

**Temporary Assistance and Supplemental Nutrition Assistance Program Employment Plan  
January 1, 2014– December 31, 2015**

**Section 1 Assurances/Signature**

As a condition of the receipt of federal and State funds the Erie County of Erie, New York Department of Social Services submits this Temporary Assistance and Supplemental Nutrition Assistance Program Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) applicants and recipients for the period January 1, 2014 through December 31, 2015. As Commissioner of Erie County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

\_\_\_\_\_, Social Services Commissioner

Date **[Click here and type the date signed]**

**Section 2 Administration**

**Section 2.1 Administrative Structure**

This agency’s organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district’s employment program.

Following is a description of the office(s) in and/or outside of the Department of Social Services that are involved in the operation of the district’s employment program. The responsibilities of each office are described below.

**The Comprehensive Employment Division of the Erie County Department of Social Services will operate the employment program in this district. See Organizational Chart – Attachment 1. In addition the following narrative will explain some functionality of the principal units of the organization that provide employment services.**

**Comprehensive Employment Division (CED)**

• **ASSESSMENT**

**Employment Counselors complete employment assessments and create employability plans for our clientele. Appropriate work activity referrals are made in compliance with federally mandated participation requirements with the intent of directing the client toward self-sufficiency. Activity referrals may include work experience, educational training, vocational training, job skills training and job development. Case management ensures employment compliance and receipt of the supports necessary for client success on a job or in an assigned work related activity. Counselors assist clients in overcoming barriers to employment, authorize supportive services, maintain case records, monitor clients’ progress and compliances and initiate noncompliance procedures.**

- **JOB DEVELOPMENT**

The Job Development Unit is responsible for developing and implementing Employability Plans that will enable clients to secure placement into unsubsidized employment. Job Developers assess clients' employment history, education, criminal background and skills set. The Job Developers work with the Employment Counselors in the Assessment Unit and all of the various worksites, providing clients with interviewing skills, job coaching, placement, pre and post-employment services. A network of employers and business partners from the community has been established to work with clients, facilitate wage subsidy contracts and provide placement opportunities into unsubsidized employment. The Unit conducts a Job Fair each month inviting various businesses to interview clients and hire potential employees. The Job Developers provide case management and coordinate day care, transportation and other supportive services to insure a smooth transition off of Temporary Assistance.

- **MEDICAL UNIT**

The Medical Unit is responsible for monitoring medically exempt clients and contacting them to obtain any updated information regarding their conditions. Medical documentation is accepted from an individual's health providers and the IMA contracted physician. An Employment Counselor monitors each client's compliance in following the treatment plan recommended by the health care professional. Clients that have an exempt determination of 6-12 months and/or the medical indicates that an application for SSI is appropriate may be referred to the Legal Advocacy for the Disabled Unit (LAD) to pursue other resources such as SSI or SSD. An Employment Counselor refers the individuals to a workfare assignment when the medical professional determines that the client is employable. Information describing an individual's limitation and need for accommodations is included in the employability assessment and considered when developing the employability plan.

- **TRANSITION TO WORK**

TTW is a division that handles approximately 63% of all active TA cases that have clients deemed employable, or temporarily unemployable. TTW's focus is to establish and monitor client eligibility. Through a close working relationship with CED, both Units share information with the ultimate goal of client self-sufficiency. Functions include and are in accordance with NYS and Federal regulations:

- determining and authorizing all aid for clients in a timely fashion, including basic grants, special allowances / vouchers and day care
- conducting semi-annual recertification interviews and review
- imposing sanctions
- handling housing, utility, and food emergencies for TTW clients
- closing cases and authorizing transitional services

- **MAAT UNIT**

The Multi-Abuse Assessment Team (MAAT) serves clients in need of treatment for substance and alcohol abuse. A Certified Alcohol and Substance Abuse Counselor (CASAC) assesses the client and determines the need for treatment and current level of care. An Employment Counselor refers the client to an appropriate treatment agency and monitors compliance. When a CASAC determines that the client is no longer exempt due to drug or alcohol use, an Employment Counselor completes an employability assessment and refers the individual to appropriate work activity or to the medical team.

- **DAY CARE UNIT**

The Day Care Unit's Social Welfare Examiners and Clerical staff work together to provide day care subsidies to both employed families with gross incomes less than 200% of the poverty level and families with child care guarantees. Examiners determine eligibility for applicants, and maintain and manage caseloads. They work closely with community providers to promote quality child care. Clerical staff maintains records, manages reports and provides supportive services to both clients and examiners.

- **ERIE COUNTY WORK CENTER (ECWC)**

ECWC emphasizes an employment focus approach for receiving Temporary Assistance (TA). Six employment orientations are conducted daily by Employment Counselors. Orientation requirements include an explanation of applicants' rights and responsibilities, as well as, the benefits and obligations of applicant participation in work activities. Applicants are informed of new time limits on receipt of TA, requirements to engage in work, school attendance requirements for teen parents and responsibility for finding child care. Employment Counselors assess TA applicants on their employability prior to case opening. The interviews include work experience, job skills, education and transportation needs. The counselors also conduct the state mandated drug and alcohol screen and make referrals to CASACs when the screening is positive; they review the Self Sufficiency Agreement Form (B4319 – Attachment #2) and the Employment Registration Agreement Form (B2341 – Attachment #3) with the applicants. If a medical condition is claimed which would limit an applicant's ability to participate in assigned work activities a medical packet is prepared. Based on final determination, nonexempt applicants are assigned to job search activities which include TANF/Safety Net/Spanish Accelerated Job Clubs and the OTDA/JOBS Program. The bus token form is completed for transportation to work activity.

- **JOB CLUB**

Job Club focuses on identifying applicants' job skills, preparing resumes, practicing workplace reading skills, job keeping skills and providing job leads. Participants learn about: job search techniques, tips for filling out applications, interviewing techniques, employer expectations, problem solving on the job, work ethics, hygiene and dressing appropriately for success. Finding quality day care is discussed and daycare registration material is distributed. Employment Counselors closely monitor compliance with program requirements. Upon completion, applicants are scheduled for an Assessment interview. Failure to comply, without good cause, results in case denial.

Section 2.2 TA and SNAP E&T Provider Agencies

Table 1 lists the local contracts or agreements with agencies to provide employment services to TA and SNAP clients. These activities and services may include, but are not necessarily limited to, employability determinations, development of assessments and employment plans, conciliation and grievance activities, provision of work activities such as job readiness training, education and job skills training, monitoring and support for compliance with treatment plans for exempt individuals with the potential for restoration to self-sufficiency, job development, job placement and retention services, and other employment related activities.

Each contract listed in Table 1 contains an assurance that the activities are not otherwise available from that provider on a non-reimbursable basis and, if not a performance-based contract, a statement regarding use of a cost allocation methodology that satisfies Generally Accepted Accounting Principles, as well as the requirements of U.S. Office of Management and Budget Circulars A-122 for nonprofit organizations, A-21 for educational institutions, or A-87 for State and local governments.

Table 2 includes agencies/providers that offer services to participants and to which the district expects to refer participants but which have no direct financial agreement with the district (e.g., WIA programs, SED funded services, OTDA Wage Subsidy providers).

**TABLE 1 - Contracts Associated with TA and SNAP Employment Programs and Services**

<b>Provider</b>	<b>Total Contract Cost (per yr.)</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
<b>Buffalo City Schools</b>	<b>\$236,600.00</b>	<b>Flex Fund/ FSET</b>	<b>FA &amp; SNF &amp; SN</b>	<b>Work Experience, GED/Educational Opportunities, Employment and Training, ESL</b>
<b>Erie Community College – CAST</b>	<b>\$500,000.00</b>	<b>Flex Fund</b>	<b>FA &amp; SNF</b>	<b>Work Experience, Vocational Training, JRT &amp; Job Placement Services</b>
<b>Erie County Medical Center for CASAC Services</b>	<b>\$397,493.00</b>	<b>Flex Fund/ Local Share</b>	<b>FA &amp; SNF &amp; SN</b>	<b>ECMC will provide Certified Alcohol and Substance Abuse Counselors (CASAC) to screen and assess applicants and TA recipients and determine level of care.</b>
<b>Goodwill Work Experience Contract</b>	<b>\$250,000.00</b>	<b>Flex Fund</b>	<b>FA &amp; SNF</b>	<b>Work Experience, Job Training, GED, Job Placement and Retention Services.</b>
<b>Goodwill Subsidized Employment</b>	<b>\$700,000.00</b>	<b>Flex Fund</b>	<b>FA &amp; SNF</b>	<b>Employment services for ECDSS hard to serve population and subsidized work assignments for TANF employable clients.</b>
<b>Industrial Medicine Associates</b>	<b>\$50,000.00</b>	<b>Flex Fund/ Local Share</b>	<b>FA &amp; SNF &amp; SN</b>	<b>Industrial Medicine Associates will provide consultative medical and psychological examinations and/or intelligence assessments for local district clients.</b>

<b>Mental Health Peer Connections</b>	<b>\$250,000.00</b>	<b>Flex Fund</b>	<b>FA &amp; SNF</b>	<b>Work Experience for clients who have a drug/alcohol dependence and/or are enrolled or require enrollment in mental health treatment.</b>
<b>Salvation Army Employment Services</b>	<b>\$150,000.00</b>	<b>Flex Fund</b>	<b>FA &amp; SNF</b>	<b>Work Experience, GED, Case Management Services, Life Skills, Job Placement and Retention.</b>
<b>United Way Works</b>	<b>\$1,205,400.00</b>	<b>Flex Fund</b>	<b>FA &amp; SNF</b>	<b>Work Experience assignments, GED, computer literacy, work skills are provided at hub sites located for client convenience.</b>
<b>Total</b>	<b>\$3,739,493.00</b>			

**TABLE 2 – Other Service Providers**

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
<b>OTDA Jobs Program</b>	<b>OTDA</b>	<b>FA, SNF, SN &amp; SNAP</b>	<b>Supervised Job Search, Job Placement Services, Job Development, WOTC pre-certifications &amp; Resume Preparation.</b>
<b>Buffalo Employment &amp; Training Center</b>		<b>FA, SNF, SN &amp; SNAP</b>	<b>Job Placement Services</b>
<b>Buffalo Public Schools Adult Education Program</b>		<b>FA, SNF, SN &amp; SNAP</b>	<b>GED, ESL</b>
<b>Erie Community College One Stop</b>		<b>FA, SNF, SN &amp; SNAP</b>	<b>Job Placement Services</b>
<b>Department of Labor</b>		<b>FA, SNF, SN &amp; SNAP</b>	<b>Job Placement Services</b>

Section 2.3 OTDA Jobs Staff Agreement

**OTDA Jobs Program Services – Target Groups**

(“X” signifies those that apply in this district)

<b>Services</b>		<b>Target Groups</b>	
Assessment/Employment Plan	_____	Applicants	<u>  X  </u>
Supervised Job Search	<u>  X  </u>	FA & SN with children	<u>  X  </u>
Job Readiness Training	_____	SN without Children	<u>  X  </u>
Job Club	_____	SNAP	_____
Job Placement Services	<u>  X  </u>	200% of Poverty	_____
Grant Diversion	_____		
Job Development (employer outreach)	<u>  X  </u>		
WOTC pre-certifications	<u>  X  </u>		

**Other Services Requested**

Described below are additional services/duties which will be requested of Jobs staff (e.g., WTWCMS data entry, case conferencing, job fairs)

- **WTWCMS data entry**
- **Distribute Bus Tokens**

**Section 3 Engagement and Work Preparation**

Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))

For purposes of satisfying the federal requirement which states that parents or caretakers must be engaged in work as soon as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance, the district’s definition of “Engaged in Work” is:

Compliance with assessment, employment planning, all activities included in the individual’s Employment/Self-Sufficiency plan including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 3.4. Also included is pursuit of other forms of income such as SSI and SSD.

**[Click here and type the additional items included]**

Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Check one of the following:

] The district provides orientation in accordance with Dept. Reg. 385.5 and no additional information is provided at orientation.

] In addition to the requirements outlined in Section 385.5 of the regulations, the district's orientation provides the following.

**In addition to everything outlined in Department Reg. 385.5, the district's orientation will cover the "Work First" philosophy, a review of available supportive services, Food Stamps, Medicaid/Managed Care, and time limits for the recipient of Public Assistance. Job Clubs or other supervised job search activities are required for all applicants determined to be able to work and not exempt from participation in work activities. Screening for Domestic Violence is conducted by the screeners prior to the orientation.**

Described below is the manner in which the district completes the required orientation for all applicants and recipients of Temporary Assistance (e.g., done in a group setting or individually or a combination of both), including the orientation procedure for exempt individuals and non-exempt individuals, if different.

**The orientation is delivered by employment counselors or the Sr. Employment Counselor usually on day 2 of the TA application process. It is done in a group session with individual follow up by an employment counselor on the same day. An applicant must sign an acknowledgement that obligations and requirements are understood. See attached documents "Employment Orientation" (Attachment # 4) and "Applicant Job Search Activity description" (Attachment #5).**

Section 3.3 Assessment and Employment Planning

Temporary Assistance Assessment (Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

] The district conducts assessments in accordance with 18 NYCRR 385.6(a) and 385.7(a) with no additional requirements.

] In addition to the requirements outlined in 18 NYCRR 385.6(a) and 385.7(a), the district's assessment also includes the following elements:

**[Click here and type the elements]**

- b. A copy of the assessment tool used by the district is attached. Additional assessment tool(s) used by the district is (are):

**See Attachment # 6 Employability Assessment – form B-2336-B (a, b, c and d).**

- c. Describe the local district procedure for the completion of an employment assessment:

**All adults in households with dependent children and 16 and 17 year olds who are not in school are assessed by Employment Counselors within 90 days of eligibility. Adults applying for or receiving public assistance and residing in households without dependent children receive assessments within a year following the application. Through the use of WTCMS “Search Folders with Alerts and Ticklers” we monitor to ensure that all are assessed within the specified time frame. Thorough employment assessments are conducted to determine the employment plan most appropriate for each client. These plans are reviewed on a yearly basis or as the individual situations dictate. The local district operates in collaboration with outside agencies to provide services needed to enable clients to overcome barriers. For example, efforts are coordinated with the resettlement agencies and work experience sites for refugees. Close collaboration assures sensitivity to the needs of that population and enables them to engage in work experience and ESL instruction simultaneously. The local district also has specialized teams of workers trained to work with clients with medical issues and substance abuse concerns. These clients are continuously monitored for compliance with mandated treatment programs. Additional support services are offered to individuals with domestic violence issues and daycare needs.**

- d. The qualifications of the employees administering the assessment tool(s) are at minimum: (Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c))

**A 4-year college degree plus employment counseling, interviewing, placement work and/or educational/vocational guidance, or counseling/guidance experience.**

- e. The district administrative unit or contractor responsible for conducting assessments is:

**The Comprehensive Employment Division of the Erie County Department of Social Services.**

- f. Applicants in households with dependent children are required to participate:

Yes       No

Applicants in households without dependent children are required to participate:

Yes       No

Temporary Assistance Employment Plans (Reference 18 NYCRR 385.6(b) and 385.7(b))

a. A copy of the district's employment plan is attached and:

The district completes employment plans in accordance with 18 NYCRR 385.6(b) and 385.7(b) and no additional information is contained in the plan.

In addition to the requirements outlined in 18 NYCRR 385.6(b) and 385.7(b), the employment plan includes:

**A recipient's responsibilities while participating in work activities is spelled out in the employment plan, i.e., following through on all mandated work requirements and appearing for all scheduled appointments, as well as, reporting any changes that could affect the client's case (change of address, change in case make-up, obtaining employment). The Employment Plan is signed and dated by the client upon every change that is made. See Attachment # 6d.**

b. The district administrative unit or contractor that develops employment plans is (list only if different from those performing assessments):

**[Click here and type ONLY if different from those performing assessments]**

c. The qualifications of the employees developing employment plans are (list only if different from the requirements for those performing assessments):

**[Click here and type ONLY if different from those performing assessments]**

Mental Health Screening and Assessment

a. The district is administering a screening tool for Temporary Assistance participants to help assess when a mental health condition may exist that warrants treatment? (This section is asking about screening in addition to screening for a disability that occurs as part of the application process or based on other instances of participant statements of work limitations/ inability to work or based on observed behavior.)

Yes       No

b. If the district is administering a mental health screening tool, please identify the screening tool used.

**[Click here and type the selected assesment tools]**

c. If the district is administering a mental health screening tool, describe the district’s policy for determining when a program participant is offered a mental health screen.

**[Click here and type local district procedure]**

d. If the district is administering a mental health screening tool, describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result.

**[Click here and type local district procedure]**

Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)

- a. Described below is how the district plans to meet federal and State Temporary Assistance participation rate requirements. Included is the weekly hours standard participation requirement for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 3.6

**Erie County utilizes a very proactive strategy to ensure that participation rate requirements are maximized.**

**Nonexempt applicants who complete the job search activity required during the application process are given appointments to meet with Employment Counselors in the Assessment Unit, for assignment to an appropriate work activity. The Counselors will engage the individuals in the activities at or as close to case opening as scheduling and staff levels permit.**

**WTWCMS is checked for pending or unassigned cases. Those without employment codes, indicating the cases are in a “CERT” status, but not yet opened, are placed in a holding pool and monitored regularly for changes (openings). Those opened with employment codes are assigned to Employment Counselors to monitor and determine if appointments are required.**

**The typical timeframe between the referral to an activity and the actual start date varies from 1 to 10 days depending on the activity. The participation maximization calendar is referenced to insure a timely enrollment for monthly participation credit. Compliance for all referrals is monitored through daily communication with worksites via telephone or email.**

**Due to work limitations or other case circumstances, appropriate hours of activity for case participation are often determined on a case-by-case basis. The standard assignment of hours for a client with an employment code of 29 is up to 25 hours per week, grant permitting. TANF and Safety Net Family case types with an employment code of 20 will be assigned up to 35 hours per week, grant permitting. If the budget does not support assignment of 30 hours for a TANF or SNF recipient, then a dual enrollment is required. The client would be assigned to 20 hours per week of work experience and 10 hours per week of an educational or job skills activity.**

**Monitoring the participation rate has been enhanced with the ability of all Supervisory staff to access the Cognos Upfront website. Cognos reports provide local district staff with timely data to aid in monitoring and maximizing participation of nonexempt adults. When needed, the agency also utilizes a data mining tool, Salient, which provides more timely information and the flexibility to develop reports regarding non-participating clients.**

**The agency has also created a variety of work experience sites located within the communities in which clients currently reside. These sites offer GED, ESL, computer training/job skills training and vocational education programs through the Educational Opportunity Center, the Adult Learning Center, WIB of Buffalo and Erie County, The Workforce Development Consortium and Catholic Charities.**

- b. Described below is a description of how the district uses work participation management reports available through Cognos or other reports and activities to monitor district progress toward meeting work participation requirements and ensuring full engagement by adults in work or work preparation activities.

**Erie County utilizes WTWCMS reports, Cognos reports and reports generated from Salient, a data mining program, to monitor progress and client participation.**

**The following Cognos reports are reviewed at minimum monthly:**

**Employability Code Duration Report**

**Possibly Miscoded Non-Legal Union Families with Children in Common Report**

**Clients with Manual Folders**

**PA Clients with Schedules Associated with FS Case Numbers TANF and SN MOE Detail Report**

**Preliminary Federal Countable Not Countable Report**

**Earned Income/Employment Reports**

**Adults with Budgeted Earned Income and No Current Employment Schedule**

**Adults with No Budgeted Earned Income and Current Employment Schedule**

**Participation and Engagement Status Reports**

**Adults in Vocational Education 9 Months or More**

**Exempted Caretaker of Child < 1 Exceeding 12 Month Limit**

**Adults with No Activity Status > 3 Months**

- c. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) applicants and recipients to participate in SNAP E&T work activities. If the district is not mandating SNAP E&T work activity assignments, please describe how NTA SNAP work registrants are informed of the services available, upon request, for assistance with job search activities. Please note: At a minimum, districts are required to make available job search as an SNAP E&T activity to SNAP applicants and recipients.

**During certification and recertification for NTA SNAP, the registrants are offered job search activities and are referred to Department of Labor, Buffalo Employment and Training Center and the Adult Learning Center.**

- d. The allowable work activities that are available in the social services district are listed and defined as follows. An “X” in the appropriate column indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNF), Safety Net Assistance for households without children (SNA), and/or Supplemental Nutrition Assistance Program (SNAP) benefits.

If a column is blank it indicates that the activity is not available for that household/case type.

FA	SNF	SNA	SNAP	Activity	Definition
X	X	X	X	Unsubsidized Employment	Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self employment and/or paid internships.

X	X	X	X	Subsidized Private Sector Employment	Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.
X	X	X	X	Subsidized Public Sector Employment	Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.

X	X	X	X	Work Experience	<p>Unpaid work performed at a public or not-for-profit organization to enable a participant who cannot find unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire, training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
X	X	X	X	On-the-Job Training (OJT)	<p>Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment due to the fact that the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>

X	X	X	X	Community Service	<p>A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community Service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, Americorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
X	X	X	X	Job Search	<p>The act of seeking or obtaining employment or preparing to seek or obtain employment and will include looking for suitable job openings in a group or individual setting, making contact with potential employers, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, preparing to or applying for and/or interviewing for jobs and related activities.</p>

X	X	X	X	<p>Job Readiness Training (JRT) Activities</p>	<p>Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
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X	X	X	X	Vocational Education	Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training other than a baccalaureate or advanced degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.
X	X	X	X	Job Skills Training	Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post secondary education courses leading to a bachelor's or other advanced degree or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.

<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Education Training	Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision making skills.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Secondary School	Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Provision of Childcare for Individual Participating in Community Service	Providing unpaid childcare to enable another Temporary Assistance (TANF/SNA MOE funded) recipient to participate in a community service program.
				Other	Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and state participation rates.

Local District Job Search Procedures:

The district assigns Temporary Assistance applicants to Job Search.  Yes  No

If yes, please describe the local district procedure for TA Applicant Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often applicants are generally required to report job search outcomes and if activities other than job search are routinely expected of TA applicants during the application period.

**See Attachment #5 “Applicant Job Search Activity Description”**

The district assigns TA recipients to Job Search.  Yes  No

If yes, please describe the local district procedures for TA Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often recipients are generally required to report job search outcomes and who in the agency is responsible for monitoring the job search.

**Each client in a Supervised Job Search is assigned to a Job Developer. The client is scheduled for weekly meetings with the Job Developer to review: interviewing techniques, resume writing, appropriate dress and hygiene, filling out applications, identifying employers, job openings, and identifying job search engines online. At each weekly appointment the Job Developer will monitor the Job Search Report Sheet. If the client is assigned to job search as their sole activity, the client is expected to spend at least 30 hours weekly with a minimum of 20 contacts per week on job search efforts, including identifying potential employers, preparing and/or submitting resumes, writing employer follow up letters or attendance at job fairs. When job search is combined with another work activity, the Job Developer will determine the minimum weekly hours and/or contacts needed for job search. The Job Developer will be responsible for assessing a client’s progress on applications, interviews, and number of contacts. Job Developers use a Job Referral Form (see Attachment #7) to verify that the client had contact with the documented employers and for possible outcomes. Job Developers also utilize on site Job Fairs for employment referrals and verification of contacts for each client. This process will enable clients to utilize additional resources and contacts by working with various Job Developers.**

Section 3.5 Job Development

Yes  No The district conducts or accesses job development services to expand job opportunities for TA and SNAP clients.

If yes, the district participates in job development activities in the following manner:

District staff contact employers to solicit jobs for Temporary Assistance participants. Below is the description of how this is done, including number of staff, frequency of contacts, etc:

**The Job Development Unit consists of 3 Job Developers and 1 Supervisor. Job Developers are assigned to specific work experience sites; collaborating with the worksite supervisor to identify and engage those clients who are work ready, (i.e. consistently showing up on time and performing well). Job Developers are also assigned to the Assessment Unit Team to work with employable clients who have recently completed Job Club. The Job Developers**

**will identify job opportunities in the community that match the education, skill level and work interests of each client. These clients will work with the Job Developers on a weekly basis until that client is placed into a job. The Job Developers work with a data base of over 300 employers which is used to match clients with job openings in the community. The Job Developers will assist clients with job interviews, provide case management and supportive services (i.e. transportation, day care, etc.) to ensure a smooth transition into employment and off of temporary assistance. The Job Development Unit also receives referrals from other Social Service Departments for clients that are job ready and need assistance and referrals to employment.**

**The Job Developers will conduct a Job Fair each month in the District Office. This involves contacting various companies that have job openings and are in need of employees. The companies will come to the Job Fair and hold actual interviews at the Job Development office which enables the employers to screen clients and recruit employees for permanent positions that are available.**

**The Job Developers utilize the PIVOT subsidized employment program. This program is designed for TANF clients and enables the Job Developers to offer employers a wage subsidy. The PIVOT Program subsidizes a client's wages for an employer that would not ordinarily hire that client because of training time that is needed. The Job Developer works closely with employers to facilitate a client's transition into promotions and jobs that pay higher wages.**

District contracts or has an agreement with another agency to contact employers and solicit jobs for Temporary Assistance and/or SNAP participants. Below is the description of how this is done, including number of staff, frequency of contacts.

**[Click here and type the description]**

OTDA Jobs Program staff are charged with job development as indicated in Section 2.3. Additional information, if any, is described below:

**[Click here and type additional information]**

### Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

- a. Describe how the district identifies appropriate education program providers for services of Adult Basic Education, High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:

**The district has developed 12 worksites referred to as “Dual-Enrollment Worksites”. These worksites offer a combination of work experience activities (which is required for the core activity for case participation) and also offer classroom instruction and training for ABE, GED, ESL, and/or Computer Skills training. If the assessment indicates that the client requires such services to increase or enhance employability, the client will be referred for enrollment at one of the dual-enrollment worksites. Several sites offer vocational training.**

- b. Describe how the district identifies appropriate providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:

**The providers of training in the district area are well versed in the requirements of ECDSS and offer a wide range of vocational/educational opportunities for clients. The Career Pathways Program, Health Professions Opportunity Grant, EOC, Adult Learning Center, Buffalo Olmsted Parks, Lt. Col. Matt Urban Center, Erie Community College CAST Program and NYS Dept. of Labor have allowed vocational training for in demand occupations. Routine presentations are made by these providers in a constant effort to keep Employment Counselors informed of any new opportunities. The District has recently partnered with Catholic Charities, Peaceprints V.O.I.C.E. Program, Hope of Buffalo and Center for Employment Opportunities to provide a wide range of services including community work experience/job skills training, GED and computer training for ex-offenders. Communication with parole officers help to identify clients that would be appropriate for referral to these providers. This population has always proven to be challenging when trying to find providers willing to accept their current status.**

- c. Describe the process and guideline workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity:

**In the assessment process, educational options will be reviewed and discussed. The district will encourage all individuals to participate in educational activities if a high school diploma or basic literacy level has not been attained. These clients would be referred to one of our established “dual enrollment” worksites which offer a combination of work experience activity and educational instruction; and they would all be TABE tested to determine their grade level. These sites include The Adult Learning Center, Catholic Charities and Literacy New York.**

- d. Describe the district’s process and policy, including the guideline workers follow, when determining whether participation in educational activities is approved for individuals who have not attained a high school diploma who are interested in participating in an educational activity. Include in this section instances when the agency would deny participation in education activities:

**The assessment process will determine if it is appropriate to approve an individual for an educational activity. The district will consider various factors in the determination process. Approval consideration will be given based on the client’s history of compliance, educational needs and aptitude. Other factors would include the feasibility of approving a particular program. An employability plan is developed for each individual that is assessed; but in determining work activity assignments, the social services district must give priority to the needs of the district to meet the prescribed participation rate.**

- e. Education and training providers are evaluated by the following standards:
1. Are licensed, certified training facilities with qualified staff.
  2. Have demonstrated a demand for the occupation(s) for which they are training.
  3. Have demonstrated a training-related placement rate of at least 60%.

**Training programs may be approved on a case by case basis.**

- f. The district procedure for advising participants of approved training providers is:

**At the time of assessment, depending upon the needs and circumstances of the client, all appropriate training options are reviewed and discussed. Those in self-initiated training will be evaluated for the appropriateness of those training.**

**In addition, the district office also conducts one (1) Job Fair per month as discussed in section 3.5. Applicants as well as recipients are informed of these opportunities, where training programs are offered by various employers in the area for Home Health Aide (HHA), Certified Nurse's Assistant (CNA), Customer Service Rep., Hospitality positions and more. Some training opportunities have provided for the client to obtain their GED in conjunction with occupational training. Job Fair announcements are also displayed throughout agency buildings informing clients of these opportunities prior to the scheduled event. Emails are sent to other agency staff and work experience sites to share with clients.**

- g. Describe the district's process and policy for determining whether or not a participant is approved/assigned to participate in job skills or vocational education activities:

**During the assessment interview the training and interests of individuals will be evaluated to determine if the individual is appropriate to participate in job skills training or a vocational activity. There will be an active effort made by staff to ensure that these services are made available to participants that need to enhance their marketable skills in areas that have opportunities in the local employment sector. The district must then also consider program duration and the client's ability to complete the training based on the limited time in which they can participate in these activities (08 ADM-07).**

- h. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

**Recipients approved for self-initiated training programs are advised via local district forms B-3854 or B-3854-A (Attachment #8 and 8A). Individuals approved by the district for a training program or referred to a work activity are verbally advised at the assessment interview and given a copy of their completed and signed Employment Plan. It serves as confirmation of approval for training and referral/enrollment to a work activity.**

- i. In accordance with 18 NYCRR 385.9 (b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as

a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as check below:

- [X] It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased Public Assistance.
- [X] A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
- [X] The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
- [X] The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
- [X] The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
- [X] The student has previously enrolled in a work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
- [ ] Additional reasons as stated below:

**[Click here and type the procedure]**

- j. To verify continued exempt status, the local district will monitor the high school attendance of 16-18 year old students in the following manner:

**Teens are required to adhere to the school attendance policy of the school district within which he/she resides. The schools are required to submit to ECDSS attendance reports as needed.**

- k. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:

**When a health-related limitation is identified, the district will make all accommodations to comply with requirements of the Americans with Disabilities Act, including assigning said individual to a specialized worksite that will accommodate the work limitation. All providers and worksites are notified in writing of an individual's work limitation. The district may make unscheduled visits to worksites to monitor compliance with our notification of client work limitations to ensure that worksites are complying. We will also confer with clients regarding their work assignments.**

### Section 3.7 Work Verification

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday

reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

Each district must describe how it will conduct periodic self audits to determine that system entries are consistent with documentation in case files. The district must also explain how it will choose the sample size, select sample cases and establish the review period (no less frequently than semi-annually). The plan must indicate the district will maintain documentation on all pertinent findings produced through its self audit process and that case records for all reviewed cases will be available for State and other auditors in their review of the local work verification system for the standard 6 year period associated with such reviews.

After each self audit is completed, the district must submit a summary of findings for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

The Quality Assurance plan must explain how staff will:

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

Please describe the process the district will use to review district worker collected documentation and data entry of the above listed elements (include a description of how a case sample for review will be selected, sample size and frequency of reviews):

**Erie County will perform four (4) random samples (20, 20, 10, 10) totaling 60 cases selected from Cognos A&QI reports semi-annually to ensure that work verification is reported accurately.**

**Erie County will review the 20 cases selected in the random sample for participation in paid activities. Both the temporary assistance and employment case files will be reviewed. Hours of employment will be verified through receipt of current pay stubs, employer verification forms, and direct phone contact with the employer documented in the case notes. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTCMS,**

documentation is in the file to support hours on WTWCMS and that the scheduled hours on WTWCMS is consistent with the documentation.

Erie County will review the 20 cases selected in the random sample for participation in unpaid work activities. The employment case file will be reviewed. Attendance will be documented by attendance sheets showing actual hours of attendance, excused absences during the month, unexcused absences during the month, and holiday time. The review will ensure that: the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTWCMS, excused absences and holiday time are documented in the case file and correctly reported on WTWCMS in accordance with federal limitations, and the documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTWCMS by district or provider staff.

Erie County will review the ten cases selected in the random sample in which a case member is reported with an employability code 38 (needed in the home full-time to care for a disabled household member). The temporary assistance case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a time frame for the exemption and that the individual is the appropriate caretaker.

Erie County will review the ten cases selected in the random sample in which a case member is reported with an employability code 31 (caretaker of a child under the age of 12 months). The temporary assistance case file will be reviewed to ensure there is footprint documentation, documentation from a hospital or birth certificate present to verify the child under the age of one.

Erie County will assess and verify that participation in the work activities reported for work eligible individuals meets the Federal definition for the activity.

A summary report will be prepared following each review period and forwarded to Kyle Miller at [Kyle.Miller@otda.state.ny.us](mailto:Kyle.Miller@otda.state.ny.us) and cc [Kathleen.Nagy@otda.ny.gov](mailto:Kathleen.Nagy@otda.ny.gov).

Erie County will maintain the supporting documentation for participation in paid and unpaid work activities and make it readily available for review by A&QI auditors upon request. In addition, documentation related to the caretaker of a child under the age of 12 months or caretaker of disabled household member exemptions/exclusions will also be retained and made available upon request.

Please describe the process the district will use to review provider collected documentation and data entry of the above listed elements (include a description of how a case sample for review will be selected, sample size and frequency of reviews):

Pre dated monthly evaluation reports with the ten legal holidays documented are annually distributed to each worksite (see December 2013 monthly calendar Attachment #9). This completed attendance report, indicating the actual hours, excused absences and attached verification is to be returned to the local district office no later than the 5<sup>th</sup> of the month following the participation month. Designated district staff makes biweekly visits using Caseload Management System (CMS) generated lists to review documentation with worksite supervisors. CMS generated lists are faxed to each worksite for all activities at that worksite the last week of the participation month. This will serve as a reminder to the worksite to submit documentation for each individual enrolled at the worksite. The worksite is immediately notified to submit any documentation that is missing. Worksite liaisons will use the WTWCMS generated lists to ensure that all required documentation is received and actual hours are entered no later than the 15<sup>th</sup> of the month. Worksite supervisors attend quarterly meetings scheduled at the District office as a group to discuss and share best practices for helping the district attain participation.

Larger worksites have an LDSS Supervisor on site to ensure accurate reporting and timely noncompliance action or resolution when appropriate. All verification/documentation is presented to the district office and entered by district staff. Attendance sign in rosters (or other means of timekeeping records) are reviewed bi-weekly at worksites by designated district staff during field visits.

Section 3.8 Requirements for Exempt Temporary Assistance Participants  
(Reference 18 NYCRR 385.2 (e))

An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist the individual in recovering from a mental or physical impairment, accept referral to and enrollment in a program of vocational rehabilitation, training, and/or other essential rehabilitation, and provide requested evidence that he/she is participating in the assigned program.

- a. Following is the district's procedure for determining if an individual who is unable to work due to a mental or physical impairment has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 6 of this plan. Included here is who (e.g., physician, employment worker, Temporary Assistance worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also included is the source and type of information used to make the determination (e.g., information from individual's physician, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

**The district staff will review medical documentation from the client's health care provider or the district's contracted provider for information regarding client's possibilities for restoration to self-sufficiency. When medical documentation received has indicated that an individual can restore or improve employability through treatment or other rehabilitative activities, the Employment Counselor will monitor individual progress more closely with the expected outcome of engaging the client in an appropriate activity as soon as possible. Updated status regarding the treatment progress is required based on durational timeline as indicated by the medical professional. When determined appropriate, the client may be referred for enrollment in a program of vocational rehabilitation designed to help restore the individual to self-sufficiency.**

- b. Following is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc. Please be specific:

**A treatment plan will be developed based on the recommendations of the medical professional. Through discussions with the client and assessment of client circumstances, along with assessment of available, appropriate treatment, a plan will be devised to meet the needs of that individual. The district will monitor for compliance.**

- c. Following is the district's procedure for tracking the participant's compliance with the treatment plan, including who in the district is responsible for monitoring compliance. Include elements such as monthly confirmation of attendance at rehabilitation or other factors to judge participation and progress, along with how often the treatment plan is updated.

**When medical documentation is received from the independent health care provider or the district's contracted physician which indicates the client is not or has not followed through with treatment plans, noncompliance action may be taken. This is done with the expected outcome of getting the client back into treatment or rehabilitation. Updated status regarding the treatment process is obtained from the medical professional. The district maintains records to document the services provided.**

### Section 3.9 Strategies/Procedures for Increasing Program Attendance

Describe district policies and/or procedures in place to reduce the amount of time participants fail to participate in work activities, including absences that are with good cause:

**The federal government requires that all clients complete their mandated hours. It is ECDSS policy that all clients must be instructed to arrange for back-up child care and schedule all personal appointments, whether it is school or medical related, around their assigned workfare schedule. If outside appointments occur during their assigned hours, clients are instructed to either come late or leave early, and make up their missed hours. Clients are routinely assigned 5 extra hours of work experience on a weekly basis, referred to as a "cushion". The client's required weekly schedule is basically bumped up an additional 5 hours (limited to the grant calculation). This is done to help clients meet the participation rate when taking into account lateness, and missed hours.**

**Individual worksites have developed incentive programs with the intent that clients will be motivated to meet full participation.**

**All client appointments with the agency; both public assistance and employment, are to be made around the client's worksite assignment. This enables the client to maintain their required hours. If there is a conflict, then district staff are instructed to make arrangements so clients can attend mandated appointments and still meet federal work requirements.**

### Section 3.10 Strategies/Procedures for Engaging Sanctioned Temporary Assistance Participants

District has no specific strategies to engage sanctioned participants.

**[Click here and type the procedure]**

District attempts to engage sanctioned participants as soon as they are sanctioned using the following strategies:

**TANF and Safety Net Family cases are called in by an Employment Counselor. If the client reports and is compliant, the initial sanction will be lifted. If they are not successful in engaging the client, they are referred for a Financial Assistance Self-Sufficiency Team FAST track appointment. This is an eligibility review and case management meeting. At the eligibility review, clients are required to explain how their household is meeting its expenses since they are sanctioned. The Counselor may inquire about household circumstances, including income and resources. Their self-sufficiency plan will be updated and any barriers to participation in work activities will be discussed. The Counselor and the**

**client work together to resolve the issues that resulted in sanction and assist them in returning to employment, work related activities, and complying with Temporary Assistance employment requirements. The client may be referred to a Job Developer for unsubsidized employment referrals. The district is also contracted with an agency to provide an immediate 8 week subsidized employment opportunity. If the client is successful, they may be placed in unsubsidized employment.**

District attempts to engage sanctioned participants when the durational period of the sanction is completed using the following strategies:

**Sanctioned participants are called in for Employment assessment interviews to reengage participants in appropriate work activities or Financial Assistance Self-Sufficiency Team FAST track appointments to review eligibility.**

District attempts to engage sanctioned participants during different times in the sanction period using the following strategies:

**[Click here and type the procedure]**

#### Section 3.11 Diversion Strategies:

District has no specific diversion strategies.

District's diversion strategies are described below:

**The New York State JOBS Program is utilized as a diversion program. (See Attachment #5). Applicants receive public transportation allowance in the form of bus tokens to participate in the mandatory job search.**

#### Section 4 Support Services (Reference 18 NYCRR 385.4)

##### Section 4.1 For Temporary Assistance and Non-Temporary Assistance Supplemental Nutrition Assistance Program Applicants and Recipients in Work Activities approved by the District

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, approved work activities and activities to restore self sufficiency:

**The district will provide case management and medical assistance, payments for transportation (as described below), work related clothing, licensing fees, required safety equipment, tools and equipment.**

- b. The district will use the following approach to assist those participants who need transportation to and from an approved work activity site, including any applicable mileage reimbursement rate, and the method used by the district to arrive at that reimbursement rate. OTDA policy establishes a mileage reimbursement rate of no less than the IRS established rate for medical/moving purposes. In all instances, should the actual cost of transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, the district will reimburse for the actual costs based on reasonable documentation submitted by the work activity participant.

Please check all that apply:

Bus pass/token

Gas card/voucher

mileage reimbursement at IRS Business rate, (effective 1/1/13 is 56.5 cents/mi)

mileage reimbursement at IRS medical/moving rate, (effective 1/1/13 is .24 cents/mi)

other mileage rate, (please explain methodology used to establish reimbursement rate)

**The New York State JOBS Program distributes bus tokens to TANF applicants assigned to job search. If engaged in work activities, a transportation allowance in the amount of \$75.00 per month is issued to those clients that reside more than one mile from their required work activity. Safety Net participants are issued public transportation fare rate per day, or a bus pass, for each day that they are required to report to their work experience assignment.**

The district will use the following approach for those individuals who reside in an area where public transportation is not available. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment. Please identify the maximum distance the participant would be expected to walk, if applicable:

**Individuals who reside in areas where public transportation is not available are very few in numbers. Placements in these areas can be difficult and require an individual approach with each case. Many of the clients who reside in these areas have a license and a car in which case a transportation allowance is authorized in the amount of \$75.00 per month (equivalent to the cost of a bus pass) to help reimburse cost of vehicle operation. Note: should the actual cost of gas to the client exceed \$75.00 per month, the district will provide reimbursement to meet the actual fuel costs. Clients would not be expected to walk more than 1 mile to a worksite. Occasional placements have been made in which the client was picked up via van transportation by the worksite. All reasonable accommodations are made for individuals with work limitations.**

- c. The district will provide the following services to assist individuals at risk of needing public assistance to improve their opportunities for employment or to maintain their employment:

**Diversion services including payment for work related clothing, licensing fees, required safety equipment.**

- d. Following is a description of how the district accommodates the needs of non-English speaking participants in accessing employment activities and services (or see below):

**Bilingual staff is available to assist staff and clients. The district has available the services of the International Institute to assist in interpretations. Catholic Charities and Journey's End provide for ESL classroom training and employment services. The District also utilizes the Language Line Telephone Interpretation Services. There are worksites that can accommodate non-English speaking participants in their work experience activity as well as classroom training to provide ESL instruction on site.**

[ ] The district does not generally find the need to provide services to individuals who do not speak English (never or rarely have occasion to serve such individuals).

#### Section 4.2 Transitional Support Services

The district will provide the following supports and strategies to support job retention:

**All clients are provided a Work Supports Checklist that outlines services and resources available to ensure that they receive all the assistance they need to remain in the workforce and improve their financial well-being. Transitional Day Care is guaranteed for 12 months after TA is closed as long as the family's income is below 200% poverty. Clients are eligible to receive a bus pass for 6 months if they are engaged in Subsidized Employment or their temporary assistance case closes due to excess earned income.**

The district will provide the following support services, for up to 90 days after case closing, to individuals whose Temporary Assistance cases have closed due to employment:

**All clients are provided a Work Supports Checklist that outlines services and resources available to ensure that they receive all the assistance they need to remain in the workforce and improve their financial well-being. Clients are provided case management and job coaching if needed. Transitional Day Care is guaranteed for 12 months after TA is closed as long as the family's income is below 200% poverty.**

#### Section 4.3 Extended Support Services

As long as funding is available (through FFFS, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines.

**Clients are eligible for case management, job coaching, Work Support Checklist. Transitional Day Care is guaranteed for 12 months after TA is closed as long as the family's income is below 200% poverty.**

**Section 5 Conciliation, Good Cause, and Dispute Resolution Procedures** (Reference 18 NYCRR 385.11 and 385.12)

Section 5.1 Conciliation

The district's conciliation process for Temporary Assistance applicants and recipients is in accordance with 18 NYCRR 385.11(a). Conciliations are conducted (check all that apply, and describe the procedure.):

- in person
- by phone
- by mail, etc

**A notice of conciliation is sent to those who fail to comply with Employment requirements. The recipient is then given 10 days (7 for Safety Net individuals and families) to contact the worker to explain the reasons for failure to comply with the assigned work requirements. While we are aware that a third party is not required for conciliation, a supervisor will be on hand to mediate a client dispute, in case the need should arise. If the Safety Net individual fails to respond to the conciliation notice or if we determine from the conciliation that the individual's refusal or failure to comply was both willful and without good cause, we issue a ten-day notice to deny or discontinue. For the TANF or Safety Net Family individual, a sanction notice is issued to reduce the amount of the grant. Satisfactory resolution would result in the client being willing to come into compliance with work requirements. Unsatisfactory resolution would result in a sanction or a client's request for a fair hearing.**

The Temporary Assistance good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity

[Click **here** and type the process]

The district's procedure for allowing all SNAP applicants and recipients who fail to comply with a SNAP employment requirement the opportunity to document good cause or an exemption from participation in SNAP work activities is in accordance with 18 NYCRR 385.12(c). The good cause determination is made by:

- client's employment worker
- a supervisor
- separate entity
- other

[Click **here** and type the process]

## Section 5.2 Sanctions

The district's procedure for determining compliance for those individuals who wish to end their employment sanction (18 NYCRR 385.11(b), 385.12), including the time period established for demonstrating compliance to the satisfaction of the district is:

**A durational sanction, which has been served, may be lifted when the client that is able to work has agreed to comply and appears for referral to an appropriate work activity. The sanction should be lifted immediately. If the client is non-compliant with the newly assigned work activity, the conciliation/sanction process must follow. A durational sanction, which has been served, may be lifted when the client that is not able to work claims a medical condition and has agreed to comply. The sanction should be lifted immediately. If the client fails to comply with the disability review procedure to verify the claimed impairment, the closing process must follow.**

**For those clients who have served durational sanctions and are currently working and meeting participation requirements, the sanction may be lifted upon receipt of employment verification.**

## Section 5.3 Dispute Resolution

The district's procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district's response to their request for health-related accommodations is conducted in accordance with 18 NYCRR 385.11(b).

The grievance is mediated by:

- an agreement with an independent entity
- supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
- designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

## **Section 6 Disability Determinations** (Reference 18 NYCRR 385.2(d))

The district's process for determining an individual's disabilities and/or work limitations is in accordance with 18 NYCRR 385.2(d). Check all that apply, and describe the process:

- District participates in the OTDA managed contract for independent medical evaluations
- District contracts directly with a physician to provide independent medical evaluations
- District accepts physician's statement provided by participant
- District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary
- Other process

**If client claims a disability, he/she is pended for 10 days to provide medical documentation from their own health care provider. The district may send individuals without their own health care provider to a contracted provider or IMA.**

The local process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited is as follows:

- District directs the contracted physician or individual's physician to determine status
- District review team reviews and determines status (described below)
- Specialized disability/medical staff or unit reviews and determines status (described below)
- Other

**Completed medical forms are submitted to the agency's staff (Attachment #10). Based on the information given by the independent health care provider or contracted physicians, the employment staff determines:**

- 1. If the client is fully employable or employable with restrictions as noted on the submitted medical document;**
- 2. If the client requires a temporary medical exemption from employment requirements (exempt periods range from 30 to 180 days);**
- 3. If the client has an unemployable determination of 12 months or more. Clients in this category may be referred to the agency's LAD Unit, which specializes in helping recipients pursue other resources such as SSI or Social Security Disability.**

**Clients are notified of the results of the determination and the right to a fair hearing to contest the determination. We will not assign the client to work activities during the medical review or if the client requests a hearing within ten days of a medical determination. Additionally, the agency's Employment Counselors regularly identify recipients who may be temporarily or permanently disabled either because of the individuals' histories of medical exemptions or because of their medical or mental illnesses manifesting themselves during their employment related activities. These recipients are referred to the agency's specialized disability/medical team, who are responsible for linking the involved recipient to the appropriate medical clinic or mental health agency in order to obtain detailed medical documentation of their condition. This team is also responsible for monitoring for expiration of the client's exempt status. Clients are contacted 30 days prior to the expiration of their medical exemption to obtain any updated information regarding their condition.**