

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

January 1, 2020 – December 31, 2021

## **Chautauqua County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Chautauqua 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 Chautauqua 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/ CLS            01/10/2020

Christine Schuyler, Social Services Commissioner

January 10, 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 Chautauqua County Department of Health & Human Services has case managers based in both the Jamestown and Dunkirk offices. In the Employment Team (Attachment A), 9 case managers are based in the Jamestown office along with one supervisor and two support staff. In Dunkirk, there are 4 case managers and one supervisor. In February, 2013, the Department began contracting with the Workforce Investment Board (W.I.B.) (Attachment A) to provide Employment Services in the five following areas: Job Readiness Training, Work Experience Program, Services to Work Limited Individuals, Job Placement/Subsidized Employment Services, and Targeted Training. The W.I.B. has offices both in Jamestown and Dunkirk which are within walking distance from the Department.

The primary responsibility for the operation of Chautauqua County's employment program rests with the case managers within the Division of Temporary Assistance. The responsibilities of the case managers include: conducting orientation and job search, working with applicants and recipients to complete Employment Assessments and Individual Employment Plans; authorizing supportive services; maintaining case records in WTCMS; making referrals to programs such as Job Readiness Training (JRT), Work Experience Program (WEP), and Subsidized Employment Programs such as Transitional Employment Advancement Program (TEAP), educational programs, rehabilitative programs, and targeted training programs. Case managers determine employability status based on medical evidence, in addition to monitoring the progress and/or barriers to progress of the recipient toward self-sufficiency. Case managers are also responsible to conciliate cases where there has been non-compliance. Dispute resolution will be managed by the employment supervisors.

### **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>
Workforce Investment Board (W.I.B.)	\$350,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other State	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Readiness Training, Work Experience Program, Services to Work Limited Recipients, Targeted Training, Management of Subsidized Employment Programs, Job Placement Services, SSI Initial Referral
Industrial Medicine Associates/SAMM	\$200,000	<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%	Substance abuse assessments, employability determinations, drug testing, and monitoring of treatment
Legal Assistance of Western New York (LAW NY)	\$90,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other State	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Provide for the representation of persons whose federal disability benefits including Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) have been denied or may be discontinued for the purpose of representing these persons in appropriate proceedings, in addition to assisting new applicants who are referred for assistance in applying for SSI and SSDI
	\$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%	

<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>
	\$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%	
	\$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>
Erie 2, Chautauqua /Cattaraugus BOCES	SNAP Employment & Training II	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	High School Equivalency, GRASP, ESL, Literacy, TABE, Best Plus, Career Exploration, various vocational and certificate programs, Family Learning Center - Spanish speaking support, ESL, and Case Management Services
Chautauqua Works		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	All One Stop Services
Cornell Cooperative Extension		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Budgeting and nutrition classes, Jobs in Agriculture for Spanish Speaking New Americans
Chautauqua Home Rehabilitation and Improvement Corporation (CHRIC)		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Housing upgrades and repairs
Learning Disabilities Association of WNY		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Family support services, case management, information and referral, educational advocacy, parent advocacy training & transitional services, inclusive children's after-school program & summer program, youth therapeutic recreation, community employment services, supported work, adult basic education (basic skills), HSE preparation classes, career development support, adult recreation, bi-lingual services, residential services, habilitation services, speaker's bureau, professional trainings
The Resource Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Basic skills, job readiness, supportive employment, placement, counseling services, job coaching
Southern Tier Environments for Living (STEL)		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Basic skills, assessment, job readiness, supportive employment, housing



<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>
OTDA Jobs Program		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Supervised job search and job placement for TA applicants, job search orientation and monitoring of job search for ABAWDS, various workshops geared towards obtaining and maintaining employment
Catholic Charities		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Food vouchers, counseling, assistance in obtaining personal items, and home repairs
Community Helping Hands		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	The Depot - clothing, furniture, household items
Love, Inc.		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	A collaboration of churches who offer a variety of services to meet client's needs
Rural Ministry		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Food kitchen, clothes closet, assistance in locating housing, and transitional housing
Chautauqua Opportunities, Inc.		<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, housing, budgeting, Child Care Council, Child Care Enrollment Agency, DADS program
St. Susan Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Food kitchen
UCAN City Mission		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Faith based support group and also run the UCAN Mission for Men
Mental Health Association		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Counseling and peer support classes
HHUNY		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Provide Care Management services for individuals with medical, mental health and substance abuse issues, as well as assistance in obtaining housing assistance, legal assistance, food, and goal setting
Southwestern Independent Living Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assist with legal services, resume preparation, and disability services
Housing Options Made Easy		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Rental assistance and security deposits for individuals with mental health issues

<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>
The Salvation Army		<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Family</li> <li><input type="checkbox"/> SNA Individual</li> <li><input type="checkbox"/> SNAP</li> <li><input type="checkbox"/> TANF 200%</li> </ul>	Clothing, household supplies, holiday/clothing give aways

### 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)

Safety net applicants and Family Assistance applicants who are work ready are referred to the Jobs Program staff. The goal is to divert the applicant from the use of Temporary Assistance funds or reconnect recipients to the workforce. The Jobs Program staff works closely with the HHS staff to coordinate any diversion funds that may be needed to get the applicant employed and to keep them employed. The Jobs staff provides a weekly orientation for one hour. At that time, each applicant is assigned to complete a minimum of 10 job search contacts. Each applicant is scheduled for a one hour weekly session to review their job search logs. After the first week, applicants are assigned to complete 5 new and 5 follow-up job search contacts each week. The Jobs staff continues to meet with each individual until their case is determined. They then make a mandatory follow-up contact at 90 days and again at 180 days.

All ABAWD individuals who are not included in a waiver or exclusion are required to participate in qualifying activities. On a voluntary basis, Jobs Program staff will be conducting job search orientations as needed in Jamestown and in Dunkirk. A maximum of 20 individuals will be scheduled per session. One on one assistance may be provided to any individuals requiring additional assistance. Individuals who are participating in the Jobs Program job search are required to complete 80 hours of job search per month. The Jobs Program job search will be a job search through the Workforce Innovation Opportunity Act (WIOA) for the 80 hour per month requirement.

### 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.

The district currently contracts with the W.I.B. to provide five employment services programs (Self-sufficiency Center Programs). All Self-sufficiency Center (SSC) staff provide services at the Career Centers in a fully integrated service delivery system. Clients sign Release of Information forms allowing partner staff to work together to determine the most effective referrals and services for each customer. Referrals are made and include outreach to a designated partner referral liaison and follow-up. Referrals are designed to be a "warm hand-off" embracing the intent of WIOA.

## **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:

### **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:

- How a client would notify the Department if they have a conflict with their activity assignment after the assignment is made and how to resolve this matter
- The work activity conciliation and dispute resolution processes
- Information on Child Care in Lieu of Temporary Assistance
- Transitioning from Temporary Assistance to employment
- Supportive Services

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 by the HHS case managers on an individual basis for applicants and recipients. This orientation includes: explanation of work requirements, supportive services available, a brief overview of the conciliation/sanction process and dispute resolution, excused vs. unexcused absences, available training and educational opportunities, work activities available, extensive explanation of job search requirements, explanation of requirements for exempt individuals, and an overview of child care. Individual orientation sessions are offered both in Jamestown and Dunkirk.

### **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:

Whenever possible, all applicants and adult household members including 16 and 17 year olds who are not in school will be scheduled for an individual orientation within 4 business days of the scheduled eligibility appointment. At this appointment the employment worker will complete the assessment form with the client.

Currently, at the individual employment appointment, the case manager will complete the assessment tool with the client. We are exploring the possibility of entering the information directly into WTCMS in the near future.

While completing the assessment tool, the case manager may make appropriate notes on the form as needed. The assessment tool will capture the items that the State requires for an assessment based on regulations 385.6 and 385.7. The tool will include English fluency, education level, basic skills, work history, training interests, family circumstances (any special needs) medical/mental health status, and supportive services that may be needed (including child care). The case manager will also complete an individual employment plan with the client at this time.

Based on the D & A screening completed by the eligibility examiner, if a D & A referral is needed, the case manager will schedule the appointment and give the client the original appointment letter as well as the universal appointment letter with the D & A appointment information on it.

If a medical is needed, the case manager will give the client the appropriate medical form to be completed by the client's primary physician, and a documentation requirement form requesting the client return the completed medical by the date which it is due. If the client does not have a primary physician, the case manager may refer the applicant to IMA for an evaluation.

If a medical is not needed, the case manager will refer the client to the DHHS weekly job search using the universal appointment letter.

The client will leave the individual orientation appointment with all scheduled appointments written on their universal appointment letter, a medical(s) if the individual is claiming an exemption, and documentation requirement with the due date for the medical.

During the eligibility process, the case manager will monitor compliance with all scheduled appointments related to employment requirements. This includes reviewing the eligibility job search logs weekly, including spot checking with employers, processing medicals and sending 4005(a) when medicals are received. The case manager will also notify the eligibility examiner of the appropriate employment code, and communicate with the eligibility worker regarding compliance and/or non-compliance.

Upon case opening, the case manager assigned to the case will schedule any additional work activities.

- c. The district administrative unit or contractor responsible for conducting assessments is:  
The Chautauqua County Department of Health & Human Services Employment Team/case managers
- 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)]
- Case managers – job description attached (Attachment C)
  - Educational Assessment Specialists at Erie2, Chautauqua Cattaraugus BOCES administers TABE test
  - IMA credentialed alcohol and substance abuse counselors administer the drug and alcohol assessments
- 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?  
All non-exempt individuals will be reassessed every 6 months. All exempt individuals will be reassessed yearly.

### 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 WTCMS.

The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTCMS.

The district develops individual employment plans 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. 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.

At assessment and reassessment the case manager jointly with the client discuss goals, work activities, barriers, supportive services and the client's interests. For some clients this discussion may involve a review of rehabilitation to return to self-sufficiency.

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

The employment plan is updated at reassessment, the change of an employability status, a new requirement to attend treatment and/or a change in the clients interests/need.

### **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 social services district will enroll Temporary Assistance clients in employment activities that will lead clients to employment and financial independence. Assignment of employment activities will meet or exceed the State and Federal requirements for participation rate purposes, but will not exceed 40 hours per week for each recipient. The hours needed to be assigned to work experience is limited to the hours derived by



dividing the household's Temporary Assistance grant, including SNAP allotment, by the higher of the Federal or State minimum wage.

- Whenever possible, applicants are assessed prior to case opening and are typically referred for enrollment in an activity within 2-3 weeks of the determination of non-exempt status.
- Recipients whose status changes from exempt to non-exempt are typically referred for enrollment in an activity as soon as possible after the determination of non-exempt status.
- All non-exempt applicants are immediately assigned to Job Search at the time of the employment interview by the case manager. Some are referred upon receipt of application and others at the employment interview.
- On-going job search may be required of all non-exempt recipients in addition to other work activities to which they are assigned.
- We plan to increase the use of TEAP and subsidized employment contracts. The W.I.B. will be recruiting employers who are willing to hire recipients and participate in the TEAP and/or subsidized employment programs.
- The district monitors participation and engagement rates by:
  - o Conducting monthly contractor contacts to assure coordination.
  - o Providing staff with individual participation rate information. This information is reviewed and discussed at the case manager's one-on-one supervision session with the supervisor.
  - o COGNOS reports, including the detail list, are generated and reviewed monthly by the Employment Principal, the Employment supervisors, and by the case managers.
- The W.I.B. will provide continuous outreach to local employers to increase our numbers of Work Experience slots and to develop employment opportunities for our work-limited and our non-English speaking populations.

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	382	290

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:

Tracking of compliance begins at the front door. Safety Net applicants and some FA applicants who are non-exempt are referred to the OTDA Jobs Program for Supervised Job Search. The remaining SN and FA applicants who are non-exempt are referred to

the HHS job search. For job search, non-compliance is tracked for no shows, incomplete job search and falsification of job search logs. All adult applicants may be referred for TABE testing. Other referrals may include Career Exploration, Best Plus, Alcohol and Substance Abuse Assessment, and FEDS. All of the above referrals for eligibility activities are tracked by the case managers/examiners to ensure that denials have been processed for applicants who do not comply with applicant job search and assessment activities.

The Employment supervisors use COGNOS reports in their daily work activities. The detail lists are printed each month and the cases reviewed with the individual workers. Wages reported in the budget and wages reported to the case manager are compared on a monthly basis with the use of two COGNOS reports: "Adults with No Budgeted Earned Income and Current Employment Schedule" and "Adults with Budgeted Earned Income and No Current Employment Schedule".

The Possible Miscoded Non-legal Union Families with Children in Common Report are reviewed as well as the Employability Code Duration Report. The Employment supervisors meet bi-weekly with each case manager individually to review timely scheduling of assessments and reassessments as well as non-compliance and need for conciliation. They also review compliance with employment activities including Job Search (attendance, completeness of logs and falsification of logs), JRT, WEP, and other employment activities to determine if conciliations have been started in all cases where appropriate.

- 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):

Chautauqua County does not mandate NTA-SNAP to participate in SNAP E & T activities.

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

All SNAP applicants and recipients are provided information on the services available to them at Chautauqua Works, upon request, including assistance with job search, job skills training, and resume preparation. .

- 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:

Non-exempt applicants may be assigned to the OTDA Jobs Program for supervised job search upon submission of their application. The goal is to divert the applicant from the use of Temporary Assistance funds and reconnect individuals to the workforce. The Jobs Program staff works closely with the HHS staff to coordinate any diversion/supportive service funds that may be needed to get the applicant employed and to keep them employed. The Jobs staff provides a weekly Jobs Program orientation for one hour. At that time, each applicant is assigned to complete 10 job search contacts. Each applicant is scheduled for a weekly one on one session to review their job search logs. After the first week, applicants are assigned to complete 5 new and 5 follow-up job search contacts each week. The Jobs staff continues to meet with each applicant until their case is determined and then makes a follow-up contact at 90 days and again at 180 days.

Non-exempt applicants who have not been referred to the OTDA Jobs Program are assigned to job search at the employment interview and are expected to make a minimum of 10 contacts per week. The job search logs are reviewed at the job search appointment which takes place weekly. Random contacts with employers are made to verify that contacts are actually being made. This review is conducted by the case managers.

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

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

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

All non-exempt recipients are required to conduct an on-going job search. Required job search hours and required employer contacts per week will vary, depending on whether or not the client is enrolled in other employment activities. When job search is combined with another employment activity, the client may be required to make additional contacts weekly, with the minimum weekly hours determined by the employment case manager. Recipients are required to report weekly with their completed job search logs which will be reviewed by HHS staff. Random contacts

with employers are made to verify that contacts are actually being made. This review is conducted by the employment clerks.

- 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.

The District will approve self-employment if the individual is making at least minimum wage. For all other self-employment, the District may determine if the activity is approved on a case by case basis, taking into account the individual's capabilities and future earning potential.

- 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	<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.
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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.
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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.

<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>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>
<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>

<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 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 WTWCMS 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>
<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>

<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>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.:

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.

All staff members employed by our Contract Agency participate in job development, job placement and job retention activities. The Self-Sufficiency Center staff actively recruits employers who will hire Temporary Assistance recipients, either directly or through the use of grant diversion or other subsidy programs. Staff identifies employers who are geographically and occupationally appropriate for the population to be served. The Contract Agency looks for jobs that could match the client's skill base, strengths, and barriers. After reviewing the assessment, a "cold" call may be made to employers to determine if the employer has any positions for which the participant may be qualified. At times, the match can be done in reverse. After learning about the employer's job openings and the skills necessary to perform the jobs, the contractor may attempt to find a participant who may have the skills needed to perform the job. Frequency of contact varies depending on the current participants in need of placement and the current employment opportunities in the community. Contacts may be as frequent as several times a day with employers that are currently looking for staff, to monthly or bi-monthly for others.

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:

Training providers must be Workforce Investment Board (W.I.B) and/or State Education Department (SED) certified. The W.I.B. approves training providers for the Eligible Training Provider List. This list is updated annually and the training provider must be on this list prior to utilization. Chautauqua County uses already existing programs operated by Erie2-Chautauqua-Cattaraugus Board of Cooperational Education Services (E2CCB) also establishes programs at additional sites when and where necessary due to demand.



- 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:

Our Targeted Training Contract has been granted to the W.I.B. who with the case managers will be assessing the needs of each recipient relative to training opportunities. In most cases, referral will be made by the case manager to the W.I.B. utilizing the Request for Education/Training form (Attachment E). The need for training of the recipient will also be identified in the Individual Employment Plan (Attachment D). The W.I.B. will assist in matching recipients to available training and will arrange to cover the costs of such training. Priorities for training will be those associated with jobs on the local Demand Occupation List which is established by the W.I.B.

Training providers must be W.I.B. and/or SED certified. The W.I.B. approves training providers for the Eligible Training Provider List. This list is updated annually and the training provider must be on this list prior to utilization. HHS contracts with the W.I.B. to provide this type of training. E2CCB correlates TABE, Best Plus, and Best Literacy scores with appropriate education and/or training opportunities. Pre and post tests are given to monitor gain or remediation requirements.

Curricula will be evaluated based on documented DOL Western New York labor market demand for the skill being taught. The W.I.B. establishes the local Demand Occupation List. For skills developed for local labor and southern tier markets, demand will be established based on regional labor market data developed by the NYSDOL and/or demand validated by the W.I.B. and W.I.B. One-Stop Operator, as well as evidence that the skill can be mastered to the demand level within the time frame allotted for training. For skills developed for regional or national demand, the above criteria will be considered as well as the ability of the trainee to attain wage rates which will offset the extraordinary expenses related to relocation to another labor market.

If there is a disagreement between HHS, the participant, and other service providers involved, about whether or not the District should approve the education or training, any of the parties involved can request a case review of the participant's situation. At the case review, all involved parties meet to discuss points of view and review additional information and/or documentation prior to the final decision which is made by HHS.

- 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:

Recipients who have not already attained a high school diploma or High School Equivalency will be offered the opportunity to participate in educational activities and may be referred for ABE, High School Equivalency preparation, or ESL classes when appropriate.

E2CCB correlates TABE, Best Plus, and Best Literacy scores with appropriate education and/or training opportunities. Pre and post tests are given to monitor gain or remediation requirements.

- 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:

Our Targeted Training Contract has been granted to the W.I.B. who with the case managers will be assessing the needs of each recipient relative to training opportunities. The W.I.B. will assist in matching recipients to available training and will arrange to cover the costs of such training. Priorities for training will be those associated with jobs on the Demand List.

Recipients who are assigned to work experience in addition to ABE, High School Equivalency preparation or ESL classes may be counted for additional participation hours.

Curricula will be evaluated based on documented DOL Western New York labor market demand for the skill being taught. For skills developed for local labor and southern tier markets, demand will be established based on regional labor market data developed by the NYSDOL and/or demand validated by the W.I.B. and W.I.B. One-Stop Operator, as well as evidence that the skill can be mastered to the demand level within the time frame allotted for training. For skills developed for regional or national demand, the above criteria will be considered as well as the ability of the trainee to attain wage rates which will offset the extraordinary expenses related to relocation to another labor market.

Recipients that have not yet attained a high school diploma or equivalent and are requesting to participate in an educational activity as part of their work activities would first be required to complete the TABE or Best Plus testing to determine their current level of education proficiency. The Case Manager would then review the minimum education requirements (TABE/Best Plus scores) as well as the current goals of the recipient as outlined in his/her Individual Employment Plan.

The educational activity would be approved if the recipient met the minimum education requirements (TABE/Best Plus scores), the educational activity is in line with the individual's goals (must be realistic for the client), and the individual is participating in a minimum of 20 hours of core activities or is participating in the maximum core activities that accommodate work limitations, whichever is less. If the educational activity is approved and the individual does not have good cause for not attending the activity on a regular basis, the educational activity will no longer be an approved work activity and the individual may be referred to other work activities as appropriate.

The educational activity would be denied if the individual does not meet the minimum education requirements (TABE/Best Plus scores), the educational activity is not in line with the goals of the individual, the educational activity is not expected to increase the ability of the individual to secure self-sustaining employment, the individual is non-compliant with required core activities, or if the educational activity would only aid the individual in securing employment that would also require a high school diploma or equivalent. When an educational activity is denied solely for the reason that it would

only lead to employment that would also require a high school diploma or its equivalent, the Case Manager will work jointly with the individual to determine if high school equivalency classes are needed or if the recipient can take the next Test Assessing Secondary Completion (TASC) test. When the recipient obtains his/her high school diploma or its equivalent, the educational activity may be approved assuming that all other requirements have been met.

If there is a disagreement between HHS, the participant, and other service providers involved, about whether or not the District should approve the education or training, any of the parties involved can request a case review of the participant's situation. At the case review, all involved parties meet to discuss points of view and review additional information and/or documentation prior to a final decision which is made by HHS.

- 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 participant must meet the minimum achievement/aptitude levels, which are prerequisites for the program requested.
  - The participant must have an approved individual employment plan which demonstrates the capacity of the individual to meet the scheduled class hours of the training/education selected as well as the scheduled hours of work required by the District.
  - The participant must demonstrate and continue to demonstrate satisfactory attendance (75% attendance), grades/performance (at least a "C" average) and progress commensurate with other students in good standing.
  - A client requesting approval of a specific training will be required to complete and submit a written justification (in the participant's own words) of how the training will help him/her in becoming self-sufficient. It will also explain how the participant expects to overcome any obstacles in completing the training while continuing to meet the number of required participation hours (Attachment E). Students who are attending school are required to submit monthly instructor signed attendance verification.
  - Up to four years of post-secondary education as a Temporary Assistance work activity may be approved beyond a twelve-month period when combined with no less than 20 hours of participation averaged weekly in paid employment, or other core work activities or community service.
  - When determining whether or not an individual is approved/assigned to participate in job skills training or vocational educational activities, including up to four years of post-secondary education, the District will consider such factors as, but not limited to, the individual's ability to successfully complete the program, the extent to which the individual is able to secure employment without the additional education or training, and the extent to which the education or training will prepare the individual for jobs in an occupation with favorable job opening predictions.
- 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 highest level of post-secondary education that will be approved is a 4 year college program.

- 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:

HHS staff will utilize the PA Individual Employment Tracking Summary in WTWCMS to track the 12 month lifetime limit. Prior to the end of the 12 month lifetime limit, a case manager will meet with the individual to update their Individual Employment Assessment and Individual Employment Plan. The case manager will identify and make appropriate referrals for employment activities.

- h. Education and training providers are evaluated by the following standards:

Education and training providers must be SED and/or W.I.B. approved instructors. The W.I.B. approves training providers for the Eligible Training Provider List. This list is updated annually and the training provider must be on this list prior to utilization.

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

Education and training opportunities will be discussed with the recipient during assessment, reassessment, and the development of the Individual Employment Plan. Desired education and training will be identified in the Individual Employment Plan as it relates to the achievement of the goals developed by the recipient. The recipient will complete the Request for Education/Training form jointly with the case manager to identify goals of the individual and relevant training that will help them to achieve their goals.

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

Notification will be by phone from the HHS case manager and/or the W.I.B. and may be followed by or preceded by a letter.

- 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:

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

At recertification, examiners are reviewing the cases for school attendance and if not in school and non-exempt, they are referring the youth to a case manager to be scheduled for an assessment.

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

When assigning an individual with limitations to an employment activity, the HHS case manager and/or W.I.B. provides a written notification of such limitations to the service provider.

### **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 (12) 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 (12) 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 (6) 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 (6) 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 WTCMS?

Yes       No

If Yes, does the district's provider/vendor collected documentation, data entry and management of WTCMS 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 has Spanish versions of State-approved and local equivalent forms. Each of our client service offices has bi-lingual staff for interpreting, as well as 2 Spanish speaking case managers in the Dunkirk location, and 2 Spanish speaking case managers in the Jamestown location. While limited, we do have some worksites that can accommodate non-English

speaking individuals. Our Contract Agency also offers Spanish speaking orientations in their Jamestown and Dunkirk locations. The District may utilize a language line service or interpreters to assist individuals with limited English proficiency other than Spanish.

### **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:

In February, 2013, the Department began to contract with the W.I.B. for five employment services; Job Readiness Program, Work Experience Program, Subsidized Employment, Services to Work Limited recipients, and Targeted Training. Provision of employment services will be more seamless with all services being provided by one contractor.

The W.I.B. will educate the worksite supervisors on the proper reporting of absences and on the need for worksite supervisors to counsel recipients when there is initial non-compliance.

The need for appropriate child care and a backup plan is discussed with the recipient at assessment, reassessment, WEP interview, JRT, and work limited orientation.

Conciliation notices are sent out, in most instances, within 2 business days after notification to the Department of non-compliance. In the case of an applicant for or recipient of Family Assistance or Safety Net Assistance, the individual must respond to and request a conciliation within the 10 day time frame. For FA cases, it is expected that the case managers contact the individual by phone to conciliate as soon as possible.

When there is non-compliance and it has been determined to be both willful and without good cause, the case is referred for sanction.

Employment Assessments and development of the Individual Employment Plan, whenever possible, will be conducted prior to case openings. Reassessments and updating of the Individual Employment Plan are scheduled in the recipient's home, worksite, or at HHS.

W.I.B. staff has been trained by District staff to complete conciliations. The W.I.B. completes conciliations for individuals who have failed to attend/comply with WEP assignment.

### **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:

Individuals who are sanctioned beyond duration will be scheduled for an office meeting with the case manager at least bi-annually but no more frequently than once per month. Meetings will include discussion to explore changes in case circumstances, household composition, medical condition, income, and the availability of resources.

When an individual who is sanctioned beyond duration expresses an interest in complying with the employment activity so that the sanction can be lifted, the case manager, in coordination with the W.I.B., will assign the individual to an employment activity and monitor the progress



toward compliance. Once the individual demonstrates compliance and completes satisfactorily with no unexcused absences, the sanction will be lifted and benefits restored retroactive to the date that the individual expressed a willingness to comply with employment requirements. Compliance is defined as a completion of the activity which caused the sanction and may be up to 10 business days in length.

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

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

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

Diversion payments may be made to meet a short term need in order to assist an individual to obtain or retain employment rather than opening an on-going Temporary Assistance case. All applications for diversion services will be interviewed and processed by the Eligibility Team. A request must be initiated by the individual indicating what services are needed. The eligibility worker investigates the availability of resources in the household (checking, savings, etc.) or if any outside resources are available (funding from another agency, family than can lend a hand, etc.). If any resources are available, the client will be responsible to access those resources first. If resources are available and the application is denied, a notice (LDSS 4002) "Action Taken on Your Request for Assistance to Meet an Immediate Need or a Special Allowance" is sent. If there are no available resources to meet the need, the client is advised to obtain documentation which may include estimates. When all required information is received, the worker evaluates the most cost effective means that will meet the client's needs. If a diversion payment is being made, the client may be required to write out a plan on how they will pay for future needs. The client is informed of the decision using client notice LDSS 4002.

SN and FA non-exempt applicants are referred on a first come first serve basis and until the orientation is full to the OTDA Jobs Program for Supervised Job Search upon submission of their application. The goal is to divert the applicant from the use of Temporary Assistance funds and reconnect the individuals to the workforce. The Jobs Program staff works closely with the HHS staff to coordinate any diversion or supportive service funds that may be needed to get the applicant employed and to keep them employed. The Jobs staff provides a weekly Jobs Program orientation for one hour. At that time, each applicant is assigned to complete 10 job search contacts. Each applicant is scheduled for a weekly one on one session to review their job search contacts. After the first week, applicants are assigned to complete 5 new and 5 follow-up job search contacts each week. The Jobs staff continues to meet with each applicant until their case is determined and makes a follow up contact every 90 days and 180 days.

## **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:

Supportive services (Attachment F) include, but are not limited to: entrepreneurship/business start-up; motor vehicle repair; vehicle insurance; vehicle registration; transportation; professional licenses and fees; tuition, books and fees; tools and equipment; job related safety equipment/clothing; and driver's license and permits. The District may also provide any other supportive services, within regulation, which are deemed necessary to allow individuals to participate in work activities, assist individuals at risk of needing Temporary Assistance to improve their opportunities for employment or to maintain their employment, or to assist employed Temporary Assistance recipients to improve their opportunities for employment which will move them to self-sufficiency.

- 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):

- 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:

Two miles

- 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:
- Individuals at risk of needing Temporary Assistance may be referred to Chautauqua Works for employment services.
  - Referrals may be made to local Temporary Employment Agencies.
  - Referrals may be made to a Lifeline Support Program for a free cell phone.

- Diversion payments or supportive service payments may be made on a short-term basis to assist an individual to obtain or retain employment rather than opening an on-going Temporary Assistance case.

## **Section 4.2 Transitional Support Services**

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

The District will provide Child Care Subsidy, Supportive Services, and Diversion Payments to support job retention. Please see the Supportive Services Plan (Attachment F).

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:

The following supportive services will continue to be available for 90 days after case closings: child care subsidy; motor vehicle repair; insurance, and registration; transportation; tools and equipment; job related safety equipment/clothing; and driver's license and permits. The District may also provide any other supportive services, within regulation, which are deemed necessary to allow individuals to participate in work activities, assist individuals at risk of needing Temporary Assistance to improve their opportunities for employment or to maintain their employment, or to assist employed Temporary Assistance recipients to improve their opportunities for employment which will move them to self-sufficiency. Please see the Supportive Services Plan (Attachment F).

## **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:

The District will provide child care subsidy.

## **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

Once notice has been received of non-compliance, the case manager/employment clerk, or W.I.B. staff mails a conciliation notice to the recipient. For FA cases, it is expected that the case manager or W.I.B. staff member attempt to contact the recipient by phone to expedite the conciliation process. At the time of the conciliation, a case manager or W.I.B. staff member will conduct the conciliation either by phone or face to face. When a conciliation takes place, the District will inform the individual in writing of the results (I.e. whether or not the District

determined that the non-compliance was both willful and without good cause). This notice may be done separately, or as a ten-day notice for recipients.

W.I.B. staff has been trained by District staff to complete conciliations. W.I.B. staff is completing conciliations for failure to attend/comply with WEP assignment.

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

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

Case managers and W.I.B. staff will take into account when deciding good cause if the non-compliance was both willful and without good cause before processing with negative action.

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

Once notice has been received of non-compliance, the case manager/employment clerk mails a conciliation notice to the recipient. For FA cases, it is expected that the case manager attempt to contact the recipient by phone to expedite the conciliation process. At the time of the conciliation, a case manager will conduct the conciliation either by phone or face to face. When a conciliation takes place, the recipient has an opportunity to document good cause or an exemption from participation in SNAP work activities. The District will then inform the individual in writing of the results (i.e. whether or not the District determined that the non-compliance was both willful and without good cause). This notice may be done separately or as a 10 day notice for recipients.

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

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

When the conciliation is conducted, the HHS worker explains to the individual that they may continue to receive SNAP benefits by attending job search as assigned.

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

When a recipient fails to comply with SNAP E & T Work Requirements, the worker will send LDSS 4230A notifying the recipient of non-compliance and requiring that they contact the Agency within 10 days to document good cause or an exemption from participation in SNAP work activities or to demonstrate compliance to avoid the SNAP E & T sanction. The recipient will be required to demonstrate compliance by conducting a job search activity consisting of 5 contacts to be submitted by the date agreed upon in conciliation in order to continue to receive

SNAP benefits. The client will have 5 business days to complete the required 5 Job Search contacts.

## **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:

The individual has a conversation with the case manager regarding their desire to end the sanction. A plan is developed jointly with the individual and the case manager for the individual to demonstrate his/her willingness by reporting to an assigned work activity site or other activity on time and prepared to engage in the work assignment. To demonstrate compliance, the individual must report to the assigned worksite or activity as scheduled for 10 business days and complete satisfactorily with no excused absences. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply, but no earlier than the expiration of the minimum duration period.

- 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:

The individual has a conversation with the case manager regarding their desire to end the sanction. A plan is developed jointly with the individual and the case manager for the individual to demonstrate his/her willingness by reporting to an assigned work activity site or other activity on time and prepared to engage in the work assignment. To demonstrate compliance, the individual must report to the assigned worksite or activity as scheduled for 10 business days and complete satisfactorily with no excused absences. SNAP benefits are restored once satisfactory compliance is attained. 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 E & T 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 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 Employment case manager, TA eligibility examiner, TA undercare examiner, and/or supervisor(s) review the medical documentation and determine status. When the documentation, diagnosis, prognosis, or limitations are unclear, the worker may contact the physician for further clarification, a nurse employed by the District who may be able to offer some clarification, and/or the worker may make a referral to IMA for an Employability Determination (second opinion).

### **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.):

Case Managers review all medical documentation submitted by an individual (normally the LDSS 4526). If the medical documentation indicates that the treating physician is recommending non-invasive treatment or rehabilitation, the Case Manager will mail the individual a request to document attendance in recommended rehabilitation treatment regardless of expected duration of the medical exemption. Attendance documentation will be completed by the treating provider and submitted by the individual no less frequently than monthly. Non-invasive treatment or rehabilitation shall include but not be limited to mental health counseling, physical therapy, occupational therapy, and cardiac therapy.

When an individual has been determined to be exempt due to a mental or physical impairment based on medical information received from the medical professional, and when the professional has recommended rehabilitation to assist in restoring the

individual to self-sufficiency, the individual will be required to submit documentation of their participation in the recommended treatment. The timeframe for submitting documentation will be based on the recommended need for treatment and will be required to be submitted at a minimum on a monthly basis. The medical status for each individual will also be reviewed at the end of the expected duration of the diagnosis and/or recertification.

When an individual has been sanctioned for failure to comply with recommended rehabilitation treatment, the individual will be scheduled for an office meeting with a case manager no more frequently than once per month.

Chautauqua County contracts with the Chautauqua W.I.B. to provide services for the work-limited population at both the Jamestown and Dunkirk Self-Sufficiency Center locations. The purpose of the program is to develop, establish, and sustain effective linkages that will benefit the work limited population. These benefits include both direct services and access to additional services and funds from the New York State Office of Adult Career and Continuing Education Services - Vocational Rehabilitation (ACCESS-VR).

For those individuals who are determined to be totally and severely disabled, program staff provides assistance accessing Social Security or Supplemental Security benefits. These individuals are assisted with the SSI/SSDI application process, including the collection of documentation and the completion of paperwork. When appropriate, Self-Sufficiency Center staff also links individuals to Legal Assistance of Western New York (LAW NY).

Self-Sufficiency Center staff will assess each TANF and Safety Net recipient referred by HHS for the Income Security Program for Work Limited Individuals from a holistic standpoint. They will develop an individualized plan of action that will include an array of services that will address their needs. This assessment will determine the services and activities that are offered to the participant and will lead to a return to full-time employment, optimal employment (with accommodations for individual barriers) or an exit from the labor market as a result of approval for SSI or SSDI. Referred individuals are expected to be work limited but non-exempt.

The Self-Sufficiency Center staff will work together with each participant to determine the appropriate steps to employment or to secure Social Security or Supplemental Security Income benefits.

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

Please see above.

- 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:



Self-Sufficiency Center staff will continue to monitor these individuals and report progress and compliance directly to HHS case managers, and, when appropriate, enters compliance/non-compliance information into WTWCMS. Staff provide a monthly report of all participants and what activities they are in.