of space and sometimes choose students by lottery (Staples 9/7/98). Many educators see this plan as radical, in light of the fact that other systems also provide remediation. For instance, 78 percent of America's colleges offered remedial education in 1995 (96 percent of all community colleges and 72 percent of four-year institutions) (Arenson 5/31/98).

Some members of the State Board of Regents, which oversees all institutions of higher learning in New York State, also see the ruling:

> as a strategy for subverting open admissions requirements that are etched in state law ... [and] a stealth plan for shrinking the university at the expense of new immigrants and poor students who make up the bulk of enrollment (Staples 9/7/98: 1).

This political tension between many CUNY staff, on one hand, and the Mayor and the Republican-controlled CUNY Board of Trustees, on the other, has greatly affected the ability of CUNY to serve poor and welfare-receiving students. Governor Pataki's and Mayor Giuliani's focus on workfare has also had an impact on these students both within and outside of the CUNY system.

CUNY in Context. A follow-up survey was conducted of all community colleges in New York City to place Hostos, La Guardia, and other CUNY colleges in perspective.[5] This survey showed that the CUNY institutions are the only ones with significant programming for welfare recipients. Findings from this survey are summarized here. The following offers a profile of the 17 responding institutions—as to their size, ethnic diversity, and regular academic and TANF-specific programming.

In the New York City context, CUNY's six community colleges—Borough of Manhattan Community College, Bronx Community College, Hostos Community College, Kingsborough Community College, La Guardia Community College, and Queensborough Community College—are among the largest of all two-year institutions within the city. CUNY's Kingsborough and Borough of Manhattan Community Colleges, for instance, represent the largest institutions, at enrollments of over 10,000 full- and part-time students (in FTEs—or, full-time equivalencies). La Guardia is the third largest CUNY community college. By contrast, about 60% of the 17 colleges surveyed had fewer than 2,500 full-time students. Hostos Community College is the smallest of the CUNY institutions; it had 3,581 students (in FTEs) enrolled in 1998. Also, enrollment at most of the colleges reflects the diverse population residing in New York City. For instance, about half of the responding colleges have a moderate amount of Latino students

(representing from 26% to 75% of all students); 41% had a similarly moderately sized African American population. Only one of all responding institutions was mostly (above 75%) non-Hispanic white; one was primarily Latino; one was primarily black. Not surprisingly, New York City's community colleges are more diverse than community colleges nationally. A survey of community colleges throughout the country (afterward referred to as the *general sample*, see Melendez, et.al. 1999), showed that an average of 69.3% of these colleges' students are non-Hispanic white, compared with only 23.2% for the 17 New York City community colleges.

Colleges were asked about which programmatic graduates were most in demand by employers. Most frequently mentioned were students in business, computer, and information systems programs. This is reflected in the ranking of programs offered. For instance, two-thirds of the New York institutions surveyed offered computer technology and information systems programs; more than half had programs in computer programming and registered nursing; more than one-third offered early childhood programs and/or other health technology programs (e.g., licensed practical nursing, dental assistant programs, health information technology). Whereas New York City's community colleges, as a whole, show less concentration in business and office-related programs than community colleges nationally, CUNY colleges show higher concentration there and in nursing—reflecting the large health care industry in this city (Table 2).

Most New York City colleges (between 70.6% and 88.2%, depending on the service) also offered standard support services to students to facilitate post-graduation employment—like offering courses and staff to help with job search techniques and activities. This is at a slightly lower rate than for all community colleges in the general sample—which was between 84.2% and 95.7% (Table 3). A smaller share of the New York institutions targeted their programs and activities to non-traditional students that require greater support for the post-secondary school experience. For instance, whereas most colleges

[5] *Peterson's Guide To Two-Year Colleges* (1999) lists 20 community colleges in New York City. Each of these was contacted for a telephone interview; 17 agreed to be interviewed.

(70.6%) said they helped students with low reading or math skills, only about half offered services to students without a high school or GED degree, services to students with young children, and/or certificate or non-degree/non-credit programs in areas in high demand by employers. Only about a third of the colleges worked with students who had troubled job experiences and only four institutions (17.6%) offered services to students with substance abuse histories (Table 3). These shares are lower than for all community colleges nationally; CUNY's community colleges here show a much higher degree of involvement working with students with special learning needs.

Among all community colleges in New York City, only a relatively small number have staff and programming specifically targeted to serving welfare recipients. Although 65% of those interviewed have, and track, TANF-recipients among their students, only 35.3% have support staff dedicated to supervising TANF-receiving students and host specific programs for them. The share with TANF programming and staff is lower than for all community colleges nationally (at 58.5%, Table 4). All of the CUNY community colleges host such programming, however, and at a higher staff to TANF-student ratio, on average, versus countrywide. About a quarter of all institutions surveyed (four colleges, all in the CUNY system) said they planned future initiatives for TANF students. Among colleges without TANF programs, one cited the small size of this group as preventing them from developing special programming; another emphasized that it deals with each individual student's needs without treating special sub-populations of students separately.

The size of the TANF populations within each college varies greatly. About one-quarter, each, of the 11 colleges with TANF students have either fewer than 100 such students, from 100 to 249, from 250 to 800, or more than 900 TANF students registered currently. Ninety percent of the colleges with TANF students say that 90% to 100% of these students attend full-time. Only three colleges (or eight percent of all New York institutions) have TANF students registered in non-degree, as well as degree, programs. This is much lower than for all community colleges nationally—of which half serve TANF students with non-degree programs (Table 5). Within the three New York colleges, the proportion of TANF students in

non-degree programs ranged from six percent to 50% of all such students registered. A college's overall size and size of its TANF population somewhat determined whether the college ran specific programming for this group. Nevertheless, colleges within the CUNY system have been most proactive in offering programming for welfare-receiving students citywide. Several non-CUNY institutions with similar overall, and TANF-receiving, student populations did not offer special programming for TANF students.

Only four of the 17 respondents in New York City listed the overall goal of their TANF-related programs. All four mentioned that they take a comprehensive approach to such students; one that provides support services along with academic and skills training to help TANF-receiving students make a difficult transition from public assistance to employment and financial independence. These colleges want to impart self-confidence and appropriate workplace behavior, along with jobs skills; they recognize the need to offer basic support (in child care, transportation, and interview apparel) so that TANF-receiving students are encouraged to stay in school, graduate, and move on.

Of the colleges that had developed programs specifically geared toward TANF students (29.4%), most had TANF programs that were comprised either of old, existing programs or a mix of old and new components—rather than brand-new programs.[6] Of these colleges, all offered some coursework in "soft skills" training (e.g., related to attitudes, punctuality, and other workplace behavior) along with content related to regular degree programs. Sixty percent offer non-degree and/or short-term training programs to TANF students. Eighty percent also offer tutorial services, and sixty percent preparatory courses, to bring TANF students' skills up to college level. Eighty percent have internship opportunities available with prospective employers (Table 6).

[6] This is due to the fact that most of these colleges are in the CUNY system. CUNY's central administration started developing programming for welfare recipients prior to national and local welfare reform in the late 1990s.

In terms of subject area, a majority of these colleges had started special programs in office technology for TANF students. On the whole—among all colleges whether they had developed programs targeted specifically to TANF students—TANF students particularly favored business-related programs (one-third of the schools with TANF students listed business courses as popular among TANF students), nursing (one-third), and office systems (one-quarter).

Only one college—La Guardia Community College—stated that it consciously included industry input into development of its TANF-programming. For this school, advisory committees of employers help it identify the skills most wanted among entry-level employees, as discussed in detail in the case study. This contrasts with the fact that seven of the 17 schools (41%) gather input from employers in general for other, traditional academic programs. Employer involvement facilitates students' later connections to jobs. More specifically, 36.4% of the colleges surveyed draw instructors or help in curricular design from area employers, and 18.2% get financial support, classroom equipment, and/or supplies from employers of their graduates. Most community colleges (90.9%), however, do offer internship opportunities to their students. Employer involvement among New York City's institutions appears to be less than among community colleges nationally (Table 7).

Of all New York City respondents, no more than half provided services targeted or helpful to TANF students. Such services included counseling (66.7% of all respondents), case management (53.3%), child care (33.3%), substance abuse programs (33.3%), and transportation (20.0%). New York City's community colleges are less likely to offer transportation, childcare, and counseling than community colleges nationally.

Among all schools with TANF students, a majority indicated high rates of program completion and initial job placement success among these students. For example, only one-quarter estimated that ten percent or fewer of these students completed the programs in which they had enrolled. By contrast, one-third stated that half to three-quarters of their TANF students were completers, and over 40% of the schools

reported that more than three-quarters of their TANF students finished. When asked to estimate employment success among the completers, almost half the schools (46%) said that more than 85% of their TANF-completers found jobs in the areas in which they had trained. On average for all New York City colleges, these completion rates are slightly lower than for all community colleges nationally (Table 8). Whereas 47% of the 17 respondents could report on TANF-school completers and initial job placements for such students, only 41% monitored the longer-term job experience of their TANF graduates. Schools conducted this monitoring in a variety of ways. They do this through telephone surveys, mailings, reunions; several maintain a database of these students; one even checks the pay stubs of graduated TANF students.

We can draw several key conclusions from this survey of two-year post-secondary institutions in New York City. First, New York City's community colleges, as a whole, show less involvement in special programming and services for TANF students than community colleges nationally. A lower share of New York institutions work with students having special learning needs, host specific programs for TANF students, offer support services for such students, and utilize employer input into both regular and TANF-specific programming than community colleges nationwide. TANF student performance in NYC community colleges is slightly below that in community colleges nationally. NYC institutions also are much less likely to offer TANF and other non-traditional students alternatives to full-time study, like non-degree or certificate programs.

This finding lends support to an argument that this lag in institutional innovation for TANF students is likely due to the relative lack of city and state support for TANF training in the strict "workfare" public policy of New York City (as described in the next section). The New York City and New York State welfare-to-work policies especially stand in stark contrast to those in California (see de Montrichard, 1999). Cal WORKS, the state's welfare reform legislation, offers significant funding and a mandate to all community colleges to offer child care, special support services (including substance abuse programs), and special educational programming for TANF-recipients, while also adopting a "work-first" philosophy.

This philosophy, however, attempts to move welfare recipients from entry-level jobs into better long-term careers. New York's community colleges offer childcare, support services, and education to TANF-recipients almost in defiance of city policy, as we will see next.

However, when one segregates the CUNY institutions from the rest of the community colleges in New York City a different pattern emerges. CUNY's community colleges show a high rate of involvement in programming for TANF students, other non-traditional students, and students with special learning needs. As I will discuss later on, this is due to CUNY's early involvement in programming for welfare recipients prior to welfare reform at the national and state levels. Even so, there is much variation within the CUNY institutions in regard to their TANF programming. The cases of Hostos and La Guardia Community Colleges highlight this diversity and help explain what specific features make some institutions as successful as possible educating welfare recipients in a public policy setting that discourages such efforts.

Workfare Versus Schooling for New York City's Welfare Recipients

Both Governor Pataki and Mayor Giuliani see themselves as taking the lead in welfare reform in the country. Both the state and city enacted workfare programs before the federal PRA legislation in 1996. New York City has put to work the largest number of welfare-recipients of any metropolitan area in the United States under its workfare provisions. In this section, I discuss the state and city's respective workfare policies and their general impact on educational opportunities for public assistance recipients in New York City.

Many see the Reagan-endorsed Family Support Act, which Congress passed in 1988, as the inspiration for states to begin experimenting heavily with workfare programs (Albelda & Tilly 1997; Casey 1998; Leon 1995).[7] New York State ran workfare programs in the early 1990s under this act, primarily for its Home

[7] Leon (1995) and Casey (1998) also describe earlier Federal efforts to stimulate workfare programming (e.g., Johnson's WIN program for AFDC recipients in 1967) and State workfare provisions (e.g., the New York State Work

Relief (HR), or general assistance, population. With Pataki's entrance as governor in 1995, both he and the legislature wanted to broaden the workfare program to all public assistance recipients while limiting education and training benefits. Because New York is one of the few states in which local governments maintain responsibility for designing, implementing, and partially funding public assistance programs, local governments decide the extent to which they want to trade training off against workfare.

New York City's Giuliani decided to support Pataki's perspective. His program, NYC Way, was equally enthusiastic in emphasizing work. Started in 1995, NYC Way combined workfare with a more rigorous eligibility and address verification program. This additionally help cut city welfare rolls and, hence, the city's related financial obligations. New York City, housing about 70 percent of the state's welfare population (but only 40 percent of total statewide population) must, under state regulations, shoulder approximately 70 percent of the total local governmental share in welfare payments (Leon 1995, Weir 1997, Casey 1998).[8] That first year of NYC Way, Giuliani announced with fanfare a 60 percent cut in the number of public assistance cases accepted and funded (Leon 1995).

In 1997, the state legislature formalized its workfare initiative with the Welfare Reform Act (Mannix et.al. 1997). This program differs from the Federal law in several ways.

- First of all, the state's TANF program has no time limits on benefits, in contrast to the five-year lifetime limit under the PRA, because the state constitution prohibits denying assistance to the poor. The program does switch to non-cash aid at that time, however, to sanction overly dependent welfare recipients.
- A second feature of the state's TANF law is that only parents with very small children (under a year old) can be exempt from workfare.
- Third, the state gives local counties and New York City discretion to determine which work activities will be locally eligible to meet workfare requirements.
- Fourth, the state encourages earnings retention by working families in two ways: working parents can keep over 40 percent of their earnings and the state offers an Earned Income Credit (EIC) program that is 20 percent of the Federal EIC.
- Finally, the state has added additional punitive regulations (e.g., "Learnfare" penalizes parents with loss of benefits if their child misses too much school) (Casey 1998).

Relief Program in 1959 which required that employable Home Relief clients to work on Work Relief projects to secure their benefits).

[8] For instance, in December 1997, New York City housed 817,000 welfare recipients out of the total of 1.16 million in the state (Casey 1998).

New York City's revised workfare program under the new state legislation is called the Work Experience Program (WEP). WEP is a continuation of the city's workfare program prior to the PRA and TANF, with some new features. As Mayor Giuliani—who sponsored the program and brought Wisconsin's welfare reform guru, Jason Turner, to New York to run it—stated in his State of the City address in 1997:

> New York City can speak about welfare from a position of strength, because while the federal government has been debating welfare reform, we've actually been doing it. In the last two years we have reduced our welfare roles more than any city or state in the nation. I know that Wisconsin is often cited as a leader in welfare reform—and quite correctly. But the fact is that the 220,000 people we moved off welfare in New York City is almost two and a half times more than the entire welfare population of Wisconsin—before they began their reform effort—and our workfare program ... is the largest in the country (Giuliani 1997:13).

The WEP program, as administered by the HRA, places the highest priority on workfare, which averaged about 35,000 participants monthly in 1998 (see also Casey 1998).[9] Casey states:

> [w]hile the city does not publish the number of welfare recipients in education and training activities, education and training providers say that the city's policies have caused sharp declines in activities such as English as a Second Language (ESL), basic literacy, GED, and vocational training. City University (CUNY) reports that the number of welfare parents in the CUNY system has declined from about 26,000 to about 13,000 (1998:14).

The drop in CUNY (and its community college) enrollments, due to the HRA's practice of channeling TANF recipients into workfare versus education and training, is confirmed by other sources including many of the respondents interviewed for these case studies.

HRA intake staff has discouraged schooling in two ways: (1) by placing welfare recipients into workfare without mentioning their rightful option to some college and vocational training, and (2) by showing unwillingness to aid those wanting to combine welfare and college by designating WEP sites near college campuses (Mannix 1997, Casey 1998). CUNY's chancellor at the time of expanding workfare rolls, W. Ann Reynolds, tried to get students exempt from workfare and, later, to get them placed into jobs on or near their campuses. Giuliani refused both requests, which, in part, led to her resignation (Arenson 12/10/98). In 1997, the State Legislature mandated that college students be placed in workfare jobs on

[9] White (1997) states that although the City reported 38,000 WEP participants in early 1997, it placed 166,683 people into WEP from July 1995 through October 1996, or about 126,000 people annually.

or near their colleges. One year later, however, only two of the 17 undergraduate campuses in the system were allowed to operate WEP sites. Six more sites were added in summer 1998, and finally (by 1999) all but two campuses were added (Arenson 7/9/98, NYT 7/4/98). Hostos Community College in the South Bronx and the Borough of Manhattan Community College are the two that have been excluded, which some attribute to "politics" (i.e., they are situated in Democratic strongholds).

In addition, several activist organizations working along with CUNY have sponsored legal challenges of related HRA practices. [10] A key case has been *Davila v. Hammons*, wherein TANF recipients sued the city's HRA because of its policy of assigning almost all recipients to WEP, or workfare, activities regardless of their desire for education or training. This suit, brought with the help of the Welfare Law Center and Legal Aid Society, charged that this policy violated the state's law requiring that individualized assessments and employability plans be made for each TANF recipient and that assignments be made according to recipient preferences when possible (Mannix et.al. 1997). The New York Supreme Court continued a temporary restraining order issued in June 1997 that prohibited the city from assigning students in two-year college programs to workfare positions that interfered with their studies (Davila n.d.). In April 1999, the TANF recipients won this case; the Court stipulated:

> the New York City welfare commissioner to do individualized assessments and develop an employability plan for TANF participants that reflects, to the extent possible, the preferences of the participant and if preferences are not honored, explains why not. The city defendant must stop automatically assigning participants to work experience or job search, refusing to approve education and training for those not already in such a program, refusing to help participants identify appropriate education and training programs, and refusing to approve education and training for those who had previously attended a training program. The court declined to order the defendant to approve training-related expenses at this time. It ordered the state defendants to use their supervisory authority to assure that the city defendant complies with the law (WLC April 9, 1999).

[10] Other issues are being contested surrounding the City's TANF program: illegal diversion and displacement, the fostering of low-quality childcare placements for TANF-related children, lack of workplace safety for workfare participants, unwillingness of non-profit organizations to become WEP sites, illegal denial of food stamp and Medicaid assistance, and payment of below-prevailing wage for workfare placements contrary to a New York State Supreme Court decision. See Abramovitz 1997, Green 1997, Mannix et.al. 1997, Laarman 1998, Casey 1998, NASW 1999, and WLC March 3, 1999 for more on these issues.

Other litigation, trying to reform workfare, has taken an early lead in New York prompted by the activities of the Welfare Law Center and others. These actors got an early start because the city had rapidly expanded workfare "nearly two years before passage of the PRA (Mannix, et.al. 1997:4). Litigation has focused on policies that discriminate against new state residents and abuses of workfare requirements (e.g., related to workplace safety, wages, and so forth). As the Welfare Law Center, headquartered in New York City, asserts: "New York City, as the nation's leader in pursuing workfare, is ground zero for organizing workfare participants and informing them of their rights" (WLC 1997:4). Organizing and activism have been a key mechanism by which New York City's welfare reform laws and agency practices, including those related to post-secondary education, have been modified to encourage education and training alongside work.

Workfare's Impact on Hostos and La Guardia

CUNY and the city's HRA initially designed the COPE Program to move single, welfare-receiving parents through at least two years of college and an Associate degree program. These credentials offer career-focused skills, entry to semi-skilled jobs, and a foothold in a potential lifetime career that could involve further education. Initially, therefore, COPE program staff focused on the retention and graduation of students. With the adoption of welfare reform laws and subsequent workfare policies, the goals of the COPE Program have been forced to change substantially. COPE staff only secure program funding if—and only if—they place TANF recipients in jobs. This section describes the specific impact that New York City's workfare program has had on the COPE Programs at Hostos and La Guardia.

The initial COPE Program phase (from 1993-1996) involved three components. First, the program targeted only a subset of welfare-receiving students. For instance, the first year's COPE cohort represented only 11 percent and 14 percent of all eligible students at Hostos and La Guardia, respectively (COPE 1995). Staff selected these first COPE participants according to their potential future employability and college-readiness. A second component of this early COPE program was to move each incoming cohort of students through as much of the academic experience together, as possible. Staff arranged

block scheduling of classes so that all COPE students attended classes only with each other; this facilitated peer studying, joint use of tutors, and peer counseling. The third program component involved the support services offered students, which ranged from personal and academic counseling to specialized workshops and job placement.

Because the early COPE program took place prior to the Federal PRA, the city's HRA allowed participants to attend college full- or part-time without meeting a workfare requirement. Students could take up to three years to complete their degrees and still receive their welfare stipends (students could take longer than three years but they would not continue to get Training Related Expenses, TREs, which included welfare stipends, childcare, transportation, and lunch expenses). This meant that an early-COPE-Program participant's day would be comprised exclusively of classes, studying, and time spent receiving counseling and other support services until she finished a two-year degree. Childcare responsibilities were balanced against this academic work. Gittell, et.al. (1996) studied CUNY's COPE students who started as freshmen in the program's first year of operation. The researchers compared these students with other welfare-receiving CUNY students who did not participate. Controlling for entering characteristics[11] and skill levels, the researchers found that COPE students still made faster progress toward a degree compared with similar non-COPE students at the same colleges.

After the Federal PRA was enacted in 1996, however, COPE underwent significant changes. Immediately, the city stopped funding students' lunch expenses and reduced their TREs to two years. In 1997, the agency initiated workfare requirements of 20 hours a week for all TANF recipients. At first, COPE staff fought for student exemptions. For the 1997-1998 school year, HRA allowed WEP exemptions for those who would graduate within one year, those on school-related internships, and (after a lawsuit sponsored by the Legal Aid Society in the Bronx) those on 20 hours per week of Federal work study employment. It is important to note that at any one time, only about ten percent of employable TANF recipients are

[11] These characteristics included a student's age, gender, welfare status, ethnicity, college of attendance, and high school group (i.e., whether high school degree was from a school in the New York City public, New York City private, New York state, or foreign/out-of-state systems, or from a GED program).

called in for workfare assignments (Finder 4/12/98). Students, then, were especially targeted because their name entered the active workfare roster once they applied for the use of training grants. Others might also be potentially employable, but since they are not called in (often because they have not applied to study), they receive welfare benefits and remain at home.

In 1998, the HRA expanded the workfare requirement to a 35-hour work week (ten more hours than the state's mandate) and reduced TREs to 12 months. This has meant major changes in a COPE student's daily life. Now, an incoming TANF recipient who wants to gain occupational skills (they can no longer use TREs for academic classes leading to transfer to a four-year college) can obtain a 12-month exemption from WEP to take classes, but often must also work. A typical incoming student often takes three to six credits of classes and spends another 10-15 hours in remedial work. Although, in reality, this all totals a full-time course-load, the HRA counts it as only 22 hours of work. Therefore, the student must fulfill another 13 hours at a work activity like a WEP assignment or work-study. The second and other years in school are not covered by TREs.

Other recent changes in the COPE program have been this year's move to a "performance-based" payment system and expansion of the program. CUNY increased the number of campuses offering COPE (from an initial four community college campuses to ten) without expanding the overall COPE program budget. In addition, all welfare-receiving students may utilize COPE services. This has meant that the COPE Programs at Hostos and La Guardia have tripled in size—in terms of the number of COPE participants—while operating on reduced funds. Furthermore, these funds are now allocated to the colleges based on the job placements they make. Thus, student retention and graduation are no longer compensatory program goals. HRA will even pay colleges for placing TANF recipients in jobs even if they had never enrolled in classes. COPE Program staff at Hostos and La Guardia Community Colleges placed about 100 TANF recipients each in jobs during the last school year—the most placements anywhere at CUNY (Table 9).

A major component of the COPE Program is the ancillary services it offers students. These services have not changed much since the passage of the Federal PRA in 1996. What has changed, however, is their level of intensity and the issues on which they are targeted. Since the COPE programs at Hostos and La Guardia each now serve a pool of students that is roughly three times larger today, staff monitoring and support of students has become less frequent and more formalized than initially. After the first program year, COPE staff found that students spent inordinate time completing paperwork for the HRA (and, therefore, missing classes) to get their transportation and childcare expenses reimbursed and training expenses approved. CUNY COPE staff members requested and were assigned an on-site HRA liaison person to facilitate these reporting requirements. Even so, COPE staff and students at both colleges report that HRA's reporting requirements have exploded in the last year. Now COPE counselors, along with the HRA-liaison, help students negotiate with the HRA, rather than deal with personal or financial issues as they had before. As one counselor explained:

> HRA makes life harder for students. They get a lot of letters from HRA. They have to go early in the morning to a Begin office [of the HRA] and stay all day to talk to them [and resolve the issue]. HRA has problems in their computers so students have to go into their office a lot. They have to go to conciliation because the HRA says they did not go to an appointment [with HRA staff] but the student was never sent an appointment letter [notifying her she had to report in].

A student added:

> Once I had to go in [to an HRA office] five or six times in a two-week period. On average, I go in once every two weeks.

The COPE counselor continued:

> We deal with issues of childcare and personal issues and academics [with our students]. Now [compared with before last year], we deal with how to deal with a WEP assignment and the issue of managing time. We feel like we have become the WEP police. We were a lot closer as a community before. We had clusters going, had a new student seminar. We would talk about a student if they were missing. We are missing the "community" in the community. Students do not have as much time now because they're so busy with working. Now it's hard to find time to meet with them.

At Hostos, success in getting through the COPE Program has now also meant a more active role for the Student Financial Aid Office. Because the city did not designate Hostos as a WEP site, its TANF students must either travel to an external WEP assignment or be involved in an internship or Federal work study

assignment. In the beginning, its public assistance students received workfare assignments that often were out in Brooklyn, an hour or more subway ride away. This logistically made it impossible to attend classes in the South Bronx, go to a part-time WEP assignment in Brooklyn, and return to classes or family responsibilities back in the Bronx. But, because work study funding can be used for on-campus work assignments, Hostos' Financial Aid Office aggressively works to get all eligible students funded. Hostos has been the leader among CUNY's community colleges in the use of the work study assignments for its students (it covered 61 percent of its welfare-receiving students with such assignments in fall 1998). This has compensated for not obtaining WEP-site designation from the city. Both colleges tailor their on-site work assignments to involve the skill-sets that students learn in class. This facilitates their subsequent placement in a career-related job as compared with the city's WEP assignments which have been mostly in low-skilled jobs (e.g., cleaning for the Parks Department, see Finder 4/12/98).

To summarize, in the face of these policy changes, COPE staff at both colleges have been remarkably resilient. The COPE Programs at Hostos and La Guardia now represent the largest and most successful (in terms of job placements) within the CUNY system. Each has grown threefold since its first year of operation (serving from 800-900 students at each campus currently). Each has dealt successfully with budget cutbacks. Each has devised different, but equally successful, mechanisms that help students carry out their WEP assignments on-site, and negotiate the often burdensome HRA bureaucracy. In addition, the staff at each college try to link students with work experiences that employ degree-related skills—both at their WEP placements and, later, on their first jobs.

Innovative Training in a Restrictive Setting

La Guardia provides other programs for public assistance recipients and other low-income individuals in addition to COPE. COPE works with TANF recipients who are full-time students who want to earn an Associate degree. Other College programs offer non-credit skill training components that allow TANF

recipients to combine training with WEP. La Guardia's administration sees COPE as one of many initiatives it has underway to help low-income people get ahead. As one vice president explained:

> We don't make a distinction between our students on welfare as compared with our regular students. We serve the neediest people in general. We feel that education can solve every social problem if people are given a chance.

In this section, I briefly describe several of these other initiatives—La Guardia's Project Enable and its HRA-funded VOWS program, the Family College, and the ACCRC Center's job search and training components. Two of these are housed under La Guardia's Adult and Continuing Education Division. This Division served almost 13,000 students in 1997 (up from more than 7,000 in 1993, at a growth rate of 78 percent). Enrollment in La Guardia's continuing education courses equals almost half of all such enrollment in CUNY's community colleges as a whole and one-fifth of all continuing education offered within CUNY. This makes it the largest such division in all of CUNY's senior and community colleges. Even more remarkable is that La Guardia's continuing education enrollment that is contract- or grant-supported equals 40 percent of all such enrollment CUNY-wide (Table 10). These contract- and grant-supported courses suggest that La Guardia's role in designing training for businesses and other organizations is very significant. I discuss the College's economic development linkages in detail in the next section.

Project Enable and VOWS. Project Enable, situated within La Guardia's Division of Adult and Continuing Education, runs several training programs for homeless heads-of-household, other public assistance recipients, and the low-income unemployed. It operates programs on-site in shelters, in transitional housing, and on campus. This year it began an HRA-funded pilot project for TANF recipients, the Vocational Work Study (VOWS) project, that expands upon earlier training programs the office has run.

VOWS offers training in computerized office skills to 120 participants whom concurrently also carry out workfare assignments. At the beginning of the training, participants also register as WEP participants. They are placed in work assignments within a cooperating city agency, the New York City Housing Authority (NYCHA), which, contrary to most WEP assignments, are directly related to the training they receive at La Guardia. Participants work at their WEP assignments three days a week and come to La Guardia for all-day training on the fourth and fifth. Since La Guardia has always stressed the integration of workplace and classroom training, this approach works well for them. So far, NYCHA has hired several trainees as full time staff, which indicates it is successful as a training program.

The project's staff members are trying to convince the HRA and the city that short-term training can be effective and also integrated into workfare settings. The training program follows an "open entry/open exit" model that the staff arrived at inductively. Welfare recipients enter training whenever they are ready. Staff run the training in short modules, so they can place each incoming trainee correctly. In addition, instructors experiment with different ways to teach to the variety of skill levels they have in the classroom. Some offer small group instruction at different levels to meet these needs. One instructor has designed the class like an office setting; students, as a group, are responsible for integrating new students into their regular procedures (e.g., they tell them how the group writes memos, what other behavior and responsibilities are expected in the classroom, and so forth). Such peer instruction and other peer learning techniques create a strong support group among the trainees.

Nevertheless, the new HRA requirements placed on these short-term training programs within the last year have made the transmittal of skills more difficult and discouraged training participants because the restrictive time pressures offer them little choice in balancing work, classes, and family responsibilities. In the words of Project Enable's Director:

> HRA has ... tipped the balance so that work is more significant and forced us into a mode of less training preparation within a given program time period. This has made [such short-term training programs with welfare recipients] more difficult to do.

Family College. Family College is another innovative model that allows welfare recipients to combine workfare and college education, along with their family responsibilities. This is a degree program, like COPE. The model was the brainchild of CUNY's former chancellor, Ann Reynolds, who created it prior to the major WEP expansion at the city's HRA. La Guardia is the third Family College center within CUNY. The Family College model allows TANF recipients to attend college and carry out HRA work requirements, while their younger children attend preschool/school within the same college. Although not a Family College, Hostos' on-campus preschool center fulfills a similar function at that college. Both preschools, which also offer kindergarten instruction, are certified with the city's Board of Education and take in other children from the surrounding communities.

This model produces a strong peer support community among the families involved. The mothers study together on campus and help each other with other issues (e.g., picking up children from other places for each other). These students are also involved with learning communities, as are the rest of the College's students, which further sustains the peer support function. As with COPE, Family College students had a full exemption from workfare assignments when the program first started. Today, the main thrust is WEP and the students must carry out a 35-hour week of WEP (with the same provisions as COPE: 12 months of TREs for the first year, with a mix of WEP hours on campus, work study, and internship experiences for the second year). The smaller Family College (it currently serves 35 college students and their 37 children) draws upon the job placement specialists within COPE and the Co-op Division to help place their students in internships and employment during and after their college experience.

ACCRC/Adult Career Counseling and Resource Center. Another way that La Guardia works with welfare recipients is through the ACCRC/Adult Career Counseling & Resource Center which is also within the Division of Adult and Continuing Education. The Center "serves young people, dislocated workers, union members, retirees and others looking for a first job, a better job or a second (or third) career" (La Guardia ACE 1999:1). ACCRC assists welfare recipients through several programs. I profile three here: its Job Search Skills Program, its Works First Center, and the InVEST Pilot Program.

Among its various services, ACCRC operates a program that assists single individuals—who have applied for public assistance and are waiting several months for benefits—to find jobs. ACCRC staff teach participants job seeking skills (e.g., interviewing techniques, how to identify likely employers). They also offer access to computers, phones, and a job placement specialist.

Also housed under ACCRC is one of the HRA's Work First Centers. ACCRC's Director wrote a grant to have this capability placed on a campus. La Guardia is one of the few community colleges with which HRA partners in this way; most Work First centers are located in community-based organizations. As a Work First Center, ACCRC receives referrals from the HRA; it teaches these TANF recipients job seeking skills and provides help finding jobs. Both advantages and disadvantages stem from this arrangement. As the Director explains:

> There are many public assistance recipients who have not done well in school. They come here [for job seeking skills] and are exposed to an education and training environment. They've now told their family that they are "going to college." This acts as a big motivator in pursuing training further.

This Center is also offering New York State's pilot program, InVEST, along with three other organizations throughout the state. InVEST involves a collaboration of four agencies: the State Department of Employment, the Higher Education Service Corporation, CUNY, and the HRA. This program offers training vouchers to public assistance recipients who are working, either full or part-time, but are still dependent on public assistance. The goal is to enhance their skills so they can obtain a job that will take them off welfare. HRA offers the client six months of TREs to take a course that will lead to better employment. Although working, these individuals earn so little that they still depend on welfare. The program's creators hope that additional skills will allow these individuals to land full-time jobs and become independent. Through this program, the state is offering the working poor an opportunity to gain some education. CUNY invites anyone on welfare with a part-time job into the program; La Guardia is the central assessment and referral center within CUNY for this program. Because the TREs are limited to six months, most participants are not able to take for-credit courses (certificate programs require at least one year). La Guardia's Family Institute, an Adult and Continuing Education program, designed six-

month Computer Information Systems and Computer Repair Programs for the pilot. Since the Division of Adult and Continuing Education houses both Work First and the InVEST training program, staff there can identify those eligible for six months of training when they come in for job seeking assistance. HRA pays for this non-credit-bearing, short-term training.

However, no other sources finance working individuals'continuing education that may lead to certificates or degrees. Explains the ACCRC Director:

> What is missing from this system is a middle ground ... where people can obtain financial aid for more vocational training ... funds that can support training for low income individuals, who want to continue their education and training but do not have sufficient resources to pay for these programs. An example would be those individuals who leave public assistance, but are still in low-level jobs.

Although La Guardia has excelled at providing short-term (and non-credit) training through its continuing education division and two-year Associate degrees through its other programs, it has done relatively little in the way of certificate programs. One-year certificate programs earn credit that the student can later apply toward an Associate or Bachelor's degree. The creation of certificate programs has been underutilized in much of CUNY, due to its overly lengthy approval process, which discourages the establishment of shorter, but credit-bearing, programs (see Table 11).

Innovative Employer Linkages

As with other COPE Programs at CUNY, La Guardia has on staff its own job placement specialist. As in the case of Hostos, she also spends much of her time working with students and other welfare recipients on interviewing skills while nurturing personal contacts with area employers. However, since she also works out of La Guardia's ACCRC Center, she is well integrated into the range of job development activities for all of the college's TANF recipients, not just those who are full-time students. Therefore, the ability to make linkages between La Guardia's programs for TANF recipients, in order to set up longer-term career ladders, exists since all of the pieces reside at La Guardia. At the same time, employers are regularly involved in the College's economic development activities, which further strengthens job

linkages. Again, the pieces are all there at La Guardia even though they have not been formally coordinated. These economic development activities are substantial and involve the activities of the La Guardia Urban Center for Economic Development (LUCED), and its participation in CUNY's Quality Consortium, its Taxi and Limousine Institute, and its partnership along with other educational institutions with the Communications Managers Association. Each of these is briefly profiled here.

LUCED is housed under La Guardia's Adult and Continuing Education Division. It was created in the mid-1980s to offer education and training programs that meet the needs of for-profit, non-profit, and public sector organizations. The Center designs and holds customized training sessions, it offers workshops for businesses (e.g., Government Contracting for Minority and Women Entrepreneurs), it links these firms to the College's Co-op Program and student interns, and it provides technical assistance and training to entrepreneurs and small businesses. LUCED's PREP and Entrepreneurial Assistance Center specifically targets programs for minority, women and small businesses. Each year La Guardia places more than 2,000 interns in 600 local companies, in part through LUCED contacts (La Guardia 1999; CUNY 1999).

LUCED's Total Quality Management component conducts programs for businesses wanting to improve the quality of their products and services through worker training programs and technical assistance. Through these efforts, La Guardia also participates with ten other CUNY colleges in the CUNY Quality Consortium (CQC). The CQC offers its services in customized training to New York's firms. This training ranges from instruction in worker participation and teamwork to courses in basic skills (e.g., math) and ESL. The CQC has worked with many large companies, such as Chase Manhattan, as well as numerous small businesses.

La Guardia's Taxi and Limousine Institute was co-founded, and is currently funded, by the city's Taxi and Limousine Commission. The Institute offers continuing education courses to all drivers, in conjunction with the Commission's training requirements. Since 1984, when the Institute was started, it has

prepared 40,000 people to qualify for a taxi license. The Institute also serves the general public and taxi drivers through driving and safety-related courses (La Guardia 1999).

Another way for La Guardia to connect with New York companies and help serve the companies' and students' interests is through membership on industry associations and partnerships. For example, La Guardia participates with six other regional educational institutions on the Communications Managers Association. This association is based in the New York City metropolitan region and offers its member companies, and their communications managers: a "forum for the evaluation of emerging technologies and their business applications; ...peer-to-peer relationships and the sharing of information; ...insight into regulatory and tariff issues; and ...constructive relationships between telecommunications suppliers and end users" (CMA 1999:1). In addition, the CMA operates regular education programs for its members, on which the education partners offer advice. These connections also help the College run a successful Co-op program, making important employment links for its students.

Organizational Features that Foster Innovation

This comparative case study research shows that, outside of their COPE Programs, La Guardia has indicated greater flexibility and creativity in confronting welfare reform, to date, than has Hostos. (This is not to say that Hostos is not innovating new programmatic responses for TANF recipients; however, its efforts are much more incipient.) Staff members in La Guardia's Adult and Continuing Education Division have contracted with the HRA to place TANF recipients in jobs immediately, through the Work First Program. They also are piloting several short-term, non-credit, training programs for TANF recipients. One, in computerized office skills, is offered such students concurrently with their workfare placements in related jobs in a city agency. Others—in office skills and home health care—combine English-as-a-Second-Language (ESL) instruction with vocational training. A third provides six-month, HRA-supported, vocational training to welfare recipients who currently work, to help them move into more skilled and higher paying jobs in the future. By contrast, Hostos has developed a one-year certificate program in nursing, but it has not tapped the non-credit adult education market, as has La Guardia.

In addition to its short-term training initiatives, staff at La Guardia have developed other mechanisms for establishing linkages with local employers. Both Hostos and La Guardia employ aggressive job developers that help TANF-receiving students link up with jobs. However, La Guardia also supports a substantial Co-op Program and economic development center (the La Guardia Urban Center for Economic Development) that maintain additional contacts with employers. They provide employers with supervised interns on a regular basis, customized training for existing or new employees, and other services besides helping to fill particular jobs. These additional services both strengthen the local employment base and identify jobs appropriate for graduates of the college's various programs. Hostos is starting to develop a close relationship with area employers through its "University in the (Hunts Point) Market" initiative, discussions with local hospitals, and other such efforts, but these projects have yet proven themselves.

A third aspect at which La Guardia shows greater leadership when compared with Hostos is in developing career-training paths for TANF recipients. La Guardia offers welfare recipients multiple ways to find employment and multiple ports-of-entry into post-secondary education. The college provides job search assistance to such individuals in obtaining their first job, non-credit skill courses that lead to a slightly more skilled job, internship opportunities that help identify potential long-term careers, and two-year Associate degrees that often offer professional certification and even higher skilled positions. Institutionally, the pieces are there to set up career ladders for TANF recipients that would allow them to combine work and education on an interspersed basis. Even so, La Guardia has yet to formally coordinate these various pieces or identify career ladders in certain professions. By contract, Hostos, however, has yet to develop the various pieces.

Explaining Institutional Innovation

The differences in performance between these two colleges stem, in part, from the job each is asked to accomplish. At the very start, Hostos has faced a more difficult educational task than La Guardia. (Hostos students require more remediation, ESL instruction, and personal attention and support because they are poorer and bear greater family responsibilities than students in most other CUNY colleges.)

Furthermore, the college's connections to local Democratic leaders have not helped it under the new city, state, and CUNY administrations. For example, it has been denied certain resources (e.g., a WEP designation) and placed under greater institutional scrutiny than its peers, like La Guardia, in similar circumstances. Therefore, one would expect Hostos' institutional performance to lag somewhat since its resources are channeled toward meeting its higher level of student need and compensating for denied resources. However, performance differences also emerge, I would argue, from differences in the two institutions' internal structure and pedagogy.

This research shows that La Guardia offers two critical internal components that have allowed its staff to excel in developing programming for TANF recipients in the current workfare-focused policy environment. These components include the college's non-traditional institutional structure and its similarly non-traditional pedagogical philosophy. This structure and teaching philosophy facilitate programmatic and teaching experimentation among staff. Experimentation fosters the new organizational and teaching solutions that a significantly changed policy environment requires.

In regard to structure, La Guardia exhibits a much broader understanding of what a college can be compared with traditional colleges. In addition to offering degree programs that all colleges offer, La Guardia also provides "education" through a variety of other venues. These include programs in the community to serve non-traditional students (e.g., at prisons, public housing sites, and institutions for the elderly). They also include programs at the College for non-traditional students (through its extensive Adult and Continuing Education Division), for the employees of particular firms (e.g., through its economic development center), for workers in specific industries (e.g., the Taxi Institute), and for single entrepreneurs. This broad institutional structure—with regular degree-granting academic divisions and several distinct organizational centers incorporated under Adult Education—allows La Guardia to house almost any new educational program for various constituencies without creating conflict in its overall mission. Hence, staff can be highly responsive in creating new programs, as they were when contracting with the HRA to offer job placement services exclusively through ACCRC.

Besides its broad organizational structure, La Guardia's pedagogical philosophy also promotes experimentation. At its founding, La Guardia's leaders wanted to serve the poor whom, traditionally, have not been college students. They constructed its degree programs around a cooperative learning model, which promotes the relevancy of college to such individuals by tying classroom work to real work settings through internships. La Guardia has also experimented over the years with ways to motivate non-English-speaking students, as has Hostos. Both developed occupational classes that incorporate language instruction. However, staff at La Guardia took this solution and applied it college-wide to all students whether they had ESL needs or not. It did this by inventing the learning community wherein cohorts of students facilitate each other's learning across blocks of classes. Learning communities are especially helpful for students with a high need for remediation.

Conclusion

These case studies of Hostos and La Guardia Community Colleges show that successful educational programming for TANF recipients can operate in a restrictive workfare policy setting. Both colleges needed an alternative vision to carry out a successful "welfare-to-school-to-work" policy. They developed this vision, in part, through the efforts of CUNY Central and the HRA in previous educationally oriented city administrations. This alternative policy also received substantial support and definition from New York's "workfare-reform" legal and activist community. However, La Guardia has been able to develop this alternative policy even further because its staff members have been especially innovative in this new policy setting. The College encourages staff innovation through its active mission for serving the poor and a wide range of community constituents, its broad organizational structure that is inclusive of new and unusual programming, and its pedagogical philosophy which aims to motivate non-traditional students. Because of these features, La Guardia has been to work with and reshape New York's rigid workfare regime to incorporate skill training for TANF recipients.

Bibliography

Abramovitz, Mimi. (December) 1997. "Workfare and the Non-profits? Myths & Realities," Report for the Task Force on Welfare Reform, NYC Chapter, National Association of Social Workers, http://www.naswnyc.org/w2.html (April 1, 1999).

Albelda, Randy and Chris Tilly. 1997. *Glass Ceilings and Bottomless Pits: Women's Work, Women's Poverty* (Boston: South End Press).

Arenson, Karen W. (May 8) 1998. "Critics Fear Role of Politics in CUNY Plan," *New York Times* (http://www.nytimes.com/archive, April 1, 1999).

Arenson, Karen W. (May 27) 1998. "CUNY To Tighten Admissions Policy at 4-Year Schools," *New York Times* (http://www.nytimes.com/archive, April 1, 1999).

Arenson, Karen W. (May 31) 1998. "Ideas & Trends; Classes Are Full At Catch-Up U.," *New York Times* (http://www.nytimes.com/archive, April 1, 1999).

Arenson, Karen W. (December 10) 1998. "CUNY Wins Ruling in a Dispute Over Graduation Requirements," *New York Times* (http://www.nytimes.com/archive , April 1, 1999).

Casey, Timothy J. (August) 1998. "Welfare Reform and its Impact in the Nation and in New York," report of the Policy, Advocacy & Research Department, Federation of Protestant Welfare Agencies, Inc., http://www.welfarelaw.org/CaseyPaper.htm (May 5, 1999).

Cohen, Marie. (March) 1998. "Education and Training Under Welfare Reform," *Welfare Information Network Issue Notes*, v. 2. no. 2.

Cohen, Marie. (June) 1998. "Post-secondary Education Under Welfare Reform," *Welfare Information Network Issue Notes*, v. 2. no. 8 (also http://www.welfareinfo.org/vocational%20ed.htm (May 18, 1999).

COPE. 1999. Program documents, CUNY.

CUNY. 1997. "CUNY Student Data Book, Fall 1997, Volume I," http://www.cuny.edu/abtcuny/facts/databook97/tocvol1.html (May 13, 1999).

CUNY. 1999. Various Website materials (http://www.cuny.edu , April 1-May 28).

Davila. n.d. "New York Court Deciding Whether Workfare Interferes with College—Davila v. Hammons," in the Top 100 Cases from the Poverty Law Library, http://www.povertylaw.org/top_100_cases/frameset_for_top_100.htm (May 19, 1999).

de Montrichard, Alexandra. 1999. "Welfare-to-Work Initiatives in Los Angeles: Los Angeles City College and Los Angeles Technical College," in Melendez, Edwin, et.al., "The Welfare-to-Work Policy Shock: How Community Colleges Are Addressing the Challenge," Community Development Research Center Report.

Finder, Alan. (April 12) 1998. "Evidence Is Scant That Workfare Leads to Full-Time Jobs," *New York Times*.

Gittell, Marilyn, Kirk Vandersall, Jennifer Holdaway, and Kathe Newman. (January) 1996. *Creating Social Capital at CUNY: A Comparison of Higher Education*

Programs for AFDC Recipients, report from The Howard Samuels State Management and Policy Center, the Graduate School and University Center of the City University of New York, New York City.

Hostos. 1999. Various Website materials (http://www.hostos.cuny.edu , April 1-May28).

Laarman, Peter. (September-October) 1998. "Why New York churches are resisting workfare," *Sojourners Magazine (Sojourners Online),* http://sojourners.com/soj9809/980915.html (April 1, 1999).

La Guardia. 1999. Various Website materials (http://www.laguardia.cuny.edu , April 1-May28).

Leon, Rachel. (July 12) 1995. "Workfare in NYS: Does It Work," report of the Hunger Action Network of NYS, http://www.crisny.org/not-for-profit/unions/hannys-1.htm (April 1, 1999).

Mannix, Mary R., Marc Cohan, Henry A. Freedman, Christopher Lamb, Jim Williams. (October) 1997. "Welfare Litigation Developments Since the PRA," report for the National Law Center, http://www.welfarelaw.org/artcommw.html (April 1, 1999).

Melendez, Edwin, with Luis Falcon, Lynn McCormick, Alexandra de Montrichard, Carlos Suarez, Kimberly Gester, Megan Holden. 1999. "The Welfare-to-Work Policy Shock: How Community Colleges Are Addressing the Challenge," Community Development Research Center Report.

NASW (National Association of Social Work), Welfare Reform Task Force. (January) 1999. "Job Centers: NYC's Diversion from Aid = Loss of Human Rights," NASW-NY Chapter, http://www.naswnyc.org/w7.htm l (April 1, 1999).

Savner, Steve. (January 15) 1996. "Devolution, Workforce Development and Welfare Reform," The Center for Law and Social Policy (http://www.clasp.org/pubs/DWDWR.html, 5/18/99).

Staples, Brent. (September 7) 1998. "Editorial Observer; The Politics of Remedial Education at CUNY," *New York Times*, http:// www.nytimes.com/archive , April 1, 1999).

Strawn, Julie. (April) 1999. "Welfare-to-Work Programs: The Critical Role of Skills," Kellogg Devolution Initiative Paper, The Center for Law and Social Policy (http://www.clasp.org/pubs/jobseducation/skillspapere.htm , 5/18/99).

Weir, Margaret. (Winter) 1997. "Is Anybody Listening? The Uncertain Future of Welfare Reform in the Cities," *The Brookings Review*, v. 15, no. 1 (also http://www. crisny.org/not-for-profit/unions/weirwi97.htm, May 11, 1999).

White, Andrew. (March) 1997. "WEP (Workers Expect Paychecks)," *City Limits* (also at http://www.citylimits.org/lores/archives/9703wep.htm, April 1, 1999).

WLC (Welfare Law Center). 1997. "WLC: 1996 Annual Report," http://www.welfarelaw.org/annrept.html (April 1, 1999).

WLC (Welfare Law Center). (March 3) 1999. "Federal Court Finds New York City Illegally Deters and Denies Food Stamps, Medicaid, and Cash Assistance Applications and Bars Expansion of 'Job Centers'," http://www.welfarelaw.org/wnreynolds.htm (May 5, 1999).

Table 1: CUNY Community College Statistics

	CUNY-WIDE	COMMUNITY COLLEGES	Hostos CC	LaGuardia CC
1997 Data				
Enrollment	175,202	64,360	4,177	10,925
Enrollment	100%	37%	2%	6%
Change in FTEs, 1980-94	15%	31%	102%	35%
Change in FTEs, 1994-97	-4%	-4%	-22%	1%
Share of FT students	63%	60%	82%	68%
Share of women students	63%	64%	78%	65%
Share of undergraduates, <23 yrs. old	47%	49%	28%	49%
Enrollment in Associate Programs by Major				
Total Enrollment		100%	100%	100%
Business & Commerce		26%	16%	30%
Data Processing Technology		13%	12%	19%
Health Services		16%	19%	20%
Mechanical & Engineering		2%	0%	0%
Natural Science Related		1%	0%	2%
Public Service Related		12%	28%	6%
Liberal Arts & Science		31%	24%	24%
Undeclared/Unknown		0%	1%	0%
First-time Freshman				
Share, 80% or more on college admissions GPA, excluding GEDs	33%	17%	26%	21%
Share w/ NYC public H.S. degree	60%	53%	34%	54%
Share w/ out-of-state & foreign H.S. degrees	12%	15%	31%	19%
Share w/ GED	14%	24%	31%	21%
Share passing none of CUNY skills assessment tests	26%	35%	55%	40%
Share passing all of CUNY skills assessment tests	22%	13%	5%	10%
Share w/ Asian ancestry	13%	10%	1%	14%
Share w/ European ancestry	20%	16%	1%	12%
Share w/ Caribbean ancestry	47%	52%	77%	46%
Share w/ English as native language	52%	49%	27%	39%
Share w/ Spanish as native language	22%	28%	69%	36%
Share of foreign-born,* most comfortable w/ other language	16%	14%	37%	21%
6-Year Transfer Rate (CUNY AA to BA, entering Fall 1991)	NA	18%	11%	18%
Share of Associate degree entrants w/ AA or BA after 5 years	NA	23%	18%	27%
Share of Associate degree entrants still enrolled after 5 years	NA	14%	13%	12%
1995 Data				
Share of undergraduates as single parents	12%	17%	43%	17%
Share of undergraduates supporting children	29%	36%	61%	38%
Share of students not working	41%	50%	63%	53%
Share w/ household income <$15,000	33%	42%	67%	44%

* Includes Puerto Ricans

Source: CUNY Student Data Book: Fall 1997

Table 2:
Programs Offered at Community Colleges

Type of Program	U.S.*	NYC	CUNY
Computers			
Computer technologies/info systems	88.6%	64.7%	83.3%
Computer programming	74.6%	52.9%	83.3%
Electronics technology	59.6%	17.6%	50.0%
Health			
Registered nursing	57.0%	52.9%	83.3%
Licensed practical nursing	47.8%	23.5%	50.0%
Health information technology	45.1%	11.8%	16.7%
Dental assistant	29.8%	5.9%	16.7%
Physical therapy	24.1%	67.6%	33.3%
Social Services			
Early childhood	64.0%	35.3%	100.0%
Other Programs			
Criminal justice/law enforcement	57.9%	0.0%	0.0%
Automotive	52.3%	5.9%	16.7%

* From general sample in Melendez et.al., 1999.

Table 3:
Programs or Services for Students

Type of Program or Services	U.S.*	NYC	CUNY
Employment Services for Students			
Staff to provide support to graduates' job search	95.7%	88.2%	100.0%
Courses/training in job search techniques	92.2%	82.4%	100.0%
Programs that connect employers to graduates	84.2%	70.6%	66.7%
Programs for Students with Special Needs			
Low reading or math skills	80.9%	70.6%	100.0%
Lack of high school diploma or GED	70.4%	52.9%	83.3%
Poor work history	50.0%	35.3%	66.7%
Students with young children	60.5%	52.9%	83.3%
Substance abuse problems	29.4%	17.6%	16.7%

* From general sample in Melendez et.al., 1999.

Table 4:
Staff Support for TANF Students at Community Colleges

Staff for TANF Students	U.S.*	NYC	CUNY
Have staff to assist TANF students	58.5%	35.3%	100.0%
Avg. staff size serving TANF students	4.6	7.8	7.8
Ratio of TANF students to staff	62.9	78.9	78.9

* From general sample in Melendez et.al., 1999.

Table 5:
Community Colleges and TANF Students

TANF Student Enrollment	U.S.*	NYC	CUNY
Percent TANF of total student body	6.4%	6.6%	4.9%
Full-time	61.0%	83.4%	90.2%
Part-time	36.3%	13.6%	9.8%
In degree programs	46.2%	83.4%	86.0%
In Non-degree or certificate programs	50.9%	12.0%	16.7%

* From general sample in Melendez et.al., 1999.

Table 6:
Program Offerings for TANF Students by Institutions with TANF-specific Programs

Type of Program Colleges Offer	U.S.*	NYC
Degree programs	71.2%	100.0%
Non-degree programs	82.7%	60.0%
Coursework to develop soft skills	96.2%	100.0%
Preparatory courses	90.4%	60.0%
Short-term training programs	84.9%	60.0%
Tutorial programs	81.1%	80.0%
Internships with employers	77.4%	80.0%

* From general sample in Melendez et.al., 1999.

Table 7:
Employer Involvement in Hot Programs

Employer Involvement	U.S.*	NYC	CUNY
Help in curriculum design	91.3%	36.4%	33.3%
Internships	89.3%	90.9%	83.3%
Classroom equipment or supplies	79.6%	18.2%	33.3%
Financial support	62.2%	18.2%	33.3%
Providing employee-instructors	59.4%	36.4%	33.3%

* From general sample in Melendez et.al., 1999.

Table 8:
Tracking TANF Students

	U.S.*	NYC	CUNY
Program completion rate for TANF students	66.7%	61.5%	61.5%
Percent of TANF students that find jobs in areas they are trained for	76.7%	66.1%	60.0%

* From general sample in Melendez et.al., 1999.

Table 9: COPE Program Statistics

	CUNY-WIDE	COMMUNITY COLLEGES	Hostos CC	LaGuardia CC	CUNY-WIDE	COMMUNITY COLLEGES	Hostos CC	LaGuardia CC
1995 Data								
HR Students	7923	3254	455	478	4%	5%	9%	4%
AFDC Students	15487	8959	1826	1368	8%	14%	38%	13%
Total HRA Students	23410	12213	2281	1846	11%	19%	47%	17%
Total Enrollment*	205835	65997	4806	10695	100%	100%	100%	100%
1998 Data								
HR Students	1459	579	59	102	1%	1%	1%	1%
AFDC Students	8836	4664	787	739	4%	7%	19%	7%
Total HRA Students	10295	5243	846	841	5%	8%	20%	8%
Total Enrollment (1997)*	201185	64360	4177	10925	100%	100%	100%	100%
WEP exemptions within COPE:								
Work Study (Spring 1998)	639	520	364	117	100%	81%	57%	18%
Internships (Spring 1998)	184	177	36	138	100%	96%	20%	75%
Total exemptions (Spring 1998)	823	697	400	255	100%	85%	49%	31%
Work Study (Fall 1998)	1439	1252	515	125	100%	87%	36%	9%
Internships (Fall 1998)	336	291	127	80	100%	87%	38%	24%
Total exemptions (Fall 1998)	1775	1543	642	205	100%	87%	36%	12%
Job placements (7/97-6/98)	646	438	100	98	100%	68%	15%	15%
Total HRA recipients (1998)	10295	5243	846	841	100%	51%	8%	8%

Source: CUNY COPE Statistics, 1999

Table 10: Enrollment in CUNY Continuing Education Courses

	Tuition-supported Courses	Contract- or Grant-supported Courses	All Courses
SENIOR COLLEGES	22555	5364	27919
COMMUNITY COLLEGES	13374	9847	23221
Bor. of Manhattan CC	1123	3277	4400
Bronx CC	1590	0	1590
Hostos CC	147	372	519
Kingsborough CC	3480	0	3480
LaGuardia CC	3554	6022	9576
Queensborough CC	3480	176	3656
TOTAL CUNY	35929	15211	51140
SENIOR COLLEGES	63%	35%	55%
COMMUNITY COLLEGES	37%	65%	45%
Bor. of Manhattan CC	3%	22%	9%
Bronx CC	4%	0%	3%
Hostos CC	0%	2%	1%
Kingsborough CC	10%	0%	7%
LaGuardia CC	10%	40%	19%
Queensborough CC	10%	1%	7%
TOTAL CUNY	100%	100%	100%

Source: CUNY Student Data Book: Fall 1997

Table 11: Enrollment in CUNY Certificate Programs

	Business & Commerce	Data Processing Technology	Health Services	Mechanical & Engineering	Public Service Related	Undeclared	All Certificate Programs
SENIOR COLLEGES	116	6	189	30	28	48	417
COMMUNITY COLLEGES	103	81	79	51	0	0	314
TOTAL CUNY	219	87	268	81	28	48	731
SENIOR COLLEGES	53%	7%	71%	37%	100%	100%	57%
COMMUNITY COLLEGES	47%	93%	29%	63%	0%	0%	43%
Bor. of Manhattan CC	0%	0%	0%	0%	0%	0%	0%
Bronx CC	1%	0%	0%	53%	0%	0%	6%
Hostos CC	5%	0%	0%	0%	0%	0%	2%
Kingsborough CC	0%	0%	0%	0%	0%	0%	0%
LaGuardia CC	19%	0%	0%	0%	0%	0%	6%
Queensborough CC	22%	93%	29%	10%	0%	0%	30%
TOTAL CUNY	100%	100%	100%	100%	100%	100%	100%

Source: CUNY Student Data Book: Fall 1997

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