

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

January 1, 2020 – December 31, 2021

## **Orange County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the OrangeCounty 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 Orange 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/ DMM      1/6/20

Darcie M. Miller, Social Services Commissioner

1/6/20, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## **Section 2 Administration**

### **Section 2.1 Administrative Structure**

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

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

The local Department of Social Services contracts all employment services to the Orange County Employment & Training Administration (ETA). We are a county agency along with DSS and have been providing these services for more than two decades. The income maintenance office of DSS is responsible for budgets and overall case management. The ETA is responsible for all employment and training activities including WTCMS functions.

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

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

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

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

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Orange County Employment & Training Administration (ETA)	\$3,711,335 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%	Case management, client orientation, assessment, employment planning, job readiness and job search assistance, support service provision, referrals including child care, transportation program, counseling, workshops, vocational and on the job training. Job placement, retention support and any other needed services to assist and overcome barriers to employment. ETA utilizes funds to run a SNAP (FS E&T) Program as well as an ABAWD job search and monitoring program which provides the same as above services for those ABAWDS receiving SNAP benefits. Also includes a local transportation program used to transport clients to and from paid work, employment activities, job search and child care locations.
Best Resource Center Call Center/Customer Service Program	\$60,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational training, certificate program. Differentiated instruction and learning modules for varied student levels. Special projects. Work experience assignments available for those who are not ready for vocational training. Outreach and home visits for non compliant consumers. Contract ends 3/31/20 (Prorated amount)

<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>
Merakey Temporary Exemption Services Program (TESP)	\$423,5000	<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%	In-home program to work with exempt populations to assist with either returning to work or obtaining SSI/SSD
RECAP, Inc. Fresh Start Café Program	\$228,287	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job skills training in culinary and food service industry, including soft skills, order taking, meal preparation, food stations, catering organization/planning, cashier, kitchen maintenance, and related. Work experience and special projects. Job search and placement with a job developer once/twice per week also part of curriculum. Contract ends 6/30/20 (prorated amount).
HONOR	\$50,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job training in food service, maintenance, housekeeping and woodworking. Soft skills and work experience related assignments for those not ready for vocation training. Job search and job placement included.
Gallagher/Newburgh City Bus - Transit Orange	\$6,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	DSS purchases city bus tickets for eligible consumers to ride for free to get to and from work/work related activities and child care.

<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>
The Visconti Loop, Transportation Services	\$272,772	<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%	Free mini bus service available to low income families and individuals in the Port Jervis area who need to get to Middletown for employment and education related transportation. Employment, childcare, and/or other human services related trips.
	\$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>
Orange Ulster BOCES	WIOA SNAP grant	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational training; GED/HSE and ESL training FS E&T grant partner; job placement and retention
SUNY Orange	WIOA financial aide	<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, certificate and degree programs
Exodus		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Training and support services for ex offenders
Legal Services of Hudson Valley		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Free legal services for low income children, families and individuals. Legal Assistance for Victims (LAV) Program partners.
		<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>Target Groups</b>	=
Assessment/Employment Plan	=	Applicants	=
Supervised Job Search	=	FA & SNA with children	=
Job Readiness Training	=	SNA without Children	=
Job Club	=	SNAP	=
Job Placement Services	=	TANF 200%	=
Grant Diversion	=		=
Job Development (employer outreach)	=		=
WOTC pre-certifications	=		=

#### Other Services Requested

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

There are no Jobs Programs Services provided in Orange County at this time.

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

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

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

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

Other:

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

Orange County Employment and Training Administration Welfare to Work Unit is physically located in all three Orange Works Career Centers in Orange County, including Newburgh, Middletown and Port Jervis. The OC ETA runs WTW programs as well as all WIOA programs and are co-located with NYS Department of Labor for over 17 years. Orange County is a leader in this collaboration and was one of the first counties to offer one stop services.

## **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:

See Section 3.4

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

Check one of the following:

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

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

The district will provide a Welfare to Work (WTW) orientation to all applicants/recipients and clients including those who are required to re-certify for temporary assistance. Information will be presented and includes a description of the following:

- Information concerning the 12 months/lifetime limit, three months per occurrence exemption from work activities for a single parent after the birth of a child, and need for medical documentation of the 6-8 week medical exemptions once the 12 month lifetime limit has been exhausted.

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:

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

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

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

The district enters assessments directly into WTWCMS

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

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

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

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

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

The district will provide an individual assessment of all adult members of households with dependent children and 16 and 17 year old members of households with dependent children who have left school without completing or receiving an equivalency diploma. The assessment will be completed within 90 days of determining that the individual is eligible for assistance.

The district will provide an employability assessment for applicants and recipients without dependent children who are not exempt from assignment to work activities and will be completed within 90 days.

The procedure for completing an assessment will include the client reporting to the Employment Unit and meeting with an employment staff member who will question, discuss, clarify and collect information about the individual and/or his or her family to accurately record information useful to identify client needs, goals, limitations, aptitudes and any other pertinent information. This information will be documented using the Assessment folder on WTCMS and can have additional or future details entered as needed.

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

Orange County Employment and Training Administration staff

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)]

Graduation from a regionally accredited or New York State registered college or university with a Bachelors Degree in related field with no work experience; OR Graduation from a regionally accredited or NYS registered college or university with an Associates Degree plus one (1) year experience working in job training, placement or human service program; OR three (3) years equivalent work experience. Good knowledge of workforce development programs, policies and procedures. Good knowledge of the cultural, environmental and personal factors influencing the lives of persons who are economically disadvantaged, low income, unemployed or otherwise facing barriers to employment and bilingual skills.

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?

Every six months and/or any time there is a significant change to the case which could impact employment or employability.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

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

The district enters employment plans directly into WTWCMS.

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

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

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

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

b. Check one of the following:

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

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

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

The district will provide an employment plan for all consumers to document a plan of action for which to move forward and proceed with. This mandated document gives consumers a tangible guide, providing an organized plan for which to proceed. This plan will include employment preferences, goals (short and long term), challenges, barriers,

support services (such as child care and transportation) and others. Goals should be specific, measurable, attainable, relevant, and timely.

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

Every six months and/or any time there is a significant change to the case, such as an employment activity, which could impact employment or employability.

**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:

Orange County plans to meet federal and State participation rates by assessing client needs, utilizing employment plans, relying on partners and supports, and engaging consumers in employment and employment related activities described in the section 'f' below. The estimated time period it takes for individuals to be engaged in activities for both newly opened cases and those who have changed from exempt to nonexempt is approximately 4-6 weeks. Some will take less time, some will take more time, but 4-6 weeks is a good average. The weekly standard participation requirement for individuals with families including all case types, such as a single parent in a household with a child under six years of age, is 35 hours per week.

- 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	500	750

- 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 and other reports including those on the Listings Menu on WTCMS are utilized to monitor cases and participation. The district also performs monthly reviews of caseloads and then meeting individually with staff to discuss issues, identify errors, and work collaboratively to motivate clients to participate. Some include Federal All Families Detail Listing, TANF/SN MOE Worker Participation/Engagement Summary Report, SN/NON-MOE Worker Participation/Engagement Summary Report.

- 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):

Orange County does not mandate NTA-SNAP recipients to participate in SNAP E&T work activity assignments.

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):

Letters are mailed to applicants and recipients with information about job search services and resources at the One Stop. The letter includes job search and employment related information about workshops, the resource room and other helpful offerings available at the Orange Works Career Centers. These services include job postings, registration for workshops, resume and interviewing prep, job search tips, computer access, fax and copier usage and other job search related services.

- 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:

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	10	35	
SNA Individuals	10	35	

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

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

Case Managers assign TA recipients to job search activities and are assigned to seek a minimum of 10 job contacts per week for a total of 35 hours per week. The recipient must keep a log provided by the case manager where contacts can be recorded and displayed as proof of the activity. Recipients are required to report job search outcomes and they are reviewed on a weekly basis.

The required number of contacts and hours may be adjusted for individuals participating in additional work activities and that no more than a total of 40 hours per week of participation in activities is assigned.

- 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. On a case by case basis, if a consumer can demonstrate he or she is self employed and can produce proof or documentation that shows fulfillment of required hours, the activity would be approved.
- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

	<b>Activity and Definition</b>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Unsubsidized Employment</b> - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Subsidized Private Sector Employment</b> - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Subsidized Public Sector Employment</b> - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.



<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Work Experience</b> - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student’s education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Community Service</b> - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Search</b> - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> <li>— SNAP</li> </ul>	<p><b>SNAP E&amp;T Supervised Job Search</b>- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Readiness Training (JRT) Activities</b> - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Vocational Education</b> - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Skills Training</b> - Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>

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

### Section 3.5 Job Development

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

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

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

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

OC ETA performs this function, but is also considered part of "the district".

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.

The OC DSS contract with the Orange County Employment and Training Administration (OCETA) to coordinate all employment services to non-exempt public assistance recipients, including TA and/or SNAP participants. OCETA, like OC DSS, is a county government agency under Orange County Government and therefore, can be considered part of the "district". A coordinator oversees all program activities in three offices across the county, with each office having line supervisors to monitor case managers. There are also two clerical support staff as well as transportation staff and per diem drivers to assist clients with getting to employment, employment related activities and training.

The line supervisors, called Employment Services Coordinators oversee the day to day activities of our job development program, called the Job Readiness Training Program (JRT). Staff in this unit are trainers in job readiness preparation, job developers (who do job development, employer contacts and job placements). This program is locally funded because it is such an asset and important part of our successful outcomes. Two job developer/placement staff make employer contacts daily. The main function of their job is to place our participants in jobs and daily go out into the community to assist them with applications, interviews and/or any other support necessary to help them gain employment. These staff contact employers daily as well as visit places of employment with their group of individuals to fill out applications and/or go on interviews. In addition, one Employment Services Coordinator (ESC) has been assigned to perform job development and employer services full time. The ESC in this role arranges on-site recruitments in the Orange Works Career Centers as well as arranging OJT contracts and other employment opportunities for consumers.

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

There are currently no Jobs Program staff in our district.

### 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:

Providers have been accredited and approved by the NYS Education Department and have had long term relationships with the Career Center of Orange County and ETA. Orange Ulster BOCES, SUNY Orange, Best Resources and the Literacy Council of Orange County (all recognized and certified by NYS Education Department) are contacted and referrals are made based on the client's needs and goals. These programs include adult basic education, high school equivalency and English language instructional services.

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

The district identifies providers by referring to the NYS eligible training provider (ETP) list. This list includes Workforce Investment Board and WIOA approved providers who have committed to working with the county. The district will approve as a work activity, up to a four year college program when appropriate and suitable related to the client becoming employed based on the education for up to one year of the training program. The approval process is based on consideration of a participant's suitability, interests, aptitudes, and likelihood of whether or not the participant will most likely become employed based on the training outcomes. A demonstration of good attendance, motivation, and overall attitude toward participation in employment and training activities is considered.

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

The process includes case managers identifying those who do not have basic literacy or high school diploma by interviewing during the completion of the assessment process. In addition, clients are referred to the district's Job Readiness Training Program (JRT) where the TABE test is administered. Once identified, clients are referred to needed services. HSE programs are provided by nearby educational partners agencies who offer HSE, ABE and ESL. Transportation and child care barriers are addressed and provided as best we can.

- 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:

Case managers and staff follow guidelines set by educational institutions such as our local BOCES and SUNY Orange to determine whether participation in educational activities is approved for those without a high school diploma. Instances when the district would deny participation would happen if the desired program has a pre-requisite of a high school diploma, HSE or specific reading or math level.

For those who do not have a high school diploma or HSE, staff encourage and recommend participation in classes and usually include this educational activity as part of their individual employment plan.

- e. Describe the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities:  
The approval process is based on consideration of a participant's suitability, interests, aptitudes, and likelihood of whether or not the participant will most likely become employed based on the training outcomes. A demonstration of good attendance, motivation, and overall attitude toward participation in employment and training activities is considered.
- 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 as a work activity, up to a four year college program when appropriate and suitable related to the client becoming employed based on the education for up to one year of the training program.
- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:  
Staff will ensure a core activity such as paid employment, work experience and/or community service are a part of the employment plan when post-secondary education has gone beyond 12 month lifetime limit. The student will have to meet with their case manager for a one-on-one appointment when an enrollment to employment or employment activities is done.
- h. Education and training providers are evaluated by the following standards:  
A Vendor Training Monitoring Guide is utilized and considers and evaluates the program's historical success, how many participants get jobs from the training, how many retain their jobs, credentials and certifications of the training institution and individual trainers, labor market demands related to the training, and other related considerations.
- i. The district procedure for advising participants of approved training providers is:  
Participants are advised of training providers during their initial orientation; by their employment case manager when discussions are had about training during the employment plan development; and during the JRT Program as an option to reach their goal of employment and independence. There is an electronic list of providers that can be viewed by participants as well.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
Participants are notified for approval for training or enrollment in writing and the activity will be included in their Employment Plan found on 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:  
Teen will be required to attend school full time. The local school district will provide proof of attendance. The district DSS requires schools to complete attendance verification forms at re-certification, which occurs twice a year. If an attendance problem is indicated they will be asked to submit the forms more frequently.
  
- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:  
All health-related limitations will be accommodated and taken under consideration when work activities are assigned. The district will inform work activity providers of any individuals' work limitations identified as part of the disability review process. The following is a description of how the district will ensure that work sites are responding to notifications of work limitations:  
Specific work limitations will be noted on all referrals to the work sites. Work sites will be required to specify nature of assignments of those with limitations and indicate that the assignment will accommodate the client's limitations. Recipients will not be assigned to work sites, which cannot accommodate their limitations.

### **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 (20) 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 (20) 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 (10) 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 (10) 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 unit has several bilingual staff in each office to accommodate the needs of Non-English speaking participants. The staff also has access to a telephone service that offers translator services when needed.

### **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:

Staff perform outreach by telephone, mail, email, and other means of contact in order to engage clients and reduce the occurrence of participants failing to attend work activities. In addition, staff have case conferences and meetings to discuss barriers and engagement strategies to problem solve and find solutions. Often, situations will occur and supports such as daycare, transportation and housing and others may play a role in noncompliance. The outreach performed by staff is very important because if the barrier can be indentified, most of the time it can be resolved with support from the unit. In addition, information about Orange Works Career Center recruitments, new vocational training programs, workshops and other interesting activities are also shared. Best Resource Center also is contracted by the district to do home visits and outreach for non-compliant consumers. ETA staff send referrals and Best Resource Center reports back.

### **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:

The district attempts to engage sanctioned clients in a several ways. Staff react proactively to recapture participation and are mindful of the type of sanction imposed. For example, for a WE1 sanction, the staff informs the participant immediately (either by mail, telephone call or calling into our office for an appointment) that compliance will immediately lift their sanction. Every attempt to get participants to come in to resolve their issue is attempted. For longer, durational sanctions, outreach and engagement efforts are attempted in the same manner, but participants are advised that their sanction will not be lifted until the durational time period is over.

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

Outreach to participants by telephone call, letters in the mail or other means of contact to engage them to re-engage are attempted.

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

Again, engagement attempts are made by telephone calls, mailings and other outreach.

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

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

Some ETA staff including case managers and job developers, perform diversion activities by assisting clients with job search activities such as scheduling interviews, providing transportation and other supportive services that may assist an applicant with obtaining a job before his or her case is opened. In addition, the Career Center hosts employer recruitments and job fairs that are available to all county residents. Often, clients are hired before their cases open and also may reduce or even close some cases when employment is obtained. In addition, the tireless efforts of the staff to assist in helping clients find jobs and to help them every step of the way to meet their goal of self-sufficiency is the most effective strategy practiced daily.

## **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:
  - Day Care registration fees - consistent with amount specified in our childcare plan. Limit \$50 first child, \$25 for each additional provider.
  - Clothing, uniforms, and footwear necessary for specific activities and employment-up to \$400.00
  - License and other work related fees- up to \$200.00 for licenses and other fees necessary to participate in training and /or accept and retain employment.
  - Job related safety equipment- up to \$200.00 per period of eligibility for protective gloves, boots, headgear, etc. needed to accept and/or retain employment
  - Tools and equipment - up to \$500.00 per period of eligibility for tools/equipment necessary for training and/or to accept or retain employment.
  - Automobile repair- up to \$2,000.00 not to exceed market value of the vehicle
  - Automobile insurance- up to \$1,000.00 for recipients/participants vehicle when it is the least costly way to provide transportation for duration of employment activity or up to ninety (90) days after entry to employment.
  - Automobile/Driver Training – up to \$1,200 per year
  - Transportation - supports including, bus passes, van fleet, and taxi service. Least expensive mode of transportation will be determined by the district. Most cost effective means will be used.
  - Car Seats – up to \$150 for children with parents who are participating in paid work or work related activities
  - Bicycles – up to \$350 including helmet and lock needed to assist in needed transportation to employment and/or employment activities.

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

Please check all that apply:

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

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

The maximum distance the client would be expected to walk is two miles. Work limitations will be addressed and accommodated with respect to the two mile walking distance requirement. Families with children who have special circumstances will also be considered.

- 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:  
The JRT Program staff tracks and unit case managers monitor participant post employment needs or those at risk by maintaining contact, providing resources, referrals and services such as child care information, transportation resources and other supports. Retention services such as client counseling, barrier intervention and employer relations are some activities addressed with those at risk.

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

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

As mentioned, JRT Program staff and other employment unit staff will provide support services to consumers and their employers following job placement, and will work collaboratively with employment case managers to make any provisions needed to make consumer successful.

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:

Child Care (when a case closes for excess income, transitional benefits are available up to one year based on income eligibility of under 200% federal poverty level)

Transportation (bus passes, van transportation)

Clothing, uniform, and footwear

Job related tools and equipment

Automobile insurance and repair

Car seats

Bicycles

Camp fees for children

### **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:

Transportation services (case by case basis, according to availability)

Job search assistance; introduction to One Stop services

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

(Reference 18 NYCRR 385.11 and 385.12)

### **Section 5.1 Conciliation**

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

- in person
- by phone
- by mail

The process is as follows: Conciliations are always sent to consumers by mail. The client may respond in person by visiting our office, by phone (via conversation with case manager or supervisor) or in writing. Through this contact with the case manager, the client will explain the circumstances for the noncompliance and if the case manager feels the reason is valid, the conciliation will end with a positive resolution and the client will be assigned to a new activity. The determination considers willfulness and good cause

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

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

Supervisors and employment case managers who are most familiar with the client's case history make the determination of good cause. These staff follow and consider certain procedures to make the determination of good cause/willfulness. If a client fails to report to the conciliation or

there is no contact (by phone, mail or other means) whatsoever, then the good cause/willful determination will be based on information available to the district. When there is contact made, the case manager or supervisor makes the determination on a case by case basis, including a interviewing, discussing, collecting documentation and other means of investigation and inquiry to make a correct determination.

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

- in person
- by phone
- by mail

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

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

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

For a client to avoid having a sanction imposed, he or she would comply with the following procedure: for families, 20 hours of job search and a minimum of 10 contacts must be completed in 10 days. For households without dependent children, 40 hours of job search and a minimum of 20 contacts must be completed in 10 days. Additional time may be granted if the client provides good cause during the 10 day period.

## **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:

Clients who agree to participate in work or work activities may have their sanctions ended after completion of the minimum duration. An individual must participate in an activity for a minimum of ten consecutive days to show their compliance. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply, (but no earlier than the expiration of the minimum duration period).

If after the durational sanction period has ended, the client claims to be work exempt, the client will be given the opportunity to submit medical documentation to verify the exemption from the work requirements and will be added back to the case, provided that the individual has complied with efforts to document the exemption, in the same time frame as a non-exempt individual who has complied with temporary assistance benefits restored retroactive to the date the individual indicated a willingness to comply.

- 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:  
An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that he/she is exempt from SNAPE&T requirements and is otherwise eligible for SNAP benefits. Consumers must fulfill their time or demonstrate their compliancy through participation in a work activity.

### **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):

Our district has a district managed contract to provide independent medical evaluations. Our district has a district managed contract to provide independent medical evaluations through IMA. Determinations made by IMA are considered final decisions on what type and duration of the exemption. Medicals from the clients' doctors are reviewed by Senior Social Welfare Examiners, placed on a data base and referred to the medical home visit vendor. The Senior Social Welfare Examiner will determine the duration of the exemption based on the doctors' recommendations. If it is longer than 12 months they will be referred to our SSI determination unit. In all cases the district will notify the individual of the determination in writing with the

## LDSS- 4005/a Notification of Temporary Assistance Work Requirements Determination (Exempt/Non-Exempt).

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:

Orange County has a contract with Merakey to do in-home assessments of our temporary disabled population. The workers make home visits, do complete assessments, help with doctor appointments and assist with SSI forms if needed. The Merakey workers collect the documentation and bring this information back to the DSS office where caseworkers and supervisors make determinations and plan next steps. The goal of the contract is to return temporary disabled clients to employment or to assist with receiving SSI/SSD benefits. We also use an independent medial service (IMA) to determine the cleint's employability. The combination of the two services minimizes the amount of clients that receive exemptions from employment and maximizes our use of the Social Security system.

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

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

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

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

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

- Yes       No

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

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



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

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

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

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

The DSS case worker makes the determination whether an individual has the potential to be restored to self-sufficiency based on information received from the individual's private physician or the results of an independent examination from IMA. At this point the DSS examiner makes a referral to OC ETA employment unit at Orange Works for orientation and assessment.

- 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 local DSS has a case management team called the TESP team. TESP stands for Temporary Exemptions Support Program. This team is available to gather information and provide intensive case management for all clients that display a need for mental health treatment. This case manager will assure that the client's mental health needs are met and that the client attends treatment. Case management team members gather information from treatment providers to ensure all needs are being met and treatment plan is being followed. When clients demonstrate an ability to return to employment they are referred to OC ETA.

For those who have other health issues, the local DSS will follow the documented prescribed treatment plan of the client's physician. For those who do not have documented health issues, or for those whose physical impairments are not clear or questionable, the local DSS will send clients to Industrial Medicine Associates (IMA) to assess medical needs and will follow the treatment plan prescribed accordingly.

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

The TESP case manager tracks the progress of the client's treatment and attendance. All clients cases are reviewed on a monthly basis and all medicals must be resubmitted every three months. Monthly attendance is received.

In addition, there are caseworkers assigned to tracking the participant's compliance with treatment for any health issues (not related to mental health) such as home visits, requesting follow up documentation regarding the impairment, appointment for therapy or treatment and other related activities. This information is reviewed and a case conference is held with the Employment Unit and appropriate plans are made.