

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

January 1, 2020 – December 31, 2021

Orleans County

Contents

Section 1- Assurances	3
Section 2 Administration	5
Section 2.1 Administrative Structure	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies	5
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	5
Table 2 – Other Service Providers.....	7
Section 2.3 OTDA Jobs Staff Agreement.....	8
OTDA Jobs Program Services – Target Groups.....	8
Other Services Requested.....	8
Section 2.4 Access to Services at New York State Career Centers	8
Section 3 Engagement and Work Preparation.....	10
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))	10
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	10
Section 3.3 Assessment and Employment Planning.....	10
TA Assessment.....	10
TA Employment Plan	12
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9).....	13
Section 3.5 Job Development	20
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)	20
Section 3.7 Work Verification	24
The Quality Assurance (QA) plan include the following elements:	25
The District’s Quality Assurance Process is as follows:.....	25
Use of Outside Providers/Vendors.....	26
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency	26
Section 3.9 Strategies/Procedures for Increasing Program Attendance	26
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	27
Section 3.11 Strategies for reducing the need for TA	27
Section 4 Support Services	27
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District	27
Section 4.2 Transitional Support Services	30
Section 4.3 Extended Support Services.....	30
Section 5 Conciliation, Sanction and Dispute Resolution Procedures	30
Section 5.1 Conciliation.....	31
Section 5.2 Sanctions.....	32
Section 5.3 Dispute Resolution	33
Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....	33
Section 6.1 Disability Determination Process and Tools.....	33
Section 6.2 Mental Health Screening and Assessment	34
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	35

Section 1- Assurances

As a condition of the receipt of federal and State funds the Orleans 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 Orleans 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/ TK 1/24/2020

Thomas Kuryla, Social Services Commissioner

1/24/2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

Section 2 Administration

Section 2.1 Administrative Structure

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

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

The Department has a long-standing contractual relationship with Orleans County Job Development in providing job-related services to Temporary Assistance and SNAP individuals. Over the years and continuing today, the two Departments have worked very closely together to develop policy, train staff and implement changes as quickly as possible to address ever-changing challenges and opportunities.

Both departments are located in the County Administrative building. This promotes easy access to applicants/recipients and the ability to collaborate at both the administrative and operational levels. Another positive to note is the ability to refer TA applicants at intake to Job Development.

The Welfare-To-Work contract is a calendar year contract and delineates each Department's responsibilities. It incorporates all the funding for Welfare-To-Work. Included in the contract responsibilities are client-focused activities such as: employment orientations, employment readiness activities, assessment and employability plan development. In addition, the contract defines responsibility to develop and implement a broad range of work activity options, to enroll sufficient clients in work activities to meet participation rates, and to conduct data collection activities in sufficient depth to meet State and Federal reporting requirements.

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
OC Job Development	\$338,734	<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%	Orientation, Assessment, Employment Plan, Work Activities
IMA	\$3,000	<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%	Employability Determinations
	\$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%	
	\$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.

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Orleans/Niagara BOCES	NYSED, Title II, EPE, Venture IV	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	JRT, Literacy/ESL, TASC, TABE-testing, Customer Service & Other Certifications, Job Search
GLOW Workforce Development Area	WIOA, TET-NWDG, Trade Act	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Employment and Training Services, such as Individual Training Accounts (ITAs), Work Experience (Work "Tryouts"), Supportive Services and other resources, are available for job ready participants pending funding availability and client eligibility.
Albion Career Center (aka NYS DOL-Albion)	Wagner-Peyser / WIOA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Computer access, veteran services, employer recruitments, literacy, and various workshops, such as Interviewing Skills, Networking, Resume, and Social Media, meeting space for workshops, assessments and orientations.
ACCES-VR	NYSED, Title IV	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Helps individuals with a permanent disability who want to obtain employment
Literacy Genesee-Orleans	NYSED, Title II	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Literacy/ESL, TASC
Associates for Training & Development (A4TD)	SCSEP	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assists individuals 55 years of age or older in obtaining employment
Rochester Regional Transit Service (RTS) Orleans	OTDA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Bus Transportation
Iroquois Job Corps	WIOA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Education offered concurrently with workforce preparation for eligible youth ages 14 to 24
		<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)

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

Other Services Requested

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

Section 2.4 Access to Services at New York State Career Centers

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

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

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

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

As an Affiliate Site in the GLOW Workforce Development Area (due to co-location of TANF & WIOA), officially the "Orleans County Career Center," this district is uniquely positioned to provide referrals for WIOA-funded services and other Career Center partners as WIOA staff are co-located in Job Development, and strong relationships have long been established with DOL and other agency counterparts within the One-Stop System. In accordance with the MOUs in place along with the approved GLOW Local Plan, Job Development works closely to improve upon service delivery within the

system on behalf of the local district. At this time, Orleans County Job Development along with all other Partners in the GLOW Workforce Development Area are participating in a planning and development process facilitated by the GLOW "One-Stop System Operator," a function performed on a contractual basis for GLOW by the Rochester, Finger Lakes Regional Planning Council.

Currently, Orleans County Job Development works closely with Career Center partners by appropriately referring participants for services, as identified through the assessment process and using the NYS DOL Referral Form, when appropriate. With appropriate client release, his/her Assessment and Individual Employment Plan is shared. Job Development staff advise individuals of the services available throughout the One-Stop System such as training assistance, available jobs and open opportunities for the Albion Career Center's Resource Room, help with resume and job search, and potential education or training when available through WIOA or other resources. When appropriate, clients may be referred to ACCES-VR or other agencies that offer assistance specific to the client's needs. In addition, staff regularly refer clients to our Title II partners, particularly Orleans/Niagara BOCES which provides scheduled Job Readiness Trainings and individualized assistance with resume development, interview skills, customer service certification, TASC achievement, job placement and other employment-related skills. We make every effort to partner with community based organizations, e.g. our strong relationship with Community Action of Orleans and Genesee which offers CSBG-funded employment and training opportunities for our clients, and to not only build upon existing partnerships but to identify new resources that will help us to better serve clients. The Orleans County JDA Director actively participates in all GLOW Workforce Development Area committee and board meetings as well as attending the regional Business Services meetings, whenever possible. The Director has also participated on work teams related to the Finger Lakes Regional Economic Development Council (REDC).

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:

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:

The Job Development staff conducts group orientations once a week, on Wednesdays, for Temporary Assistance applicants/recipients.

If individuals are working and not able to attend an orientation, the Job Development staff will schedule a one-on-one orientation at a mutually convenient time. In order to accommodate individual needs/other circumstances (e.g. limited English speaking, medical/mental health issues where individuals cannot function in a group setting) may necessitate a one-on-one orientation by Job Development staff.

Job Development staff explain the job search requirements.

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:

An assessment is completed within 90 days from when recipients are determined to be eligible for TA, including 16 and 17 year-olds not in school. Usually, the assessment is completed within 30-45 days upon case opening and is updated on an on-going basis. Also, households without dependent children receive assessments within a year following their application. Based on the assessment, an Employability Plan is developed on WTCMS and in consultation with the recipients to lead them to economic independence and is updated on an on-going basis when addressing the needs of families with multiple and significant barriers. Appropriate referrals are made, as follows: ex. ACCES-VR, veteran services, various literacy programs. Based on the assessment DSS will refer recipients to GCASA, Mental Health, and IMA if deemed necessary.

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

Orleans County Job Development Agency

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)]

The Employment & Training Counselors will have at least a 2 year college degree; or the equivalent in work experience in a related field with similar duties of Job Development, DOL, or Social Welfare Examiner, as approved by Orleans County Civil Service.

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 are updated annually at a minimum or as needed if precipitated by changes, such as medical issues, family circumstances, childcare, household composition, becoming non-exempt when previously exempt, becoming exempt when previously non-exempt, or a need for supportive services has become evident.

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.

In conjunction with completion of an individual's assessment, the employment plan is developed with client input on short- and long-term goals to gain self-sufficiency and inputted into WTCMS by the Counselor during the interview process.

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

Plans are updated as needed at the Counselor's discretion and with client input if precipitated by changes, such as medical issues, family circumstances, childcare, household composition, becoming non-exempt when previously exempt, becoming exempt when previously non-exempt, or a need for supportive services has become evident.

Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)

a. Describe below how the district plans to meet federal and State TA participation rate requirements. Included is the weekly hours standard participation requirement for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

- The district plans to meet federal and state participation rate requirements by engaging individuals in activities immediately at opening. All non-exempt applicants are enrolled in a job search prior to case opening. Before the case opens the Job Development staff meet with applicants on a weekly basis to assess employability, skills, and to review job searches. Our goal is to have all nonexempt individuals assigned to start a work assignment on the day the case opens.
- When the status changes from exempt to nonexempt the TA Eligibility Worker refers the client to Job Development and the client is scheduled to attend the next orientation and assessment. Our goal is to have these clients engaged in activities immediately.
- Individuals are assigned to at least the minimum number of hours of participation for their case to count in the participation rate: true single parent families with a child under 6 to participate 20 hours weekly. Single parent families with a child six or older to participate 30 hours weekly. Safety Net Non-MOE individuals are required to participate 35 hours weekly or the hours of work experience as allowed by the amount of the public assistance and SNAP benefits. Two parent families in which one parent is disabled are required to participate 30 hours weekly. Two parent families, in which neither parent is disabled, may be required to participate up to 40 hours. WEP hours are limited to the monthly PA grant plus the Supplemental Nutrition Assistance Program (SNAP) allotment divided by the State or federal minimum wage, whichever is higher.
- Individuals assigned to work experience will usually be assigned to the maximum number of hours that the TA grant and SNAP benefits will allow (not to exceed 40 hours per week). WEP hours are limited to the monthly PA grant plus the Supplemental Nutrition Assistance Program (SNAP) allotment divided by the State or federal minimum wage, whichever is higher.
- When assigning individuals to paid or unpaid work activities we strive to assign individuals fully, within any limitations, up to 40 hours per week in one or more countable work activities.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	50	75

- 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:

Each employment counselor reviews the various Cognos reports regularly to manage their caseloads and determines which Cognos reports are helpful in managing their caseloads. The Workforce Coordinator reviews the various reports and addresses any issues/concerns regarding individuals not participating/not counting in the participation rate.

- 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):

Orleans County Department of Social Services does not require 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):

The district provides individuals with written information on how to access assistance with job search activities through the Orleans County Job Development Agency (aka Orleans County Career Center, an affiliate partner of the One-Stop System). This information is also made available on the County Job Development web site page, to which the County's DSS page links.

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

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

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

Non-exempt TANF applicants are assigned a job search at orientation and are required to make six or more employer contacts at the Counselor's discretion and to spend at least 6 hours per week looking for work. The Job Development Counselor meets at least bi-weekly with applicants to review and monitor their job search until a case determination is made. Prior to the anticipated case opening date, the case is transferred to the assigned Job Development staff to meet with the applicant so they can be enrolled in a work activity immediately upon case opening.

Non-exempt SN applicants are assigned to a job search at orientation and are required to make at least six employer contacts per week and spend at least 6 hours per week looking for work. SN applicants are assigned to a supervised job search class at the Orleans/Niagara BOCES in Medina. BOCES staff monitors their job search and administers the TABE test to each applicant. Thereafter, SN applicants who have their HS diploma/HSE* attend two days per week, 3 hours per day. Those SN applicants without a HS diploma/HSE* are assigned to attend 5 days per week, 3 hours per day. Applicants bring their job search books to class daily. Job search is supervised, referrals are made to employers, and applicants attend various job fairs in the area, go on job interviews, and use computers to complete their job searches. Their job search books are reviewed by Job Development staff at least bi-weekly. If applicants fail to comply, the application is denied for failure to complete a job search assignment. This is the process until a case determination is made. *High School Equivalency

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	6/week	6 hours/week	
SNA Individuals	6/week	6 hours/week	

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

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

- Non-exempt TA recipients are assigned a job search at Orientation. The hourly requirement for assignment to ongoing job search will vary depending on whether or not the recipient is enrolled in other activities. When job search is combined with another work activity the minimum required weekly hours are determined by the Job Development staff.

- Non-exempt recipients participating in self-directive job search will be required to maintain and submit a log detailing the amount of time spent looking for work.

- In-person contact between the Job Development Counselor and the recipient will be at least weekly to review job search efforts.

- Non-exempt TA recipients are assigned to job search on a continuous basis. Individuals are required to present their job search handbook (LDSS-3696) at all scheduled appointments with the Job Development staff.

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. Self-employment is approved as part of an individual’s required work activities if included in the individual’s income budget. The individual completes a self-employment log and

the income is divided by the federal minimum wage to calculate the hours entered. If they are paid hourly minimum wage or higher, actual hours worked are used. Other employment and/or work activity is considered if there is no outlook for the applicant/recipient being self-supporting in the current self-employment.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

	Activity and Definition
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Unsubsidized Employment - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Subsidized Private Sector Employment - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Subsidized Public Sector Employment - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Work Experience - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student’s education curriculum. (Note: Paid internships are to be reported as employment.)</p>

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

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

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

Section 3.5 Job Development

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

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

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

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

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.

Job Development works in collaboration with the Albion Career Center to refer clients for recruitments being held at the ACC. In addition, Job Development coordinates Job Fair(s) in the community with local businesses and service providers; clients are referred to attend and learn about employment opportunities and community resources. Job Development staff also utilize local temporary employment agencies, communicate with businesses about their needs, and encourage employers to call when they need to fill positions. Identified candidates are referred to employers for interviews for job openings, when appropriate.

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

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

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

The district has an on-going relationship with educational providers in our area and the availability to immediately enroll clients in appropriate educational activities listed above. The District has education services primarily available through Orleans/Niagara BOCES.

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

The district has an on-going relationship with many educational and vocational training providers in our area. They are aware of our attendance and satisfactory progress requirements. The district will notify them of our approval process as it has changed slightly regarding the length of training allowed. In addition, all educational and vocational training providers must be certified by the State Education Department, Veterans Administration, or be included on the NYS DOL Employment & Training

Provider List (ETPL). The district will track the successful completion rate of students from their programs, the number entering training related jobs and their degree of cooperation in obtaining attendance and satisfactory progress report.

- 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:

- Nonexempt individuals who possess less than a 9th grade literacy level are encouraged, and may be required, to enroll in educational activities. These activities may include basic literacy, high school equivalency, or other educational programs.
- Nonexempt individuals who have attained a basic literacy level but have not attained a high school diploma or the equivalent will be offered, and may be required, to enroll in educational programs designed to improve literacy level and/or prepare an individual to attain a high diploma or the equivalent.
- Individuals with limited English proficiency, without a high school diploma obtained in the United States, will be offered the opportunity, and may be required to participate in educational activities. These activities may include adult basic education or preparation for a high school equivalency diploma. Individuals with limited English proficiency will be assessed to determine whether enrollment in ESL is necessary before the individual is enrolled in an Adult Basic Education or secondary education program.
- Nonexempt individuals who have an IEP and have not attained either a high school diploma or High School Equivalency will be offered, and may be required, to enroll in an educational program designed to improve literacy levels and/or prepare an individual to attain a high school diploma or the equivalent.
- All educational enrollments will be based on assessments and the district will also consider other pertinent factors when determining whether or not an assignment is appropriate, such as:

The extent to which the individual is capable of participating in and able to benefit from participation in an educational activity.

The individual's progress with the activity or progress achieved in similar prior activity assignments. When reviewing progress, districts will consider the time that has elapsed since prior participation, whether or not the prior enrollment was appropriate for the individual, and factors known or presented by the individual which may have impacted his or her ability to make satisfactory progress.

The individual's attendance or prior compliance with past similar educational activity assignments. When reviewing program attendance or prior compliance, districts will consider the time that has elapsed since prior participation and factors known or presented by the individual which may have impacted his or her ability to satisfactorily attend.

- 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 will be assigned to educational activities consistent with their individual assessment and employment plan.
- Staff will review individuals' progress with the activity or progress achieved in similar prior activity. When reviewing progress, district will consider the time that has elapsed since prior participation, whether or not the prior enrollment was appropriate for the individual, and factors known or presented by the individual which may have impacted his/her ability to make satisfactory progress.
- Individuals' attendance or prior compliance with past similar educational activity assignments will be reviewed. When reviewing program attendance or prior compliance, district will consider the time that has elapsed since prior participation and factors known or presented by the individual which may have impacted his/her ability to satisfactorily attend.
- Staff will determine if the individual is capable of participating in and able to benefit from an educational activity.
- Individuals requesting to participate in an educational activity may be denied if the Counselor determines it's an inappropriate work activity based on assessments, not an "in demand" occupation, and case review.

- 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 of an individual to participate in job skills or vocational education activities will be based upon (1) individual must show an active job search has been unsuccessful with the current skills and abilities (2) the individual's current ability to reasonably compete for jobs in the chosen occupation without additional training, (3) attendance and satisfactory progress evaluations from previously assigned work activities, (4) prerequisite educational levels needed to be successful in the program, and (5) the client's readiness to seek employment after the training is completed. This readiness includes availability of transportation and daycare.

Prior approval is required to enroll a client in vocational or educational training. An approval procedure is currently in place. The criteria are that the training cannot be more than 52 weeks in length, must be in a demand occupation and must provide sufficient skills enabling the trainee to move directly to employment.

- 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 approves post-secondary education as a work activity if the post-secondary degree program includes/involves a relevant internship that meets or exceeds 20 hours/week. Time sheets signed by the internship provider are required and verified by the E&T Counselor.

- 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:
The district does not approve post-secondary education beyond 52 weeks/12 months.
- h. Education and training providers are evaluated by the following standards:
The district has referred clients to many educational and training providers in our area in the past. The providers are made aware of our attendance and satisfactory progress requirements. All education and training providers must be certified by the State Education Department and/or be listed on the Department of Labors Employment & Training Provider List (ETPL). Curriculum appropriateness is evaluated based on documented labor market demands and the employment needs in the area. The district tracks the successful completion rate of students from their programs, the number entering training related jobs, and their degree of cooperation in obtaining attendance and satisfactory progress reports.
- i. The district procedure for advising participants of approved training providers is:
The Agency has books and pamphlets available from training facilities for the recipient's use. Our Counselors will sometimes suggest a training facility that is currently running a specific program the recipient is interested in and suggest to the recipient to look into course offered.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:
Recipients are given written notification of the start date if there is sufficient time. If there is not sufficient time they are notified by phone or personal contact.
- k. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below:
- It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.
 - A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
 - The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
 - The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
 - The student fails to progress toward the completion of a course of study without good cause, as determined by the district.

— The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.

— Additional reasons as stated below:

- I. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:
The attendance policy is monitored by the Temporary Assistance staff by requesting School Verification annually.

- 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:
Job Development staff will provide in writing participants' medical restrictions or limitations to the Supervisor at their work assignment. (Privacy laws prohibit disclosure of medical conditions).

Section 3.7 Work Verification

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

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

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

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at AQI.WV.SelfAudits@otda.ny.gov for State review including specific information on each of

the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

The District's Quality Assurance Process is as follows:

The district will perform a random sample of (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 WTCMS and documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

The district will perform a random sample of (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 WTCMS, excused absences and holiday time are documented in the case file and correctly reported on WTCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

The district will perform a random sample of (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:

Non-English speaking participants are scheduled for a 1-on-1 orientation in lieu of the normal weekly group orientation. In addition, for all appointments arrangements are made, whenever possible, to have an on-site interpreter or they are informed that they may bring their own, if that's more comfortable for them. In addition, the district does subscribe to Language Line, and all counselors are provided instructions how to access this service when needed for employment activities and services. A shared spreadsheet with DSS staff is utilized to track usage. For WIOA clients, the Albion Career Center (NYS DOL) also subscribes to Language Line and provides access for our staff, 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:

Counselors work with participants to determine if supportive services or alternative placements, for instance, may assist the participant in meeting work activity goals. In addition, utilizing other resources in the community are researched. We endeavor to assist participants in succeeding.

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:

When a sanctioned participant informs the TA worker of their willingness to comply, a referral is made to Job Development. Job Development staff then schedules the sanctioned participant for an orientation and immediately engages the individual in an activity.

TA eligibility worker will refer individuals sanctioned beyond duration to the Welfare Fraud Investigator. Those sanctioned individuals will be required to meet monthly with the Welfare Fraud Investigator to establish on-going eligibility for Temporary Assistance. At each appointment, the Welfare Fraud Investigator will explore changes in case circumstances, household composition, medical condition, availability of resources, barriers to self-sufficiency, and household income/expenses. Individuals will be required to present at each meeting receipts or other acceptable verification of how previous month's bills were paid; shelter, fuel, utilities, phone, food, etc. The Welfare Fraud Investigator will discuss the benefits of work with the sanctioned individual, including supportive and transitional services available to support employment. The Welfare Fraud Investigator will continue to meet monthly with individuals sanctioned beyond duration.

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

Section 3.11 Strategies for reducing the need for TA

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

Orleans County provides supportive services to divert applicants from needing Temporary Assistance. These supportive services are provided on a case-by-case basis and are only approved for individuals who are either already employed or have a promise of employment. In order to be eligible for a diversion payment, an individual must have verifiable employment or the promise of employment.

Section 4 Support Services

(Reference 18 NYCRR 385.4)

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

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, approved work activities and activities to restore self-sufficiency:
- Expenses related to child care such as registration, application or service fee to secure or hold a day care slot.
 - A clothing allowance up to a maximum of \$175.00 will be provided to participants in need of clothing to participate in their work activity, job interview or other work-related need or to maintain employment. Documentation of the need must be provided.
 - Fees and licenses necessary for employment not to exceed \$250.00. This may include driver's license/vehicle registration or any other license required by the state, physicals, and PPDs, for instance.
 - Up to \$200.00 for tools, equipment and miscellaneous items needed for an applicant or recipient in order to retain employment. Documentation of the need from the employer must be provided.
 - Payment for car insurance and car repairs may be made, and the cost will not exceed \$600 for repairs, or the retail value, whichever is greater per year per individual and \$500 for insurance per year per individual. Clients must use authorized repair shops licensed by the State of New York and must provide at least two-three estimates, or per Counselor's discretion (per below).

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

-Proof of ownership of the vehicle being requested to repair is that of the individual participating in the required activities;

-Must be employed or have offer of employment; proof of employment, employment offer, or compliance in required activities of the individual requesting repairs and/or insurance is required (e.g. documentation of offer or verification of income);

-Proof of valid driver's license of the individual requesting repairs and/or insurance; Two-three separate written estimates from New York State approved vehicle repair shops listing all necessary repairs to the vehicle to put it in safe working order. This statement must include a valid DMV Repair Shop Identification Number.

-In the event that two-three written estimates cannot be obtained (e.g. the vehicle cannot be driven), the reason why must be documented prior to approval of any repair or towing cost.

-Upon receipt of the two-three written estimates, or documentation per above, Orleans County will review to determine if car repairs can be paid. Contact must be made to the chosen repair shop to confirm only those repairs listed on the estimate are to be done. Once completed, the repair shop must submit a bill to Orleans County for payment directly to the repair shop.

- Counseling, including life and parenting skills, family issues, housing, physical/mental health issues, and drug and alcohol issues. Appropriate referrals will be made to providers.
- Case management services to assist participants in becoming self-sufficient.
- Medical assistance will be provided through Medicaid if the participant is a recipient of Medicaid. Expenses incurred as the result of any injury suffered in an assigned work activity will be processed through Medicaid or Workers' Compensation, whichever is deemed appropriate

- 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):

Bus passes are issued in situations where the individual can use mass transit transportation.

Individuals who have access to a motor vehicle may be reimbursed with gas vouchers. Orleans will provide \$30.00 gas vouchers to individuals who have obtained employment, if necessary. Gas vouchers will be disbursed at the discretion of the Job Development Counselor. Verification of employment or compliance with the work related activity must be met prior to issuance.

- 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 district endeavors to assign participants to work sites in close proximity to their homes. A participant is generally expected to walk up to two (2) miles to their assignment. Reasonable accommodations are made based on individual's work limitations, individual circumstances, and weather conditions.

- 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:
- Expenses related to child care – See Section 4.1 a.
 - Clothing allowance - See Section 4.1 a.
 - Tools needed employment – See Section 4.1 a.
 - Fees and licenses necessary for employment – See Section 4.1 a.
 - Transportation – See Section 4.1 a and 4.1 b.
 - Vehicle repairs and car insurance - See Section 4.1 a.

Section 4.2 Transitional Support Services

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

- Expenses related to child care such as registration, application of service fee to secure or hold a day care slot.
- Vehicle repairs and car insurance - See Section 4.1 a.
- Fees and licenses necessary for employment not to exceed \$250.00. This may include driver's license/vehicle registration or any other license required by the state, physicals, and PPDs, for instance.
- Clothing necessary to retain employment up to a maximum of \$175.00.
- Post employment services, counseling, case management

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:

- Expenses related to child care such as registration, application of service fee to secure or hold a day care slot.
- Vehicle repairs and car insurance - See Section 4.1 a.
- Fees and licenses necessary for employment not to exceed \$250.00. This may include driver's license/vehicle registration or any other license required by the state, physicals, and PPDs, for instance.
- Clothing necessary to retain employment up to a maximum of \$175.00.
- Post employment services, counseling, case management.
- Each case that is closed on Public Assistance due to employment will automatically be evaluated for Transitional Medicaid and SNAP

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:

Bus passes through RTS Orleans

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 district will issue a conciliation notice to individuals who have refused or failed to comply with employment requirements. The district uses the conciliation notice that is generated through the WTCMS. The conciliation notice identifies the specific instance(s) of noncompliance with work requirements. All conciliations are maintained as part of the district records.

If the individual does not contact the Job Development Counselor within the period in the notice, the Counselor will make the determination to refer for sanction based on all available information.

If the individual contacts the Job Development Counselor within the period in the notice, the Counselor will determine if the failure to comply was willful and without good cause based on information and documentation gathered during the conciliation.

A DSS official conducts the grievance/dispute resolution if requested by individuals. If the individual's grievance is not resolved through conciliation, the individual shall be informed of the right to a fair hearing

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

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

The Job Development Counselor will determine if the instance on noncompliance was willful and without good cause.

Individuals will be responsible for providing documentation (upon request) to the Job Development Counselor to substantiate a claim of good cause. The Counselor will review the information provided and determine whether or not an individual's noncompliance with employment requirements was willful and without good cause. If there is a disagreement, dispute or uncertainty, management/supervision will review to make a 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 district will issue a conciliation notice to SNAP recipients who have refused to comply with work requirements as assigned. The district uses the conciliation notice that is generated through the WTCMS. The conciliation notice identify the specific instance(s) of noncompliance with work requirements. All conciliations are maintained as part of the district records.

If the individual does not contact the Job Development Counselor within the period in the notice, the Counselor will make the determination to refer for sanction based on all available information.

If the individual contacts the Job Development Counselor within the period in the notice, the Counselor will determine if the failure to comply was willful and without good cause based on information and documentation gathered during the conciliation. If there is a disagreement, dispute or uncertainty, management/supervision will review to make a determination.

A DSS official conducts the grievance/dispute resolution if requested by individuals. If the individual's grievance is not resolved through conciliation, the individual shall be informed of the right to a fair hearing.

Individuals who fail to comply and express an interest in avoiding a SNAP E&T related sanction are offered the opportunity to attend an orientation to available services that also includes testing as part of Job Development employment assessments, and then is assigned to a one week job search (minimum 6 employer contacts) to demonstrate compliance.

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

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

The Job Development Counselor will determine if the instance of noncompliance was willful and without good cause.

Individuals will be responsible for providing documentation (upon request) to the Job Development Counselor to substantiate a claim of good cause. The Counselor will review the information provided and determine whether or not an individual's noncompliance with employment requirements was willful and without good cause. If there is a disagreement, dispute or uncertainty, management/supervision will review to make a determination.

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

Individuals who fail to comply and express an interest in avoiding a SNAP E&T related sanction are offered the opportunity to attend an orientation to available services that also includes testing as part of Job Development employment assessments, and then is assigned to a one week job search (minimum 6 employer contacts) to demonstrate compliance.

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:

Sanctioned individuals may demonstrate their willingness to comply at the end of the sanction period by participating in an assigned work activity for a maximum of 10 business days.

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:
- Individuals who express a willingness to comply in order to end a SNAP E&T related sanction are offered the opportunity to attend an orientation to available services that also includes testing as part of Job Development employment assessments, and then is assigned to a one week job search (minimum 6 employer contacts) to demonstrate compliance. Individuals who are subject to a durational sanction period must serve the full durational period and demonstrate a willingness to comply or document that he/she has become exempt from SNAP work requirements in order to restore eligibility for SNAP benefits. The time period for demonstrating compliance to the satisfaction of the district is no more than ten business days.

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):
- Individuals claiming a temporary or permanent disability are given a medical (LDSS-4526) for their health provider to complete. Individuals have ten calendar days from the date of the request to provide documentation of a medical/mental impairment. Extensions may be given based on the availability of the provider to complete required information.
 - DSS staff or the Job Development staff will evaluate the medical documentation. If there are any questions, they will contact the medical provider for clarifications.
 - The district will notify the individual in writing of the disability determination using the LDSS-4005 or LDSS 4005(a).
 - Orleans County reserves the right refer an individual to Industrial Medical Associates (IMA) to help clarify disability status

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:

Temporary Assistance workers review medical documentation and determine employability status.

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 LDSS will require the individual's practitioner to complete a medical (LDSS-4526) to determine whether or not the individual can recover from a mental or physical impairment. The individual must comply with the treatment plan recommended by his/her physician. DSS may make a referral to IMA for further evaluation. Information gathered is reviewed by DSS and the Job Development staff.

- 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 recommendation of the physician is followed.

- 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 District reviews an individual's exemption status at recertification or sooner if there is a reason to believe the status has changed. The District tracks and monitors participant compliance with treatment plans on a regular basis. Job Development and TA staff monitor the exempt TANF population and schedule appointments to review their medicals, compliance with treatment recommendations, attendance, and if needed, gather further medical documentation. The District may refer individuals to IMA for further evaluations. TA and Job Development staff review the SN exempt population.