

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

January 1, 2020 – December 31, 2021

## **Onondaga County**

# Contents

<b>Section 1- Assurances .....</b>	<b>3</b>
<b>Section 2 Administration .....</b>	<b>5</b>
Section 2.1 Administrative Structure .....	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies .....	5
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	5
Table 2 – Other Service Providers.....	7
Section 2.3 OTDA Jobs Staff Agreement.....	8
OTDA Jobs Program Services – Target Groups.....	8
Other Services Requested.....	8
Section 2.4 Access to Services at New York State Career Centers .....	8
<b>Section 3 Engagement and Work Preparation.....</b>	<b>9</b>
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)) .....	9
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	9
Section 3.3 Assessment and Employment Planning.....	9
TA Assessment.....	9
TA Employment Plan .....	11
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9).....	12
Section 3.5 Job Development .....	20
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) .....	20
Section 3.7 Work Verification .....	24
The Quality Assurance (QA) plan include the following elements: .....	25
The District’s Quality Assurance Process is as follows:.....	25
Use of Outside Providers/Vendors.....	26
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency .....	27
Section 3.9 Strategies/Procedures for Increasing Program Attendance .....	27
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	28
Section 3.11 Strategies for reducing the need for TA .....	28
<b>Section 4 Support Services .....</b>	<b>29</b>
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District .....	29
Section 4.2 Transitional Support Services .....	31
Section 4.3 Extended Support Services.....	32
<b>Section 5 Conciliation, Sanction and Dispute Resolution Procedures .....</b>	<b>32</b>
Section 5.1 Conciliation.....	32
Section 5.2 Sanctions.....	33
Section 5.3 Dispute Resolution .....	34
<b>Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....</b>	<b>35</b>
Section 6.1 Disability Determination Process and Tools.....	35
Section 6.2 Mental Health Screening and Assessment .....	35
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	36

## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Onondaga 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 Onondaga 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/ Sarah Merrick      02/18/2020

Sarah Merrick, Social Services Commissioner

February 18, 2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## Section 2 Administration

### Section 2.1 Administrative Structure

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

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

The JOBSplus! program, operating under a contract between Onondaga County and Onondaga Community College, coordinates and/or operates the WTW Program. JOBSplus! is responsible for employability determinations, orientation, assessment, employment planning, assignment to work activities, monitoring of participation, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, coordination and provision of supportive services, and employment placement and retention services. JOBSplus! is also responsible for conciliation, referral to sanction, and dispute resolution. The Temporary Assistance Unit implements sanctions. The provision of childcare is coordinated among TA/SNAP Intake, TA Undercare, the Day Care Unit, and JOBSplus! according to a plan that was developed among those offices. An organizational chart for JOBSplus! is attached, as well as an overall chart of the district offices.

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

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

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

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

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Onondaga Community College/JOBSplus	\$8,783,285	<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%	All employment-related functions

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Partners in Learning	\$25,000	<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, ESOL, job placement for non-English-speaking jobseekers
Crouse Irving Memorial Hospital	\$225,000.	<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%	Independent physical, mental health, and substance abuse evaluations/assessments; review of MH case records for SSI applications
RISE	\$98,578.	<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%	Provides ongoing case management, job readiness and placement, and workforce-oriented English language training for limited English proficient recipients.
Industrial Medicine Associates	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Medical and Psychiatric Evaluations
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

**Table 2 – Other Service Providers**

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

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
OCM BOCES		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Workplace education, short term vocational training
Syracuse City School District		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Workplace education, short term vocational training
DOL Strikeforce		<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
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

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

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

#### Other Services Requested

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

N/A

### 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.
 

JOBSplus! and Department of Social Services have developed linkages with the local Career Center, CNY Works. DSS has located a kiosk at CNY Works which participants can use to deliver paperwork requested by DSS. JOBSplus! and CNY Works have established liaisons to take referrals for all participants. For youth in particular, JOBSplus! and CNY Works have developed strong referral and information sharing linkages, including participation data and in addition have developed a TEAP work experience program.



## **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:

In addition, the definition of "engaged in work" includes being in the process of conciliation or sanction for failure to comply with work requirements; or, providing care for an incapacitated household member

### **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:

An emphasis on employment; participant responsibilities to engage in work, rehabilitation, and other activities designed to restore employability; school attendance requirements for teens; and, participant responsibility for locating child care, including the availability of regulated care and subsidies for care.

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:

Initial orientation may be conducted individually or in groups by JOBSplus! or Temporary Assistance staff. Orientation at recertification is conducted individually by Temporary Assistance staff.

### **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 WTCMS.

The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.

The local equivalent does not contain additional elements other than what is required.

The local equivalent does contain additional elements beyond what is required, listed below:

b. Describe the district procedure for the completion of an employment assessment:

Applicants for assistance who are requesting exemption for disability, substance abuse, pregnancy within one month of due date, recent (within six months) birth, or the need to care for an incapacitated household member are assessed by job coaches stationed with the TA Intake office. All other applicants (i.e., those who are nonexempt, including 16- and 17-year-olds not in school) are assessed by job coaches at the JOBSplus! office within 90 days of eligibility, or within one year following application in the case of SN non-exempt singles. In most cases, the assessment for non-exempt applicants begins in the JOBSplus! Job Search/Assessment Workshop, in which participants identify values, interests, and barriers. All assessments include a review of the individuals' strengths and barriers in the context of employment. No specific screening tools are used to identify participants with potential disability.

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

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)]

Employees who provide assessment are professional-level (Job Coaches) who possess, at minimum, a baccalaureate degree or equivalent experience and one year professional level experience providing direct service to educationally and/or economically disadvantaged people in at least two of the following areas: intake, assessment, case management, job readiness/job search preparation, and post-employment follow-up services

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?

Applicants for assistance who are requesting exemption for disability, substance abuse, pregnancy within one month of due date, recent (within six months) birth, or the need to care for an incapacitated household member are re-assessed by job coaches stationed at the TA Intake office at each new application, unless the assessment had been completed within the previous 30 days.

Recipients are reassessed (i.e., those who are nonexempt, including 16 and 17-year-olds not in school) by job coaches at the JOBSplus! office at each change in employability status, (for example, from exempt to non-exempt) change in team assignment, or whenever there are changes in the individual's circumstances. At minimum, assessments are updated yearly.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

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

The district enters employment plans directly into WTCMS.

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

The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent.

The local equivalent **does not** contain additional elements other than what is required.

The local equivalent **does** contain additional elements beyond what is required, listed below:

The types of jobs (and local employers who have them) that the participant will apply for

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.

Employment plans are completed with the cooperation of the client at the time of assessment.

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

The employment plan is updated with the cooperation of the client as the client reaches goals outlined in the plan, or if there is any change in planned activity, client circumstances or if there is a change in employability status (non-exempt to exempt for example).

### **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:

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

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

Those with children under the age of six may be required to participate in less than 35 hours/week, but always, when possible, in a sufficient number of hours to be countable. The weekly standard of 35 hours is used as it matches the local county's work week.

A recipient who provides child care for another parent and who receives less than the hourly minimum wage in payment will be required to participate in 35 hours of activity each week, not including the hours of provision of child care. However, two weeks will be allowed to the recipient to give notice to the parents of the child(ren) receiving the care; additional time may be permitted as determined by the district based on case circumstances.

100% attendance is required in all activities, including work experience, job readiness training, vocational training, and all other assigned activity. Absences may be excused if they are documented as being due to emergency medical, dental, or psychiatric/social work appointments; illness; pre-approved non-emergency medical, dental, psychiatric/social work, or attorney appointments; court appearances; temporary assistance recertifications or fair hearings; short-term childcare interruptions; death in family; serious illness in family; short-term transportation problems; job interview; temporary site closings; other pre-approved absences for mandatory appointments with Section 8, Children's Division, HEAP, WIC, Probation, etc.; and adverse weather conditions.

Recipients without dependents who are aged 19 and older and who are in high school or other educational training may also be assigned to work experience (which will not conflict with school hours) unless engaged in 10 or more hours of paid employment.

Recipients with dependent children who are aged 20 or older and who are in high school or other educational training may also be assigned to work experience (which will not conflict with school hours) unless engaged in 10 or more hours of paid employment.

Recipients who are on an employment sanction will not be authorized to provide child care to other recipients who are engaged in work activities unless provided financial compensation equal to at least minimum wage per hour.

Safety Net recipients will participate in maximum work experience hours as determined by dividing the temporary assistance grant plus SNAP grant by the higher of federal or state minimum wage (unless medically limited) based on availability of sites. All Safety Net recipients must also participate in other activities, including job search, job readiness training, or secondary school for a total of 35 hours/week.

Vocational training may be approved per Section 3.6 below.

Individuals in single-parent families in receipt of Safety Net Assistance due to having received 60 months of cash assistance may participate in the same work activities, subject to district approval and district participation rate needs, as single-parent TANF families

All two-parent family adults (whether in receipt of TANF or Safety Net Assistance) must participate in full-time activity (35 hours) unless subject to medical limitations. If assigned to work experience, they will be assigned to up to the maximum number of hours as determined by dividing the temporary assistance grant plus SNAP grant by the higher of federal or state minimum wage.

Applicants may be assigned to any of the activities enumerated in the chart following.

Whenever possible, all non-exempt FA, SN, and SN Family individuals are engaged in activity on the day of case opening.

Those individuals whose status changes to non-exempt are engaged within one month whenever possible .

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	2497	2905

- 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:

CMS/WRTS data is downloaded via COGNOS into an Access database and combined with information from an internal database to yield a variety of reports, including: entered employments by team, case type, and staff person; average wage at placement, top

placement sites, and number of new vs. repeat placements; for each case type, number of persons assigned each employability code, number of persons not counting and for how long; a breakdown of both the numerator and denominator, including the reasons persons did not count for participation rate and how long they have not counted; changes in the caseload, including openings and closings over time, assessments past due and due within 30 days. Our internal data is compared to the COGNOS reports issued by the State to verify and correct programming errors. Reporting is the primary responsibility of the Program Information/Evaluation Coordinator but in addition, each supervisor is trained in COGNOS reporting, and will create individual reports based on work or team assignment.

- 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):  
Onondaga County does not mandate NTA SNAP recipients to participate in SNAP E&T work activities.

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

The district makes job search available as a SNAP E&T work activity to NTA SNAP applicants and recipients. Job Search assistance is offered at application and recertification. NTA SNAP recipients are provided with a letter of invitation to attend job search workshops at which they are offered assistance with job search activities.

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

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

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

Non-exempt applicants in households with children are required to report to JOBSplus! within one week of application. At that time, applicants where the head of household is 25 years old or older, are assigned to weekly job search for up to four weeks. Applicants with a head of household under 25 years old are assigned to a GOALS assessment workshop prior to being assigned to job search. In general, applicants may be assigned to up to 35 hours of job search per week, which will be conducted in groups as well as individually. This job search activity includes elements of the approved definition of job search and assessment activities.

Applicants are generally required to make up to 15 employer contacts/week up to 35

hours. They will report no less than weekly, with the job searches they completed the previous day/week.

Employed applicants may also be assigned to job search if needed to increase hours of employment or wage rate. The number of hours of job search will depend on the employment hours. The number of employer contacts generally required in this case will depend on the time available to engage in job search.

Non-exempt Safety Net applicants without dependents are required to participate in job search during the application phase. They will report daily, no less than bi-weekly, with the job searches they completed the previous day/week/every two weeks. Applicants are generally required to make up to 15 employer contacts/week up to 35 hours. Other than attending job search groups as assigned, no other activity is assigned to Safety Net applicants without children.

In all job search assignments, the district will adhere to HHS and State requirements in documenting that the number and type of contacts is reasonable for the amount of time assigned. Travel time between potential employers will be included in this determination.

When assigned to job search, current job leads matching jobseekers' work abilities and skills are regularly provided.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	10/week	20/hours	Exception: clients who are employed or work limited may be assigned less job search to accommodate work hours or limitations.
SNA Individuals	10/week	20/hours	Exception: SN applicants who are determined to be work limited are assigned to job search hours in consideration of their limitations

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

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

The required number of job search contacts and hours per week assigned for recipients in households with children AND Safety Net households without children will vary by the circumstances. In most cases, the goal is a total of 35 hours of activity. If the recipient is enrolled in another activity, the number of hours of job search the jobseeker is assigned to will be reduced, as well as the number of generally required employer contacts. If the jobseeker is assigned to job search in the middle of the week, the number of hours will be adjusted to a reasonable level depending on how many days are left in the week. If the jobseeker is assigned only to job search and for an entire week, the assignment will be for up to 35 hours of job search each week, and the maximum number of employer contacts would be 15.

Jobseekers will report on a daily or weekly basis with their job search contacts for review. In all job search assignments, the district will adhere to HHS and State requirements in documenting that the number and type of contacts is reasonable for the amount of time assigned. Travel time between potential employers (but not from home to the first potential employer or from the last potential employer to home) will be included in this determination. Other activities that count for job search hours include resume development, online applications, phone contacts, online job search, and job search group meetings.

- 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.

As stated above, a recipient who provides child care for another parent and who receives less than the State hourly minimum wage in payment will be required to participate in 35 hours of activity each week, not including the hours of provision of child care. However, two weeks will be allowed to the recipient to give notice to the parents of the child(ren) receiving the care; additional time may be permitted as determined by the district based on case circumstances.

For all other self-employment, the district will approve self-employment as part of an individual's required work activities provided the self-employment income is documented and the hours of employment are documented. Otherwise, the gross income before disregards is divided by the State hourly minimum wage to determine the hours in self-employment. Self-employed individuals earning less than the State hourly minimum wage will be required to participate in activity up to 35 hours/week.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An "X" in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance



Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

	<b>Activity and Definition</b>
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<p><b>Unsubsidized Employment</b> - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<p><b>Subsidized Private Sector Employment</b> - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<p><b>Subsidized Public Sector Employment</b> - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<p><b>Work Experience</b> - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>

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

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

### Section 3.5 Job Development

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

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

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

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

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

Approximately 1 FTE JOBSplus! staff are assigned to the job development function. They are in daily contact with employers and host several on-site employer visits each year

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

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

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

The district is in close communication with educational providers in the community and ensures it has information about available resources.

If a client requests this type of education, and the district is in agreement that it will increase the client's employability, the client will be assigned to the activity. The district supports educational agencies' applications for State funding for additional programs as appropriate.

- 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 is in close communication with vocational educational and training providers in the community to ensure it has information about available resources.

When funds are available, the district may also contract for training programs that meet the needs of its clients. Currently, the district contracts with Partners in

Learning, Inc. for VESOL training. JOBSplus! provides computer skills training as well.

If a client requests this type of training, and the district is in agreement that it will increase the client's employability, the client will be assigned to the activity. Training which requires funding must be approved by the local One-Stop as an in-demand occupation, and funding is requested through the One-Stop

- 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:

Educational opportunities for jobseekers who demonstrate low literacy levels and/or who do not have a high school diploma or equivalent will be explained and discussed during assessment as part of determining the appropriate package of activity for the jobseeker.

The issue will be revisited during case reviews and upon the request of the jobseeker. Staff have access to a list of available educational opportunities, including contact information, class days and times, and minimum entrance requirements

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

Such requests are approved unless the job coach determines the individual had recently engaged in such activity and did not maintain acceptable attendance or satisfactory progress, or has repeatedly engaged in such activity with little or no progress.

- 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:
1. No approval of training will be given for any recipient who has received training in the past, whether through Social Services programs or otherwise, unless the training is now obsolete or the recipient's physical limitations prevent employment in the occupational area.
  2. No approval of training for an individual will be given for a program of training which is not approved as per the standards for education and training providers described in this section.
  3. No approval of training will be given for individuals enrolled in four-year post-secondary degree programs, regardless of the length of time remaining to complete the program. Individuals may request approval for up to a two-year post-secondary program if the training can be shown to assist the individual in obtaining a job in a field that is locally in demand. Approval will be considered if the individual has not had prior training and demonstrates the ability to succeed in the program. In this case, approval is granted on a semester-by-semester basis. In all cases, approvals for post-secondary programs

must be developed in conjunction with the job coach and be included in the employment plan.

4. If a jobseeker is already enrolled in, and attending, an approved training program as described in this section, prior to being assessed, the training will be approved only if all of the following conditions are met:

- a. the jobseeker has incurred a financial liability for the training
- b. the jobseeker is not on academic probation
- c. the jobseeker has secured sufficient funding to complete the program
- d. the training is an approved training program as per this section
- e. the training will be completed within the length of time described in the program's catalogue or brochure
- f. training was not previously disapproved for the jobseeker

Jobseekers already enrolled in, and attending, any training, up to an undergraduate degree level, which was not previously disapproved for the jobseeker, will be allowed to complete the current semester or quarter regardless of whether further training will be approved. However, the jobseeker may be required to participate in other work activities as assigned up to 35 hours.

5. Jobseekers must be in satisfactory standing with all assigned activities immediately prior to training. This means the jobseeker is not currently pending conciliation, has attended the majority of scheduled activity hours, and has provided acceptable verification of all absences.

All jobseekers requesting vocational training approval complete a "Vocational Training Information Form," which is reviewed by the job coach and a team leader or administrator.

Additional requirements for recipients enrolled in approved training are as follows:

- Recipient must participate in continuing work experience or paid employment if training is less than 35 hours/week. (including allowable study time)
- Recipient must participate in continuing job search while in training, as assigned.
- If there is a tuition charge for the training program, funding must be secured prior to final approval. LDSS will not pay tuition.
- If enrolled in educational training such as a GED program, the recipient must participate in up to 35 hours of total activity, comprising 20 hours of work experience and 15 hours of classroom activity.

Additional requirements for recipients enrolled in any work activity:

- High school or education leading to an equivalency may be required of all teenagers aged 16 through 18 if without dependents, and ages 16 through 19 if a pregnant or parenting teen, unless subject to the provisions of 18 NYCRR 385.9 (c)(3)

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:  
The highest approvable level of post-secondary level education is a two-year college degree.
  
- 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:  
All vocational training enrollments are monitored using in-house lists and available Cognos reports. Enrollments beyond the 12 month lifetime limit will be combined with the necessary additional hours to maximize participation.
  
- h. Education and training providers are evaluated by the following standards:
  - 1. History of providing education/training services, or being part of a larger organization which has done so. The WIOA Career Services Center list of approved providers and programs will be utilized;
  
  - 2. Training provides skills that are in demand for specific occupations locally (as determined by local DOL economic analysts);
  
  - 3. There is a written standard of satisfactory progress for each training course, including qualitative measures of progress (grades, competencies) and quantitative measures of progress (established amount of time to complete training);
  
  - 4. Education/training program must be provided in such a way that training can be completed within one calendar year;
  
  - 5. Courses for which tuition is charged will not be approved if similar, free, programs are available.
  
- i. The district procedure for advising participants of approved training providers is:  
Training options are discussed at the time of assessment if appropriate or requested. Should a jobseeker request a training provider that has not previously been considered for approval, the agency will contact the provider to determine if approval can be given.
  
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
All recipients either receive written notice of their approved and assigned activity or activities, and/or the activity is included on the employment plan. Recipients also receive written notice of disapproval of vocational training.
  
- k. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below:

- It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.
- A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
- The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
- The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
- The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
- The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
- Additional reasons as stated below:

- I. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:  
The client will be requested to provide verification of exemption due to being enrolled in high school at the time of application and at recertification.
- 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:  
All individuals are assessed to determine if there are limitations on work hours or work activity due to medical or psychiatric issues. Individuals are assigned only to the number of hours of activity per week allowed per the client's physician or the agency's independent medical examiner. Any limitations that impact the ability to take part in the activity – usually, work experience is the activity most affected by limitations – are shared, in writing, with the activity supervisor with a release of information from the jobseeker. All assignments are discussed with the jobseeker in order to address any expressed concerns.

### **Section 3.7 Work Verification**

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance



reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

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

The district will sample cases from each month within the (6 month) semi-annual period. The October to March review will be due by May 20th. The April to September review will be due by November 20th. The results of these audits will enable the district to identify policies, processes or cases that may need corrective action.

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at [AQI.WV.SelfAudits@otda.ny.gov](mailto:AQI.WV.SelfAudits@otda.ny.gov) for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

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

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

The district will perform a random sample of (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:

Each individual Coach and Technical Assistant has been trained in proper data entry procedures for WTWCMS and local databases. The job coach will create enrollments, enter case narratives and calculate attendance. Once the attendance entry is calculated by the coach, Technical Assistants will enter the data on WTW CMS. All staff are required to adhere to established data entry, system use and confidentiality policies. Team Leaders review and audit entries for accuracy.

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

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

The county adheres to the local LEP Title VI/ADA policy in order to provide an equal and meaningful opportunity to people with limited language skills to participate in programs and activities. Inserts offering translation are included in each mailing. The district pays for qualified, independent, contracted interpretive services. Posters alerting jobseekers of translation services are posted throughout the agency. Clients who refuse interpretation services, or indicate a preference to utilize his or her own competent and appropriate interpreting resource, are asked to sign a waiver at each contact indicating they have been offered, but refused to take advantage of the language services available. The district retains the responsibility for ensuring that effective communication is in place. Given the nature and complexity of our procedures, we generally do not permit children under the age of 18 to serve as interpreters.

There are two community-based organizations that work primarily with Spanish-speaking clients. The district or State has contracts with each to provide activities, which can include applicant job search, work experience, ESOL, vocational training, and other activities as appropriate. One of these agencies provides these services to speakers of other languages as well, and serves as an activity site for some refugees.

The Refugee Assistance Program (RAP) provides acclimation activities for newly arrived refugees. By agreement with the RAP, non-RCA refugees are assigned to work with the program for the first three months of their stay in the United States as their work activity. Attendance is submitted for each individual to document his/her participation. At the end of the first two months, refugees are referred to JOBSplus! for assessment, and new activities are assigned as appropriate. The RAP or other refugee resettlement agencies may provide translation or additional resettlement services for several months, but, as described above, the district will pay for translation that is not otherwise available on a no-cost basis.

Refugees classified RCA are assessed and assigned to activity after eight months.

The district has an account with Voiance which provides immediate translation over the telephone. The district also contracts with Empower Interpretation Services of CNY, and independent interpreters on a fee for service basis to provide interpretation with medical providers, individual appointments with job coaches and for job search groups.

### **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:

Visits to subsidized employment sites and Work Experience sites are conducted regularly. Attendance from work experience and other activity sites is submitted weekly, allowing coaches to respond in a timely manner to attendance issues, and team leaders conduct regular case reviews. All jobseekers are required to have a childcare backup plan.

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

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

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

A JOBSplus job coach has been assigned to re-engage sanctioned individuals through a combination of individual meetings, mailers and group settings.

For example, sanctioned individuals who request re-engagement and have served the durational period, are assigned to a group meeting where activities are offered to allow the sanctioned person to demonstrate compliance. Barriers to compliance are addressed at these meetings and support services are provided as appropriate.

Sanctioned individuals who claim medical limitations are given the opportunity to provide medical documentation.

Sanctioned individuals who do not self-initiate compliance, are called in for an eligibility group meeting where they are asked to document how they are meeting expenses with reduced benefits. Sanctioned individuals who repeatedly refuse or fail at re-engagement may be called directly or may be interviewed by the JOBSplus staff at recertification. Jobsplus staff explain why compliance is beneficial and what it involves. Interviewers attempt to gain an understanding of why the participants continue to remain sanctioned and offer services as indicated. Job development assistance is also offered.

The District also conducts home visits with non-durationally sanctioned participants to assess special needs or circumstances and to offer services, including a streamlined manner in which to initiate the compliance process. The sanctioned individual would not be called in for an eligibility review any more than monthly after the end of the sanction.

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

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

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

Intake employment staff offer diversion services, such as assistance with applying for subsidized childcare . Those with a documented promise of employment are also offered diversion services.

Generally, applicants are required to participate in job search for the duration of the application phase, which may include participation in a job search/assessment workshop for all or part of the application phase. Non-exempt individuals employed less than full-time are also required to conduct a job search to secure full-time employment

Applicants and Recipients who are parenting and under the age of 25, will be offered the services of a special group of district and jobsplus staff dedicated to reducing generational poverty through a whole family, coaching approach. In addition, clients who fall under this pilot group will be offered the support of a job coach for up to one year after case closing. The district will include non-custodial parents in this wholistic approach.

## **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:  
Excluding tuition, the district will provide supportive services payments for any expenses required for participation in approved training, other assigned activity, or employment, for applicants or recipients, including but not limited to:

clothing: uniforms, work clothing, specialty items, equipment: specialty tools or equipment

licensing: licensing or testing fees

All requests are evaluated on a case-by-case basis as to the relevance to obtaining or retaining employment. Evaluation criteria include: alternative sources of funding or service; whether other resources are exhausted; estimates from one or more providers of service or material; whether the requested item/service is required or optional; and whether the amount of the request is commensurate with the need.

Written documentation from the work site or employer of the need for the required items must be submitted. Payment will be based on the lowest cost estimate. Payment may be issued directly to the jobseeker, who must submit proof that the funds were used to purchase the items authorized. If the district determines that the supportive service payment was not used for the intended purpose, a referral to investigate will be made. Alternatively, payment may be pre-arranged with and go directly to a vendor.

- 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 will provide transportation assistance as necessary for applicants or in order to participate in assigned work activities.

1. During application stage, and until the first structured program assignment, transportation is provided as necessary to apply for specific job openings or attend interviews.
2. Once a jobseeker is enrolled in structured activity, s/he will be given a bus pass so long as s/he does not live within one mile or 10 blocks of the assigned activity.
3. In the event a jobseeker is unable to use available bus service, the agency will provide reimbursement for carpooling or driving of a vehicle which has been reported as a resource to the district (along with proof of ownership, registration, insurance, and driver's license) at the established IRS Medical/Moving rate. Approval for this arrangement is made on a case-by-case basis. This rate represents the cost of gas, but does not include the cost of any repairs or insurance, which may be reimbursed separately, on an as-needed basis. Should the actual cost of gasoline needed to participate in an assigned work activity exceed the reimbursement rate, the agency will reimburse for the actual cost based on reasonable documentation submitted by the work activity participant.
4. Transportation assistance will be provided for applicants and recipients who begin paid employment until the temporary assistance case is denied or closes (see transitional services, below for post-case-closing procedures). Employed applicants and recipients may also be considered for assistance with the cost of car repairs, insurance, and driver's license fees (but not fines), subject to the other provisions of this section. Should the participant be employed part-time and engaged in other assigned activity, bus passes or mileage reimbursement will be authorized as needed for both the employment and the activity. Employed recipients who own their own vehicles can seek reimbursement on an ongoing basis if the vehicle is needed in the course of his/her work and mileage is not reimbursed by the employer.

5. If a documented medical need is present, such that a jobseeker cannot walk 10 blocks or one mile, a pass for bus transportation will be issued.
  6. Jobseekers who are employed at participating employers who are outside of available bus service and who do not have access to other forms of transportation, may be considered for authorization of rides through LYFT.
  7. Transportation assistance to Safety Net families will be provided. If the individual is employed, transportation will be provided using TANF funds. If the individual is not employed, other non-TANF funds, such as Safety Net and/or SNAP E&T participant reimbursement, will be used.
- 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:
- One mile
- 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:
- Services to assist individuals at risk of needing public assistance to improve their opportunities for employment or to maintain their employment are available on an as-needed, case-by-case basis. Such services may include: referral to child care subsidies; work-related expenses such as tools, uniforms, and licensing fees; transportation expenses such as car repairs, bus passes, and gas money (as needed until next paycheck is expected); and emergency day care (if provider is contracted and child care subsidy application has been filed). If an applicant for such services owes the district money under a previous recoupment, these services may be denied.

#### **Section 4.2 Transitional Support Services**

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

Transportation assistance will be provided, as needed, for as long as the individual remains employed and on Temporary Assistance, provided the individual lives more than one mile or 10 blocks from the place of employment. Transitional transportation assistance will be subject to all other provisions in Section 4.1.b

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:

1. Assistance with the cost of car repairs and/or insurance will be provided upon request, subject to the restrictions stated in Section 4.1.b.
2. Training and work-related expenses will be provided for any expenses required for employment, including but not limited to:
  - clothing: uniforms, work clothing, specialty items

equipment: specialty tools or equipment

licensing: licensing or testing fees

3. Lyft rides for employed jobseekers outside of bus service and who do not have access to local bus service or other means of transportation and who are employed by participating employers.

All requests are evaluated on a case-by-case basis as to the relevance to retaining employment. Evaluation criteria include, but are not limited to: alternative sources of funding or service; whether other resources are exhausted; estimates from one or more providers of service or material; whether the requested item/service is required or optional; and whether the amount of the request is commensurate with the need.

### **Section 4.3 Extended Support Services**

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

None

## **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

Conciliation notices instruct jobseekers to respond in writing or by phone within 10 days. Once the response is received, the designated staff person reviews all the circumstances of the case, including case notes, attendance sheets, pay stubs/other employment verification, doctor's notes and appointments/hospitalization/clinic records, other appointments, and any other documentation submitted, as well as the reasons offered by the jobseeker, to determine whether the jobseeker willfully and without good cause refused or failed to comply with employment requirements. Where a jobseeker claims a specific issue but does not submit documentation to support it, the jobseeker is given an additional ten days to provide such documentation when appropriate.

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

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



A JOBSplus employment worker with no direct responsibility for the case, under the direction and supervision of a Team Leader.

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

Conciliation notices instruct jobseekers to respond by either providing in writing or by phone the reasons they did not comply with the required SNAP work requirement and/or to avoid a SNAP sanction by demonstrating compliance through a job search assignment. Both the written response and/or the job search assignment must be submitted within 10 days. Once the response is received, a JOBSplus employment worker, with no direct responsibility for the case, under the direction and supervision of a Team Leader makes the willful and good cause determination. The designated staff person reviews all the circumstances of the case, including case notes, attendance sheets, pay stubs/other employment verification, doctor's notes and appointments/hospitalization/clinic records, other appointments, and any other documentation submitted, as well as the reasons offered by the jobseeker, to determine whether the jobseeker willfully and without good cause refused or failed to comply with employment requirements. If the jobseeker submits a response that shows the client's actions were willful and without good cause, the client is given an additional 10 days to demonstrate compliance through a job search assignment. In addition, the district allows all SNAP applicants and recipients who fail to comply with a SNAP employment requirement the opportunity to document good cause or an exemption from participation in SNAP work activities.

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

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

A JOBSplus employment worker with no direct responsibility for the case, under the direction and supervision of a team leader, makes the willful and good cause determination.

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

SNAP recipients wishing to demonstrate compliance to avoid a SNAP E&T sanction must complete ten direct job search contacts (made at either the employer's place of business or online) and submit documentation within 10 days to be considered in compliance to avoid a SNAP E&T 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:

The individual is assigned to a 10-day, seven hours per day, activity unless the individual has limitations which impact his/her ability to participate. If s/he completes the activity satisfactorily, with no unexcused absences, the sanction will be ended.

A sanction may also be ended once it has reached its duration if the individual can demonstrate incapacity or obtains full-time (30 hours or more) employment.

Part-time employed individuals may be assigned to a ten days of activity congruent with their work schedule to demonstrate compliance once the sanction duration is over.

Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period).

If the individual is (re)applying for TA benefits after the duration of sanction has expired on a new or previously closed case, the individual would need to comply with applicant work requirements, unless claiming an exemption where documentation to support the exemption would need to be obtained.

- 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:

Onondaga County does not mandate NTA SNAP recipients to participate in SNAP E&T work activities. For recipients of TA and SNAP, if the duration of the SNAP sanction has ended, an individual may be eligible for SNAP benefits by completing 10 job search contacts within 10 days. If both TA and SNAP durations have ended an individual may be eligible for SNAP benefits by attending a 10 day Assessment Workshop.

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

### **Section 5.3 Dispute Resolution**

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

The grievance is mediated by:

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

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

(Reference 18 NYCRR 385.2)

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

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

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

The employment worker reviews the documentation submitted by the client. Additional information may be requested from the client and/or the client may be referred for an independent evaluation through either the OTDA managed contract or through a local contract with Crouse Hospital. Upon receipt of all available information, a decision is made by the worker regarding the individual's claim of disability.

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:

### **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 individual's treating practitioner, or the state or district contracted provider, will make the determination whether the individual would benefit from treatment.
- b. Following is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc. Please be specific:  
If the treating practitioner, or the contracted provider, indicates the individual would benefit from treatment, the employment worker includes it on the treatment plan and makes a formal referral for treatment. In addition, a restoration plan is completed in cooperation with the individual outlining the steps needed to improve the ability to work.
- 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 treatment plans is tracked by the job coach responsible for the case. All

treatment attendance is verified on a monthly basis. The treatment attendance form also requests progress information. A release of information for the treatment provider is obtained from the client to permit the job coach to follow up with the provider as needed. The restoration plan is updated when new medical information is obtained