

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

January 1, 2020 – December 31, 2021

## **Cattaraugus County**

# Contents

<b>Section 1- Assurances .....</b>	<b>3</b>
<b>Section 2 Administration .....</b>	<b>5</b>
Section 2.1 Administrative Structure .....	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies .....	5
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	5
Table 2 – Other Service Providers.....	7
Section 2.3 OTDA Jobs Staff Agreement.....	8
OTDA Jobs Program Services – Target Groups.....	8
Other Services Requested.....	8
Section 2.4 Access to Services at New York State Career Centers .....	8
<b>Section 3 Engagement and Work Preparation.....</b>	<b>10</b>
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)) .....	10
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	10
Section 3.3 Assessment and Employment Planning.....	11
TA Assessment.....	11
TA Employment Plan .....	13
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9).....	14
Section 3.5 Job Development .....	22
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) .....	22
Section 3.7 Work Verification .....	26
The Quality Assurance (QA) plan include the following elements: .....	26
The District’s Quality Assurance Process is as follows:.....	27
Use of Outside Providers/Vendors.....	28
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency .....	28
Section 3.9 Strategies/Procedures for Increasing Program Attendance .....	28
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	29
Section 3.11 Strategies for reducing the need for TA .....	29
<b>Section 4 Support Services .....</b>	<b>29</b>
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District .....	29
Section 4.2 Transitional Support Services .....	31
Section 4.3 Extended Support Services.....	31
<b>Section 5 Conciliation, Sanction and Dispute Resolution Procedures .....</b>	<b>31</b>
Section 5.1 Conciliation.....	31
Section 5.2 Sanctions.....	33
Section 5.3 Dispute Resolution .....	33
<b>Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....</b>	<b>34</b>
Section 6.1 Disability Determination Process and Tools.....	34
Section 6.2 Mental Health Screening and Assessment .....	34
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	35

## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Cattaraugus 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, 2020 through December 31, 2021. As Commissioner of Cattaraugus County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

/s/ AT 02/24/2020

Anthony Turano, Social Services Commissioner

February 24, 2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## **Section 2 Administration**

### **Section 2.1 Administrative Structure**

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

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

The Cattaraugus County Department of Social Services has one (1) office located at One Leo Moss Drive, Olean, NY that provides WTW services to applicants and recipients of benefits under TANF, Safety Net, 200%, and SNAP Employment and Training Program. In addition, Cattaraugus County Department of Social Services is part of the consortium that operates the One Stop Career Center, along with the Workforce Investment Board. The One Stop Career Center offers a variety of educational and training services along with several activities that support the local district's Welfare to Work efforts. The Employment Unit is comprised of:

- 1 Chief Examiner
- 1 Sr. Examiner
- 4 Employment Specialists (One Stop)
- 1 Examiners (One Stop)
- 1 CASAC Worker
- 1 clerical support staff (One Stop)
- 1 Senior Mobile Work Crew Supervisors.
- 2 Mobile Work Crew Supervisors.

Together, they provide the following employment services which include, but not limited to, employability determinations, orientations, assessments, employment planning, assignment to work activity, monitoring of participation, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self sufficiency, provision of supportive services, and employment placement and retention services.

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

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

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

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

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Greater Olean Chamber of Commerce	\$55,000.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	On-The-Job Training Programs - Job Development
Olean Medical Group	\$	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Physicals and "second opinions" relative to employment and/or physical limitations at a cost of \$131.00 per visit.
Olean Community Schools	\$30,840.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other Title XX	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Math & Reading Tutorial Programs & High School Equivalency (HSE)
Drug & Alcohol CASAC Worker	\$63,672.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Case management of Temporary Assistance recipients who are in drug/alcohol treatment
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

**Table 2 – Other Service Providers**

Table 2 includes agencies/providers that offer services to participants and to which the district expects to refer participants but which have no direct financial agreement with the district.

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Title V		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services and employment opportunities for low income individuals 55 years of age and older
ACCORD		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Child care resources, referral and approval of day care providers
STRAWW - Southern Tier Recovery Activities Without Walls		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Offers supportive services to individuals 18 years and older with a diagnosed mental illness or disability in recovery. This is a community based program that assists with personal goal setting, utilizing the community to develop volunteer, educational, and employment opportunities.
ACCESS-VR Adult Career & Continuing Education Services - Vocational Rehabilitation		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Access/evaluation individuals with disabilities; provide training assistance, education, rehabilitation and career development; make referrals
Literacy West		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Adult Literacy, English as a Second Language
Literacy West		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Venture IV - workforce development, education and training to SNAP applicants and recipients through targeted job placement services
Community Action		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Housing and energy
WIOA/One Stop	WIOA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Employment and training opportunities, job referrals, job placements, workshops and various other activities
Department of Labor		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Employment referrals and business services

### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

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

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

#### Other Services Requested

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

### Section 2.4 Access to Services at New York State Career Centers

In New York State, TANF is a required WIOA partner and must coordinate access to TANF services with the comprehensive Career Centers.

a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:

- The district has employee(s) physically present at a Career Center
- The district has contract staff physically present at a Career Center
- The district makes available direct access to its program staff via phone or technology at a Career Center
- The district makes available copies of the LDSS-2921 (Common Application) at a Career Center

Other:

b. Please provide a description of how the district coordinates with Career Center partners with providing 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.

Both LDSS staff and our partners are located at the One Stop Career Center. This allows for greater collaboration and communication to better serve our clients. We use a customer focused referral system to assist job seekers in accessing One Stop resources.

The Employment Specialist advises individuals of the services available through the One Stop Career Center. Once it is determined that a partner would be a helpful



resource for a client the worker will either walk over, call, email, or interoffice a referral to that partner. This includes collaboration/referrals to:

- Literacy West (literacy and english as a second language services, workforce development, education & training).
- Directions in Independent Living (supportive services for individuals with disabilities, SSI application process assistance)
- Department of Labor (employment referrals, business services)
- WIOA (employment/training opportunities, job referrals/placements, workshops and other activities)
- Greater Olean Area Chamber of Commerce (On the Job Training programs, job development)
- Olean Community Schools (education, High School Equivalency)

Information may only be shared by the Vocational Rehabilitation partners with a signed written release from the customer. The time limited release form will specify the information that can be released and to whom the information can be released. Personally identifiable information obtained from customers of specific programs during outreach, intake, system orientation, initial assessment, referral to a partner programs, referral to supportive services, or otherwise is confidential and will not be released, disclosed or re-disclosed without obtaining the proper program specific release. Programs for which program specific releases may be required to ensure customer confidentiality includes but are not limited to TANF, NYSDOL programs, and Vocational Rehabilitation programs.

## **Section 3 Engagement and Work Preparation**

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

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

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

Include any additional information regarding the district’s local “engaged in work” requirements:

Compliance with appropriate educational programs assigned and included in the individuals Employment/Self-sufficiency plan.

Treatment/rehabilitation programs, as listed above, also include participation in substance abuse or mental health treatment.

### **Section 3.2 Orientation (Reference 18 NYCRR 385.5)**

Check one of the following:

The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.

In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

Each individual is also provided with information on participants' rights and responsibilities and domestic violence counseling information/availability.

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

Orientation is conducted on an individual basis for applicants and recipients.

During the face-to-face eligibility interview with the TA Examiner the household is advised of the following:

- SNAP ABAWD requirements
- Their responsibility in establishing paternity and enforcing child support obligations.
- Applicable time limits on public assistance and other pertinent information regarding eligibility requirements.
- Domestic Violence counseling information/availability
- How to contest their employment status and requirements to document work limitations or inability to work

- Reporting requirements if client becomes employed

During the Employment Assessment the Employment Specialist advises the client of the following:

- Supportive services available through the SSD

\*\*The voluntary TANF 200% application is discussed/offered. If the client chooses to complete, the Employment Specialist would take the client to the One Stop TANF 200% Examiner to complete that application process.\*\*

- Child care available for those whose TA is terminated
- Child care assistance for those assigned to work activities
- Education, employment and training opportunities, including partnerships with organizations/programs that may be able to assist the client reach self-sufficiency
- Job Search requirements for employable applicants
- Work activities available through the SSD
- Transitional benefits available if TA closes due to employment
- Responsibilities associated with repayment of student financial aid

Within a month the client, if non-exempt, is notified in writing regarding assigned work activities.

### **Section 3.3 Assessment and Employment Planning**

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

- a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):
  - ☐ The district enters assessments directly into WTCMS
  - ☐ The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.
  - ☐ The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.
  - ☐ The local equivalent does not contain additional elements other than what is required.
  - ☐ The local equivalent does contain additional elements beyond what is required, listed below:
- b. Describe the district procedure for the completion of an employment assessment:

Individuals are scheduled to meet with an Employment Specialist following their Temporary Assistance interview.

Individuals with and without dependent children are scheduled to complete the assessment within thirty (30) days of the TA application date, unless they are exempt due to substance abuse (employment code 63).

Applicants that meet criteria of employment code 63 (substance abuse - exempt) are scheduled to see Employment Specialist at initial recert or upon change of their employment status/code.

Employment code 64 (substance abuse-non-exempt) individuals living outside the district, that are the fiscal responsibility of Cattaraugus County, will have a paper version of the assessment mailed to them to complete and return. A telephone appointment will be made to review the entire assessment with an Employment Specialist.

The following explained/reviewed at the assessment:

- Work rule requirements
- Non-compliance consequences
- Job search
- Request medical information, if appropriate
- Child care resources
- Barriers, strengths, short-term and long-term goals.
- Non-exempt individuals will be assigned to work activities such as, work experience, job search, vocational & educational training, basic educational programs if the individual doesn't have a high school diploma or HSED, job skills training related to employment, On-the-Job training program or a combination of activities. The Employment Specialists will continuously monitor such activities and adjust those activities based on the individual's progress.

- c. The district administrative unit or contractor responsible for conducting assessments is:  
Cattaraugus County Department of Social Services Employment Specialist
- d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]

The minimum qualifications for an Employment Specialist include high school diploma or HSED and either graduation from regionally accredited or New York State registered college or university with an associate degree in social science, human services or resources and one year of work experience involving substantial communication with adults involving persuasion, negotiation, explaining, or counseling. This experience must have involved exercise of judgement in dealing with or responding to another person; or three years' experience as described above.

Full job descriptions and qualifications can be provided upon request.

- e. Applicants in households **with** dependent children are required to participate in completion of an assessment:  
 Yes       No

- f. Applicants in households **without** dependent children are required to participate in completion of an assessment:  
 Yes       No
- g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:  
 Yes       No
- h. How often and under what circumstances is the assessment updated?  
Individuals with and without dependent children have their assessment updated at least annually and when the individual moves from exempt to non-exempt status.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:
- The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
  - The district enters employment plans directly into WTWCMS.
  - The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTWCMS.
  - The district develops individual employment plans using a local equivalent tool and later enters information into WTWCMS. Attached is the local equivalent.
    - The local equivalent **does not** contain additional elements other than what is required.
    - The local equivalent **does** contain additional elements beyond what is required, listed below:
- b. Check one of the following:
- The same administrative unit or contractor that conducts employment assessments also develops employment plans.
  - A different district administrative unit or contractor develops employment plans, and their qualifications include
- c. Describe the district procedure for the completion of an individual's employment plan.  
Individual employment plans are completed during the assessment process. The client signs the plan and is given a copy, if they are present. A copy of the plan is mailed to the client if they are not present.
- d. How often and under what circumstances is the employment plan updated?

The employment plan is created at initial assessment and updated at reassessment and when the clients exempt/non-exempt status changes. Update is also completed when there is a change in a work activity assignment.

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

- a. Describe below how the district plans to meet federal and State TA participation rate requirements. Included is the weekly hours standard participation requirement for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

The Employment Specialist meets with the individual within 30 days, unless code 63, of the TA application date and completes the assessment. At that time the individual is:

- Referred for TABE test, if appropriate and one isn't on file.
- Advised if they do not have a high school diploma or equivalent, they may be assigned to participate in an educational activity to improve their basic skills and/or to obtain a high school equivalency diploma.
- Informed of all work requirements and expectations.
- A non-exempt individual is immediately placed on Job Search by the Employment Specialist (unless pended due to living situation as described in section e. below). Additional appointment is scheduled to review the job search log with the individual.
- Develop an "Individual Employment Plan". This occurs prior to case opening.
- Engagement in activities, other than work experience, begins immediately. Along with job search, and individual may be assigned to a variety of job readiness activities, such as HSED (high school equivalency diploma), resume preparation, career exploration, skills upgrade, workshops, or job club. This time period between case opening and work experience assignment is typically a week to 10 days.

Non-exempt individuals, to the extent each is medically able, will be enrolled in 35 hours of activity/week, including, whenever possible, at minimum, the requisite number of hours of countable activity as defined under federal and state legislation.

Anyone who is employed less than 35 hours/week will be required to participate in additional activity to total 35 hours/week.

Those with children under the age of six may be required to participate in less than 35 hours/week, but always, when possible, in a sufficient number of hours to be countable.

The weekly standard of 35 hours is used. Individuals whose employability status changes from exempt to non-exempt are typically engaged in activities within 30 days of notification of status change.

Participation rate and engagement in activities, is monitored by time sheets submitted weekly by the work site supervisors and reviewed by the Employment Specialist.

Participation in "Core" and "Non-Core" activities is assigned by the Employment Specialist based on the needs and concerns addressed in the individual's employment plan.

Activity hours may be determined on a case-by-case bases as appropriate due to work limitations or other case circumstances.

Employment code 63 individuals are tracked/monitored. Monthly reports are gathered from the treatment provider/facility in order to enter the schedule into WTWCMS.

Individuals are assessed on a case by case basis to determine if appropriate to approve self-employment as an approved activity. Clients that meet the hour requirement, that do not meet the minimum wage requirement will be assessed in three (3) months to determine if this is an acceptable path to self-sufficiency or if supplemental, countable work activities are needed. Additional time may be permitted as determined by the district based on case circumstances.

Those clients who are child care providers will be allowed three (3) months to obtain certification, which allows for higher wages once obtained.

Management reports (available through COGNOS) are monitored on a monthly basis to ensure full engagement by adults in work or work preparation activities.

The agency also distributes a daily report of openings/reopenings, and denials/closures to ensure that the Employment Specialists are aware of case status performed by the Temporary Assistance unit.

The process for individuals whose employment status changes from "exempt" to "non-exempt" is the same as above.

Exemptions are monitored on a regular basis and the individual is notified of any change in employment status.

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	186	316

- c. Describe below 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:

The county developed Case Conference database which is updated daily by the Employment Specialist to assist in managing their caseloads. This database is available to all parties involved with the case.

In COGNOS, the Universal Case Listing report is used during the month to determine who will be in the denominator and to make sure that clients are assigned to countable activities. Other available COGNOS reports are also used.

Employment Specialists and the Sr. Examiner review the following additional COGNOS reports monthly and compare them with the Universal Case Listing and other to ensure full engagement.

Employability Code Duration Report

SN NON-MOE Detail Report

ABAWD Tracking Report:

SSI Tracking Report

Time Limit Tracking Report

Anticipated Future Action Report

TANF & SN Moe Worker Participation Report

Adults with Budgeted Earned Income and Current Employment Schedule

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) recipients to participate in SNAP E&T work activities. If the district is offering Supervised Job Search as an E&T activity component, the district must describe how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts. (Please note: Case management services must be provided to all participants enrolled in an E&T activity):

The district no longer requires NTA SNAP applicants/recipients to participate in mandatory work activities. The district does offer job search assistance upon request from applicant/recipient.

If the district is not mandating SNAP E&T work activity assignments, please describe how NTA SNAP work registrants are informed of the services available, upon request, for assistance with job search activities. (Please note: At a minimum, districts are required to make available job search as a SNAP E&T activity to NTA SNAP applicants and recipients):

All NTA-SNAP applications have an insert that advises individuals that the agency will provide assistance at the One Stop Career Center with job search.

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

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



If yes, the process for engaging TA **applicants** is:

Hours related to participation in job search activities, such as submitting applications (in person and/or on-line), interviewing for a job, researching a business or company, preparing a resume, and the travel time between potential employers is reported on a job search log which requests the date, time spent, location (including address), phone number and contact person for each employer. It is expected that applicants complete at least five (5) employer contacts per week. The job search log is reviewed by the Employment Specialist to assess the extent to which the required hours and contacts were made. The Agency periodically verifies the job search logs by contacting employers to confirm that applications were submitted.

Applicants generally meets weekly (maximum biweekly) with an Employment Specialist or the Employment Examiner while in the application process. The initial job search appointment will be with the Employment Specialist, additional job search appointments may be made with the Employment Examiner during the TA pending period. Additionally, non-exempt applicants, with and without children in the household, will be referred to register with the Department of Labor, which will then do follow-up appointments with the individual once the case is active.

Job searching will be pended for applicants who are currently in a hotel/motel, homeless or DV shelter. This will allow these applicants to focus on obtaining affordable permanent housing. Once permanent housing has been found the client will be scheduled to meet with the Employment Specialist to start the job search process described above.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	5	10	per week
SNA Individuals	5	10	per week

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

If yes, the process for engaging TA **recipients** is:

Non-exempt recipients, with and without children in the household, will be referred to the Department of Labor for job search activities. For individuals without access to private or public transportation, the Employment Specialist will meet with the individual face-to-face monthly to review job searches. Outreach sites will be utilized in order to minimize any transportation hardship on the individuals. Recipients are expected to conduct on-going job search activities (in person and/or on-line) with the anticipated goal of finding employment that will ultimately lead to self-sufficiency.

As this doesn't meet the TA federal definition of job search, as they are meeting monthly rather than face-to-face weekly, Cattaraugus County does not enter the job search into WTCMS for households with dependent children.

- f. Describe the district’s process and policy, including the guidelines workers follow, when determining whether participation in self-employment is approved as part of an individual’s required work activities. If the district always approves self-employment as part of an individual’s required work activities, please note this policy below. Individuals are assessed on a case by case basis to determine if appropriate to approve self-employment as an approved activity. Clients that meet the hour requirement, that do not meet the minimum wage requirement will be assessed in three (3) months to determine if this is an acceptable path to self-sufficiency or if supplemental, countable work activities are needed. Additional time may be permitted as determined by the district based on case circumstances.

Those clients who are child care providers will be allowed three (3) months to obtain certification, which allows for higher wages once obtained.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

	<b>Activity and Definition</b>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>

	<b>Activity and Definition</b>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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, 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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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 equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>

### Section 3.5 Job Development

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

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

District staff contacts employers to solicit jobs for TA and SNAP participants.

Below is the description of how this is done, including number of staff, frequency of contacts, etc.:

The district utilizes a DSS Employment Specialist, located at the One Stop Career Center, the numerous resources and partner agencies at the One Stop Career Center, and a contracted agency to conduct and implement job development activities. Realizing that job development and OJT's are critical in moving individuals into employment, the LDSS contracts with the Greater Olean Chamber of Commerce and their job developer. District staff and the Chamber are in daily contact with local employers. The Chamber has been serving the Greater Olean Area since 1906 and currently has over 1000 business members. The LDSS also has a working relationship with Cattaraugus County Economic Development and Business Development Corporation. The on-going relationship between the Department of Social Services, the Chamber of Commerce, the One Stop Career Center, and other community agencies combine to make job development activities successful.

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

Greater Olean Chamber of Commerce-see above

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

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

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

During the assessment process the Employment Specialist reviews education, work history, skills, barriers, short and long term goals, and a variety of other elements based on the individual's circumstances. If employable, and a TABE is not on file for the client, the individual may be required to complete a TABE test to assess basic literacy levels. The Employment Specialist will meet with the individual and review the results of the TABE test and discuss in-depth the strenghts and barriers of the individuals Employment Plan. If an individual does not have a high school diploma or HSE diploma, they may be required to participate in an educational activity to improve basic skills and/or to obtain a HSE diploma. The Agency collaborates with the One Stop Career Center, Literacy West, Accord, Acess-VR, Olean Community School Program and BOCES to arrange appropriate educational activities based on an individual's needs.

- b. Describe 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:

The District, as previously stated, is the joint operator of the Cattaraugus One Stop Career Center. Individuals are referred to the One Stop Career Center for assessment of appropriate Vocational Educational programs and Job Skills training. The One Stop Center offers a variety of workshops that address the necessary job skills employers are looking for when hiring. Individuals are also referred to ACESS-VR if appropriate. Please reference subsections (a) and (h) as they describe how this district identifies appropriate providers of Vocational Education & JST.

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

The Employment Specialist, at the assessment, inquire as to the educational status of the applicant. The individual is informed that if they do not have a high school diploma or HSE diploma, they may be assigned to participate in an educational activity to improve basic skills and/or to obtain a HSE diploma. The individual, if employable, will be referred, by the Specialist, to complete a TABE test. Employment Specialist will then assess the TABE scores, discuss the results with the individual, and make appropriate assignments.

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

Individuals may be denied participation in educational activities if their TABE scores are well below the entrance level of the courses they are requesting. They may also be denied if they are considering a degree program that requires a license without first clearing up a criminal background. Individuals may also be denied if their case history has shown that they have not completed previous courses that they have enrolled in. All individuals are reviewed on a case by case basis.

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

The Employment Unit has established a system of prerequisites in order to determine if the participant is likely to follow through and successfully complete the job skills or vocational activities. The participant may be required to upgrade basic literacy scores, attend a HSE diploma program, attend tutorial upgrades, and/or participate in work experience prior to considering job skills or vocational training activities.

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

The district will approve a two year post secondary level of education.

- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:  
The Employment Specialist utilize WTWCMS time limit tracking functions. Clients are also encouraged to seek Work Study programs. Any post secondary education beyond the 12 month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities, work experience or community service.
- h. Education and training providers are evaluated by the following standards:

  - a) Providers must be licensed by the State Department of Education or sponsored by a governmental agency such as; WIOA or Department of Labor
  - b) Providers must submit their course curriculum to LDSS for approval and provide course schedules
  - c) Providers must develop courses where local demand occupations and job market conditions indicate the likelihood of placement in unsubsidized employment following completions of training/educations courses
  - d) Providers must have demonstrated effectiveness in the provision of the proposed training/education courses
  - e) Providers must agree to provide attendance and progress reports as required by the local district
  - f) Providers must provide the name and phone number of their contact person for consultation and agree to provide final grades in a timely manner
- i. The district procedure for advising participants of approved training providers is:  
  
Upon request to participate in a training/education program, the Employment Specialist will meet with the client to review their request, advise the individual on approved training providers, assess whether curriculum/program fits with their employment plan, evaluate short and long term goals, the length of training, and whether there is reasonable expectation that successful completion of the program will result in employment. If approved, the Employment Specialist will advise the individual that the training/education program will be added to their employment plan. The Employment Specialist will advise the participant of their responsibilities, such as providing the name, address, and telephone number of the provider, the contact person, the class schedule, attendance reports, and progress notes. The Specialist will also advise the individual of the supportive services available to assist them throughout their training to ensure success.



- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
Recipients are notified in writing that they have been assigned to a specific work activity or that they have been approved for training. The notification includes the site, address, and contact person. The notification will also include the date and time to report, the mandated number of hours required to meet compliance, and the LDSS contact person.
- k. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below:
- It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.
  - A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
  - The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
  - The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
  - The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
  - The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
  - Additional reasons as stated below:
- l. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:  
School attendance is monitored at application and recertification by the Temporary Assistance Unit for teens 16-18 years of age. Enrollment and attendance is verified by the teen's school district with verification maintained in the Temporary Assistance case record.
- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:  
The Employment Specialist reviews with the client any/all barriers pertaining to health related limitations and/or necessary accommodations. Recipients must give approval, through written consent on approved authorization forms, for the release of information

from physicians and mental health providers. Determination of the ability to work is based on documentation provided by the above mentioned professionals.

If an individual has limitations, the Employment Specialist will notify the work site supervisor by phone and in writing to assure accommodations can be met. The Employment Specialist has the discretion to request the individual be referred to the Agency's contracted physician if a second opinion is warranted.

### **Section 3.7 Work Verification**

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

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

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 WTCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

### The District's Quality Assurance Process is as follows:

The district will perform a random sample of (6) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTCMS and documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

The district will perform a random sample of (6) cases semi-annually for participation in **unpaid work activities** to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTCMS, excused absences and holiday time are documented in the case file and correctly reported on WTCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability code **38-needed in the home fulltime or employability code 48-time limit exemption** to care for a disabled household member to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability **code 31-caretaker of a child under the age of 12 months** to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. TA records will also be reviewed to ensure that the

household composition is in fact a one parent case and that the individual has not exceeded the 12-month lifetime limit.

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.

### **Use of Outside Providers/Vendors**

Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?

Yes       No

If Yes, does the district's provider/vendor collected documentation, data entry and management of WTWCMS follow the same process that would be used by the district worker?

Yes       No

If No, please describe the process used below:

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

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

The district utilizes Language Line to provide interpretation services for non-English speaking clients who are applying for assistance or who are assigned to activities. Interpreter services posters are hanging in the client waiting area. All district workers have been provided the Language Line quick reference guide for accessing interpreting services. Clients have the option to choose to use a relative or friend rather than Language Line, if they do A Waiver to Right of Free Oral Interpretation Services form is signed and kept in the case record. This is in accordance with direction in 06-ADM-05 and 17-INF-14.

The educational institutions in our district have also been valuable resources when needed and they have been very helpful in accepting referral into their ESL classes.

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

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

If an individual is assigned to work activities and fails to participate, including absences with good cause, the Employment Specialist will attempt to reach the individual by phone first, and follow up with a letter to discuss the issue. The Specialist will attempt to solicit the circumstances behind the non-compliance and attempt to assist the individual to resolve the problem that occurred that prevented the individual from complying. Child care and transportation issues are common causes. The specialist will explore supportive services that may be available to resolve the situation.

### **Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants**

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

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

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

Sanctioned individuals are encouraged to utilize resources at the One Stop Career Center that are available to the universal population. Individuals are encouraged to look for work, meet with Department of Labor, and attend various workshops that are available to assist individuals to obtain and retain employment. Employment Specialist will make contact with this population by sending a letter to the sanctioned individual. The Specialist may suggest outside providers that could assist while the sanction is in place and make sure that the individual understands the basis for the sanction. The Employment Specialist will attempt to engage the individual to assist with compliance after the durational portion of the sanction has been served.

### **Section 3.11 Strategies for reducing the need for TA**

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

The district uses diversion strategies as follows; The Employment Examiner will meet with any/all individuals requesting "emergency" assistance or a diversion payment to enable them to maintain or obtain pending employment. Individuals are required to complete an application, provide necessary documentation to determine the household's eligibility and provide verification of the employment related issue. The individual must also provide verification of employment, verify available resources, and attest to the necessity of such expense. While the ultimate goal is to divert individuals from needing ongoing assistance, the worker will review and document whether there is a reasonable chance that the one-time short term payment will enable the applicant to maintain self-sufficiency and avoid the need for on-going assistance.

## **Section 4 Support Services**

(Reference 18 NYCRR 385.4)

### **Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District**

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, approved work activities and activities to restore self-sufficiency:
  - Clothing - not to exceed \$150.00/year unless approved by the Chief Examiner (or designee)

- Transportation reimbursement at 30 cents per mile for privately owned vehicles
- Bus fare, bus passes, gas voucher and/or gas cards
- Automobile repair up to \$1500.00 per year (contingent on 3 estimates which include a statement that the vehicle is worth repairing)\*
- Car insurance up to \$1,000.00 per year
- Licensing, including motor vehicle registration
- Drivers Education
- Work-related expenses
- Case management and retention services
- Any other supportive services as approved by the Chief Examiner (or designee)

\*Expenditures above \$1500.00 require the approval of the Chief Examiner (or designee)

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

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/19 is 58 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/19 is 20 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate): 30 cents/mile

- c. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below each way to a work activity or to access public transportation:

Along with mileage reimbursement and gas cards, the Specialist will make every attempt to find a site within the two (2) mile maximum distance. If necessary the Specialist will place the individual on the Mobile Work Crew van which provides transportation to work sites and also supervised/structured work activities.

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

- car repairs and/or car insurance
- tools and equipment
- necessary clothing
- protective equipment/clothing

- any other service approved by the Chief Supervisor (or designee)

## **Section 4.2 Transitional Support Services**

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

The Employment Specialist will work directly with individuals who are employed and assist them with these services that will help them maintain employment. The agency finds job retention to be a critical component of the Employment Unit. The district informs the individual that once employment is found, they will be contacted periodically throughout their first 90 days of employment by the Employment Unit. The Employment Examiner will contact the client by mail 30 days after case closing regarding retention/issues with employment. Any identified problems that the individual may be experiencing that could hinder their job retention will be discussed and available supportive services discussed. The client is made aware that they can contact their Employment Specialist at any time to seek assistance with problems they may be experiencing. The Specialist may complete a referral for supportive services, job coaching, financial literacy, etc. to assist the individual with maintaining their 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:

- car repair and insurance to maintain employment
- clothing (not to exceed \$150.00 unless approved by the Chief Supervisor( or designee))
- any other reasonable request that would result in the continuation of employment and self-sufficiency

## **Section 4.3 Extended Support Services**

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

- gas cards/voucher
- bus passes
- Vocational Education/training when available depending on training
- On the Job Training Programs
- childcare assistance

## **Section 5 Conciliation, Sanction and Dispute Resolution Procedures**

(Reference 18 NYCRR 385.11 and 385.12)

### **Section 5.1 Conciliation**

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

- in person
- by phone
- by mail

The four Employment Specialists are assigned to handle the conciliation process and any non-compliance. Upon receipt of a negative incident, the Specialist follows the procedures and requirements as outlined in 18 NYCRR Sections 385.11 and 385.12. A conciliation notice is mailed for each negative incident. Individuals are informed of the non-compliance issue and of their right to provide "good cause". The individual is also informed of the contact person, phone number, and date they must respond by. The recipient must respond within the required time frame. The individual is informed of the potential consequences if no response is received.

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

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

The Employment Specialist determines if the individual's non-compliance was willful and without good cause, as defined by regulation. If a sanction is to be imposed, a timely and adequate notice of denial, closure or reduction (whichever is appropriate) is issued, after supervisory review by the Employment Senior Examiner.

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

- in person
- by phone
- by mail

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

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

Cattaraugus County will allow all SNAP recipients who fail to comply with SNAP employment requirements the opportunity to document good cause. The procedure will be the same as the conciliation procedure for TANF and SN individuals as far as notification. Individuals are informed of the non-compliance issue and informed of their right to provide "good cause". The Employment Specialist and supervisor will review the facts to determine if the non-compliance was willful and without good cause.

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

Clients will have ten (10) days from the date of the conciliation notice to either document an exemption from participation or submit a completed job search log with 5 valid job contacts to demonstrate compliance with work requirements to avoid a SNAP sanction. If the individual does not respond nor choose to come into compliance, the individual will be sanctioned and the SNAP grant reduced or case closed accordingly.



## Section 5.2 Sanctions

- a. 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 is: Individuals are informed at the time of the sanction as to when and how they can "end their sanction" and become compliant. An individual whose TA case has closed must serve the durational period, if any, reapply and must comply with all program requirements during the pending period to establish TA eligibility, including applicant employment requirements.

Benefits for TA recipients will be restored retroactive to the date the individual demonstrated a willingness to comply, but not before the durational sanction period has been served. Individuals are determined to be in compliance once an updated Employment Plan is created, an assignment to an appropriate activity is made, and 10 days of participation in that work activity have been completed by the recipient.

- b. The district's procedure for determining compliance for those SNAP 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 is: Individuals are informed at the time of the sanction as to when and how they can "end their sanction" and become compliant. An individual whose case has closed must serve the durational period, if any, reapply and must comply with all program requirements to establish SNAP eligibility, including applicant employment requirements.

Benefits for recipients who demonstrate compliance consistent with this section will be restored the month after the individual indicates a willingness to comply, but not before the end of the durational sanction period. Compliance can be demonstrated by completing at least 5 job applications, which they document on the Job Search Log, and then send to their employment worker.

An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefits.

## Section 5.3 Dispute Resolution

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

The grievance is mediated by:

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

## **Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals**

(Reference 18 NYCRR 385.2)

### **Section 6.1 Disability Determination Process and Tools**

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

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

The district relies primarily on the individual's physician report to provide a complete diagnosis of a person's employability status. If the information is incomplete or the doctor is unable to document the status, the Agency has the ability to refer the individual for an employment related physical or a second opinion with a physician as deemed necessary.

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

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

The district will review the medical documentation provided by the contracted physician or the individual's physician. If the documentation is incomplete a more thorough diagnosis is requested. Once a final determination is made the individual is notified in writing using the LDSS 4005(exempt notification) or the LDSS 4005 (a) (non-exempt notification).

### **Section 6.2 Mental Health Screening and Assessment**

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

- Yes       No (*If No, section 6.2 is complete*)

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

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

Yes       No

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

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

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

### **Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))**

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

- a. Following is the district's procedure for determining if an individual who is unable to work due to mental or physical impairment has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 6.1 of this plan. Included here is who (e.g., medical practitioner, employment worker, TA worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also included is the source and type of information used to make the determination (e.g., information from individual's medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

If an individual claims to have a disability or medical limitation, the Employment worker will obtain the necessary consent forms for all physicians the individual is seeking treatment from. Medical forms are then sent to all physicians. The physician(s) completes the appropriate sections and returns forms to the Employment Specialist. The Specialist relies on the physician's evaluation, diagnosis, and recommendations in regards to appropriate work activities and whether the individual has limitations or needs special accommodations. The physician(s) is also asked on this form if rehabilitation services are being considered. The Employment Specialist will follow up on rehabilitation services if they were recommended by the client's physician(s). The Employment Specialist will reassess the individual's disability status at least quarterly, unless the initial medical documentation states the illness/incapacity to be of a longer

duration. The Employment Specialist may also refer the individual for a "second opinion" if further clarification is needed. Individuals with a documented illness/incapacity of a longer duration will be reassessed at least annually.

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

The physician(s) will make a recommendation as to the abilities of the individual to participate in employment and/or work activities. If the medical verification indicates a treatment plan is necessary, the Employment Specialist will refer the individual to the appropriate provider, make sure the employment code is accurate, document the findings in WTCMS, and follow up with the individual to make sure they are following through with treatment plan.

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

The Employment Specialist meets with the individuals minimally on a quarterly basis. The worker will review health issues, current treatment plans, and upcoming appointments. If medical documentation shows that an individual may return to work, the Employment Specialist will review any/all limitations. If an individual was referred for rehabilitation per their physician, the Specialist will secure necessary forms to document and verify attendance and progress.