

# **Westchester County**

## **Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan**

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

- a. 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.  
*(Attachments must be uploaded to the system through the "Documents" screen prior to submitting the plan. Use the textbox below to provide any additional information.)*

Organizational chart attached.

- b. Below 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 and include the responsibilities of each office.

The Office of Work Activities (OWA) in the Westchester County Department of Social Services (WCDSS) has programmatic responsibility for the operation of the Welfare-To-Work (WTW) program for all Temporary Assistance (TA) individuals. Since the last Biennial Plan 2022-2023, COVID 19 continued to change the way in which WCDSS engages individuals in the employment process. However, standard activities such as orientation, assessment, medical evaluations, and referrals for activities have continued. Face-to-face contact was waived for much of the time period and most services have been offered telephonically with remote learning and telehealth options. OWA has four units of Department of Social Services personnel and eight contracted agencies under our contractor/vendor operations. The four DSS distinct units consist of workers who perform specific functions: one unit of Employment Counselors and three units Eligibility Examiners.

OWA Employment Counselors perform the following functions with TA applicants: upfront engagement, DSS Employment focused orientation, initial assessments, referrals to the Career Center, referrals to our contractor(s), create enrollments for activities, and referrals to OWA Eligibility Examiners for exempt individuals or those contesting employability. They will work with our contracted vendors to enter actualized hours into the Welfare to Work Case Management System (WTWCMS) system. OWA Employment Counselors also work with Westchester's Office of Temporary Housing Assistance (OTHA) to engage homeless customers. The OWA Employment Counselors are co-located in our District Offices and in the Career Centers. The work of the unit of Employment Counselors is monitored by a Program Administrator.

OWA contractor(s) perform the following functions with TA nonexempt applicants and recipients: applicant supervised Job Search, Job Placement and Employment Retention, Job Matching and Job Referrals, Job Readiness/Attitudinal Workshops, Financial Literacy, enrollment into approved work activities such as Community Work Experience programs, and Vocational/Educational Training. Individuals are matched with activities based on the components in the Employment Assessment. The contractor(s) monitor the individual's engagement closely to provide guidance, ensure supportive services are in place, and address any issues that may arise when an individual is newly placed. The work of the contractor(s) is monitored by two Program Administrators.

The OWA Eligibility Units perform eligibility and employment functions. One unit of Eligibility

Examiners is dedicated to working directly with our contracted vendors that handle non-exempt individuals. They ensure supportive services are issued and handle non-compliances. This unit focuses on employment related aspects and does not maintain the TA case itself. That is the responsibility of the Examiner in the District Office. All of the cases that have employment income are also handled in the OWA eligibility unit by a designated worker. That worker is responsible for all aspects of the case (ongoing needs, rent, emergencies, budgeting income, etc.). The other two units of Eligibility Examiners work with TA individuals who are coded exempt. They set up appointments with the following providers as appropriate: Industrial Medical Associates (IMA) for medical or psychiatric barriers, Westchester County Department of Community Mental Health (DCMH) CASACs for substance abuse barriers, Maximus for assistance with applying for Social Security benefits, and our WCDSS Domestic Violence liaison. The Examiners in this unit monitor the appointment status of the individual (show/no show), review appointment results and employability status, make code changes if needed, issue notices, update WTWCMS, and handle non-compliances. They also monitor codes for continued exempt status. If a re-evaluation is needed, they handle that. Specific workers will be assigned audits as they come up. This unit is also handling full TA caseload responsibilities for individuals with specific employability codes in the Yonkers District Office and may be expanded in the future. The work of each Eligibility Unit is monitored by a Supervising Eligibility Examiner.

Depending on case circumstances, members from each unit interface with other departments within WCDSS such as certification, recertification, the SNAP center, Adult Protective Services and Child Welfare. WCDSS personnel work together in order to provide quality customer service and meet the immediate needs of those vulnerable in our communities.

## **1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies**

- a. 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 limited to: employability determinations; development of assessment 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. Districts must maintain proper monitoring and oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA

Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

**Contracts or Agreements with Agencies Who Provide TA and SNAP Employment Services**

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Westhab, Inc. Singles Contract	\$1,105,225	FFFS SNAP E & T Local	SNA Individual SNAP	<p>The primary purpose is to improve the job placement rate and long-term labor market prospects of non-exempt single Adult Temporary Assistance (TA) applicants and recipients. Westhab will use intensive case management to focus on engaging customers in meaningful employment, workshops, and skills training. The staff also supports TA customers at critical points along their path to self-sufficiency. The services will include Engagement and Case Management, Job Placement and Employment Retention, Job Matching and Job Referrals, Job Development, Attitudinal and Job Readiness Workshops, Financial Literacy, and CWEP Placement and Development. The services assist applicants and recipients to become self-sufficient by overcoming economic, educational, psycho-social, cultural, linguistic, and lack of work experience barriers. The first level of this program will have up-front engagement to assess the employability of the individual and to create customized employability plans, with the ultimate goal of employment. It will include orientation, job matching/referral to suitable employment opportunities, and enrollment into suitable work activities.</p> <p>The next level includes ensuring that all participants meet the requirements to continue the receipt of TA while assigned to</p>

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
				these activities. Case Managers work with the Job Developers in sharing information to strengthen job-matching and improve customers work readiness.
Westhab, Inc. Families Contract	\$1,459,879	FFFS SNAP E & T Local	FA SNA Family SNAP	<p>The primary purpose is to improve the job placement rate and long-term labor market prospects of non-exempt Adult Temporary Assistance (TA) applicants and recipients on family cases. Westhab will use intensive case management to focus on engaging customers in meaningful employment, workshops, and skills training. The staff also supports TA customers at critical points along their path to self-sufficiency. The services will include Engagement and Case Management, Job Placement and Employment Retention, Job Matching and Job Referrals, Job Development, Attitudinal and Job Readiness Workshops, Financial Literacy, and CWEP Placement and Development. The services assist applicants and recipients to become self-sufficient by overcoming economic, educational, psycho-social, cultural, linguistic, and lack of work experience barriers. The first level of this program will have up-front engagement to assess the employability of the individual and to create customized employability plans, with the ultimate goal of employment. It will include orientation, job matching/referral to suitable employment opportunities, and enrollment into suitable work activities.</p> <p>The next level includes ensuring that all participants meet the requirements to continue the receipt of TA while assigned to</p>

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
				these activities. Case Managers work with the Job Developers in sharing information to strengthen job-matching and improve customers work readiness.
Westchester Community College/ JobSTAR Program	\$728,978	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP	Job STAR provides vocational and educational programming for the WCDSS population. Services include but are not limited to: educational assessments, TABE testing, Adult Basic Education, skill enhancement training, credit-bearing certificate programs, food preparation and computer training, CWEP/Internships, and post-placement job advancement services.
Westchester County Department of Community Mental Health/ CASAC (DCMH)	\$732,375	Local	FA SNA Family SNA Individual	DCMH Credentialed Alcoholism and Substance Abuse Counselors (CASAC) conduct Drug And Alcohol assessments for appropriate applicants and recipients on Temporary Assistance. Services include referrals to outpatient programs, Inpatient rehab, detox and residential treatment programs. DCMH CASAC's conduct conferences on crisis cases, monthly monitoring of all customers, discharge planning and referrals to programs with higher levels of care. In collaboration with the treatment programs, DCMH works on developing a plan with the individual that leads to self-sufficiency.
Westchester County Dept. of Parks/ Advance Through Parks	\$179,741	Local	FA SNA Family SNA Individual	WCDSS entered into an Interdepartmental Cooperative Agreement with Westchester Parks Department to provide on-the-job training and employment placement and retention services for TANF (FA), Safety Net Families (SN MOE), and SN Single (SN Non MOE) individuals on work experience assignments

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
				in various County parks. Individuals learn work related skills in the following: building maintenance, grounds keeping, horticulture, customer service, clerical, food service etc.
Industrial Medicine Associates (IMA)	\$400,000	Others: Local State contract, Westchester submits for reimbursement	FA SNA Family SNA Individual	IMA performs medical, psychological and IQ testing for applicants and recipients on Public Assistance. IMA also provides a specialized evaluation to help identify if homeless customers understand their consequences for failures to comply with housing and employment rules.
Mt. Vernon/ Greenburgh Health Center	\$1,131,937	Local	FA SNA Family SNA Individual SNAP	Mount Vernon/Greenburgh Health Center provides physical medical evaluations for WCDSS Homeless Singles residing in homeless shelters. This evaluation is part of the SHAC assessment that is submitted to WCDSS to determine employability codes and ensure that customers are placed in housing suitable for their medical conditions.
Maximus	\$500,000	Local Others: State and Federal	FA SNA Family SNA Individual	Maximus accurately screens and identifies potentially SSI/SSDI eligible TANF participants to increase the number of approved applications and maximize resources.
Mental Health Association (M.H.A.)	\$514,491	Local	SNA Individual	MHA provides case management, CASAC and mental health services to the Single Homeless population residing in Temporary Housing shelters.
Westchester County Department of Corrections	\$20,000	FFFS, Local	TANF 200%	A mentoring program for incarcerated women to prepare them for release back into the community. The focus will be on teaching parenting and life skills that will enable mothers to successfully re-unite with their

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
(WCDC) Emerge				children and live together as a unified family unit.
Title 1 Youth Training	\$350,000	FFFS	FA SNA Family TANF 200%	The program, with the help of six vendors, will prepare youth (ages 18-24) for post-secondary education opportunities and employment options. The program will link occupational and educational learning and recruit youths from Putnam and Westchester Counties.
Summer Youth Employment Program	\$117,970	FFFS	FA SNA Family TANF 200%	A collaborative effort between the Westchester County Department of Social Services, the Workforce Investment Bureau, and the Westchester County Department of Parks, Recreation and Conservation to provide jobs in various positions around Westchester County to children receiving foster care services.

- b. 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.

Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and TANF 200%.

**Agencies and Providers to whom the District Refers for Employment Services**

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
SUNY Westchester Educational Opportunity Center (WEOC)	Others: State and Federal	FA SNA Family SNA Individual SNAP TANF 200%	Westchester Educational Opportunity Center (WEOC) provides tuition-free academic and vocational training, college preparation, and workforce preparation programs and services to adults. These certified, credential earning programs include vocational and educational training for Security Guard, CDL, OSHA30, HSE, and English as a New Language (ENL). They also offer training for HHA, CNA, EMT, Pharmacy Technician, and other health related occupations.

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
			Individuals receive a credential or certificate of completion upon graduating from these courses.
VIVE SCHOOL Pathways to Success	Others: State and Federal	FA SNA Family SNA Individual SNAP TANF 200%	Housed at the Vive School, Pathways to Success offers Basic Skills, High School Diploma Preparation (TASC and NEDP), and English as a New Language (ENL). The credentialed Vocational Training includes Culinary Arts, Microcomputer Applications, Retail trades, OSHA 10, CPR, Barbering, PCA and Medical Billing. Individuals receive a credential or certificate of completion upon graduating from these courses.
Westchester / Putnam Career Center Network	Others: State and Federal	FA SNA Family SNA Individual SNAP TANF 200%	The Westchester-Putnam Career Center Network is made up of four physical locations that provide free resources and services to both job seekers and employers. The Career Centers are primarily staffed by Westchester County, Putnam County, and New York State Department of Labor employees and include a state-of-the-art resource room, workshops, employment counseling, and career and training services for youth, adults, and employers. The Career Centers also include staff from partner agencies and a referral network to provide expanded services. Resources can also be accessed on this website.

c. Monitoring and Oversight of TANF and SNAP E&T Funded Contracts/Agreements

Described below is the process used to monitor district held contracts/agreements with providers that use TANF and SNAP E&T funds for employment services:

Each month contractors are required to submit Performance Measurement Indicator Statistics (PMIs). These PMIs allow DSS Management to get an overview of numbers served, specific services rendered and any possible red flags in the referral process. The OWA Program Administrator communicates regularly with contractor management regarding new State guidance, changes in County procedures, unexpected situations like increasing caseloads, and developing more effective ways to provide services. Programs may be asked to submit additional information on specific areas of their work as part of OWA's quality assurance process. Periodically, random case samples are pulled for review and submitted to the contractor for corrective action, if warranted.

### 1.3 OTDA Jobs Staff Agreement

- a. OTDA Jobs Program Services - Target Groups (reply yes or no to the options as they apply):

#### Services Provided by Jobs Staff

Yes or No:	Services Provided:
N/A	Assessment/Employment Plan
N/A	Supervised job search
N/A	Job readiness training
N/A	Job club
N/A	Job placement services
N/A	Grant diversion
N/A	Job development (employer outreach)
N/A	WOTC pre-certification

#### Jobs Staff Target Groups

Yes or No:	Target Groups:
N/A	Applicants
N/A	FA & SNA with children
N/A	SNA without children
N/A	SNAP
N/A	TANF 200%

- b. Described below are the additional services/duties Jobs Staff will be requested to perform (e.g., Welfare to Work Case Management System (WTWCMS) data entry, case conferencing, job fairs).

N/A

## 1.4 Access to Services at New York State Career Centers

- a. Described below is how the district provides access to its programs and services with Career Center partners (reply yes or no to the options as they apply):

### Programs and Services Provided at Career Centers

Yes or No:	Programs and Services Provided:
Yes	The district has employee(s) physically present at a Career Center
Yes	The district has contract staff physically present at a Career Center
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
N/A	Other (described here):

- b. Described below is how the district coordinates with Career Center partners to provide services to the district's clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

Nonexempt TA applicants are referred during upfront engagement to the OWA Employment Counselors in the local Career Centers. Individuals are referred to orientations, workshops, on-site trainings, and job fairs. Applicants and recipients are assessed for Individual Training Accounts (ITAs) and other grant funded programs. OWA Employment Counselors support individuals in their job search efforts by referring them to various work-related workshops and trainings, accessing websites such as westchesterputnamonestop.com and JobZone.ny.gov. TA and SNAP individuals have access to all services offered by the Career Centers including occupational skills training, JobZone, Department of Labor Employment Counselors in addition to the Career Center partners such as ACCES-VR. In addition, these individuals must comply with their job search requirements by submitting monthly job logs.

## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

- a. How does the district provide orientation (reply yes or no to the options as they apply)?

#### District Orientation Procedures

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.

<b>Yes or No:</b>	<b>District Orientation:</b>
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: Information and assistance with Home Visiting Services.

- b. Described below is how the district completes the required orientation for all applicants and recipients of TA at application and recertification. Orientation can be held in-person, either in a group setting, individually, or a combination of both. It can also be held virtually, over the phone, or by sending orientation material to the client by mail. Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

The orientation is conducted primarily on the phone. At orientation, OWA Employment Counselors provide all applicants with a Microsoft PowerPoint presentation. If the individual does not have a working phone or prefers to meet face-to-face, arrangements are made for the individual to safely come to their local Career Center to complete orientation. The orientation is usually conducted one-on-one using a computer. If an individual wanted a hard copy of the presentation, it was emailed or mailed to their address. The orientation presentation has been translated into Spanish both in the printed and PowerPoint versions. If an individual speaks and/or understands a language other than English or Spanish, the worker will use the Language Line translators. Orientation for exempt and nonexempt individuals are the same. Upon completion of the orientation, the applicant will be asked to complete an Employability Statement which indicates if there are any issues with enrolling in a work activity. If the applicant provides information on a medical, psychological and/or drug and alcohol barrier, a referral is made for further evaluation with Industrial Medicine Associates (IMA) or Westchester County Department of Community Mental Health (DCMH) CASAC. The applicant may also have the option to submit a LDSS 4526.

## 2.2 Temporary Assistance (TA) Employment Assessment

- a. How does the district conduct assessments as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

### District Assessment Procedures

<b>Yes or No:</b>	<b>How the district conducts assessments</b>
No	The district enters assessments directly into WTWCMS.
Yes	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
No	The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. If applicable, the local equivalent contains additional elements beyond what is required:

- b. Described below is the district procedure for the completion of an employment assessment, including when initial assessments are conducted and whether an assessment is conducted in-person, virtually by phone, or a combination of both:

Upon completion of the orientation (currently by phone), applicants with and without dependents will be referred to complete an assessment within 1 year for singles and 90 days for families of application approval. The goal, however, will be to update every 6 months. If, during the assessment, the applicant discloses a medical, psychological, or substance abuse issue they will be referred for further evaluation with Industrial Medicine Associates (IMA) or Westchester County Department of Community Mental Health (DCMH) CASAC. All other applicants have their assessment completed (inclusive of all required elements) to gather information on family circumstances, educational and work history, including strengths, needs and barriers toward seeking gainful employment.

- c. Which district administrative unit or contractor is responsible for conducting assessments?

OWA Employment Counselors and contractor staff are responsible for conducting assessments.

- d. Described below are the minimum qualifications of the employees conducting the assessment (refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)):

Staff conducting assessments completed WTWCMS systems training through OTDA or have received district coordinated informal training from workers who have completed ESTI (Employment Services Training Institute) training. WCDSS workers possess a minimum of a bachelor's degree. Contracted vendors possess a minimum of High School Diploma or equivalency. All personnel administrating assessments either have been trained in motivational interviewing or have demonstrated effectiveness in evaluating employability and plan development to prepare the assessments and plans required by this section.

- e. Are applicants in households with dependent children required to participate in completion of an employment assessment?

Yes

- f. Are applicants in households without dependent children required to participate in completion of an employment assessment?

Yes

- g. Are exempt adults in households without dependent children required to participate in completion of an employment assessment?

Yes

- h. How often and under what circumstances is the employment assessment updated?

Assessments are updated, at minimum, yearly for individuals with and without dependent children. However, they can be updated within the year if circumstances change i.e., code changes, life circumstances change, discharge from residential treatment, newborn etc. The goal, however, will be to update every 6 months. Depending on the individual's availability, reassessments are conducted in person or over the phone. OWA Employment Counselors and Eligibility Examiners complete the majority of reassessments. Case Managers from our contractors reassess customers enrolled in their programs as necessary.

### 2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)

- a. How does the district develop individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

#### District Employment Plan Procedures

Yes or No:	How the district develops employment plans
Yes	The district enters employment plans directly into WTCMS.
No	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTCMS.
No	The district develops individual employment plans using a local equivalent tool. If applicable, the local equivalent contains the following additional elements beyond what is required:

- b. Who develops the employment plan (reply yes or no to the options as the apply)?

#### District Employment Plan Development

Yes or No:	Who develops the districts employment plans
Yes	The same administrative unit or contractor that conducts employment assessments also develops employment plans.
No	A different administrative unit or contractor develops employment plans and the contractor's qualifications include:

- c. Described below is the district procedure for the completion of an individual's employment plan:

Nonparticipating nonexempt customers are referred to an OWA Worker or a contracted employment worker to be placed in an activity. Exempt customers are referred to an OWA Eligibility Examiner for treatment monitoring and Employment Plan completion. Employment Plans are completed in conjunction with the customer in a conversational manner using motivational interviewing skills. Depending on system availability, the Employment Worker will complete the Employment Plan in WTCMS or use the printed LDSS 4978 (NYS Employment Plan). If using the printed version, the information is entered into WTCMS when a computer is available. The individual is provided a copy of their Employment Plan.

- d. How often and under what circumstances is the employment plan updated?

Employment Plans are updated when the customer is initially placed in an activity and when the activity changes i.e., job search to vocational training or CWEP to Employment. The Employment Plans are also reviewed at every assessment and updated if necessary. The individual is provided a copy of their Employment Plan.

### **3. Engagement**

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

- a. Federal requirements state 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 4.1. Also included is pursuit of other forms of income such as SSI and SSDI.

- b. Described below is additional information regarding the district’s “Engaged in Work” requirements:

The district's local "engaged in work" requirements also include the following: Drug/Alcohol Treatment to restore a person to employability; Medical treatment/rehabilitation to restore a person to employability; Remedial education, adult basic education, TASC (formerly GED) or education in English proficiency to enable a person to attend vocational training or to achieve employability; providing care for another member of the household who has a verified mental or physical impairment.

#### **3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency**

- a. Described below is how the district accommodates non-English speaking participants' access to employment activities and services:

WCDSS utilizes licensed and certified providers such as EOC, Yonkers Public Schools VIVE program that provide English as a New Language (ENL) instruction. When possible, non-English speakers are referred to sites where someone on-site speaks the same language or where they can easily be accommodated. Staff utilize the Language Line for non-English speakers to facilitate access to employment activities and services.

### 3.3 Strategies/Procedures for Increasing Program Attendance

- a. Described below are the district policies and/or procedures used to reduce the number of times participants fail to participate in work activities. This includes absences with good cause:

Westchester is working towards mandated in-person activities; however, opportunities are available via virtual/remote learning for vocational and educational training. Discussions are had between WCDSS/contractor staff and the TA individuals as to computer and internet access (whether at home or at the training site) as well as potential backup plans. When individuals are referred to an activity, attendance is monitored through communication with the activity provider. During the placement interview, individuals develop an Employment Plan with the WCDSS Employment Counselor or contractor staff to help identify any barriers and supportive services needed to comply with the work activity. Once the individuals are placed at a site, the contractor staff monitor the activity closely for lateness, absences, supportive services, or any issues that may arise. This also includes regular, sometimes-daily, communication with the site coordinator. Most sites have good working relationships with WCDSS and our contractors, so feel comfortable reaching out immediately if there are any concerns. In order to remain in compliance with work requirements individuals are informed that they may have to make up hours for their absences. Monthly meetings are held with WCDSS staff and contractor staff, identifying areas that need improvement. The primary focus is to examine and strategize those cases in noncompliance and those with excessive absences. The discussion identifies paths to move these hard to serve individuals toward compliance and eventually self-sufficiency. WCDSS intervenes on recipients' behalf, whenever possible, to reduce absences for appointments with legal entities, government agencies and other contractors. COGNOS and WTWCMS reports are utilized in assisting Administrators and case managers with their caseloads.

### 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

- a. The following are strategies used to engage sanctioned participants. If a district uses one of the options, a description will be provided (reply yes or no to the options as they apply and provide a description for "yes" responses):

#### Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	<p>Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:</p> <p>Prior to a WE1 sanction being imposed, WCDSS OWA staff and/or contractor staff make efforts to reach out to the individual and gain compliance, usually by phone. If a WE1 sanction is imposed, OWA staff or contractor staff send Family Assistance individuals a letter to contact them and discuss compliance. If the individual is willing to comply (not a durational sanction), ways to meet compliance are discussed, depending on why the sanction was implemented. If an Employability Assessment is needed, once the individual is assessed, a referral to OWA examiner to lift sanction is sent. If the individual is sanctioned due to participation in a work activity, the sanctioned individual is referred to the Career Center for assistance with job search or our contractor for assignment of an applicable work activity. The individual will work with the OWA Employment Counselor at the Career Center on fulfilling one week of Job Search, 20-40 hours depending on the employment code</p>

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
	and individual circumstances. Once the requirement of job search has been met, the Employment Counselor will make a request to eligibility to have the sanction lifted. Participation in the new work activity, identified by the contractor, will also be assigned for on-going compliance. If a Safety Net Individual has been newly sanctioned WE1, they will have to continue on the sanction for 90 days.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: OWA Eligibility staff may initiate a sanction call-In for durationally sanctioned individuals. Eligibility sends out the call-in letters to discuss compliance (may be phone or in-person). If the individual is willing to comply, they are informed of what is needed for compliance. OWA staff will do a referral to our contractor to engage the individual in a work activity or OWA will do a referral to the Career Center for supervised Job Search. The individual will work with the Career Center Employment Counselors on fulfilling one week of Job Search (20-40 hours depending on the employment code and individual circumstances). Once the requirement has been met, the Employment Counselor will make a request to eligibility to have the sanction lifted (once the individual has met their durational time frames i.e., 90 or 180 days).
No	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

### 3.5 Strategies for Reducing the Need for TA

- a. Described below are the district’s strategies for reducing the need for TA:

Whenever possible, OWA staff explores all resources in order to divert the individual from Temporary Assistance, and directly into employment. Diversion is done in tandem with Eligibility staff in the District Offices meeting any emergent needs of the applicant, thereby providing short-term Temporary Assistance and Supplemental Nutrition Assistance Program benefits. Referring customers to the Career Centers to meet with Employment Counselors encourages individuals to find employment and avoid the need for TA.

During this time, individuals who are employed have their budgets reviewed for small deficits. WCDSS workers (both OWA and District Office eligibility staff) encourage individuals to increase their hours of employment, work with the Office of Child Support Enforcement, apply for Section-8 or other affordable housing options. contact Childcare Subsidies and apply for SNAP and/or Medicaid.

The short-term assistance is generally less than 90 days and must not extend more than four months in duration. For example, the individual will be employed and may have a crisis or episode of immediate need. This need can be met immediately during certification, therefore diverting the individual from the need for ongoing assistance.

## 4. Work Activities

### 4.1 Allowable Work Activities

- a. Below is a list of activities available to individuals receiving Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), and Supplemental Nutrition

Assistance Program (SNAP) benefits. In the chart below, the case type is listed next to each activity available to it in the district.

**Allowable Work Activities by Case Type**

Activity and Definition	Case Type
<p><b>Unsubsidized Employment</b> – 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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Work Experience</b> – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Search</b> – 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 and applying for, and/or interviewing for jobs and related activities.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Vocational Education</b> – 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>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Secondary School</b> – 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 equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. 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>	<p>FA SNAFAM SNA</p>

Activity and Definition	Case Type
<p><b>Job Skills Training</b> – 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>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Education Training</b> – 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 (ABE), 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>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Readiness Training (JRT) Activities</b> – 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>FA SNAFAM SNA SNAP</p>
<p><b>Subsidized Private Sector Employment</b> – 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.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p><b>Subsidized Public Sector Employment</b> – 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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>N/A</p>
<p><b>SNAP E&amp;T Supervised Job Search</b> – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>	<p>N/A</p>
<p><b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p>	<p>FA SNAFAM</p>
<p><b>Other</b> – 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>	<p>N/A</p>

## 4.2 Job Development

- a. Does the district conduct or access job development services to expand job opportunities for TA and SNAP participants?

Yes

How does the district participate in job development activities (reply yes or no to the options as they apply)?

### How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	<p>District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: WCDSS relies on the Career Centers and our vendor to develop jobs and expand the opportunities for TA and SNAP participants. WCDSS staff refer individuals to the local Career Center staff, which include Employment Counselors, a Program Administrator, a Program Specialist, Community Work Assistants and a Community Outreach Worker. Career Center Employment Counselors will evaluate the individual for immediate job referrals and/or potential WIOA approved occupational training and/or both. In addition, the individual may also be referred to participate in job readiness activities such as resume preparation, mock interviewing, job search, attend job fairs, and other job readiness trainings individually or in a group setting. If participating in job readiness activities through the Career Center or placed in training or referred to a job, the staff will reach out to the individual every 30-60 days to review progress, workplace/training related issues, and additional supports that may be needed. Even when a TA individuals case closes, they are still encouraged to utilize the Career Center resources and participate in Job Fairs. Additionally, WCDSS Employment Counselors refer job ready nonexempt individuals to our vendor, Westhab, during the upfront orientation process. Individuals are assigned to Job Developers and Retention Specialists who outreach to employers and solicit jobs for TA customers. Westhab has a job bank of employers throughout the community that they continuously cultivate to refer job ready individuals for job placement. The Job Developers meet with TA recipients that are classified as job ready at least once a month and work with the individual on referrals to interviews, job fairs, or additional training.</p>
Yes	<p>District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: OWA Employment Counselors refer job ready, nonexempt individuals to the contracted vendor which has Case Managers, Job Developers and a Retention Specialist who outreach to employers and solicit jobs for TA individuals. The vendor has a job bank of employers throughout the community that they continuously cultivate to refer job ready individuals for job placement. The Job Developer is expected to meet with TA recipients that are classified as job ready at least once a month.</p>

### **4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)**

- a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), 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. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.

WCDSS refers TA individuals to our contracted provider Westchester Community College / JobSTAR program for TABE testing. TA recipients who meet the education requirements are referred to JobSTAR Program, to enroll in the Adult Basic Education (ABE) classes. WCDSS utilizes licensed and certified providers such as EOC, Yonkers Public Schools VIVE program to provide Adult Basic Education, Test Assessing Secondary Completion (TASC) preparation, and English to Speakers of Other Languages (ESOL) instruction.

- b. Described below is how the district identifies appropriate program 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. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

WCDSS maintains a contract with Westchester Community College's JobSTAR program to provide such services to our TA individuals. In addition, EOC, provider listed on table 2, is also utilized at no cost to Westchester County. When recipients enroll themselves in training programs that are not County offerings, the courses are evaluated individually as to whether the curriculum meets the Vocational Education or Job Skills Training definition. Individuals referred to the local Career Centers are assessed for ITAs (Individual Training Accounts) for occupational skills training. These trainings are reviewed for appropriateness and potential for immediate and successful job placement.

- c. Described below are the district's process and guidelines 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. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.

During the assessment, workers will refer individuals with a High School Diploma, its equivalency, or less, to TABE testing offered through JobSTAR at WCC. IMA provides IQ testing for individuals exhibiting severe literacy deficits. Individuals are referred to JobSTAR's ABE class or to the MAXIMUS vendor to assist in applying for SSI if the IQ tests reflect scores of 3.0 or below. All individuals 18 and under are assigned to an educational activity. Individuals who test at a High School level are assigned to a HSE program. Those individuals not yet at a High School level are assigned to educational programs to bring them to a level where they can be referred to a HSE program. None of these individuals would be assigned to any activity that would prevent them from pursuing a HSE Diploma. Those individuals under 18 who opt not to attend High School or pursue a HSE Diploma may be referred to a vocational education program that results in some form of credential (license, certificate, etc.) which leads to employment.

- d. Described below are the district's process and policy, including the guidelines 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 district would deny participation in educational activities.

All TA individuals without a high school diploma or its equivalent are TABE tested and assigned to one of the educational programs listed in either Table 1 or Table 2, depending on their aptitude. Individuals 18 and under are assigned to an educational activity. These individuals would not be assigned to any activity that would prevent them from pursuing a HSE Diploma. Those individuals under 18 who opt not to attend High School or pursue a HSE Diploma may be referred to a vocational education program that results in some form of credential (license, certificate, etc.) which leads to employment. We do not deny individuals 18 and under from participating in such HSE programs. If they demonstrate a pattern of non-compliance, outreach is done to ascertain what the barrier might be. We encourage those 18 and older to obtain their HSE diploma.

- e. Described below is the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities.

Employment Counselors and contractor staff use the WTCMS Assessment to identify individuals who would benefit from engagement in job skills and/or vocational educational activities. Critical factors include the individual's interests and ability to work. This also includes whether the requested training is required to prepare the recipient for specific work identified in the individual employment plan. The individual must have the following: Minimum reading and math scores required for the requested program, no previous education, training certificate or degree in the same field as the proposed training, and interests including short or long-term goals in which the training is essential in order to meet self-sufficiency objectives.

- f. Described below are the standards by which education and training providers are evaluated.

- Must be licensed by the New York State Department of Education or other appropriate licensing agency for the type of training provided;
- Must have a demonstrable record of success in placing their graduates in employment;
- Must not require participants to take out a student loan to pay for the cost of the program. Individuals seeking to participate in trainings where there is a cost are counseled on their responsibility to pay fees. They also sign a waiver of understanding that WCDSS is not responsible for any fees or penalties they may incur as part of participation in the training opportunity;
- Must offer courses of study leading to employment for jobs in demand in the local economy;
- Must have established procedures approved by DSS for reporting attendance and satisfactory progress to DSS for students who are DSS recipients.

- g. Described below is the district's procedure for advising participants of approved training.

As part of orientation, individuals are informed of the approved training providers based on the individual's employability assessment and plan. Those who meet the requirements for vocational/educational training described above are also informed of approved training providers along with the programs available. Employment Counselors review training options prior to referring individuals to our contracted vendor for placement in activities. If individuals show a specific interest in an occupational area, the Employment Counselor and contractor will work with the customer to identify potential training opportunities.

- h. Described below is the district's procedure for notifying participants they are approved for training or enrollment in a work activity.

Individuals are notified of approval from their Employment Workers who receive confirmation of the person's enrollment from the provider using the WTWCMS feedback form. Providers also confirm acceptance via email, phone calls or their agency created approval letter. Many of the providers reach out directly to the individual to notify them of approval and entrance in the program.

- i. Described below is how the district will monitor the high school attendance for 16-18 year-olds in order for them to retain their TA exempt status.

Non-Employment Eligibility Workers monitor school attendance every six months at the time of case recertification.

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

OWA Employment staff and contractor staff notify the providers when calling to place individuals in work activities. The person's limitations are also noted on the WTW referral letters under Worker Remarks to Provider. To ensure that providers are responding to notifications of work limitations, staff speak at length with the participants to inquire about conditions and tasks being assigned at the site.

#### **4.4 Post-Secondary Education Approval and Enrollment Policies**

- a. Described below is the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program (please ensure to include the current providers the districts partners with for the provision of post-secondary education programs in Table 1 or Table 2 under Section 1.2 of this plan):

WCDSS will consider approving a two or four-year college degree as a work activity on a case-by-case basis. Westchester's primary degree granting institution is Westchester Community College. For non-contracted institutions of higher education, documentation of hours of participation may be established by submitting initial documentation of enrollment hours along with any other documentation gathered by the participant monthly as confirmation of actual attendance. WCDSS will report unsupervised homework or study time for up to one hour for each hour of class time towards the hours of participation in an educational activity, provided that the total number of hours of homework/study time do not exceed the documented hours expected by the educational provider. Contractor staff have regular ongoing contacts (No less than a bi-weekly basis) with program participants to

establish adequate evidence that the participants are maintaining satisfactory attendance and making satisfactory academic progress.

- b. 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 described below (reply yes or no to options as they apply):

**Conditions For Disapproval of Work Activities For Individuals Enrolled in College**

Yes or No:	Conditions for disapproval of work activity
Yes	It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
Yes	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.
Yes	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.
Yes	The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
Yes	The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
Yes	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.
N/A	Additional reasons as stated here:

**5. Work Requirements**

**5.1 Meeting TA Work Requirements**

- a. Described below is how the district plans to meet federal and State TA participation rate requirements. Included in this description is the weekly hours standard participation requirements 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 whose status changed from exempt to nonexempt. (Information regarding engaging exempt individuals is entered in Section 9).

WCDSS plans to meet Federal and State Temporary Assistance participation rate requirements by interviewing and engaging recipients as quickly as possible, usually within no more than 10 days of assessment/re-assessment in order to ensure full participation in countable activities. The goal of WCDSS is to engage every non-exempt FA, SNF, and SNA recipient in a countable work activity for at least 30 hours per week but not more than 40 hours weekly. TA recipients are often assigned to independent job search while arranging childcare or awaiting the start of a training or educational program.

- b. Estimate the number of individuals expected to receive employment services for:

**Number of Individuals Who Receive Employment Services**

Household Type	Number Served
Households with Dependent Children Average Monthly	260
Households without Dependent Children Average Monthly	236

- c. Described below is 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:

COGNOS reports are run by management in OWA and the District Office. The primary reports ran to measure progress with participation and engagement are the Preliminary Not Countable reports (bi-weekly), Non-Participating reports (monthly), Activity Status of Adults (monthly) and the Earned Income Employment reports (monthly). These reports are pulled weekly, bi-weekly, or monthly. The OWA unit that handles the exempt population utilizes the Employability Code Change and Duration reports. OWA Management will run other periodic reports specifically based on codes, income, or activities. These reports are reviewed, analyzed, and sent to individual units for clarification or correction on cases. Corrective actions are imposed based on findings from the report reviews. There are instances where staff training is required or a modification in service provision is needed in order to address the issues hindering efforts to meet engagement/participation goals. Issues are reviewed in monthly meetings between departments and inter-unit conferences with management and direct line staff.

- d. Does the district assign TA applicants to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Use the “Additional Information” column in the chart below to describe how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

Yes

**Applicant Job Search**

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	20	Applicants with school aged children are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 25-40 hours of job search weekly if possible. The Applicants' Job Search is monitored by the Employment Specialists within Westhab. Applicants without school-aged children; not enrolled in full time school or daycare are encouraged to engage in a minimum of 20 hours weekly. If the applicant has reliable childcare for a young

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
			child, they are encouraged to participate in as many Career Center activities as possible. Job Search performed by customers without school-aged children is monitored by Westhab Workshop Facilitators at the Mount Vernon Career Center until the application is approved. Westhab engages with the customer weekly while they conduct Job Search.
SNA Individuals	15	30	Single applicants are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 30-40 hours of job search if possible. The Applicant Job Search is monitored by the Employment Specialists within Westhab. Westhab engages with the customer weekly while they conduct Job Search.

- e. Does the district assign TA recipients to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. 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 using the “Additional Information” column.

Yes

#### **TA Recipient Job Search**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	10	20	Recipients with school aged children are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 25-40 hours of job search if possible. The Recipient Job Search is monitored by Westhab Staff who are co-located within the District Offices. Job Search is for no more than 4 consecutive weeks. Recipients with children not enrolled in full time school or daycare are encouraged to engage in a minimum of 20 hours weekly. If the recipient has reliable childcare for a young child, they are encouraged to participate in as many Career Center activities as possible. The Recipient Job Search is monitored by Westhab staff who are co-located within the District Offices. Job Search is for no more than 4 consecutive weeks. It is usually added to another activity such as CWEP, Employment or Vocational Education. Customer will be eligible for child care supportive services for participating in any of the work activities identified. The District provides supportive services needed for the customer to attend the work activity regardless of the type of the work activity assigned or the number of hours of participation. Westhab

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			engages with the customer at minimum bi-weekly while they conduct Job Search.
SNA Individuals	20	35	Single recipients are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 35-40 hours of job search if possible. The Recipient Job Search is monitored by Westhab staff who are co-located within the District Offices. Job Search is for no more than 4 consecutive weeks. The District provides supportive services needed for the individual to attend the work activity regardless of the type of the work activity assigned or the number of hours of participation. Westhab engages with the customer at minimum bi-weekly while they conduct Job Search.

- f. Described below is the district’s process and policy used for determining whether participation in self-employment is approved as part of an individual’s required work activities, including the guidelines workers follow. If the district always approves self-employment as part of an individual’s required work activities, please note this policy below:

Self-employment is accepted as long as the individual is able to meet federal minimum participation hours and minimum wage requirements. There is an exception for individuals performing childcare and adult care services. Individuals must provide an attestation of this employment which is submitted to eligibility for budgeting. If the calculation of wages divided by the federal minimum wage does not satisfy minimum hours required for participation, generally the individual will be required to supplement the hours with an additional activity within 2 months of WCDSS becoming aware of the self-employment. Individuals are also assisted in finding better paying, more reliable employment in a similar field.

## 5.2 Informing SNAP Applicants and Recipients of Work Requirements

The district informs SNAP households where at least one member is subject to a work requirement of the applicable work rules at certification, recertification, and when a previously exempt household member or new household member becomes subject to work requirements. Notification is provided verbally and in writing.

- a. Described below is how SNAP applicants and recipients are informed in writing of SNAP work requirements (reply yes or no to options as they apply).

### Written Information Provided to SNAP Applicants and Recipients

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	Eligibility staff use the LDSS-5193 <i>Important Information about SNAP Work Rules (General, Mandatory E&amp;T, and ABAWD)</i> and the LDSS-5193A <i>Important Information about SNAP Work Rules (General and Mandatory E&amp;T)</i> as appropriate.

<b>Yes or No:</b>	<b>How written information is provided to SNAP applicants and recipients</b>
No	Eligibility staff use a local equivalent consolidated work requirements notice to inform SNAP applicant and recipient households of their work requirements. Please attach a copy of the district's OTDA approved local equivalent.

- b. Described below is the process eligibility staff follow to provide a comprehensive oral explanation to SNAP households of work requirements, including General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules which pertain to non-exempt individuals in the household.

The TA Eligibility Examiner will provide the SNAP household individual with an explanation of their SNAP work rules requirement both verbally and in writing (using the LDSS-5193 or 5193A and form #2162). The oral explanation will include the work rules associated with the form provided, which household members are subject to the work requirements, how to request an exemption, rights and responsibilities related to applicable work requirements in order to maintain eligibility, pertinent dates individual needs to take action by in order to remain in compliance, consequences for failing to comply, an explanation of good cause including examples and how to request good cause, WCDSS responsibility to pay for supportive services associated with participation, and USDA contact information and instructions for filing a program discrimination complaint. This information will be scanned into IEDR, and the case record will contain notes demonstrating an oral and written explanation was provided to the individual.

- c. Described below is how the district documents in the case record how the written information about SNAP work requirements was provided to the household (reply yes or no to options as they apply).

**How the District Documents the Written Requirement in the Case Record**

<b>Yes or No:</b>	<b>How written information is provided to SNAP applicants and recipients</b>
Yes	The district retains copies of all LDSS-5193/LDSS-5193A in the case record.
No	The district retains copies of local equivalent notices provided to the household in the case record.

- d. Described below is the district's process for documenting in the case record how the oral explanation of SNAP work requirements was provided to the household (reply yes or no to options as they apply).

**How the District Documents the Oral Requirement in the Case Record**

<b>Yes or No:</b>	<b>How oral information is provided to SNAP applicants and recipients</b>
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
Yes	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
Yes	Eligibility staff document the case record through case notes/comments.

### 5.3 Meeting SNAP Work Requirements

- a. Described below is the extent to which the district requires NTA SNAP recipients to participate in SNAP E&T work activities. (Please note: Case management services must be provided to all participants enrolled in SNAP E&T activity):

Since Non-TA SNAP Recipients are not mandated to participate in E & T activities, the four District Office reception areas post information on Career Centers. A flyer listing Career Center locations, services and resources is made available. If the customer is enrolled in a SNAP E & T activity in addition to referral and placement, the customer will also receive case management services.

- b. If the district is offering Supervised Job Search as an E&T activity component, describe below how the job search activity will be supervised and tracked, including the frequency of monitoring the participant’s job search efforts.

N/A

- c. If the district is not mandating SNAP E&T work activity assignments, please describe below 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 offer job search assistance to NTA SNAP applicants and recipients):

Flyers listing job search services with their location are made available to SNAP applicants and recipients in our four District Offices reception areas. The District offers and provides job search services.

### 5.4 Advising Households of Employment and Training Services

At the time of recertification, non-exempt SNAP recipients who are members of certain TA/SNAP and NTA/SNAP households must be advised of the availability of employment and training services within the district and/or region. This requirement applies non-exempt recipients in households containing at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report.

- a. Described below is who the district provides information about employment and training services to (reply yes or no to the options as they apply):

**Who the District Provides Employment and Training Services Information to**

Yes or No:	Who the district provides employment and training services information to:
Yes	Required population only
No	Other groups described here:

- b. Described below is the method the district uses to advise SNAP recipients of available employment and training services at recertification (reply yes or no to the options as they apply):

**How the District Provides Employment and Training Services Information**

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
No	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website:
No	Material and information provided via email.

**5.5 Provider Determinations**

- a. Not every activity assignment/referral to training might be the right fit for every participant. As such, districts are required per federal regulations at 7 CFR 273.7(c)(18) to have procedures in place for when a provider/contractor determines an individual is not a good fit for a particular activity or program they are referred or assigned to. This is called the provider determination process. Described below is the district’s process for provider determination, including the process for screening individuals prior to referral to a provider, how to communicate information related to provider determinations with the district, how workers communicate information related to provider determinations with the client, and documenting provider determinations.

An individual is screened for a particular activity by the OWA staff members. The screening includes the Employability Assessment as well as the individual's interests, capabilities, limitations, etc. Once the individual is referred to a provider, that provider may conduct their own screening depending on the activity. If, during the course of screening or participation in the activity itself, the provider determines the individual is not a good fit, they will refer the individual back to WCDSS within 10 days of making their determination. This will be done via email or letter and be made part of the case record, along with case notes. WCDSS will then notify the individual within 10 days from the receipt of the provider determination via phone, mail, or both. The notification will include what a provider determination is, the next steps the agency will take (most likely a referral to a more suitable activity), contact information, and that the individual will not be sanctioned for this. The notification will be documented in the case record.

- b. Described below is the district process for informing providers of their authority and responsibility to determine if an individual is not a good fit for a particular activity or program.

Providers are informed of their authority and responsibility to determine if an individual is a good fit for a particular activity via email, which outlines the WCDSS Provider Determination Process. This process also states that if, during the course of screening or participation in the activity itself, the provider determines the individual is not a good fit, they will refer the individual back to WCDSS within 10 days of making their determination.

- c. Described below is the district process for provider oversight to ensure that provider determinations are not unfair or used to discriminate against protected classes.

Provider Determinations are reviewed on many levels (worker, Supervisor, and Manager) to ensure that they are fair and do not discriminate against protected classes.

## 6. Quality Assurance/Work Verification

### 6.1 Quality Assurance Process - Random Case Sampling

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.

The district will sample cases from each month within 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 results of these audits will enable the district to identify policies, processes or cases that may need corrective action.

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at [AQI.WV.SelfAudits@otda.ny.gov](mailto:AQI.WV.SelfAudits@otda.ny.gov) 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 (QA) plan must include the following elements:

- 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, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) 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 parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

35

- b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

35

- c. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA Employability Code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

15

- d. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 31 – “Parent or caretaker relative of a child under 12 months of age”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

15

The district will review district worker or approved provider/vendor collected documentation and data entry of the above listed elements. The district will assess and verify that participation in the reported work activities listed above meet the State approved definition for the activity.

## 6.2 Use of Outside Providers/Vendors

- a. Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTCMS?

Yes

- b. If Yes, does the district's provider/vendor documentation collection, data entry and management of WTCMS follow the same process that would be used by the district worker?

Yes

- c. If No, describe below the process used:

N/A

## 7. Supportive Services

### 7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District

- a. The district must provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide 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:

WCDSS will provide child day care subsidies for children until the age of 13 in households programmatically and financially eligible for a subsidy. When programmatically eligible, WCDSS will also subsidize child day care for special needs children over age 13. WCDSS will refer families who are unable to make child day care arrangements on their own and who are in receipt of TA, to the Child Care Council of Westchester, Inc. The Council will assist the individual in identifying at least 3 providers in the appropriate area, with vacancies verified by the Child Care Council. Personal providers such as friends or family can apply to be Legally Exempt Providers through the Child Care Council. However, until these personal providers are approved as Legally Exempt Providers, individuals are encouraged to register with a regulated licensed daycare center. While the application is in certification, this will allow them to remain in compliance with work activities. Payment will not be authorized to the Legally-Exempt Provider until the Child Care Council approves their application and they are issued a vendor contractor number through Westchester County. WCDSS will also evaluate other supportive services, as needed, to enable individuals to participate in activities. These include Transportation, Employment and Training Essential Needs, and Training Fees.

- b. Indicated below are the services the district will use 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 (reply yes or no to the options as they apply).

**Transportation Services Provided to Clients**

<b>Yes or No:</b>	<b>Transportation Assistance Provided</b>
Yes	Bus pass/token
No	Gas card/voucher
Yes	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
No	Other mileage rate (the methodology used to establish reimbursement rate is described here):

- c. OTDA policy establishes a distance not to exceed two miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. Describe below the distance an individual may be required to walk, each way, to a work activity or to access public transportation:

Recipients will not be expected to walk more than approximately 1 mile to a work assignment. Each recipient is evaluated individually for their ability to walk to sites. Recipients with limitations or health related issues that impact walking distances would be assigned to the work activities nearest to their home consistent with individual limitations as outlined by their IMA evaluation or LDSS 4526. WCDSS does not anticipate assigning recipients to work activities in any remote areas where access to public transportation would be a hardship. If recipients obtain employment in a remote area, we will use the strategies described above to address their transportation needs.

- d. Described below are the services the district will provide to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:

Applicants at risk of needing public assistance to improve their opportunities are referred to the Westchester-Putnam Career Centers for assistance with resumes, job search for better paying jobs etc. Referrals can be made to clothing closets for business attire. Referrals can be made to the Child Care Subsidies Unit for potential subsidized childcare.

## **7.2 Post-Employment/Transitional Supportive Services**

- a. Described below are the supports and strategies the district will provide to support job retention:

Funds to provide for the cost of public transportation for up to 90 days after case closing if needed. Expenses for uniforms, books or necessary clothing required for employment. Expenses to cover the cost of exams that result in the awarding of professional certifications, licenses, renewals, etc. Expenses for tools and equipment necessary to enable the individual to secure employment. The district will provide the following support services, for up to 90 days after case closing, to individuals whose TA cases have closed due to employment. Our contractor utilizes Case Managers, Job Developers, and a Retention Specialists to keep in touch with individuals and their employers to address issues that arise which could impact job retention.

- b. Described below are the support services (for up to 90 days after case closing) the district will provide to individuals whose TA cases have closed due to employment:

Transitional Medical Assistance is provided for up to 6 months under the Low Income Families (LIF) Medicaid program to TANF recipients who lose Medicaid eligibility due to excess income from employment or from a combination of employment and unearned income, including child support payments.

Funds to provide for the cost of public transportation for up to 90 days after case closing if needed. Expenses for uniforms, books or necessary clothing required for employment. Expenses to cover the cost of exams that result in the awarding of professional certifications, licenses, renewals, etc. Expenses for tools and equipment necessary to enable the individual to secure employment. The district will provide these supportive services, for up to 90 days after case closing, to individuals whose TA cases have closed due to employment. Transitional SNAP benefits are also available to those who qualify.

## **7.3 Extended Support Services**

- a. Described below are the support services the district will provide for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines. These services can be provided as long as funding is available (FFFS, etc.):

One-Time Employment Related Expenses: Clothing, transportation, fees for clinical tests needed for employment, payment for a license or a certificate for guaranteed employment.

## 8. Conciliation, Sanction and Dispute Resolution Procedures

### 8.1 Conciliation

- a. The district's conciliation process for TA applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(a). Indicate below how conciliations are conducted (reply yes or no to the options as they apply).

#### How the District Conducts Conciliation for TA Applicants and Recipients

Yes or No:	How conciliation is conducted
Yes	In person
Yes	By phone
No	By mail

The districts process for conduction TA conciliations is described below:

OWA Eligibility staff, who are not directly related to the case, review documents submitted and determine whether the noncompliance was willful and without good cause. Efforts are made to re-engage the individual prior to reaching the point of conciliation. This is done by both vendor staff and WCDSS staff through telephone calls, emails, and written notices.

- b. Who makes the TA good cause/willfulness determination (reply yes or no to the options as they apply)?

#### How the District Makes the Good Cause/Willfulness Determination for TA Applicants and Recipients

Yes or No:	Who makes the TA good cause/willfulness determination?
No	The client's employment worker
No	A supervisor in the district
Yes	A separate entity (described here): OWA Eligibility staff who are not directly related to the case, review documents submitted and determine whether the noncompliance was willful and without good cause.

- c. The district's conciliation process for SNAP applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(d). Indicate below how conciliations are conducted (reply yes or not to the options as they apply).

#### How the District Conducts Conciliation for SNAP Applicants and Recipients

Yes or No:	How conciliation is conducted
Yes	In person

<b>Yes or No:</b>	<b>How conciliation is conducted</b>
Yes	By phone
No	By mail

The district's process for conducting SNAP conciliations is described below:

TA/SNAP recipients who are subject to SNAP work requirements and fail to comply with a TA work requirement, willfully and without good cause, are offered an opportunity to avoid a SNAP sanction through the conciliation process. Recipients are issued a conciliation notice (LDSS4230) advising of the ability to avoid a SNAP E & T sanction through compliance with a SNAP work activity. Recipients have 10 days to respond to the conciliation notice and provide good cause; and if not provide Job search logs in 10 days to avoid a SNAP sanction.

- d. Who makes the SNAP E&T good cause/willfulness determination (reply yes or no to the options as they apply)?

**How the District Makes the Good Cause/Willfulness Determination for SNAP Applicants and Recipients**

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
No	The client's employment worker
No	A supervisor in the district
Yes	A separate entity (described here): OWA Eligibility staff who are not directly related to the case, review documents submitted and determine whether the noncompliance was willful and without good cause.

- e. Described below is the district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction:

WCDSS offer all SNAP recipients who fail or refuse to comply with an assigned work activity an opportunity to avoid a SNAP sanction by demonstrating compliance. To meet this requirement, WCDSS will issue a conciliation notice (LDSS4230) advising the recipient of his/her ability to avoid a SNAP E & T sanction through compliance with a SNAP work activity, and also the opportunity to participate in conciliation. Recipients have ten days to respond and either provide good cause, provide documentation of exemption from participation in SNAP E & T activities, or initiate the demonstrated compliance process by complying with the SNAP work activity. WCDSS assigns the recipient to a minimum of 10 Job Search contacts to avoid a SNAP sanction.

## 8.2 Sanction

- a. Described below is the district’s procedure for determining compliance for those TA recipients 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:

Recipients who were sanctioned for failure to comply with a work activity must perform an acceptable activity for a minimum of 5 consecutive days as assigned to be in compliance and end the sanction. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period). Recipients who failed to comply with assessment may have their sanction lifted once the assessment or reassessment is complete.

- b. Describe below the district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 18 NYCRR 385.13), including the time period established for demonstrating compliance to the satisfaction of the district:

Recipients who want to comply to end their SNAP sanction must complete the job search logs with the 10 required contacts in order to have their sanction lifted. After the recipient complies SNAP benefits will be restored for the month following the month, but not earlier than the expiration date of the minimum duration period. If recipient is on a sanction and claims to be exempt from SNAP work requirements and provides documentation of the exemption, sanction will be lifted as of the date that the customer claimed exemption.

## 8.3 Dispute Resolution

- a. 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 must be conducted in accordance with 18 NYCRR 385.11(c). Indicate below who mediates the grievance (reply yes or no to the options as they apply).

### Grievance Mediation

Yes or No:	Who makes the TA good cause/willfulness determination?
No	An independent entity which has an agreement with the district.
No	Supervisory staff who are trained in mediation and who have no direct responsibility for the individual’s case.
Yes	Designated supervisory staff who have no direct responsibility for the individual’s case and who are not trained in mediation.

## 9. Disability Determinations, Documentation and Requirements of Exempt Individuals

### 9.1 Disability Determination Process and Tools

- a. The district's process for determining an individual's disabilities and/or work limitations must be in accordance with 18 NYCRR 385.2(d). Indicate below what the district's process is for determining an individual's disabilities and/or work limitations (reply yes or no to the options as they apply).

#### Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual's disabilities and/or work limitation
Yes	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	<p>Other process:</p> <p>During the application process, individuals complete the Employability Statement indicating why they are unable to participate in a work activity. Based on the answers provided, the individual may be referred to our State contracted provider, Industrial Medicine Associates (IMA). IMA performs medical, psychological and intelligence evaluations for WCDSS applicants and recipients.</p> <p>Applicants and Recipients can also submit a completed LDSS-4526 from a licensed health care practitioner within 10 days or request an extension if the 10 days is not attainable. The LDSS-4526 must clearly list the diagnosis, prognosis, medications, treatment recommendations, work, limitations, duration of the condition and recommendations for SSI.</p> <p>If the LDSS-4526 is not clear or if the Applicant/Recipient does not have a primary physician, they will be referred to IMA.</p> <p>When referred to IMA, customers are informed to bring prescriptions and supportive documentation from their personal practitioner to share with the IMA practitioner. All homeless singles who claim an exemption receive their medical, psychological and substance abuse evaluations through the Single Homeless Assessment Center (SHAC) process. The Mental Health Association (MHA) completes the mental health and CASAC portions of the evaluation. Greenburgh Health Center completes the physical portion. The final document is referred to as the SHAC and it is used to determine employability status and recommendations for treatment. Applicants who fail to comply with these evaluations can be denied until compliance. Recipients can be closed or sanctioned until compliance.</p>

- b. Described below is the district’s procedure for notifying an individual of their exempt or non-exempt determination whenever an individual alleges to be unable to participate, or the individual otherwise participates in the employability disability review, including when an individual is notified that their status changes from exempt to non-exempt:

Evaluations and/or supporting documentation may come from the District Office eligibility staff, the vendor, or within OWA itself. The OWA eligibility staff review the documentation that should include the specific diagnosis, prognosis, medications, work limitations, duration of the condition and recommendations for SSI. Using the LDSS LDSS-4925/4926 to determine the TA Emp Code and LDSS-5062A for SNAP codes, OWA workers change codes to classify the customer as nonexempt, exempt or work limited. The district sends the LDSS-4005/LDSS-4005(a) and retains a copy in the case record.

- c. Described below is how the district notifies an individual of their exempt or non-exempt determination (reply yes or not to the options as they apply):

**Process for Notifying an Individual of Their Exempt or Non-Exempt Status**

<b>Yes or No:</b>	<b>District’s process for reviewing medical documentation</b>
Yes	The district sends the LDSS-4005 or LDSS-4005a and a retains a copy in the case record.
No	The district sends a local equivalent and retains a copy in the case record.

- d. Indicated below is the process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited and describe the process by which the determination is made (reply yes or no to the options as they apply).

**Process for Reviewing Medical Documentation**

<b>Yes or No:</b>	<b>District’s process for reviewing medical documentation</b>
No	District directs the contracted physician or individual’s physician to determine status.
Yes	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: Evaluations and/or supporting documentation may come from the District Office eligibility staff, the vendor, or within OWA itself. The OWA eligibility staff review the documentation that should include the specific diagnosis, prognosis, medications, work limitations, duration of the condition and recommendations for SSI. Using the LDSS LDSS-4925/4926 to determine the TA Emp Code and LDSS-5062A for SNAP codes, OWA workers change codes to classify the customer as nonexempt, exempt or work limited. The district sends the LDSS-4005/LDSS-4005(a) and retains a copy in the case record.

## 9.2 Mental Health Screening and Assessment

- a. In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?

No

- b. Describe the district's policy for determining when a program participant is offered a mental health screen:

N/A

- c. What screening tools does the district use (reply yes or no to the options as they apply)?

### Screening Tools the District Uses

Yes or No:	Screening Tools
N/A	LDSS 5009 - Mental Health Screening Tool
N/A	The computer assisted version of the Modified Mini Screening tool (MMS)
N/A	Other Screening tool (described here):

- d. If using the MMS, indicate below the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation.

N/A

- e. Describe below the procedure the district uses if the screening tool warrants a mental health evaluation referral:

N/A

## 9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))

- a. An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist them 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 the individual is participating in the assigned program.

Described below is the district's procedure for determining if an individual, who is unable to work due to 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 9.1 of this Plan. Indicate who makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities (e.g., medical practitioner, employment worker, TA worker, local review team, etc.). Also indicate 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.).

WCDSS relies on the evaluation and conclusions of the medical professionals (who have provided documentation that includes the specific diagnosis, prognosis, medications, work limitations, duration of the condition) in order to determine if an individual has the potential, through rehabilitation, to improve their ability to work. As described above, these evaluations may come from IMA, a completed LDSS-4526 from a licensed health care practitioner, or a SHAC assessment.

- b. Described below is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc.

WCDSS follows the treatment plan recommendations of the medical professionals. We work with the individual to encourage them to follow that plan. WCDSS staff may refer individuals to their health insurance representative, if needed, to assist in them in identifying a list of in-network providers. SHAC will make direct referrals to providers in the community that could best serve the individual based on their preliminary diagnosis. If the individual was previously receiving treatment, they can continue with the practitioner if they are benefiting from the treatment and services. If, based on the medical professional's evaluation and conclusions, the individual is deemed permanently unemployable, the individual is referred to our contractor, Maximus, who assists them with SSI application and appeals.

- c. Described below is the district's procedure for tracking the participant's compliance with their 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.

OWA requires that individuals submit a Monthly Treatment Plan (MTP) from their practitioner that supports their diagnosis, prognosis, prescribed medications, frequency of medical visits and compliance with recommended treatment. OWA staff monitors the compliance with recommended treatment by doing the following:

- Update Employability Codes based on recommendations from the IMA/SHAC/DCMH final recommendation
- Create enrollments in WTWCMS based on the information provided from the IMA/SHAC/DCMH final recommendations
- Develop timelines and regular intervals for recipients to be re-evaluated prior to the employment code expiration date
- Monitor compliance with re-evaluation appointments
- Request updated MTP from treatment provider
- Monitor bi-weekly outpatient substance abuse treatment attendance from provider that is entered directly into WTWCMS
- Follow up with individual on missed appointments, highlighting the need for compliance and consequences for failing to comply

- Take action on non-compliances
- Based on new information from medical documentation or other sources, individual may be re-evaluated to determine a change in treatment plan
- Upon successful completion of their treatment and return to employable status, individuals will be re-engaged and referred to our non-exempt vendor.

## **10. District Certification**

### **10.1 Certification**

As a condition of the receipt of federal and State funds the Local District Commissioner of Westchester County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2024 through December 31, 2025. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations, and provisions of this Plan.

2/12/2024  
Leonard Townes  
Commissioner