

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

January 1, 2020 – December 31, 2021

Erie County

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Section 1- Assurances

As a condition of the receipt of federal and State funds the Erie County Department of Social Services submits this Temporary Assistance (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 Erie County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

/s/ MC 01/24/2020

Marie Cannon, Social Services Commissioner

January 24, 2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

Section 2 Administration

Section 2.1 Administrative Structure

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

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

ERIE COUNTY WORK CENTER (ECWC)

The Erie County Work Center emphasizes an employment focused approach for applicants applying for Temporary Assistance (TA). The ECWC Employment Counselors hold seven employment orientations daily to inform applicants of work requirements and expectations. Orientation requirements include an explanation of applicants' rights and responsibilities, as well as, the benefits and obligations of applicants' participation in work activities. Applicants are informed of TA time limits, requirements to engage in work activities, school attendance requirements for teen parents and responsibility for finding child care. TA applicants are assessed prior to case opening to determine employability status, identify and address any immediate barriers to participation in job search and referred to an employment activity or other services simultaneous to the application process. The assessment interview includes questions regarding job skills, prior work experience, educational levels, including literacy and English language proficiency, medical limitations, supportive services and child care needs. Employment Counselors also conduct the state mandated alcohol and drug abuse screening referral form LDSS-4571 and make referrals to Certified Alcohol and Substance Abuse Counselors (CASAC) for an alcoholism/substance abuse assessment based on the screening results. Employment Counselors review the Self Sufficiency Agreement Form B-4319 (Attachment #2) and the Employment Registration Agreement Form B-2341 (Attachment #3) with the applicants. If a medical condition is claimed which would limit an applicant's ability to participate in assigned work activities a medical form LDSS-4526 is given to them to obtain medical documentation from the applicant's medical provider. In those instances where the applicant does not have a medical provider, a referral is made to Be Well Healthcare Medicine (d/b/a Great Lakes Physician Services) for a medical evaluation to determine employability. Based on final employability determination, nonexempt applicants are assigned to job search activities which include TANF, Safety Net and Spanish Accelerated Job Clubs or private job search.

COORDINATED SERVICES TEAM

The Coordinated Services Team is a specialized Team of Employment Counselors who service applicants of Temporary Assistance determined to be in need of drug and/or alcohol treatment services by a contracted Certified Alcohol and Substance Abuse Counselor (CASAC). Employment Counselors complete assessments, develop Employment Plans and refer individuals to appropriate treatment services. Compliance with treatment is monitored during the application process, as it is a condition of eligibility. CASAC's are co-located in the Team to conduct alcohol and substance abuse assessments, determine the level of care needed and recommend the employability status of each applicant. The Team is co-located with the

Temporary Assistance Employment and Financial Planning team that is responsible for determining eligibility for applicants of Temporary Assistance benefits.

THE MAAT UNIT (MULTI ABUSE ASSESSMENT TEAM)

The MAAT Unit (Multi Abuse Assessment Team) is co-located with the The Coordinated Services Team. The MAAT Unit is responsible for monitoring services to recipients of Temporary Assistance who have been determined to be in need of drug and/or alcohol treatment services by a contracted Certified Alcohol and Substance Abuse Counselor (CASAC).

CASAC's conduct alcohol and substance abuse assessments, determine the level of care needed and recommend the employability status of each recipient. Employment Counselors refer each recipient to an appropriate treatment agency and monitor compliance. When it is determined that the client is no longer exempt from employment activities in respect to drug or alcohol abuse, an Employment Counselor completes an employment assessment and develops an Employability Plan. The individual is referred to an appropriate work activity, or the disability review procedure is followed if a client claims a medical disability.

DOMESTIC VIOLENCE TEAM

The Domestic Violence Team monitors the employability status and case management of recipients that are victims of domestic violence. When it is determined that the client is no longer exempt from employment activities in respect to domestic violence, an Employment Counselor completes an employment assessment, and develops an employability plan, referring the individual to an appropriate work activity.

JOB CLUB

Job Club provides job readiness training, focusing on promoting the benefits, financial and otherwise, of going to work. Participants learn: to identify job skills, prepare resumes, interview techniques and job retention skills. They also learn about: job search techniques, tips for filling out employment applications, employer expectations, problem solving on the job, work ethic, proper dress and hygiene. Job leads are provided while motivating participants in their job search. Finding quality day care is discussed and daycare registration material is distributed. Employment Counselors closely monitor compliance with program requirements. Upon completion, applicants are scheduled for an assessment interview.

ASSESSMENT

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

MEDICAL UNIT

The Medical Unit Employment Counselors request medical documentation from clients that are claiming a medical disability. Documentation submitted is reviewed to determine employability and the client is notified of exempt/non-exempt status. The Medical Unit monitors for compliance with treatment plans recommended by the medical provider. Clients may be referred to Industrial Medicine Associates (IMA), as needed, for consultative medical examinations. Incapacitated/disabled clients with medical documentation indicating that an application for SSI is appropriate, may be referred to the Legal Advocacy for the Disabled (LAD) Unit to pursue SSI or SSD. When clients are determined non-exempt from employment activity requirements based on medical documentation, the clients are assessed and employability plans are developed, taking into consideration each individual's limitations and need for accommodations.

JOB DEVELOPMENT

The Job Development Unit is a resource available to Temporary Assistance and SNAP applicants and recipients. Job Development staff identifies potential job leads for participants, recruits new employers for placement, matches participants with job opportunities based on their employment goals and preferences, screens applicants for employers and provides pre and post-employment services to ensure a smooth transition to work and self-sufficiency. Job Development staff provides interviewing techniques, job coaching and case management, coordinates day care and transportation and works as a liaison between the participant and employer. A network of employers and community partners has been established to work with participants and provide job placement opportunities into unsubsidized and subsidized jobs. Monthly Job Fairs are held by the Job Development Unit to help connect participants with employers and vocational training opportunities. The Job Development Unit also partners with the NYS DOL One Stop Center to coordinate Job Fairs with various employers around Western New York. The Unit also utilizes the Placing Individuals in Vital Opportunity Training Program (PIVOT), a six month wage reimbursement program that places TANF participants into permanent job opportunities. This Job Development Unit also has been working with various employers to provide transportation to businesses that are not accessible with public transportation.

COMPLIANCE UNIT

The Contract Compliance Team monitors service providers for compliance with performance measures. This team is also responsible for the oversight of contract expenditures and monthly invoicing. In addition, monitoring work activity compliance, management of client attendance and entering data into WTCMS system, issuance of bus passes and program quality assurance.

COMMUNITY RESOURCE TEAM

The Community Resource Team is responsible for identifying community resources, referrals and linkage to resources and supportive services. This team serves as the Project Manager for the Summer Youth Employment Program and Vocational Training Fairs. They assist with vocational training placements and the coordination of educational sessions and development of community activities. Staff manages and monitors the youth holding pool which is comprised of youth ages 16-18.

ABLE-BODIED ADULTS WITHOUT DEPENDENTS (ABAWD) and SNAP E&T PROGRAM

The Able-Bodied Adults without Dependents (ABAWD) Team informs Supplemental Nutrition Assistance Program (SNAP) clients of ABAWD eligibility requirements, consequences for failure to meet the ABAWD requirements and qualifying work activities that meet requirements. Staff monitors and tracks ABAWD's participation in qualifying work assignments to maintain eligibility for SNAP benefits. They review for exclusions and perform (ABAWD) related override transactions to adjust data elements that are used as part of the ABAWD tracking process based on case circumstances. Staff provides job search assistance to SNAP applicant and recipient work registrants. Sessions are held to provide information on Job Search resources and employment preparation activities.

SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP)

This division administers the Federal Supplemental Nutrition Assistance Program (SNAP). Social Welfare Examiners determine eligibility for SNAP benefits. Staff also determines and notifies all applicants/recipients of work registrant and ABAWD status. The worker assigns an appropriate SNAP employment code and ABAWD indicator. At certification and re-certification SNAP applicants/recipients are offered assistance with job search efforts.

TEMPORARY ASSISTANCE UNDERCARE UNIT

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

CHILD CARE SUBSIDY PROGRAM

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

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.

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Buffalo Public Schools Adult Education Program	\$286,600	<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%	Work Experience, HSE and ESL Educational Services, Workplace Literacy, Job Readiness Training, Career/Vocational Training, Job Placement and Retention Services, Case Management Services
Erie Community College - CAST	\$500,000	<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%	Work Experience, Job Skill Training, Vocational Training, Job Readiness Training, Job Placement and Retention Services, Case Management Services
Goodwill Industries-Worksite Management	\$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%	Work Experience, Job Skills Training, Job Placement and Retention Services, Case Management Services
Goodwill Industries-Subsidized Employment Services	\$500,000	<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%	Subsidized Work Assignments, Case Management, Job Placement and Retention Service
WNY Independent Living-Mental Health Peer Connection	\$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%	Work Experience, Job Placement and Retention Services, Case Management Services for Individuals with Drug/Alcohol or Mental Health Diagnosis
Salvation Army	\$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%	Work Experience, Job Skills Training, Vocational Training (CHEST), Job Readiness Training, HSE, Job Placement and Retention Services, Case Management Services

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
United Way Works: Belmont Shelter Corp, Catholic Charities Lackawanna, The Belle Center, Gloria J. Parks, Literacy NY, Lt. Col Matt Urban Ctr. Northwest Buffalo Community Center, Seneca Babcock Community Center, BOCES 1, BPS-Adult ED	\$1,355,400	<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%	Work Experience, Job Skills Training, HSE, ESL, Computer Literacy, Financial Literacy Provided at Community HUB Sites
Erie County Medical Center (ECMC) CASAC Services	\$397,493	<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%	Certified Alcohol and Substance Abuse Counselors (CASAC), determine need for treatment, level of care and employability status
Be Well Healthcare Medicine DBA/Great Lakes Physician Services	\$75,000	<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%	Medical Evaluations to determine employability of TA applicants Fee for Service - \$250/Examination Maximum referrals 25 per month
Erie County Employers (PIVOT) Wage Subsidy Program	\$2,694,286	<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%	6 Month Wage reimbursement employment training contracts
Community Services for Every1	\$100,000	<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%	Work Experience, Job Skills Training, HSE, Job Placement and Retention Services, Case Management Services
Strengthening Families	\$176,400	<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%	Prevention and Employment Services for parents who are actively involved in substance abuse treatment/services with children aged 5 to 15 years old
Catholic Charities/ International Institute (co-recipient)	\$100,000	<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%	Job Readiness Training Program designed for LEP individuals

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.

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Industrial Medicine Associates	Revenue Intercept	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Consultative Medical and Psychiatric Examinations
NYS Department of Labor		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Placement Services, Employment Workshops, Job Fairs
Buffalo Employment Training Center	WIOA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Placement Services, Employment Workshops
Erie Community College One Stop	WIOA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Placement Services, Employment Workshops
ACCESS VR		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational Training for Individuals with Disabilities
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%	Nutrition Education
Center for Employment Opportunities		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Re-Entry Employment Services
Summer Youth Employment Program		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Youth Employment Services
WIB Health Professionals Opportunity Grant		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational Training
Jewish Family Services		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	ESL, Career Counseling
Buffalo & Erie County Botanical Gardens		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Buffalo 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%	Worksite Sponsor

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Buffalo History Museum		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Buffalo Olmsted Parks Conservancy		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
City of Buffalo		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Friends of Night People		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Gerard Place		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Hispanics United of Buffalo		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
New Life Residential Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Buffalo Zoo		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Buffalo Federation of Neighborhood Centers		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor/Skills training
Educational Opportunity Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational and Educational Training
Catholic Charities of Buffalo		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor/HSE/ESL
Erie 1 BOCES		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational Training
Journey's End Refugee Services		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	HSE/ESL/Vocational Training(MAC)

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Restoration Society Inc.		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Placement Services, Career Counseling
Child Care Resource Network (CCRN)		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Child Care Resource & Referral Agency
Buffalo Urban League		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Youth Services
Workforce Development Institute (WDI)		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Child Care Subsidy Facilitated Enrollment Program
Beacon Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider
Erie County Medical Center/Out Patient Clinics		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
Endeavor		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider
Evergreen Health		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider
Cazenovia Recovery Systems		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider
Best Self Behavioral Health		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
Horizon Health Services		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
Spectrum Health Services		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
BryLin Hospital		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Veterans Hospital		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider
Catholic Health System		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider
CAO/DART		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Treatment Provider
Buffalo & Erie County Public Library		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
Delevan Grider Community Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor
George K. Arthur		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Worksite Sponsor

Section 2.3 OTDA Jobs Staff Agreement

OTDA Jobs Program Services – Target Groups

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

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

Other Services Requested

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

Section 2.4 Access to Services at New York State Career Centers

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

- a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:
 - The district has employee(s) physically present at a Career Center
 - The district has contract staff physically present at a Career Center
 - The district makes available direct access to its program staff via phone or technology at a Career Center
 - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
 - Other:

- b. Please provide a description of how the district coordinates with Career Center partners with providing services to the district’s clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

The district and One-Stop Career Center partners have an agreement to participate in a customer focused referral system that will assist job seekers to access resources. Each partner offers information on services, program eligibility, and how to apply for program services. A referral liaison is available for each program partner to arrange for service referrals and appointments. Assessment and Individual Plan information is shared with appropriate client release. The district and the DOL partner on Job Fairs and various

employer projects. The DOL attends the ECDSS Job Clubs on a weekly basis and informs clients of various job fairs in the community. In addition, the DOL meets with clients on a one to one basis to provide job search, resume writing, and other job readiness activities. Clients go to the One Stop Centers (Buffalo Employment Training Center and Erie Community College) for job placement services and employment preparation workshops.

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:

The district's orientation will also cover the "Work First" philosophy, Medicaid/Managed Care, and the Work Support Checklist (Attachment #4A, #4B, #4C, #4D, #4E, #4F, #4G, #4H).

Described below is the manner in which the district completes the required orientation for all applicants and recipients of 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 delivered by Employment staff. Applicants are either scheduled for a group orientation conducted on day 2 of the TA application process or for an individual one on one appointment. Applicants are asked to sign a statement of understanding B-5683 “Employment Orientation” (Attachment #5) but no negative action is taken if the individual declines to sign. Orientation for recipients is provided individually at recertification.

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 WTWCMS

The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.

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:

All adults in households with dependent children, and 16 and 17 year olds who are not in school, are assessed by Employment Counselors within 90 days of eligibility. Adults applying for Temporary Assistance and residing in households without dependent children are assessed within a year following the application. Employment Counselors, through the use of WTCMS “Search Folders with Alerts” monitor to ensure that all applicants are assessed within the specified time frame.

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

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

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

Employment Counselor:

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

a. One additional year of experience as described above;

OR

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

OR

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

e. Applicants in households **with** dependent children are required to participate 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?
- application;
 - recertification;
 - Whenever there is reason to believe that an individual has a physical or mental impairment that would limit their ability to participate in work activities;
 - Whenever changes in individual’s circumstance or activity warrant reassessment;
 - Based on client circumstances assessments are conducted every 6 to 12 months.
 - Aged 60 and older are only assessed if determined to be in need of treatment for drug and alcohol abuse.
 - Phone assessments are conducted for extenuating circumstances including medical documentation received confirming inability to report for an in person assessment, individuals receiving in-patient drug and alcohol treatment services, and out of county college students. The case notes clearly document why a phone interview is necessary.

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.

A face to face interview is conducted unless extenuating circumstances warrant a phone interview. This includes full-time employment, out of county college students, and receipt of medical documentation confirming inability to report. The case notes are clearly documented why a phone interview was necessary. All of the information collected during the employment assessment process is considered when developing an individual's Employment Plan. Employment Plans are developed at assessment, reassessment and as changes in circumstances warrant.

- Employment goals, as well as, other goals are determined and developed specific to the individual;

- Challenges and barriers to the individual's ability to attain his/her goal(s); how the barriers are to be addressed, including any reasonable accommodations that are needed;

- Client preferences are indicated through assessment; if preferences cannot be accommodated, notation as to reason why is on the Employment Plan;

- Work activity assignments;

- Supportive services that the district will provide, including child care and transportation; as well as addressing any special needs of the children

- Upon completion of the Employment Plan, the individual is given a copy

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

- As changed circumstances warrant;

- As the employment assessment information warrants;

- As the individual's goals change

- Upon completion of the updated Employment Plan, the individual is given a copy

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:

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

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

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

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

Due to work limitations or other case circumstances, appropriate hours of activity for case participation are often determined on a case-by-case basis. The standard assignment of hours for a single parent/caretaker of a child under age 6 (employment code of 29) is up to 25 hours per week with WEP being limited to the hours determined by dividing the household’s TA grant plus SNAP allotment by the higher of the federal or State minimum wage. For households with no children or no children under the age of 6 (employment code of 20) are assigned up to 35 hours per week, with WEP being limited to the hours determined by dividing the household’s TA grant plus SNAP allotment by the higher of the federal or State minimum wage.

Monitoring the participation rate is enhanced with the ability of all Supervisory staff with access to the Cognos reporting system. Cognos reports provide staff with timely data to aid in monitoring and maximizing participation of non-exempt adults and status changes.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	3,258	4,162

- 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:

Erie County utilizes WTWCMS reports, Cognos reports and District reports to monitor progress and client participation.

The following Cognos reports are reviewed monthly:

- Employability Code Duration Report
- Possibly Miscalculated Non-Legal Union Families with Children in Common Report
- Clients with Manual Folders

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

Preliminary Federal Countable Not Countable Report

Earned Income/Employment Reports

Adults with Budgeted Earned Income and No Current Employment Schedule

Adults with No Budgeted Earned Income and Current Employment Schedule

Participation and Engagement Status Reports

Adults in Vocational Education 9 Months or More

Exempted Caretaker of Child < 1 Exceeding 12 Month Limit

Adults with No Activity Status > 3 Months

ABAWD Enhanced Caseload Listings

- 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):

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):

Erie County does not mandate SNAP E & T work activity assignments to NTA SNAP work registrants. NTA SNAP applicant/recipient work registrants are offered at certification and recertification, assistance with job search efforts and this is documented in the SNAP case record. Those interested in assistance with job search activities are either scheduled for a session or provided a job search information sheet with contact information for the Comprehensive Employment Division (CED). CED holds sessions to provide information on job search resources and employment preparation activities. Information is provided on Work Pays publications, job interview tips, filling out job applications, job search websites, recording job search efforts, Job Zone, Job Fairs, and One Stop Resource Centers.

- 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:

- Safety Net Accelerated Job Search (SN AJS) is a three week job search program designed to provide single Safety Net applicants with a meaningful job search activity. Non-exempt Safety Net applicants are required to report on time each day to participate in the classroom segment which includes job search techniques, interviewing techniques and job retention skills. A resume is done for each participant in SN AJS. Additionally, all applicants are registered with the NYS Department of Labor Career Center. Applicants are required to complete 3 job applications per day. A computer lab is available for participants to learn computer skills and to complete on-line job applications. Employment Counselors closely monitor applicants' compliance with program requirements. Failure to comply results in the denial of the pending application. Upon completion of SN AJS, the applicants are scheduled for an assessment interview and work activity assignment. Weekly presentations are provided by the NYS Department of Labor, Cornell Cooperative Extension "Eat Smart NY" Program and WNY Catholic Charities "Financial Literacy Workshop".
- TANF Accelerated Job Search (TANF AJS) is designed to provide TANF applicants who have a limited work history with a meaningful job search activity prior to case opening. Non-exempt TANF applicants are required to report on time to three classroom sessions during a three week period. Job search techniques, tips for filing out applications, proper dress and hygiene, interviewing techniques and how to find quality day care are discussed. Additionally, all applicants are registered with the NYS Department of Labor Career Center. Applicants are required to complete 12 applications during the three weeks of TANF AJS. Employment Counselors closely monitor applicants' compliance with program requirements. Failure to comply results in the denial of the pending TA application. Upon completion of TANF AJS, the applicants are given day care registration materials, and scheduled for an assessment interview and work activity assignment. Weekly presentations are provided by the Child Care Resource Network and NYS Department of Labor.
- Spanish Accelerated Job Search is designed to provide Spanish-speaking applicants with a meaningful job search activity prior to case opening. Non-exempt Spanish-speaking applicants are required to report on time to three classroom sessions during a three week period. Job search techniques, tips for filing out applications, proper dress and hygiene, and interviewing techniques are discussed. Applicants are required to complete at least 12 applications during the three weeks of AJS. EDCSS Spanish Speaking Employment Counselors closely monitor applicants' compliance with program requirements. Failure to comply results in the denial of the pending TA application. Upon completion of Spanish Job Club, the applicants are scheduled for an assessment interview and work activity assignment.

- Applicant Job Search is a self-directed job search for those applicants with a recent work history, or those determined through the assessment process not appropriate to participate in Accelerated Job Search. TANF applicants are required to document 4 employment applications per week and SN-IND 15 employment applications per week. The applicant is scheduled to return 3 weeks from the date assigned to applicant job search. An Employment Counselor provides the applicant with Job Search forms B-5764 & B-5525 (Attachment #6 and #7) and explains to the client the requirements and consequences if non-compliant, answering any questions the client may have. Failure to comply results in the denial of the pending TA application. Upon completion of the job search, applicants are scheduled for an assessment interview and work activity assignment.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	4/week	18 weekly	Report 1 time weekly for 3 weeks
SNA Individuals	15/week	40 weekly	Report daily for 3 weeks. Includes JRT and Job Search

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

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

Safety Net Recipient Job Club (SNR) is a four week, job search program to assist Safety Net Recipients in addressing barriers to employment. Classroom activities focus on how to get a job when you have limited work experience and/or dated work history. Accommodations in class requirements are made for participants that have work limitations. The goal is to engage our work-limited population. Participants complete self-assessments to increase awareness of attitude, motivation and the need for change. Participants report 2 days a week, and complete 3 applications per day. Upon completion of Safety Net Recipient Job Club, the participants are scheduled for an assessment interview and work activity assignment. Participants that fail to comply with Job Club program rules are offered conciliation and may be subject to an employment sanction.

The Supervised Job Search Program is available to all clients. The client is scheduled for weekly meetings with an Employment Counselor in the Job Development Unit to review: interviewing techniques, resume writing, appropriate dress and hygiene, filling out applications, identifying employers, job openings, and identifying job search engines online. At each weekly appointment the Employment Counselor will monitor the job search progress. If the client is assigned to job search as their sole activity, the client is expected to spend at least 30 hours weekly with a minimum of 20 contacts per week on job search efforts. Job search activities include

identifying potential employers, preparing and/or submitting resumes, interviews, writing employer follow up letters or attendance at job fairs. When job search is combined with another work activity, the Employment Counselor will determine the minimum weekly hours and/or contacts needed for job search. The Employment Counselor will be responsible for assessing a client’s progress on applications, interviews, and number of contacts. Employment Counselors use a Job Referral Form B-2342-A-2 (Attachment #8) to verify that the client had contact with the documented employers and for possible outcomes. Employment Counselors also utilize on site Job Fairs for employment referrals and verification of contacts for each client. This process will enable clients to utilize additional resources and contacts.

TA Applicants and Recipients that present with significant barriers and have difficulty completing Job Club requirements will be linked with ECDSS and Community Resources. Participants also have access to an EDCSS/CED Caseworker to assess clients in crisis or clients with undisclosed medical concerns.

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

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

- 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.

	Activity and Definition
<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP 	<p>Unsubsidized Employment - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Subsidized Private Sector Employment - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Subsidized Public Sector Employment - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Work Experience - 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"> — FA — SNA Fam — SNA Ind — SNAP 	<p>On-the-Job Training (OJT) - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</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>

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Community Service - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</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"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Search - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> — SNAP 	<p>SNAP E&T Supervised Job Search- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Readiness Training (JRT) Activities - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE 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"> • Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance. • Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Vocational Education - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Skills Training - Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Education Training - Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Secondary School - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Provision of Childcare for Individual Participating in Community Service - 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"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Other - Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>

Section 3.5 Job Development

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

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

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

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

The Job Development Unit consists of 3 Employment Counselors, 1 Sr. Employment Counselor and an Employer Relations Coordinator. Employment Counselors are assigned to specific work experience sites; collaborating with the worksite supervisor to identify and engage those clients who are work ready, (i.e. consistently showing up on time and performing well). Employment Counselors are also assigned to the Assessment Unit to work with employable clients who have recently completed Job Club. Employment Counselors will identify job opportunities in the community that match the education, skill level and work interests of each client. These clients will work with Employment Counselors on a weekly basis until that client is placed into a job. Employment Counselors work with a database of over 300 employers which is used to match clients with job openings in the community. Employment Counselors will assist clients with job interviews, provide case management and supportive services (i.e. transportation, day care, etc.) to ensure a smooth transition into employment and self sufficiency. The Job Development Unit also receives referrals from other Social Service Unit for clients that are job ready, need assistance and referrals to employment.

Employment Counselors will conduct a Job Fair each month in the District Office. This involves contacting various companies that have job openings and are in need of employees. Employers come to the Job Fair and hold interviews at the District office which enables the employers to screen clients and recruit employees for their available openings. The ECDSS Job Development Unit partners with the NYS DOL to work with employers and facilitate Job Fairs at contract providers and hub sites throughout the district. DSS and DOL collaborate with area employers to remove barriers such as transportation that limit job opportunities for many clients.

Employment Counselors utilize Placing Individuals in Vital Opportunity Training (PIVOT) Subsidized Employment Program. This employment subsidy program is designed for TANF/SNF clients and enables the Employment Counselors to offer employers a wage subsidy. The PIVOT program subsidizes a client's wages to an employer that would not ordinarily hire that client. Employment Counselors work closely with employers to facilitate a client's smooth transition into employment and jobs that offer permanent long-term positions. The Unit also holds additional specialized Job Fairs to accommodate employers that may require a specific skill or that have an immediate need.

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.

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:

Through collaborative efforts with district educational institutions and refugee resettlement agencies the district has developed 13 worksites referred to as “Dual-Enrollment Worksites”. These worksites offer a combination of work activities and also offer classroom instruction, training for ABE, HSE, ESL, and/or Computer Skills training. If the employment assessment indicates that the client requires such services to increase or enhance employability, the client will be referred for enrollment to one of the dual-enrollment worksites. Several sites also offer vocational training. The standards used to identify appropriate education program providers is outlined in Section 3.6(h).

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

The district has developed close working relationships with district vocational training providers and the NYS Department of Labor to identify trainings available in demand occupations. The Program Providers include but not limited to; Buffalo State Advanced Manufacturing Program, BCATS, BOCES I, BOCES II, Journeys End, Health Professions Opportunity Grant, Educational Opportunity Center, Adult Learning Center, Buffalo Olmsted Parks, Lt. Col. Matt Urban Center, Northland Workforce Training, Youthbuild Service Collaborative, Salvation Army, Erie Community College and Trocaire offer a wide range of vocational training opportunities in demand occupations. Routine presentations are made by these providers in a constant effort to keep Employment Counselors informed of any new opportunities. The District partnered with Catholic Charities and Center for Employment Opportunities to provide a wide range of services including community work experience/job skills training, HSE and computer training for ex-offenders. Communication with parole officers help to identify clients that would be appropriate for referral to these providers. The District also partners with Catholic Charities/International Institute to provide a job readiness training program. This program is designed to meet the job search needs of immigrants and refugees, offering an intensive four-week job search and one on one placement assistance.

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

In the assessment process, educational options are reviewed and discussed. The district encourages all individuals to participate in educational activities if a high school diploma or basic literacy level has not been attained. These clients would be referred to one of our established “dual enrollment” worksites which offer a combination of work activities and educational instruction. The clients are TABE tested to determine grade level. Educational services are provided by; The Adult Learning Center, Catholic

Charities, Literacy New York, Educational Opportunity Center, BOCES, and Erie Community College.

- 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:

The assessment process will determine if it is appropriate to approve an individual for an educational activity. The district will consider various factors in the determination process. Approval consideration will be given based on the client's history of compliance, educational needs and aptitude. Other factors would include the feasibility of approving a particular program, the district's need to comply with federal and State work participation rate requirements and individual circumstances in the development of the individualized Employment Plan.

- 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:

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

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

A four year college program would be the highest level of post-secondary level education that could be approved. This approval would be determined based on the individual's assessment plan for self-sufficiency and the district's need to meet Federal and State work participation requirements. Approval for enrollment considers factors such as: the individual's ability to successfully complete the program; whether it is necessary for the achievement of the individual's employment goals outlined in their Employment Plan; and whether such goals relate directly to obtaining employment in an occupation with favorable job prospects. Continued approval of enrollment is based on proof provided by the student that they are maintaining satisfactory progress in the program, and verification of school attendance. This verification is the responsibility of the participant and the agency assigned to monitor the participant's weekly attendance.

- 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:

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

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

1. Are licensed, certified training facilities with qualified staff.
2. Have demonstrated a demand for the occupation(s) for which they are training.
3. Have demonstrated a training-related placement rate of at least 75%.

Training programs are approved on a case by case basis.

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

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

In addition, the district office also conducts one (1) Job Fair per month as discussed in section 3.5. Vocational training providers, schools and colleges attend these Job Fairs, providing information to applicants and recipients about their programs and subsequent career opportunities. In addition, two Vocational fairs are held annually to provide the opportunity for clients to explore various trainings in an array of occupations. These include advanced manufacturing, construction trades, healthcare, hospitality and customer service. Participants must maintain satisfactory attendance and progress.

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

Recipients approved for self- initiated training programs are advised via Local District Forms B-3854 (Attachment #9 Front and Reverse) or B-3854-A (Attachment #9A). Individuals approved by the district for a training program or referred to a work activity are advised at the assessment and given a copy of their completed Employment Plan. It serves as confirmation of approval for training and referral/enrollment to a work activity.

k. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below:

— It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.

— A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.

- The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
- The institution or student fails to monitor and report information regarding the student’s attendance and performance as required.
- The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
- The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
- Additional reasons as stated below:

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

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

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

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

Section 3.7 Work Verification

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

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

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 for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

The Quality Assurance (QA) plan must include the following elements:

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, 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 (24) 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 WTWCMS and documentation is in the file to support hours reported on WTWCMS and that the scheduled hours on WTWCMS is consistent with the documentation.

The district will perform a random sample of (24) 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 (12) 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 (12) 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:

Bilingual staff and contracted interpreters are available to assist staff with Non-English speaking clients. The District utilizes the International Institute's IMSS (Interpreter Management Scheduling Software) system to arrange "Language Days" where multiple interpreters are scheduled to maximize the number of clients being assessed in a day.

For walk-ins, quick questions, or short interviews, staff has access to the Language Line telephonic interpretation service, which allow workers and clients to communicate through a third-party interpreter via a 3-way call.

The providers for clients with limited English are well versed in the requirements of ECDSS and offer a wide range of services. Catholic Charities, Adult Learning Center, The Belle Center, Northwest Community Center, and Lt. Col. Matt Urban Center can accommodate Non-English speaking participants with work experience activities while simultaneously providing on site ESL instruction.

The Language Identification Tool is posted in District Offices advising clients that an interpreter in their language will be provided at no cost to them.

A tagline sheet is included in all outgoing mailings to clients that are in ECDSS control, every time something is mailed, regardless of the language status of the client. A tagline sheet is an informational flier instructing LEP clients of their rights to language access services, and instructing them to call the number provided.

LEP participants now have access to Job Readiness Training (JRT) classes as a result of a collaboration between ECDSS, International Institute, and Catholic Charities. LEP participants are engaged in 35 hours per week of JRT designed to assist the individuals on the path to economic and social self-sufficiency. The services include: Assessment/Career Exploration, Intensive Case Management, Job Preparation, Job Search, and Job Development Placement and Retention.

Section 3.9 Strategies/Procedures for Increasing Program Attendance

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

Clients have input in the development of their Employment Plan.

Clients are advised to have a child care plan and a backup plan in place. They are provided with resources to obtain child care.

Clients assigned to work experience sites are called by case managers one week prior to their start date. Several providers also contact clients via mail as a reminder of their scheduled start date. This process has increased clients' attendance and helped decrease the high percentage of no-shows at various sites.

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

In those instances where the client is a no show for the initial enrollment or they have missed 3 consecutive days, a notification of pending termination is sent to the client advising them of their non-compliance with work requirements and the potential for sanction or case closing if good cause is not established. Social Services case managers also call the client regarding the pending termination notice to try and re-engage the client into their program, or to assist them with any barrier that are preventing them from attending.

Pre-dated monthly evaluation reports, with the ten legal holidays documented, are annually distributed to each work activity provider (January 2020 Monthly Evaluation Calendar B-3683 Attachment #10). The completed attendance report, indicating the actual hours, excused absences, and the attached verification is returned to the local district office no later than the 5th of the month following the participation month. Designated district staff make biweekly visits to each provider to reconcile the WTCMS generated list against those enrolled at the work activity site. A WTCMS list is provided to each work activity provider during the last week of the month to ensure that a monthly evaluation report is completed for each client assigned to them.

ECDSS staff then meets with each worksite when monthly calendars are completed to review each client's attendance, verify documentation, and meet with clients that are not meeting participation.

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:

- TANF and SN-FAM clients serving initial sanctions are immediately scheduled for an appointment with their Employment Counselor in an effort to address any barriers, lift the sanction and engage the client in a work activity.

- TANF and SN-FAM clients serving a durational sanction may be referred for an eight week subsidized employment opportunity if they meet the criteria for participation in the program. Successful candidates may transition into unsubsidized employment.

- TANF and SN-FAM clients who are non-exempt, and deemed appropriate, may be referred to our Job Development Unit for assistance with a Job Search.

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

- TANF and SN-FAM clients who have served their durational sanctions are scheduled for an appointment with their Employment Counselor in an effort to address any barriers, lift the sanction and engage them in a work activity

- A FAST track appointment may be made with the client for a review of their eligibility and barriers.

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

- A FAST track appointment may be made with the client for a review of their eligibility and barriers.

FAST Track is an eligibility review and case management appointment. At the eligibility review meeting, individuals are required to explain how their household is meeting its expenses since they are sanctioned. We may inquire about household circumstances, including their income and resources. The self-sufficiency plan will be updated and any barriers to participation in work activities will be discussed. We work together to resolve the issues that resulted in sanction and assist them in returning to employment, work related activities, and complying with Temporary Assistance Employment Requirements.

Section 3.11 Strategies for reducing the need for TA

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

Applicants that present verification of employment or the promise of employment are provided supportive services that assist them in obtaining and/or maintaining employment.

Section 4 Support Services

(Reference 18 NYCRR 385.4)

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

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

The district will provide payments for transportation (as described below), work related clothing, licensing fees, required safety equipment and tools. Allowances are determined on a case by case basis for the specific work activity with supporting documentation and justification of need and to the cost of the required expense.

- 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): The district authorizes a seventy-five dollar (\$75.00) monthly transportation allowance equivalent to the cost of a monthly bus pass, to each participant in an approved work activity whose mode of transportation is a private vehicle.

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

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

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

Applicants will be provided diversion services that include information regarding services and resources for nutrition, health, housing, childcare assistance and transportation. Applicants are evaluated for possible payment for work related clothing, licensing fees, and required safety equipment to assist them in obtaining and or maintaining employment.

Section 4.2 Transitional Support Services

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

When clients cases are closed for excess income, a letter is mailed that outlines all transitional services. This includes a Work Supports Checklist that outlines services and resources available to ensure that they receive all the assistance they need to remain in the workforce and improve their financial well-being. Clients are also given information regarding the THRIVE program which is an additional support that offers customized assistance to those that are employed, to help them maximize their success. Transitional day care may be guaranteed up to 12 months after the TA case is closed for eligible families. Clients are eligible to receive a bus pass for 6 months if they are engaged in Subsidized Employment.

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:

A TANF recipient is eligible to receive a bus pass for up to 90 days if their Temporary Assistance closes due to excess income. Clients are also provided case management and job coaching services.

Section 4.3 Extended Support Services

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

Clients may be eligible for a bus pass for 3 months if their TA case has closed and they can verify they are employed a minimum of twenty (20) hours per week. If clients are eligible under the 200% of poverty eligibility guidelines, transportation assistance is provided for an additional 3 months. At the end of the 12 month guarantee transitional daycare program they are recertified for eligibility for low income subsidy daycare.

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

A notice of conciliation is sent to those who fail to comply with employment requirements. The individual must respond within 10 days from the date of the conciliation notice to request conciliation. A third party is not required for conciliation; however, a supervisor will be available to mediate a client dispute if the need arises.

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

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

If an individual fails to respond to the conciliation notice or if we determine from the conciliation that the individual's refusal or failure to comply was both willful and without good cause, a notice of denial or a ten-day notice of intent to discontinue or reduce temporary assistance will be issued.

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

A notice of conciliation is sent to those who fail to comply with employment requirements. The individual must respond within 10 days from the date of the conciliation notice to request conciliation. A third party is not required for conciliation; however, a supervisor will be available to mediate a client dispute if the need arises.

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

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

If an individual fails to respond to the conciliation notice or if it is determined from the conciliation that the individual's refusal or failure to comply was both willful and without good cause, a notice of a ten-day notice of intent to discontinue or reduce SNAP is issued.

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

The notice of conciliation will offer the client the opportunity to avoid the SNAP sanction before issuance of the SNAP sanction notification. Demonstration of compliance will be accomplished by the client completing a job search. Job Search Record B-5701 (Attachment #11) will be issued with each SNAP conciliation notice. Individuals may demonstrate compliance to avoid a SNAP sanction simultaneous to the conciliation process. The due dates are indicated on the conciliation notice and are the same for completion of the Job Search log to demonstrate compliance and to respond to the conciliation. Individuals will be required to provide the log with at least 5 job contacts. If the client provides the job search log by the due date, with the required minimum 5 valid job contacts, the district will not impose a SNAP sanction. Failure to comply with job search requirements to avoid SNAP sanction by the due date will result in SNAP sanction if the non-compliance is determined to be willful and without good cause.

If the individual does not provide the log and instead, claims to have good cause or claims to be exempt, but the district subsequently determines that the individual did not have or failed to document good cause/exemption, the individual is given an additional 5 calendar days beyond the conciliation due date for completion and submission of the job search log to prevent a SNAP sanction.

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:

A durational sanction, which has been served, may be lifted when a client that is able to work has agreed to comply and appears for assessment. An updated Employment Plan will be developed, based on the assessment, to determine the most appropriate work activity. If the individual demonstrates compliance and accepts the work activity referral, the sanction will immediately be lifted. TA benefits will be restored retroactive to the date the individual demonstrated a willingness to comply, but not before the durational sanction period has been served.

A durational sanction, which has been served, may be lifted when a client that is not able to work is assessed to develop an updated Employment Plan. The assessment will determine the barriers to employment and the sanction will be lifted immediately. Clients who claim a physical or mental health disability must follow the disability review procedure. Failure to comply with this process will result in case closing. Clients who fail to comply with drug and alcohol requirements will be subject to another sanction.

A durational sanction will be lifted for employed clients, who are meeting participation requirements, upon receipt of employment verification, but not before the durational sanction period has been served.

- 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:

A durational SNAP sanction, which has been served, may be lifted when a client that is able to work has agreed to comply and appears for assessment. An updated Employment Plan will be developed, based on the assessment, to determine the most appropriate work activity. If the individual demonstrates compliance by accepting the referral to a work activity, the sanction will immediately be lifted and SNAP benefits will be restored retroactive to the date the individual demonstrated a willingness to comply, but not before the durational sanction period has been served.

A durational sanction, which has been served, may be lifted when a client that is not able to work has agreed to comply and is assessed to develop an updated Employment Plan. The assessment will determine their barriers to employment. The sanction will be lifted immediately. Clients with a physical or mental health disability must follow the disability review procedure. Failure to do so will result in case closing. Clients who fail to comply with drug and alcohol requirements will be subject to another sanction.

A durational sanction will be lifted for employed clients, who are meeting participation requirements, upon receipt of employment verification, but not before the durational sanction period has been served.

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

Section 5.3 Dispute Resolution

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

The grievance is mediated by:

- An agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the

individual's case

— Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals

(Reference 18 NYCRR 385.2)

Section 6.1 Disability Determination Process and Tools

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

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

Clients who claim a disability are pended for 10 days to provide medical documentation from their health care provider. The district may send individuals without a health care provider to a contracted provider or to IMA for evaluation to determine employability status. The district may also refer individuals who provide a physician's statement to IMA to obtain a second opinion.

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

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

Completed medical forms are submitted to agency staff. Based on the information given by the independent health care provider or contracted physicians, the employment staff determines:

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

Clients are notified via LDSS - 4005 of the results of the employability determination and the right to a fair hearing to contest the determination. The client is not assigned to work activities during the medical review or if the client requests a hearing within ten days of a medical

determination. Additionally, Employment Counselors regularly identify recipients who may be temporarily or permanently disabled due to the individual's history of medical exemptions or if their medical or mental illnesses manifest themselves during their employment related activities. These recipients are referred to the agency's specialized disability/medical team, who are responsible for linking the involved recipient to the appropriate medical clinic or mental health agency in order to obtain detailed medical documentation of their condition. Clients are contacted 30 days prior to the expiration of their medical exemption to obtain any updated information regarding their condition.

Section 6.2 Mental Health Screening and Assessment

The district is administering a screening tool for 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.):

The determination that an individual, who is unable to work, has the potential through treatment or other rehabilitative activities to improve the ability to work, is determined by the Employment Counselor who carefully reviews the medical documentation. The district adheres to the recommendation of the medical provider regarding the need for treatment or rehabilitative activities.

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

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

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

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