

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

January 1, 2020 – December 31, 2021

## **Ontario County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Ontario 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 Ontario 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/ ET 01/09/2020

Eileen Tiberio , Social Services Commissioner

01/09/2020, 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.

DSS Administration and Workforce Development Organizational Charts are attachment #1.

The responsibilities of the DSS Workforce Development Unit (WD) are described below.

1. Provide orientation to all public assistance applicants to explain their responsibilities in participating in job search, work experience, community services, and all related employment activities.
2. Provide exploring employment assessment and complete the employability plan with each participant as required by state/federal regulations.
3. Provide counseling, case management, work activity assignment and enrollment and monitor progress for all clients, to ensure compliance with their employment plan.
4. Recruit work experience and community service worksites to ensure ongoing participation for clients.
5. Monitor the employment activities progress of all clients to assure compliance with regulations and/or policies.
6. Provide job development/placement opportunities in the private/public sector.
7. Provide individual and group job readiness and job search activities.
8. Provide and coordinate all supportive service needs for clients in work activities.
9. Assist and provide staff representation for conciliations and fair hearings as may be required.
10. Report matters of client non-compliance to the Temporary Assistance Unit in accordance with developed procedures.
11. As required by NYS, the Department of Social Services Workforce Development Unit determines eligibility for contracted programs offered to TANF under 200% of the poverty level.
12. Assist Temporary Assistance staff in the screening of employability for persons claiming mental or physical disabilities as well as referral for appropriate evaluations and treatment.
13. Coordinate employment services with other programs to assure documentation of client participation in those programs.
14. Develop and implement a plan offering specific services which target the employed client population. Services may include: non-traditional hours and expanded services to employed clients to assist with retention and advancement.

15. Make participant records available for the purpose of ongoing program review and monitoring.
16. Provide reports to NYS Office of Temporary and Disability Assistance, as required.
17. Provide targeted services to eligible adults and children.
18. Provide services at both the Hopewell and Geneva office sites.
19. Require that all staff involved in this program comply with confidentiality policies.
20. Directs program efforts aimed to meet or exceed the participation rates established by the state/federal government.

The total number of employees of the local Department of Social Services is 160.

### 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>
Family Counseling of the Finger Lakes	\$34,860	<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%	Interpreter Services
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$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>
Finger Lakes Community College	SED	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Readiness Training, Vocational Education, High School Equivalency
NYS Dept. of Labor	Wagner Peyser and Veterans	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Labor Exchange, job search, job bank
Wayne-Finger Lakes BOCES	Educational Resource Grant, SED	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	High School Equivalency, Vocational Training
ACCES-VR	SED	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational Training, Intensive Case Management, Job Placement and Supported Employment
		<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)

WTWCMS Data Entry

### 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: County and WIB Websites

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

The Ontario County Workforce Development Career Center provides access and referral services to all required WIOA Career Center Partners, including: Title V Older Americans Act, Jobs for Veterans, Local Offices for the Aging, Local Housing Authorities, JobCorps, Native American Programs, Migrant/Seasonal Farmworkers Program, PathStone Corporation, Trade Act Adjustment (TAA), Wagner-Peyser, Unemployment Insurance (UI) and Temporary Assistance for Needy Families (TANF).

Ontario County utilizes a digital referral form to refer and track referrals made to and between WIOA mandated partner services. Information is shared at quarterly Consortium meetings, through OSOS (One Stop Operating System), and through direct referrals.

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

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

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

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

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

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

Check one of the following:

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

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

Assurance: The social services district will provide a WTW orientation to all applicants/recipients of temporary assistance at the time of application to include descriptions of the following:

- brief overview of welfare reform (time limits, income disregards, etc.);
- education, employment and training opportunities available, including those which are available at no cost to the individual and those which are available in the local district according to its employment plan;
- the participant’s responsibilities associated with the repayment of student financial aid;
- supportive services available through the district and the obligations of the district to provide them to individuals participating in employment programs;
- work activities available through the local district and the local district’s obligation, if any, regarding those activities;
- the types and settings of reasonably accessible child care services for individuals assigned to work activities, and how such services will be provided and financed;
- the assistance available upon request to help individuals assigned to work activities select and obtain child care services; and,
- the individual’s responsibility to cooperate in establishing paternity and enforcing child support obligations;
- a discussion about the upcoming assessment and plan development;

- childcare availability for employed individuals in lieu of temporary assistance;
- an overview of ABAWD requirements.

Within one month of the individual's participation in orientation, the individual will be notified in writing of the opportunity to participate in the district's work activities or this notification may be incorporated into the district's orientation.

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:

At the time of application, the orientation is done in a group setting for all applicants of cash assistance on a daily basis, although some situations dictate an individual session. Staff from both the Temporary Assistance and Workforce Development Units conducts the session. At recertification the Temporary Assistance staff completes the orientation on a 1-1 basis.

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

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

- a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):

- The district enters assessments directly into WTCMS
- The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.
- The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.
- The local equivalent does not contain additional elements other than what is required.
- The local equivalent does contain additional elements beyond what is required, listed below:

We complete the JOBS Program Participant Intake Form and a local form, both of which are attached #2 and #3, as the assessment documents to minimize duplication of similar information, in addition to direct data entry into WTCMS.

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

Applicants of cash assistance are engaged by the WD unit the day they apply for benefits. All cash applicants, including 16 and 17 year olds not attending school, must attend a group activity called "Exploring Employment." This activity begins their assessment by listening to the employment requirements and activities they may be required to or voluntarily participate in and also the support services they may receive while participating. During Exploring Employment, the applicants will complete the JOBS Program Participant Intake Form and also complete the Test of Adult Basic

Education. A review of basic job search techniques is also covered. For those individuals that are non-exempt at the time, they are scheduled for four (4) consecutive weeks of Supervised Job Search. Following the completion of SJS or once the case is opened the non-exempt customers are scheduled for an intake with a Workforce Development Counselor for further assessment and development of an employment plan and entry into WTCMS. Exempts are excused from Job Search but will meet with a Counselor within regulation time frames to develop a plan of self-sufficiency.

- c. The district administrative unit or contractor responsible for conducting assessments is:  
Ontario Co DSS/Workforce Development Unit
- 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)]  
Human Services Worker or Workforce Development Counselor in keeping with Civil Service requirements. (Job descriptions and qualifications are attachment #4).
- 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?  
Assessments/PASS are updated whenever there is a change in circumstance and at least every 6 months.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:
- The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
  - The district enters employment plans directly into WTCMS.
  - The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTCMS.
  - The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent.

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

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

b. Check one of the following:

The same administrative unit or contractor that conducts employment assessments also develops employment plans.

A different district administrative unit or contractor develops employment plans, and their qualifications include

c. Describe the district procedure for the completion of an individual's employment plan.

Employment plans will be completed after the completion of an assessment and within 30 days of a client's case opening and when deemed employable. It will detail the expectations of the client and the specific steps they must take to address the barriers to employment. It will specify the supportive service the agency will provide to address the barriers while the client works toward employment and ultimately self-sufficiency. Employment plan information will be documented in WTWCMS Assessment tab.

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

The employment plan will be updated when a re-assessment has been completed or whenever a change in the individual's circumstance warrants a reassessment. Otherwise, assessments and employment plans will be updated every six months.

### **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:

Assurances: The social services district will enroll temporary assistance clients in work activities that will:

1. Non-exempt individuals, to the extent each is medically able, will be enrolled in 35 hours of activity/week, including, whenever possible, at minimum, the requisite number of hours of countable activity as defined under federal and state legislation. Anyone who is employed less than 35 hours/week will be required to participate in additional activities to total 35 hours/week. Those with children under the age of six may be required to participate in less than 35 hours/week, but always, when possible, in a sufficient number of hours to be countable. The weekly standard of 35 hours is used. Individuals whose employability status changes from exempt to non-exempt are typically engaged in activities within 30 days of notification of status change. Non-exempt SN are engaged in

supervised and weekly job search as applicants as part of the Front Door Diversion process. Non-exempt TANF and SNF applicants are engaged in countable core and non-core activities as developed with the counselor at the assessment appointment, and

2. lead clients to employment and financial independence.

The participation rate requirements are monitored by Workforce Development staff and reviewed by DSS staff utilizing the Cognos reports and locally produced reports.

Work experience and community service assignments will meet the requirements prohibiting displacement and other provisions contained in 18 NYCRR 385.9(d)(3). The number of hours of participation in work experience and any work portion of community service will not exceed the Temporary Assistance and SNAP grants divided by the Federal or State minimum wage, whichever is higher.

Clients are engaged in on-going job search activities that include components of job readiness training in order to obtain unsubsidized employment.

The Workforce Development staff provides immediate engagement to all DSS applicants to divert them from ongoing assistance while combining work activities such as job search and work experience for cases that receive ongoing assistance in order to meet participation rates and ultimately unsubsidized employment.

Participants whose status changes from exempt to non-exempt are brought in for a re-assessment and employment plan within 30 days of the employment code changing.

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	80	80

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:

Cognos reports are run on a monthly basis to ensure that staff has engaged participants in employment activities with a goal of full participation but more importantly that customers are engaged and taking the necessary steps towards unsubsidized employment and overcoming barriers to employment. The reports are run by senior staff and distributed to staff so they can meet with the participant and update their employment activities. Participation rate by each staff is distributed to all as a means to incentivize and “compete” with each other.

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

search efforts. (Please note: Case management services must be provided to all participants enrolled in an E&T activity):  
 The district will send a letter outlining our location, resources and services to non-exempt Non-Temporary Assistance SNAP recipients annually. (Attachment 8)

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

All NTA SNAP work registrants are informed of the resource room to assist with their job search, Finger Lakes Works Career Center services and where to find any available job lead and training information. The staff responsible will also assist any work registrant with job search assistance.

- 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:

Upon completion of Exploring Employment, all non-exempt applicants are assigned to Supervised Job Search for four (4) consecutive weeks. All applicants are expected to report weekly with their job search handbook/log with eight (8) verifiable contacts and a minimum of twenty (20) hours of job search activity. The handbook/log is reviewed by staff or the JOBS staff for compliance. Random samples of applicant’s job contacts will be called to verify if a recent application is on file and/or if contact was made. Individuals are required to report employment or any changes in income within 10 days. During the 4 weeks of applicant job search, applicants are generally not required to participate in other work activities.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	8/week	20	
SNA Individuals	8/week	20	

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

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



OTDA and WD Staff continue to meet weekly in Geneva and bi-weekly in Canandaigua with TA recipients that are assigned to job search. We understand that bi-weekly job search may not meet participation rate requirements. The recipient is required to have five (5) verifiable contacts per week, as documented in a job search handbook/log and a minimum of twenty (20) hours of job search activity. Random samples of recipient’s job contacts will be called to verify if a recent application is on file and /or if contact was made. This activity is structured to be flexible in scheduling, depending on a recipient’s other activity schedules, or other extenuating circumstances.

- 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. A recipient who provides unregistered child care is encouraged to register through the Child Care Council to become a legally exempt childcare provider in order to receive payment from the agency and a higher rate of payment. OCDSS with budget this childcare income as appropriate. An individual that is self-employed 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 self-employment. OCDSS will allow two months to all self-employed individuals to increase their business income, additional time may be permitted as determined by the district based on case circumstance.
- 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>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Subsidized Public Sector Employment</b> - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Work Experience</b> - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Community Service</b> - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>

	<b>Activity and Definition</b>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Search</b> - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> <li>— SNAP</li> </ul>	<p><b>SNAP E&amp;T Supervised Job Search</b>- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Readiness Training (JRT) Activities</b> - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Vocational Education</b> - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>

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

### Section 3.5 Job Development

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

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

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

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

The Ontario County Workforce Development Business Services Representative (BSR) contact employers and solicit jobs for Temporary Assistance participants. The BSR has many contacts in the employer community and regularly works with businesses and staffing agencies to fill openings within their companies. Employers are contacted daily and job orders distributed to all staff. Incentives such as employer reimbursement of wages, under grant diversion and OJT programs, are marketed to group and individual employers daily. Quite often staffing agencies come in to recruit, especially on days when there is a significant number of applicants or recipients in the office. The BSR also works very closely with Economic Development staff and makes connections with employers that have recently secured Economic Development loans that require the employer to hire low to moderate income individuals. These job leads are available for all TA and SNAP individuals

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

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

JOB Program staff has established employer contacts and will use those contacts in job development activities and coordinate those activities with the Business Services Representative.

### 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:

There are three (3) program providers of ABE/HSE/ESL instruction in our county: Wayne Finger Lakes BOCES, the Finger Lakes Community College and Literacy Volunteers. We have long standing relationships with each of these providers and make referrals on a regular basis.

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:

Ontario County utilizes the system that is used for WIOA training providers and the Finger Lakes Workforce Investment Board. Providers that are approved by the FLWIB are also approved by Ontario County DSS.

- 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:

Individuals are given the Test of Adult Basic Education (TABE) at Exploring Employment. The TABE will identify if an individual is in need of adult basic education services regardless of their completion of high school or not. Also individuals may disclose their lack of a high school diploma. In both cases, individuals may be mandated to attend ABE/HSE instruction through the local community college, BOCES or a rural home study program. For those non English speaking individuals, Finger Lakes Community College offers English as a Second Language classes that recipients may be mandated to attend. We also administer the Spanish TABE for those Spanish speaking customers to identify possible difficulty in their native language. Literacy Volunteers may also be an appropriate referral for those with very low literacy levels.

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

Individuals that lack a high school diploma are required to participate in educational activities to improve their basic skills. Staff would inform participants of the programs available and a joint decision would be made as to which program meets their need and then a letter is given to the customer with the relevant provider information and attendance sheets that must be signed and returned to the staff on at least a monthly basis for documentation of their participation. The same process would be done for someone not mandated.

Clients that have previously been unsuccessful in educational activities and/or have a history of non-compliance may not be approved. Also, the district takes into consideration the client's aptitude for educational training and the district's need to give priority to meeting participation rate requirements.

- 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:

Individuals that may be interested in or appropriate for Vocational Education or Job Skills training, are referred to WD staff skilled in approving customers for training. Customers are required to go through a similar process or in some cases the same process as Career Center customers which begins with an informational workshop called Training Options. From that session they are given a Training Preparation Workbook, attachment #5, to complete and schedule an appt with the staff person for further discussion and a recommendation of whether or not the training may be approved. The training program must be on the local demand occupation list and providers of that training accessible for the individual and be approved by the Finger Lakes Workforce Investment Board. Any training program that is not included on the FLWIB demand occupation list may be approved upon consultation with the Deputy Commissioner if the program is best suited

for the person to obtain unsubsidized employment. These cases will be reviewed on a case by case basis.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:  
The district will approve up to a two year Associates in Applied Science in a demand occupation for those individuals that lack post-secondary education. For individuals that may already possess at least 60 credits and do not have a marketable degree, we may approve up to a four year post-secondary program in a demand occupation if the individual can complete the program within 24 months.

Instances where the district may deny participation include but not limited to: the program selected were not in a local demand occupation, if the individual were to take longer than 24 months to complete the program, if the individual possessed marketable skills and was capable to obtain and maintain employment in that occupation or if past performance in higher education was poor.

- 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:  
Many post-secondary programs now require some type of internship or co-op experience as part of the program. We will count that as appropriate Work Experience time during the semester. If internships or co-ops were not available then the district would assist the individual to obtain an unpaid work experience in a related field or possibly part time paid employment with many of the employers we have relationships with.
- h. Education and training providers are evaluated by the following standards:  
Ontario County utilizes the system that is used for WIOA training providers and the Finger Lakes Workforce Investment Board.
- i. The district procedure for advising participants of approved training providers is:  
Participants are referred to [www.fingerlakesworks.com](http://www.fingerlakesworks.com) and directed to the Finger Lakes WIB approved training provider and demand occupation list.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
If a participant is approved for training, they then meet with the WD staff for completion of the training voucher, attachment #6, and a review of attendance requirements and forms to be completed. For other activities, such as job search, letters are sent with notice of at least 5 business days, attachment #7. Most letters are generated from what is available in WTWCMS.
- 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:  
Teens in school, coded exempt are required to submit school attendance verification at the time of application and when their case is recertified by the Temporary Assistance Unit.
- 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:  
At the initial assessment/intake meeting between client and the WD staff any restrictions related to health are discussed. In developing a worksite, restrictions are taken into consideration and the individual is placed in an assignment that is appropriate and within the medical restrictions. The job duties are developed through communication with the worksite representative to ensure that any limitations are accommodated and the worksite is notified in writing of any limitations. Notice to the worksite of the specific limitations, but not the medical diagnosis, will be indicated on the referral letter.

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

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

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

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability **code 31-caretaker of a child under the age of 12 months** to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. TA records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12-month lifetime limit.

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

### Use of Outside Providers/Vendors

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

Yes       No

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

Yes       No

If No, please describe the process used below:

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

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

The district contracts with Family Counseling Services of the Finger Lakes to provide interpreter services to non-English speaking participants. In addition we have translated documents commonly used for employment programs into Spanish.

We have also worked with Finger Lakes Community College to provide specific job readiness training workshops and services for the Hispanic population.

Telephone contacts are available to translate for the following languages including but not limited to: Albanian, Arabic, Chinese (Mandarin and Cantonese), Creole, French, Hebrew, Hindi, Italian, Korean, Russian, Spanish, Urdu and Vietnamese.

Individuals that are Non-English speaking are immediately referred to the community college's ESL program. WD staff also use online or over the phone interpreting services to complete the assessment, employment plan and communicate effectively with the person.

Through the Finger Lakes Works Career Centers there is a Basic Job Hunting workshop in Spanish that many Hispanic individuals are referred to. In addition, the Salvation Army in Geneva has bi-lingual staff that will accept recipients for work experience placements.

### **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:

At the onset of when an individual applies for cash assistance the district informs and reinforces throughout their participation that assistance is only temporary and we are here to help them move toward self-sufficiency, however there are choices the person must make that can either help or hinder their participation. During the applicant process we start by explaining specifically what will be expected of them while on assistance. We strongly encourage the use of our resources to help in finding employment. WD programs are set up in a way that mirrors paid employment and staff emphasize this during the process and as educational opportunities when a participant fails to comply. We also explain the unfortunate consequences of their choosing not to follow through with required activities. This kind of knowledge early in the process will hopefully curtail unexpected consequences and increase participation in work activities. If a person does not follow through, staff has the ability to contact the person and find out immediately the reason they did not participate instead of beginning the conciliation process. We also believe that building a strong rapport with customers will help in making positive choices.

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

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

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

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

Ontario County engages participants that have been sanctioned for the first time thirty (30) days after the sanction began. For those participants that have durational sanctions we engage them within 30-45 days prior to their sanction term completion. We invite both first time and durational sanctioned participants in for a case conference to explain how to end the sanction and what we can do to help them become employed. We also invite in the participants that wish to remain disengaged for a similar case conference in hopes they will end their sanction and begin participation. These meetings continue to happen on a monthly basis until the person ends their sanction or until their case is closed. Sanctioned individuals who wish to participate would be eligible for all supportive services listed in Section 4.1.

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

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

Supportive services and diversion payments are offered for individuals that may be employed and in need of transportation assistance or other supports to maintain their employment. This is done at initial application, at orientation and at any time during the application process. Referrals to other agencies are also made during this time to assist individuals in self-sufficiency.

## **Section 4 Support Services**

(Reference 18 NYCRR 385.4)

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

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

The social services district will provide to participants the following expenses, in addition to child care, which the district deems necessary for the individual to participate in assigned work activities. Cash applicants and recipients and SNAP recipients may be entitled to the following expenses.

1. Tuition may be paid for those clients enrolled in Vocational or Job Skills Training provided there is no other funding source available (e.g. TAP, PELL, scholarships, and other sources that may offset the cost of the tuition) and the client and the WD Case Manager have jointly developed the employability plan which has identified the needs for the training. Reimbursements for books and supplies can also be provided in addition to tuition. Written documentation from the training facility will be required for payment for

tuition and books. This will be accomplished by utilizing the Training Facility Voucher, attachment #6. Payment will be made directly to the provider unless otherwise arranged (payment to the client) and approved by the Senior Counselor or Deputy Commissioner. The maximum allowable amount per lifetime is \$3000. The \$3000 limit includes tuition, books, academic fees, and supplies. [NOTE: Tuition, books, and supplies are not an allowable training related expenses (TREs) unless approved by the district.]

2. A transportation allowance reimbursed at the rate of \$.30 per mile for round trips at least 5 miles per day paid to clients enrolled in work activities when other funds and sources of transportation are not available. Reimbursement to clients will be made twice per month or monthly. The District will consider any transportation hardship claims over and above the policy.

Monthly bus passes are purchased for individuals involved in work activities and on fixed public transportation routes. "Dial a ride" passes are purchased for TANF and SN applicants and recipients in work activities that are not on fixed transportation routes.

On a case-by-case basis, payment can be pre-approved on the condition the client will attend the assigned activity. If the client fails to attend the activity, the payment will be recouped from future supportive services of the client.

3. A clothing allowance of up to \$200 annually will be available to clients in need of clothing in order to participate in their work activity. The client or instructor/supervisor must provide documentation of the need for the clothing. The WD Case Manager will authorize payment for the clothing based upon estimates from vendors or upon receipt of sales slips. This allowance can only be used for items absolutely necessary for the participation in the program. If a payment is issued directly to the client, a sales slip must be submitted to the Case Manager within 5 days after the purchase. All requests will be considered on a case by case basis. Consideration will be given to the client's progress and participation in the work activity. Clients are not automatically entitled to this allowance and approval must be granted by the WD Case Manager and Senior Counselor or Deputy Commissioner prior to issuance.

4. If a client is required to have a license to pursue training, the fee for the license will be paid at an actual cost not to exceed \$300. This may include driver's licenses or any other license required by the state. Whenever possible, the payment will be made directly to the provider. If payment must be made to the client, a receipt or documentation must be submitted to the Case Manager prior to payment being made. No payments will be made without prior approval of the WD Case Manager and Senior Counselor or Deputy Commissioner.

5. Tools, equipment and miscellaneous items required for training or employment will be paid for upon documentation from the training facility or employer. The list of tools, etc. that will be required must be identified by the instructor or supervisor at the start of the training or job unless otherwise arranged. Whenever possible, payment will be made directly to the vendor. If payment is made to the client, payment will be made based upon the estimate provided by the instructor or worksite supervisor. The total amount cannot exceed \$500. If payment is made directly to the client, receipts must be

submitted to the Case Manager within five (5) days after the purchase. No payments will be made without prior approval of the WD Case Manager and Senior Counselor or Deputy Commissioner.

6. Payment for car insurance and car repairs may be made for those enrolled in a work activity provided that this is the least costly means of providing transportation. The cost will not exceed \$1,000.00, or the retail value of the vehicle (as documented by Edmunds.com) per year per individual for repairs and \$1,000.00 per year for insurance.

In order for Ontario County Workforce Development to consider paying for a client's car insurance, it is necessary the following be submitted to Ontario County Workforce Development: two separate written quotes of comparable insurance coverage for the vehicle, if a new policy is required. If there is current coverage for the vehicle, the statement/bill is required. All documentation must state the year, make and model of the vehicle, coverage dates, amount due, date payment is due (must be a minimum of 5 business days) and address of where payment is to be mailed.

Clients must use authorized repair shops licensed by the State of New York and must provide at least two estimates on official company documents. Clients submit these documents to the WD Case Manager for review. Approval must be made by a Supervisor before work is started. Please note all repairs must be done by authorized repair shops and must include their DMV Repair Shop Identification Number. No reimbursement will be made without prior approval of the WD Case Manager and Senior Counselor or Director. The estimate must be attached to the DETA 11 form.

In order for Ontario County to consider paying for repair to a client's vehicle, it is necessary that the following be submitted to Workforce Development:

A. Two separate written estimates of comparable work from New York State approved vehicle repair shops listing all necessary repairs to the vehicle to put it in safe working order. In addition, a statement on the estimate indicating that the vehicle has been visually inspected and the repairs listed on the estimate are necessary to put the vehicle in safe working order. This statement must be signed by the repair shop owner or manager, and include a valid DMV Repair Shop Identification Number.

In the event that two written estimates cannot be obtained (i.e.: the vehicle cannot be driven), the reason why must be documented prior to approval of any repair and/or towing costs.

B. Upon receipt of the two written estimates, the WD Case Manager will review to determine if car repairs can be paid for by Ontario County. All repairs must be reviewed with a Supervisor who will determine if repairs will be approved. No approvals are to be made verbally or without written statements. If the repair expense can be authorized, the case manager will authorize the repairs in writing, furnishing a copy of the authorization to the repair shop and to the client. If the repairs cannot be authorized, the Case Manager will notify the client, in writing, of this fact.

C. Once the work is completed, the repair shop must submit a bill to Workforce Development, showing that the work has been completed and listing the repair shop's Federal Employer Tax Identification Number and DMV Identification Number, authorizing them to do repairs.

Upon receipt of this bill, the Case Manager will submit the bill, along with the estimate for payment.

D. An individual log for each case is maintained that includes case number, name, repairs, vendor, amount and date work completed. Supervisory approval is required for these payments.

Expenses will be paid if there are no other monetary sources to meet these needs.

- 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): Due to the limited funds of our clients and the likelihood that they have older vehicles that aren't fuel efficient, we have determined that the IRS Medical/Moving rate may cause hardship to our clients; therefore we have established a higher reimbursement rate of \$.30 per mile.

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

For those TANF/SN cash assistance individuals that reside in rural areas where public transportation is not available we would expect them to walk no more than two (2) miles one way. On a case by case basis, this maximum could be waived where clients can demonstrate limitations or other inability to attend work activities. However individuals may receive a "dial a ride" public transportation bus pass that would transport them anywhere within Ontario County with at least twenty four (24) hour advanced notice to the bus company.

- 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: Support services such as car repair, car insurance, public transportation assistance and licensing fees are commonly provided to individuals at risk of needing assistance to improve their opportunities for employment or to maintain employment. However, other supportive services may be provided to an individual with proper documentation and participation upon the Director's or Senior staff's approval. Services such as job placement assistance, job leads, job readiness workshops, resource room utilization, case management and others are available to the universal population at any time.

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

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

Additional work supports provided and referred to the myBenefits website will be made as well as additional job coaching/counseling to the individual to overcome any workplace issues in retaining their employment, maybe provided.

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. Non-recurring expenses relating to childcare (daycare registration or application for service fees) not to exceed \$50. Payment will be made directly to the provider.
2. Clothing allowance of up to \$200 for employment or in connection with the participant's job. The case manager and the client will develop a list of necessary items. Payment will be made directly to the client who will submit a receipt after purchase.
3. Tools and equipment for employment, not to exceed \$500 and documented by the employer if such tools and equipment are required to be purchased by other employees similarly employed. Payment will be made directly to the vendor or if this is not possible, payment will be made directly to the client utilizing the estimate received from the employer or the vendor. The need for tools, etc. will be identified at the start of the client's employment unless otherwise arranged. Reimbursement for job related safety equipment of up to \$200 will be provided to the client upon documentation of the need from the employer.
4. Reasonable cost of necessary repairs to a recipient's automobile if this is the only barrier to the client's employment and it is reasonable. At least two estimates from licensed repair shops or garages are necessary prior to approval. Payment will be made directly to the provider. The total cost will not exceed \$1,000 or the retail value of the vehicle, whichever is lower. See #6 above in 4.1. Payments will be made only to authorized repair shops.
5. Payment for a monthly bus pass.
6. Payment for automobile insurance premiums up to a maximum of \$1000 per year (coverage will include basic requirements and collision if necessary) if this is the only barrier to the participants employment. Payment will be made directly to the insurance company. See #6 above in 4.1.

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



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

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

Employment related clothing

License and other work related fees

Job related safety equipment

Automobile repairs/towing

Automobile insurance

Transportation - bus passes

## **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

For persons who have failed or refused to comply with one or more requirements, the following conciliation procedure is provided to recipients of Safety Net Assistance, Family Assistance and Safety Net Families. It should be noted that applicants are not afforded the opportunity of conciliation during the applicant process as they are only required to complete an employment assessment and job search.

1. The timeframes for requesting conciliation must be made within the 10 days indicated on the conciliation notice.
2. If the individual responds either in person or in writing, a conciliation hearing will be scheduled within 14 days at which the individual may give reasons for the failure/refusal to comply.
3. The procedure will be administered by designated trained staff with no direct responsibility for a participant's case. Based on all available evidence, including that offered by a participant, the Mediator must determine if the client had good cause in his/her willful refusal or failure to comply.

4. If it is determined that good cause exists, no action shall be taken for failure to comply; if it is determined that the client willfully did, without good cause, refuse or fail to comply, a ten day notice must be issued to begin the process of negative action.

5. If the participant does not respond to the 10 day conciliation notice, a ten day written notice of intent to discontinue or reduce assistance will be issued to begin the process of negative action.

The conciliation period shall last no longer than 14 days from the date on which an applicant for or recipient of safety net requests conciliation, and no longer than 30 days from the date of the conciliation notice issued to an applicant for or recipient of family assistance, unless the individual and the social services official agree that the conciliation period should last longer.

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

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

The County's Senior Social Welfare Examiner assigned to employment will make the determination after hearing the client's and the WD Counselor's issue.

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

- in person
- by phone
- by mail

The client is notified via the Conciliation Notice (LDSS-4230) and given ten (10) days to respond. Included with the conciliation notice are instructions on how the client may demonstrate compliance in lieu of the conciliation hearing. If the client wants a conciliation hearing and is found to not have good cause for their non-compliance, they can still avoid a SNAP sanction by demonstrating compliance. •

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

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

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

The Client (if appropriate) may meet with staff to complete an Employment Assessment. If an Employment Assessment has already been done, they must complete five (5) employer job search contacts within five (5) days and submit verification of those contacts.

## **Section 5.2 Sanctions**

- a. The district’s procedure for determining compliance for those TA recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:  
Ontario County’s policy requires a sanctioned individual to sign an “agreement to comply” document AND attend at least one activity to demonstrate compliance prior to removing the sanction. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply, but no earlier than the expiration of the minimum duration period.
  
- 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:  
When feasible, the district requires that an individual who wishes to end their employment sanction comply with the employment activity they failed to comply with originally. Attending for five (5) days demonstrates compliance. If it is not feasible to have the individual comply with the original activity, the district will assign them to another activity. Attending for five (5) days demonstrates compliance.

Once the individual has demonstrated compliance, 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 an individual on a SNAP sanction provides evidence of a SNAP E & T exemption at any time during the SNAP sanction, the SNAP sanction will be lifted.

### **Section 5.3 Dispute Resolution**

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

The grievance is mediated by:

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

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

(Reference 18 NYCRR 385.2)

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

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

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

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

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

At application and recertification or whenever the Dept of Social Services staff has reason to believe that an applicant for or recipient of public assistance might have a physical or psychiatric impairment, DSS staff inquire whether such individual has any medical or psychiatric conditions which would limit his/her ability to participate in work activities.

2. Should the applicant or recipient declare that he or she has a psychiatric or physical impairment, DSS staff notifies the individual in writing of the opportunity to present, within ten calendar days, a statement from the individual's treating health care practitioner. Such documentation must contain a specific diagnosis resulting from any medically appropriate tests and specify any work limitation of the individual; Workforce Development staff shall not assign the individual to work activities until after a determination is made.

3. DSS staffs evaluate the individual's claim of a physical or psychiatric impairment, determining whether the documentation provided is sufficient to make a determination.

4. DSS staffs require new documentation as indicated by the length of disability indicated by the existing medical statement.

5 DSS staff notifies the individual of an opportunity to present any medical documentation available from the individual's practitioner to further determine employability status.

6. At the time that DSS staff make a determination of an individual's medical condition, we will notify the applicant or recipient in writing of such determination and of the right to request a fair hearing to contest such determination within ten days of such notification.

a. If the individual requests a fair hearing within the ten day period, Workforce Development staff shall not assign the individual to work activities pending the fair hearing determination, except that WD staff may, during the pendency of a determination pursuant to this section assign an individual, with the agreement of such individual, to a limited work assignment which would be consistent with any limitations associated with the psychiatric or physical impairments alleged by the individual.

b. An individual shall not have the right to a fair hearing to contest such determination if he or she requests a fair hearing after the ten day period specified in subparagraph (1) of this paragraph.

7. a. At any time after an applicant or recipient alleges that he or she has a psychiatric or physical impairment which would limit his or her assignment to work activities, or render him or her exempt from assignment to work activities and the District has reason to believe that the individual does not suffer from such an impairment, DSS shall notify the individual in writing of a potential sanction, the duration of which is consistent with the provisions of 18 NYCRR 385.12 of the Employment Policy Manual.

b. DSS staff shall affect such sanction if:

i. he or she determines, based upon clear medical evidence, that there is no medical basis for the individual's claim that he or she is unable to participate in work activities based upon a physical or psychiatric impairment; and

ii. he or she determines that the individual intentionally misrepresented his or her psychiatric condition.

8. Workforce Development staff shall not assign to work activities any individual for whom a medical determination is pending until such a determination is rendered pursuant to the requirements of this section unless the individual agrees to a limited work assignment consistent with the individual's alleged medical condition.

9. Notwithstanding any other requirement of this section, an individual who is eligible to receive comprehensive health services through a special needs plan as set forth in paragraph (m) or (n) of subdivision one of section 364j of the social services law and the regulations promulgated thereunder, regardless of whether such a plan is operating in the social services district in which the individual resides, shall be considered to be either disabled or work limited, as determined by the District.

10. Notwithstanding paragraph (1) through (11) of this subdivision, an individual whom the District suspects as having, or who indicates that he or she has an impairment that is due to alcohol or substance abuse, shall be subject to the requirements of subdivision (i) of section 351.2 of 18 NYCRR.

## **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.):

TA staff review medical information obtained by the individual's treatment provider and if the person is unable to work then the individual is coded appropriately and referred to appropriate services based on his/her treatment needs. TA staff review medical and/or treatment updates based on the individual's circumstances on a timely basis.

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

The district does not develop treatment plans however we do refer individuals to treatment. We discuss with the individual their needs and review treatment options and providers to best meet their needs. Referrals may be done via phone contact or provider information given to the customer for them to follow up with. A release of information may be obtained or medical verification requested to document if follow up has taken

place. Although, the district does not develop the treatment plan, the provider's treatment plan may be requested and used by the district.

Substance abuse treatment plans are determined by the providers and documentation of participation is received on at least a 90 day basis. Referrals are made to Finger Lakes Addictions Counseling and Referral Agency (FLACRA) for the assessment and based on the assessment treatment recommendations are made and must be followed by the client. The individual is required to participate in the necessary treatment as a condition of eligibility for temporary assistance.

- 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:

Tracking of the treatment plan is completed through verification from the provider that the participant is attending through medical statements or releases of information. In some instances after a referral is made, the participant attends monthly case conference meetings with TA and WD staff to determine if follow through was completed.