

**Temporary Assistance and Supplemental Nutrition Assistance Program Employment Plan
January 1, 2016 – December 31, 2017**

**Erie
County**

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**Temporary Assistance and Supplemental Nutrition Assistance Program Employment Plan
January 1, 2016– December 31, 2017**

Section 1- Assurances

As a condition of the receipt of federal and State funds the Erie County 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, 2016 through December 31, 2017. 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

Amendments to this Plan:

Date Approved OTDA	Section Amended	Pages Effected

(To be completed by OTDA)

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.

ERIE COUNTY WORK CENTER (ECWC)

The Erie County Work Center emphasizes an employment focused approach for applicants applying for Temporary Assistance (TA). The ECWC Employment Counselors hold seven employment orientations daily to inform applicants of work requirements and expectations. Orientation requirements include an explanation of applicants' rights and responsibilities, as well as, the benefits and obligations of applicants' participation in work activities. Applicants are informed of TA limits, requirements to engage in work activities, school attendance requirements for teen parents and responsibility for finding child care. TA applicants are assessed prior to case opening to determine employability status, identify and address any immediate barriers to participation in job search and referred to an employment activity or other services simultaneous to the application process. The assessment interview includes questions regarding job skills, prior work experience, education levels including literacy and English language proficiency, medical limitations, supportive services and child care needs. The counselors also conduct the state mandated alcohol and drug abuse screening referral form LDSS-4571 and make referrals to Certified Alcohol and Substance Abuse Counselors (CASAC) for an alcoholism/substance abuse assessment based on the screening results. The counselors 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 form LDSS-4526 is given to them to obtain medical documentation from the applicant's medical provider. In those instances where the applicant does not have a medical provider, a referral is made to Be Well Healthcare Medicine d/b/a Great Lakes Physician Services for a medical evaluation to determine employability. Based on final employability determination, nonexempt applicants are assigned to job search activities which include TANF, Safety Net and Spanish Accelerated Job Clubs; OTDA/JOBS Program or private job search.

JOB CLUB

Job Club provides job readiness training, focusing on promoting the benefits, financial and otherwise, of going to work. Participants learn: to identify job skills, prepare resumes, interview techniques and job retention skills. They also learn about: job search techniques, tips for filling out applications, employer expectations, problem solving on the job, work ethics, proper dress and hygiene. Job leads are provided while motivating participants in their job search. 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.

ASSESSMENT

The Assessment Unit evaluates and refers clients to appropriate work activities in compliance with federal and state mandated work participation requirements, with the intent of directing the clients toward self-sufficiency. Case management ensures compliance with employment activities and receipt of the supports necessary for client success on a job or in an assigned work activity. Employment Counselors complete employment assessments, develop employability plans, counsel clients in overcoming barriers to employment, authorize supportive services, monitor clients' progress and compliances and initiate non-compliance

procedures. Activity referrals may include work experience, educational training, vocational training, job skills training and job development.

JOB DEVELOPMENT

The Job Development Unit is a resource available to Temporary Assistance and SNAP applicants and recipients. Job Development staff identifies potential job leads that can be used by participants, recruits new employers for placement, matches participants with job opportunities, screens applicants for employers and provides pre and post-employment services to insure a smooth transition to work and self-sufficiency. Job Development staff provides interviewing techniques, job coaching and case management, coordinates day care and transportation and works as a liaison between the participant and employer. A network of employers and community partners has been established to work with our participants and provide job placement opportunities into unsubsidized and subsidized jobs. Monthly Job Fairs are held to help connect participants with employers and vocational training opportunities. The Job Development Unit utilizes the PIVOT (Placing Individuals in Vital Opportunity Training) Program, a six month wage reimbursement that places TANF participants into permanent job opportunities.

MEDICAL UNIT

The Medical Unit is responsible for monitoring the medically exempt population. The Medical Unit staff requests medical documentation from clients, reviews the provided documentation to determine employability and notifies the client of exempt/non-exempt status. The Unit refers clients to Industrial Medicine Associates (IMA) as needed to provide consultative medical examinations, and monitors for compliance with treatment plans recommended by the medical provider. Incapacitated/disabled clients with medical documentation indicating that an application for SSI is appropriate, may be referred to the Legal Advocacy for the Disabled (LAD) Unit to pursue other resources such as SSI or SSD. When clients are determined non-exempt from employment activity requirements based on medical documentation, the clients are assessed and employability plans are developed, taking into consideration each individual's limitations and need for accommodations.

MAAT UNIT

The Multi-Abuse Assessment Team (MAAT) is a specialized unit that services applicants and recipients of Temporary Assistance who have been determined to be in need of drug and/or alcohol treatment services by a contracted Certified Alcohol and Substance Abuse Counselor (CASAC). CASAC's, are co-located in the Unit and conduct alcohol and substance abuse assessments, determine the level of care needed and recommend the employability status of each applicant/recipient. The Employment Counselors refer each applicant/recipient to an appropriate treatment agency and monitor compliance. When it is determined that the client is no longer exempt from employment activities in respect to drug or alcohol abuse, an Employment Counselor completes an employment assessment and develops an employability plan, referring the individual to an appropriate work activity or to the medical team.

CHILD CARE SUBSIDY PROGRAM

Child care subsidies are available for working families that meet program and income eligibility guidelines. Parents contribute toward the cost of care based on a sliding income scale. Low income child care assistance is available to employed families who earn 200% or less of the Federal Poverty Level. Transitional child care assistance is available to recipients of Temporary Assistance who become ineligible for cash benefits due to earned income. Transitional child care assistance is guaranteed for 12 months after case closing if the working family earns 200% or less of the poverty level. The Unit is comprised of Social Welfare Examiner series staff and clerical staff. Examiners determine program eligibility and authorize day care assistance payments. Clerical staff provides support to the Unit through record maintenance, management of reports and supportive services to both clients and examiners. The Unit works closely with the Child Care Resource Network and the Office of Children and Family Services to ensure access to high quality child care.

TEMPORARY ASSISTANCE-TRANSITION TO WORK

Cases with an attachment to employment, recent unemployment or the possibility of employment after short-term medical issues are handled in the Transition to Work Unit. Services provided by this Unit include: determining primary needs and connecting clients to the most appropriate assistance program, service area or community resources that will lead to self-sufficiency. The Unit is comprised of Social Welfare Examiner series staff that works closely with Employment Counselors on these cases. Functions performed by this Unit include: authorization of Temporary Assistance and/or SNAP benefits, child care assistance, transportation allowance, imposing employment related sanctions and monitoring wages.

Supplemental Nutrition Assistance Program (SNAP)-Work Registrant and ABAWD

This division administers the Federal Supplemental Nutrition Assistance Program (SNAP). The Social Welfare Examiner series staff determines eligibility for SNAP benefits, Work Registrant and ABAWD status for all applicants/recipients and assigns the appropriate SNAP Employment Code and ABAWD indicator. The Employment division staff is responsible to ensure engagement and attendance monitoring in the required work activity.

Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies

Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services

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.

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Buffalo City Schools	\$236,600.00	<input checked="" type="checkbox"/> FFFS <input checked="" type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Work Experience, HSE/Educational Opportunities, SNAP Employment and Training Programs, ESL
Erie Community College – CAST	\$500,000.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Work Experience, Vocational Training, JRT & Job Placement Services

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Erie County Medical Center for CASAC Services	\$397,493.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	ECMC will provide Certified Alcohol and Substance Abuse Counselors (CASAC) to screen and assess applicants and TA recipients and determine level of care.
Goodwill Work Experience Contract	\$300,000.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Work Experience, Job Training, HSE, Job Placement and Retention Services.
Goodwill Subsidized Employment	\$600,000.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Employment services for ECDSS hard to serve population and subsidized work assignments for TANF employable clients.
Industrial Medicine Associates	\$45,000.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Industrial Medicine Associates will provide consultative medical and psychological examinations and/or intelligence assessments for local district clients
Mental Health Peer Connections	\$250,000.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Work experience and case management services for clients with a drug/alcohol or mental health diagnosis.
Salvation Army Employment Services	\$200,000.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Work Experience, HSE, Case Management Services, Life Skills, Job Placement and Retention.
United Way Works	\$1,355,400.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Work Experience, ESL, HSE and computer literacy are provided at subcontracted community hub sites.
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
Total	\$3,884,493.00			

Table 2 – Other Service Providers

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., WIOA programs, SED funded services, OTDA Wage Subsidy providers).

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
OTDA Jobs Program	OTDA	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Supervised Job Search, Job Placement Services, Job Development, WOTC pre-certifications & Resume Preparation.
Buffalo Employment & Training Center		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Placement Services

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Buffalo Public Schools Adult Education Program		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	HSE, ESL
Erie Community College One Stop		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Placement Services
Department of Labor		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Family <input checked="" type="checkbox"/> SN Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Placement Services
		<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SN Family <input type="checkbox"/> SN Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Section 2.3 OTDA Jobs Staff Agreement

OTDA Jobs Program Services – Target Groups

("X" signifies those that apply in this district)

Services		Target Groups	
Assessment/Employment Plan	<input type="checkbox"/>	Applicants	<input checked="" type="checkbox"/>
Supervised Job Search	<input checked="" type="checkbox"/>	FA & SN with children	<input checked="" type="checkbox"/>
Job Readiness Training	<input type="checkbox"/>	SN without Children	<input checked="" type="checkbox"/>
Job Club	<input type="checkbox"/>	SNAP	<input type="checkbox"/>
Job Placement Services	<input checked="" type="checkbox"/>	TANF 200%	<input type="checkbox"/>
Grant Diversion	<input type="checkbox"/>		
Job Development (employer outreach)	<input checked="" type="checkbox"/>		
WOTC pre-certifications	<input checked="" type="checkbox"/>		

Other Services Requested

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

- WTCMS 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.

Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Check one of the following:

- The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.
- In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

The district’s orientation will also cover the “Work First” philosophy, Medicaid/Managed Care, and the Work Support Checklist (attachment 4a,4b,4c,4d,4e,4f,4g,4h).

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 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. Individuals are asked to sign a statement of understanding but no negative action is taken if the individual declines to sign this form. See attached document “Employment Orientation” (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 as required by 18 NYCRR 385.6(a) and 385.7(a):

- The district enters assessments directly into WTWCMS

- The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.
- The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.
 - The local equivalent does not contain additional elements other than what is required.
 - The local equivalent does contain additional elements beyond what is required, listed below:

b. 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 Temporary 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 applicants are assessed within the specified time frame.

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

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

d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]

Graduation from a regionally accredited or New York State registered college or university with a Bachelor's Degree, and one year of experience in either educational or vocational guidance or employment interviewing, employment counseling or employment placement work; and either:

a. One additional year of experience as described above;

OR

b. Completion of 30 graduate semester credit hours with specialization in guidance or counseling;

OR

c. An equivalent combination of training and experience as defined by the limits of (a) and (b).

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

Yes No

f. 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. Check one of the following:

The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):

- The district enters employment plans directly into WTWCMS.
- The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTWCMS.
- The district develops individual employment plans using a local equivalent tool, and later enters information into WTWCMS. Attached is the local equivalent.
 - The local equivalent does not contain additional elements other than what is required.
 - The local equivalent does contain additional elements beyond what is required, listed below:

b. Check one of the following:

- The same administrative unit or contractor that conducts employment assessments also develops employment plans.
- A different district administrative unit or contractor develops employment plans, and their qualifications include:

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 6:

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

Nonexempt applicants completing the job search activity required during the application process are assessed and referred to an appropriate work activity at or as close to case opening as scheduling and staff levels permit.

Cases pending certification ("CERT" status), are placed in a WTWCMS holding pool and monitored regularly for changes (openings). Active cases are then assigned to Employment Counselors to monitor engagement.

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 with WEP being limited to the hours determined by dividing the household's TA grant plus SNAP allotment by the higher of the federal or State minimum wage. TANF and Safety Net Family case types with an employment code of 20 will be assigned up to 35 hours per week, with WEP being limited to the hours determined by dividing the household's TA grant plus SNAP allotment by the higher of the federal or State minimum wage. 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 a combination of work experience and educational or job skills activity not to exceed 40 hours per week.

Monitoring the participation rate has been enhanced with the ability of all Supervisory staff to access the Cognos website. Cognos reports provide local district staff with timely data to aid in monitoring and maximizing participation of nonexempt adults and status changes. 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.

- b. Estimate the number of individuals served averaged monthly:

	Households with Dependent Children	Households without Dependent Children
Individuals	1,585	881

- c. 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

- d. 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 a SNAP E&T activity to NTA SNAP applicants and recipients:

NTA-SNAP applicants/recipient work registrants interested in job search assistance are referred at eligibility determination and redetermination to the Comprehensive Employment Division Job Development staff for referral to services available through the Department of Labor, Buffalo Employment and Training Center, and the Adult Learning Center.

- e. Please describe the local district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

1. The district assigns TA applicants to Job Search. Yes No

If yes, the process for engaging TA applicants is:

- Safety Net Accelerated Job Search (SN AJS) is a three-week full time job search program designed to provide single Safety Net applicants with a meaningful job search activity. Employable Safety Net applicants are required to report on time each day to participate in the classroom segment which includes job search techniques, interviewing techniques and job keeping skills. A resume is done for each participant in AJS. Additionally, all applicants are registered with the NYS Department of Labor Career Center. Applicants are required to place 3 job applications per day. Employment Counselors closely monitor applicants' compliance with program requirements. Failure to comply results in the denial of the pending application. Upon completion of SN AJS, the applicants are scheduled for an assessment interview and work activity assignment to coincide with case opening at the Employment Division.

- TANF Accelerated Job Search (TANF AJS) was designed to provide TANF applicants who have a limited work history with a meaningful job search activity prior to case opening. Employable TANF applicants are required to report on time to three classroom sessions during a three week period. Job search techniques, tips for filing out applications, proper dress and hygiene, interviewing techniques and how to find quality day care are discussed. Additionally, all applicants are registered with the NYS Department of Labor Career Center. Applicants are required to make 12 applications during the three weeks of AJS. The employment counselors at AJS closely monitor applicants' compliance with program requirements. Failure to comply results in the denial of the pending application. Upon completion of TANF AJS, the applicants are given day care registration materials, and scheduled for an assessment interview and work activity assignment to coincide with case opening at the Employment Division.

- Spanish Accelerated Job Search was designed to provide Spanish-speaking applicants with a meaningful job search activity prior to case opening. Employable Spanish-speaking applicants are required to report on time to three classroom sessions during a three week period. Job search techniques, tips for filing out applications, proper dress and hygiene and interviewing techniques are discussed. Applicants are required to make at least 12 applications during the three weeks of AJS. The employment counselors at AJS closely monitor applicants' compliance with program requirements. Failure to comply results in the denial of the pending application. Upon completion of Spanish Job Club, the applicants are scheduled for an assessment interview and work activity assignment to coincide with case opening at the Employment Division.

Applicant Job Search	Number of Contacts	Number of Hours	Additional Information
TANF and SN MOE	12	18 weekly	Report 1 time weekly for 3 weeks
SN Individuals	45	40 weekly	Report daily for 3 weeks. Includes JRT and Job Search

2. The district assigns TA recipients to Job Search. Yes No

If yes, the process for engaging TA recipients is:

Safety Net Recipient Job Club (SNR) is a four week, full time job search program to assist Safety Net Recipients in addressing barriers to employment. Classroom activities focus on how to get a job when you have limited work experience and/or dated work history. Participants complete self-assessments examining attitude, motivation and the need for change. Participants report 2 days a week, and complete 3 applications per day. Upon completion of Safety Net Recipient Job Club, the participants are scheduled for an assessment interview and work activity assignment. Failure to comply with Job Club program rules may result in discontinuance of benefits.

The Supervised Job Search Program is available to all clients. The client is scheduled for weekly meetings with a 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. Job search activities include identifying potential employers, preparing and/or submitting resumes, interviews, 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 #6) 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.

- f. The allowable work activities that are available in the social services district are listed and defined as follows. An "X" in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SN Fam), Safety Net Assistance for households without children (SN IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. If a check box is blank it indicates that the activity is not available for that household/case type. See the table on the next two pages.

Activity and Definition	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input type="checkbox"/> SNAP	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-f. 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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input type="checkbox"/> SNAP	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 in accordance with New York State Social Services Law 336-e. 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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	Work Experience - 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. 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.)
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	On-the-Job Training (OJT) - 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. 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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	Community Service - 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. 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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	Job Search - 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.

Activity and Definition	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	<p>Job Readiness Training (JRT) Activities - 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"> 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. 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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	<p>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 up to a four year 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.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	<p>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.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	<p>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.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	<p>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.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SN Fam <input checked="" type="checkbox"/> SN Ind <input checked="" type="checkbox"/> SNAP	<p>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.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SN Fam <input type="checkbox"/> SN Ind <input type="checkbox"/> SNAP	<p>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.</p>

Section 3.5 Job Development

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

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

- District staff contacts 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 450 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.
- OTDA Jobs Program staff are charged with job development as indicated in section 2.3. Additional information, if any, is described below:

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, HSE, 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 Buffalo State Advanced Manufacturing Program, BOCES I, BOCES II, Our lady of Loretto, Journeys End, 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 offer vocational training 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 partnered with Catholic Charities and Center for Employment Opportunities to provide a wide range of services including community work experience/job skills training, HSE 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. 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 education, skills 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 (08ADM-07).

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four year college program:

A four year college program would be the highest level of post-secondary level education that could be approved. This approval would be determined based on the individual's assessment plan toward self-sufficiency and the district's need to meet Federal and State work participation requirements. Approval for enrollment may consider factors such as: the individual's ability to successfully complete the program; whether it is necessary to the achievement of the individual's employment goals outlined in their employment plan; and whether such goals relate directly to obtaining employment in an occupation with favorable job prospects. Continued approval of enrollments must ensure that the participant maintain satisfactory progress. Verification of school attendance is the responsibility of the participant.

- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12 month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities, work experience or community service:

Clients are called in one month prior to the 12 month vocational lifetime limit expiring. A re-assessment and new Employment Plan is completed and work activities are assigned at that time.

- h. 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.

- i. 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 vocational education providers, schools, colleges and employers in the areas of home health aides (HHA), Certified Nurse's Assistant (CNA), Customer Service Representatives, hospitality, advanced manufacturing and more. Some training providers have opportunities that enable the client to obtain their TASC in conjunction with occupation training. Job Fair announcements are also displayed throughout agency

building, 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.

- j. 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 (Attachment #7 Front and Reverse) or B3854-A (Attachment # 7A). Individuals approved by the district for a training program or referred to a work activity are verbally advised at the assessment 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.

- k. 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 checked below:

- It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased Temporary Assistance.
- 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.
- 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.
- The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
- The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
- The student has previously enrolled in 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:

- l. 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.

- m. 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 WTWCMS, 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):

The district will perform a random sample of (20) cases semi-annually for paid work activities to review district worker collected documentation and data entry. Both the temporary assistance and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTWCMS and

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

The district will perform a random sample of (20) cases semi-annually for participation in unpaid work activities to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure 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 documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTWCMS by district or provider staff.

The district will perform a random sample of (10) cases semi-annually in which a case member is reported as an employability code 38-needed in the home fulltime or employability code 48-time limit exemption to care for a disabled household member to review district worker collected documentation and data entry. 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 timeframe for the exemption and that the individual is the appropriate caretaker.

The district will perform a random sample of (10) cases semi-annually in which a case member is reported as an employability code 31-caretaker of a child under the age of 12 months to review district worker collected documentation and data entry. The temporary assistance case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. Temporary assistance records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12 month lifetime limit.

In each of the above samples, the district will assess and verify that participation in the reported work activities meets the State approved definition for the activity.

The district will sample cases from each month within in the (6 month) semi-annual period. The October to March review will be due by May 20th. The April to September review will be due by November 20th. The district will maintain supporting documentation for the cases that are reviewed and make them readily available for review by A&QI auditors upon request.

The results of these audits will enable the district to identify policies, processes or cases that may need corrective action. We will ensure that a summary report will be prepared following each review period and forwarded to Kathy Nagy, Kathleen.Nagy@otda.ny.gov, and Kyle Miller, Kyle.Miller@otda.ny.gov.

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):

Erie County will designate a liaison to conduct the semi-annual reviews and report results to appropriate OTDA staff. The review process will include researching the following: case files, document imaging, WTWCMS and WMS. These resources will be used to obtain documentation to support the audit findings.

The 60 random cases are selected from Cognos A & QI reports for the review period. The random starting point for each sample is determined by the roll of a "die". The intervals for each review are determined by using the universe for each sample from the previous review period, divided by the total cases to be reviewed.

Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

Following is a description of how the district accommodates the needs of Non-English speaking participants in accessing employment activities and services:

Bilingual staff is available to assist staff and clients. The district collaborates with the International Institute for interpretation services. Catholic Charities and Adult Learning Center 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 with work experience activities while simultaneously providing on site ESL instruction.

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:

Clients have input in the development of their employability plan.

Clients are advised to have a child care plan and a backup plan in place.

They are instructed to schedule personal appointments around their assigned work activity schedule. If appointments are scheduled during this time clients are afforded the opportunity to make up the hours. Clients are routinely assigned to more hours than the minimum required for participation. WEP hours are limited to the hours determined by dividing the household's TA grant plus SNAP allotment by the higher of the federal or State minimum wage.

In those instances where the client is a no show for the initial enrollment or they have missed 3 consecutive days a notification of pending termination is sent to the client advising them of their non-compliance with work requirements and the potential for sanction or case closing if good cause is not established. The intent is to reengage them into the program.

Individual work activity sites have developed incentive programs with the intent of motivating clients to attend the scheduled hours.

Pre-dated monthly evaluation reports, with the ten legal holidays documented, are annually distributed to each work activity provider (see December 2015 Monthly Evaluation Calendar Attachment # 8). This completed attendance report, indicating the actual hours, excused absences and the attached verification is returned to the local district office no later than the 5th of the month following the participation month. Designated district staff makes biweekly visits to each provider to reconcile the WTWCMS generated list against those enrolled at the work activity site. A WTWCMS list is provided to each work activity provider during the last week of the month to ensure that a monthly evaluation report is completed for each client assigned to them.

Regular communication with supervisors at the work activity sites ensures accurate and timely reporting of attendance, non-compliance issues and resolutions.

DSS appointments are scheduled around the clients work activity assigned hours.

Section 3.10 Strategies/Procedures for Engaging Sanctioned Temporary Assistance Participants

- District attempts to engage sanctioned participants as soon as they are sanctioned using the following strategies:
 - TANF and SN-FAM clients serving initial sanctions are immediately scheduled for an appointment with their Employment Counselor in an effort to address any barriers, lift the sanction and engage the client in a work activity.
 - TANF and SN-FAM clients serving a durational sanction may be referred for an eight week subsidized employment opportunity if they meet the criteria for participation in the program. Successful candidates may transition into unsubsidized employment.
 - TANF and SN-FAM clients who are employable, and deemed appropriate, may be referred to our Job Development Unit for assistance with a Job Search.

- District attempts to engage sanctioned participants when the durational period of the sanction is completed using the following strategies:
 - TANF and SN-FAM clients who have served their durational sanctions are scheduled for an appointment with their Employment Counselor in an effort to address any barriers, lift the sanction and engage them in a work activity
 - A FAST track appointment may be made with the client for a review of their eligibility and barriers.

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

- District has no specific strategies to engage sanctioned participants.

Section 3.11 Strategies for reducing the need for Temporary Assistance:

District's strategies for reducing the need for Temporary Assistance are described below:

Diversion services include payment for work related clothing, licensing fees and required safety equipment.

Section 4 Support Services (Reference 18 NYCRR 385.4)

Section 4.1 TA and Non-TA SNAP 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 payments for transportation (as described below), work related clothing, licensing fees, required safety equipment and tools.

- 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 1/1/15 is 57.5 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/15 is 23 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):

The District authorizes a seventy-five (\$75.00) dollar transportation monthly allowance to each participant in an approved work activity site that do not use public transportation.

- c. 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 or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below each way to a work activity or to access public transportation:

There are a limited number of individuals that live in areas where public transportation is not available. Placements in these areas can be difficult and require an individual approach to each case. Clients that have a license and a car are issued a transportation allowance in the amount of \$75.00 per month (equivalent to the cost of bus pass) to help reimburse the cost of vehicle operation. Should the actual cost of gas to the client exceed \$75.00 per month, the district will provide reimbursement to meet fuel costs based on submitted documentation of expense and calculation of mileage. Clients are not expected to walk more than one (1) mile to a worksite. Occasional placements have been made in which the client was picked via van transportation by the worksite. All reasonable accommodations are made for individuals with work limitations.

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

Individuals at risk of needing temporary assistance are provided the followings services: Job Club, Job Fairs, referrals to the One-Stop Centers, OTDA JOBS and the NYS Department of Labor. In addition they are given a Work Support Check List.

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 may be guaranteed up to 12 months after the TA case is closed for eligible families. 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 may be guaranteed up to 12 months after the TA case is closed for eligible families.

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:

They are given the Work Support Checklist. Transitional Day Care may be guaranteed for up to 12 months after the month in which a TA family's case is closed for eligible families. Clients may be eligible for a bus pass for 6 months if their TA case has closed and they can verify that they are employed a minimum of twenty (20) hours per week.

Section 5 Conciliation, Sanction 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 individual must respond within the required timeframe for the case type. A third party is not required for conciliation; however, a supervisor will be available to mediate a client dispute if the need arises.

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

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

If an 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 wilful and without good cause, we issue a notice of denial or a ten-day notice of intent to discontinue or reduce public assistance.

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

- in person
- by phone
- by mail, etc.:

The SNAP E&T good cause determination is made by:

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

The district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is:

The notice of conciliation will offer the client the opportunity to avoid the SNAP sanction before issuance of the SNAP sanction notification. Demonstration of compliance will be accomplished by the client completing a job search. Job Search logs (see attachment #9) will be issued with each TA/SNAP conciliation notice. Individuals may demonstrate compliance to avoid a SNAP sanction simultaneous to the conciliation process. The due date for completion of the Job Search log to demonstrate compliance is the same date as the due date to respond to the conciliation and is indicated on the conciliation notice. Individuals will be required to provide the log with at least 5 job contacts. If the client provides the job search log by the due date, the district will not impose a SNAP sanction. Failure to comply with job search requirements to avoid SNAP sanction by the due date will result in a SNAP sanction if the non-compliance is determined to be willful and without good cause.

Section 5.2 Sanctions

The district's procedure for determining compliance for those individuals who wish to end their employment sanction (18 NYCRR 385.12, 385.13), 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. If the individual demonstrates compliance, the sanction will be lifted and TA benefits will be restored retroactive to the date the individual indicated a willingness to comply, but not before the end of the durational sanction period. 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 will be lifted immediately. If the client fails to comply with the disability review procedure to verify the claimed impairment, the closing process will follow.

For those clients who have completed the durational sanctions and are currently working and meeting participation requirements, the sanction will 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, Documentation and Requirements of Exempt Individuals

(Reference 18 NYCRR 385.2)

Section 6.1 Disability Determination Process and Tools

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 (please describe):

Clients who claim a disability are pended for 10 days to provide medical documentation from their health care provider. The district may send individuals without a health care provider to a contracted provider or to IMA for evaluation to determine employability status.

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 (Legal Advocacy for the Disabled) 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. The client is not assigned 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. Clients are contacted 30 days prior to the expiration of their medical exemption to obtain any updated information regarding their condition.

Section 6.2 Mental Health Screening and Assessment

The district is administering a screening tool for Temporary Assistance participants to help determine whether a referral for a mental health evaluation is warranted, in addition to screening for a disability that occurs as part of the application or disability determination process

Yes No

If yes, describe the district's policy for determining when a program participant is offered a mental health screen.

If yes, does the district use or intend to use the LDSS 5009 - Mental Health Screening Tool and/or the computer assisted version of the Modified Mini Screening tool (MMS)?

Yes No

If yes, indicate the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation:

If using a screening tool other than the MMS, indicate the screening tool used:

Describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result:

Section 6.3 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 6.1 of this plan. Included here is who (e.g., medical practitioner, 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 medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

The determination that an individual, who is unable to work has the potential through treatment or other rehabilitative activities to improve the ability to work, is determined by careful review by the employment worker

of the medical form completed by a medical provider. The district adheres to the recommendation of the medical provider regarding the need for treatment or rehabilitative activities

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

The treatment plan for the individual is based upon the recommendation of the health care provider. The client is regularly assessed to determine compliance with the treatment plan. Appropriate clients may be referred to ACCESS-VR for services.

- 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:

Compliance with the treatment plan is the responsibility of the Employment Counselor assigned to monitor the case. Clients are reassessed in accordance with the exemption period as determined by their health care professional. At each review, the client is required to provide updated medical documentation which is used to determine compliance and employability status.