

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

January 1, 2020 – December 31, 2021

## **Rockland County**

## Contents

<b>Section 1- Assurances .....</b>	<b>3</b>
<b>Section 2 Administration .....</b>	<b>5</b>
Section 2.1 Administrative Structure .....	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies .....	5
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	5
Table 2 – Other Service Providers.....	8
Section 2.3 OTDA Jobs Staff Agreement.....	9
OTDA Jobs Program Services – Target Groups.....	9
Other Services Requested.....	9
Section 2.4 Access to Services at New York State Career Centers .....	9
<b>Section 3 Engagement and Work Preparation.....</b>	<b>11</b>
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)) .....	11
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	11
Section 3.3 Assessment and Employment Planning.....	11
TA Assessment.....	11
TA Employment Plan .....	13
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 .....	23
The Quality Assurance (QA) plan include the following elements: .....	23
The District’s Quality Assurance Process is as follows:.....	24
Use of Outside Providers/Vendors.....	25
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency .....	25
Section 3.9 Strategies/Procedures for Increasing Program Attendance .....	25
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	25
Section 3.11 Strategies for reducing the need for TA .....	26
<b>Section 4 Support Services .....</b>	<b>26</b>
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District .....	26
Section 4.2 Transitional Support Services .....	27
Section 4.3 Extended Support Services.....	28
<b>Section 5 Conciliation, Sanction and Dispute Resolution Procedures .....</b>	<b>28</b>
Section 5.1 Conciliation.....	28
Section 5.2 Sanctions.....	29
Section 5.3 Dispute Resolution .....	30
<b>Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....</b>	<b>30</b>
Section 6.1 Disability Determination Process and Tools.....	30
Section 6.2 Mental Health Screening and Assessment .....	31
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	32

## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Rockland 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 Rockland 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/ JS 1/27/20

Joan Silvestri, Social Services Commissioner

1/27/20, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## Section 2 Administration

### Section 2.1 Administrative Structure

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

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

The Rockland County Department of Social Services Employment Unit is solely responsible for the monitoring and tracking of the employment activities of Temporary Assistance and SNAP applicants and recipients. Rockland County utilizes the local One-Stop, the Rockland County Career Center, and other agencies to assist participants to meet the countable work activities mandates. These programs provide job readiness trainings such as resume building, computer skills, interviewing techniques and soft skills such as dressing to impress, personal hygiene and how to behave in a work setting.

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

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

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

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

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Community Outreach Center	\$36,100.00	<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%	Assist the unemployed to obtain skills, training or education needed. Assessments for job placement. Assist with resume and interview skills

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Martin Luther King Multipurpose Center	\$18640.00	<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%	Assistance conducting employment searches and creating resumes. Access to computers and faxes. Assist youth to prepare for employment.
WESTCOP Rockland Community Action Partnership	\$43,750.00	<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%	Offers job readiness workshops and job training programs.Help with resume writing and interview skills, computer lab available for job search. Dress for success services.
Haitian American Cultural and Social Organization	\$6,000.00	<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%	Offers job development and job training assistance. Assists with access to employment and training and support services.
Cornerstone	\$18,000.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Medical examinations for employability assessments.
	\$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%	

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

**Table 2 – Other Service Providers**

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

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Rockland County Career Center (One-Stop)	\$75,000.00 -WIOA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assessments, job training, job placement, case management, educational services and referrals to other community agencies/services
Rockland BOCES	Various Sources	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	SNAP recipients obtain skills and training needed to achieve employment goals at no cost. Options include TASC, ESL, academic skills, academic counseling, career training, job placement and SNAP to Success Program.
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	



### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

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

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

#### Other Services Requested

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

The district does not participate in the OTDA Jobs Program Services.

### 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: District makes direct referrals to the Rockland County Career Center for TA applicants and recipients.
  
- 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.
 

All non-exempt TA applicants and recipients who are placed on Job Search are referred to the local One-Stop who is also a WIOA partner. The Rockland County Department of Social Services Employment Unit sends a referral to the One-Stop notifying them of individuals who will be attending their weekly screening workshop. The One-Stop will notify the Employment Unit of the clients who attended the workshop and detail any

recommended next steps for the client such as resume building workshops or Employment Boot Camp.

## **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:

The Rockland County Department of Social Services Employment Unit adheres to OTDA's definition of "Engaged in Work".

### **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:

Information regarding services provided by the local One-Stop and Youth Program Services. The district provides information regarding services for English as a Second Language, TASC, child care subsidy and treatment for alcohol/substance abuse and mental/physical health concerns.

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:

All Employment Assessment Orientations are conducted individually when the person applies for assistance regardless of whether or not the person is contesting employability. All applicants and recipients of assistance have the right to be notified of expectations and services that are available.

### **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:

Rockland County will complete assessments for households with dependent children within 90 days of the case opening. Rockland County will complete assessments for households without dependent children within 1 year of the case opening.

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

The Rockland County Department of Social Services Employment Unit staff conduct all assessments and enter the information directly into WTCMS.

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 minimum qualifications for an employee conducting assessments are as follows: 1. Bachelor's Degree, 2. Completion of two years of college and either one year of employment interviewing or placement experience in a client service program which involves direct public contact, 3. Graduation from high school or possession of an equivalency diploma and either two years of employment interviewing or placement experience or four years of work experience in a client service program which involved direct public contact.

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 at least annually. Assessments are also updated when a client reports a change in circumstance and when a work exemption is evaluated for renewal.

## 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.

The Rockland County Department of Social Services Employment Unit staff complete the employment plan at the time of assessment. The employment plan is entered directly into WTCMS. The employment plan is printed out and given to the client to sign once completed. A copy of the completed signed plan is scanned into the case record.

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

The employment plan is updated at least annually and any time the client is reassessed. Employment plans are also updated when a client reports a change in circumstance and when a work exemption is being evaluated for renewal.

### 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 Rockland County Department of Social Services Employment Unit engages all newly opened cases including TANF, SN-MOE and SN-non MOE within 1 month of case activation. Appointment letters are mailed to all recipients within 10 days of the case opening. Work Experience participation is calculated by taking the monthly TA and SNAP benefit and adding them together and then dividing by the NYS Minimum Wage and then dividing that figure by 4.333. All individuals are expected to participate in employment activities up to 40 hours per week. To further meet the participation rate, individuals are placed on job search and referred to the local One-Stop. The One-Stop may enroll individuals in other activities and cases are adjusted as needed.

All exempt individuals are called into the Rockland County Department of Social Services Employment Unit 1 month before their exemption expires and are reassessed. If a recipient is contesting employability, new documentaion may be requested including a treatment plan. If the receipient is determined to be employable then they are immediately placed on activities. If the case is TANF or SN-MOE and in need of child care subsidy, the district will establish eligibility for the Child Care Subsidy Program before placing recipients on activities.

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	125	152

- 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:

Both monthly and current COGNOS reports are utilized to identify recipients who are either not counting or not meeting participation requirements. Each individual's case is analyzed and a determination is made as to why the client is not counting and actions are taken to engage and enroll the client into countable activities.

- 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):

Rockland County does not mandate non-exempt NTA SNAP recipients to participate in SNAP E&T activities.

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

Clients are offered assistance with job search activities at intake, recert and undercare. Clients who request assistance in finding employment are referred to the Rockland County Department of Social Services Employment Unit where they are referred to the Rockland County Career Center and Rockland BOCES.

- 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:

All TA applicants who are not contesting employability are immediately referred to the Employment Unit after the TA application interview. The Employment Unit conducts an Intake Orientation which includes an explanation of the job search policy, procedure and required documentation. Clients are given self attesting job search logs that they must complete and return to the Employment Unit. Job searches may be done in person or by online job application. Clients on job search are seen every two weeks.

Applicants with children who indicate the need for child care are given child care forms to complete and return before they are placed on 40 hours of job search. Applicants without children are immediately placed on 40 hours of job search.

Homeless clients are referred to the Housing Unit for assessment before being placed on 40 hours of job search.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	10	20	Contacts are on line applications for employment with confirmation of submittal and/or in person job applications.
SNA Individuals	10	20	Contacts are on line applications for employment with confirmation of submittal and/or in person job applications.

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

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

All recipients are assessed and interviewed to determine employability and identify any barriers to employment. A employment plan is developed for each client. Clients are given self attesting job search logs that they must complete and return to the Employment Unit. Job searches may be done in person or by online job application. The number of hours a client is assigned to job search activities varies depending on case type. Clients on job search are seen every two weeks.

Clients with dependent children are offered a child care subsidy before being placed on job search activities. Recipients who are determined not to be ready for employment are referred to the appropriate community agencies such as the Rockland County Career Center or Rockland BOCES. Referrals are also made to the Substance Abuse Monitoring Unit or community mental health programs if needed.

- 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. The Rockland County Department of Social Services Employment Unit will approve self-employment conditionally if the client wishes to pursue self-employment. Individuals are encouraged to certify their business with the Rockland County Clerk to obtain a license number. The Employment Unit will ask the individual to track and report earnings and hours worked to the Employment Unit monthly. It is expected that minimum wage will be earned. If the client cannot establish at least earning minimum wage, employment activities will be assigned to ensure compliance.



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

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

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

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

### Section 3.5 Job Development

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

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

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

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

The Rockland County Department of Social Services Employment Unit attends job fairs to meet employers and to ascertain what jobs are available and what skills are needed for those jobs. The Employment Unit maintains regular contact with the local One-Stop's outreach person. The district also has an Employment Board in the main lobby of the Department of Social Services that posts job and training opportunities.

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

The Rockland County Department of Social Services Employment Unit has an agreement with the local One-Stop which is the Rockland County Career Center. The district has 6 workers that refer applicants and recipients of TA and SNAP to RCCC every week for orientation and to obtain other services such as job interviewing strategies and resume building skills.

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 contracts with local community based organizations that provide basic adult education, TASC, ESL and other certifications. Through the use of the WTWCMS Assessment and Employment Plan, the Employment Unit staff refers clients to agencies as needed. Attendance and feedback will be provided to the Employment Unit from the community agency to verify the clients participation in the assigned activities.

- 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 Employment Unit will review documentaion submitted by the client from the educational institution or job skills training program ensuring that the documentation includes a detailed description of services offered, requirements needed to complete the

program, a recognized certification in the field of study or job placement and verification on how the program is paid for. Any regionally recognized Vocational and Jobs Skill Trainings would be considered. The district has partnerships with Rockland BOCES and Rockland Community College to provide services such as ESL, job skills, bookkeeping, commercial driving, food prep and Nursing and Skilled Labor Programs.

- 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:

All recipients are interviewed using the WTWCMS Assessment and Employment Plan. If a recipient identifies that they have not attained a basic literacy level and/or attained a high school diploma or equivalent, they are referred to the Rockland BOCES TASC program.

- 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:

Through the use of the WTWCMS Assessment and Employment Plan, workers ascertain recipients's education and job readiness levels. If the individual does not have a high school diploma or equivalent, they will be referred to obtain one. If the individual has barriers before they can be in a classroom type setting such as an untreated mental or physical health issue and/or substance abuse issues, the district will address those needs first.

- 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:  
Through WTWCMS Assessment and Employment Plan, workers establish individual's education, certifications and job readiness levels. The district may approve job skills and/or vocational education activities if 1. the recipient has not used up their 12 month lifetime limit, 2. the educational/training program results in a certification that is directly related to the preparation of the individual for employment, 3. the education/training improves the individual's employability and ensures basic skills required by employers.

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

The district will approve and support all recipients who need to obtain a high school diploma or equivalent. The district will approve on a case by case basis a 12 month vocational certification program. The district may also approve up to a four year college program as long as it ensures the basic skills required by employers and that the participants meet all other activities mandated by the Employment Unit.

- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:

All recipients who are beyond the 12 month lifetime limit are referred to a work experience/volunteer worksite. All worksites that the district refers to have an agency

agreement on file which stipulates that they are responsible for giving recipients job skills and that the worksite will report monthly attendance to the district.

- h. Education and training providers are evaluated by the following standards:  
The district refers clients to community based organizations that offer education and training services. These CBOs have a contract with the County of Rockland and go through a rigorous application process and are reviewed periodically according to their contract. These reviews include site visits conducted by the County of Rockland to ensure contract compliance.
- i. The district procedure for advising participants of approved training providers is:  
The district advises participants of approved training providers both verbally and in writing by distributing a list of providers and the training they offer. Providers often provide us with flyers and informational materials to give to clients.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
The district notifies participants of an approved training or work activity either in person during an appointment or by mail stating that they are required to report to the approved training or work activity. The referral indicates the contact name, address, date and time.
- 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 district would only require acceptable enrollment and participation in high school as determined by the school. Monthly attendance is not required.
  
- 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:  
Before assigning an individual with health related limitations to a worksite, the district will ensure that the worksite is aware of the limitations and can accommodate any needs.  
The worksite supervisor will be notified in writing of the individual's limitations and needs.

### **Section 3.7 Work Verification**

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

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

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

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

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

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

**The District’s Quality Assurance Process is as follows:**

The district will perform a random sample of (12) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTWCMS and documentation is in the file to support hours reported on WTWCMS and that the scheduled hours on WTWCMS is consistent with the documentation.

The district will perform a random sample of (12) cases semi-annually for participation in **unpaid work activities** to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTWCMS, excused absences and holiday time are documented in the case file and correctly reported on WTWCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTWCMS by district or provider staff.

The district will perform a random sample of (6) 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 (6) 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:

Recipients who are non-english speaking are provided a translator by DSS who maintains a list of available staff who can serve as a translator depending on availability based on language. DSS will also arrange for a translator from an outside agency if necessary.

### **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:

The district contacts participants directly using the conciliation process to ascertain the reason for the absences and determine if the absences are with good cause or without good cause. Even with good cause absences, the district will explain the importance of reporting to work on time and being accountable. If the absences are without good cause, the participant may be sanctioned resulting in a reduction or termination of benefits.

### **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:

Participants in cases with sanctioned individuals in households with children that are running with their first sanction are contacted by the district within 30 days of the sanction ending by mailing a Rockland County form call "Notice to End Your Sanction" and a referral for an

appointment to be assessed, comply with the sanction and if appropriate placed on employment activities. Individuals in households without children are contacted by the district within 30 days of their sanction ending by mailing a Rockland County form call "Notice to End Your Sanction" and a referral for an appointment to be assessed, comply with the sanction and if appropriate placed on employment activities.

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

The district contacts sanctioned participants 30 days prior to the duration portion of their sanction ending by mailing a Rockland County form "Notice to End Your Sanaction" and a referral for an assessment appointment, compliance with the sanction and to be placed on employment activities if appropriate.

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

All sanctioned individuals are sent the Rockland County form "Notice to End Your Sanction" and a referral for an appointment 30 days before the sanction is ending. All sanctioned individuals are afforded the opportunity to comply with their sanction before the duration has terminated. Whenever there is contact with the sanctioned individual, the district engages in conversation regarding the sanction and notifies the client how they can come into compliance.

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

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

All TA applicants that are employable are referred to the Employment Unit immediately after the TA application interview. The Employment Unit staff conducts an Orientation Interview and an Assessment and places the applicant on activities such as job search as a diversion. If the applicant is in need of child care services or other services, the district will assist individuals with their barriers and then place the applicant on activities.

The district will also offer individuals and families a one-time Emergency Assistance benefit to aid with certain emergency situations in lieu of opening an ongoing TA case.

The district utilizes partnerships with community based organizations and the Rockland County Career Center and Rockland BOCES to assist applicants and recipients to become job ready and find employment.

## **Section 4 Support Services**

(Reference 18 NYCRR 385.4)

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

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants the following expenses which the district deems necessary for the individual

to participate in orientation, assessment, employment planning, approved work activities and activities to restore self-sufficiency:

The district will provide bus tickets for individuals to participate in work activities. A taxi may be provided for a health related evaluation. The district also utilizes Extended Supportive Services to assist and support individuals to move toward self-sufficiency.

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

Please check all that apply:

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

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

The district requires individuals to walk no more than 2 miles to participate in work activities and/or access public transportation.

- 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: Individuals who are at risk of needing TA will be assessed for their barriers to obtaining employment. Based on their assessed needs, the individual may be referred to a myriad of organizations to assist the individual or family towards self-sufficiency. Organizations include the Rockland County Career Center, Rockland BOCES, mental health treatment agencies and substance abuse treatment programs.

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

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

The Rockland County Department of Social Services Employment Unit provides the following supportive services: short term transportation assistance in the form of buses tickets and Extended Supportive Services which covers the costs of uniforms, work boots, tools, and licensing fees. Extended Supportive Services has a \$600.00 lifetime cap for each person.

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:

The Rockland County Department of Social Services Employment Unit provides the following supportive services: short term transportation assistance in the form of bus tickets and Extended Supportive Services which covers the costs of uniforms, work boots, tools, and licensing fees. Extended Supportive Services has a \$600.00 lifetime cap for each person.

### **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:

The district will consider assisting individuals with paying for certifications, uniforms, application fees, finger printing processing fees etc., if it will lead toward permanent employment. The district will also assist with Temporary Assistance diversion payments such as rental arrears and payment to prevent utility termination.

## **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 consider any claim of good cause raised by the household for not meeting the program requirements. When a TA recipient fails to comply with an assigned work activity that is subject to conciliation the district will determine if the individual willfully and without good cause refused or failed to comply before a TA employment sanction may be imposed. The district will advise the TA recipient in writing using WTWCMS Conciliation Referral stating the failure to comply with the assigned work activity. The recipient is allowed up to 10 days to respond in person, by phone or by mail explaining the circumstances surrounding the failure to comply and establishing good cause or not for the failure to comply with the Employment Unit's requirements.

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

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

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

When a SNAP recipient fails to comply with an assigned work activity that is subject to conciliation the district will determine if the individual willfully and without good cause refused or failed to comply before a SNAP employment sanction may be imposed. The district will advise the SNAP recipient in writing using the WTWCMS Conciliation Referral stating the failure to comply with the assigned work activity. The recipient is allowed up to 10 days to respond in person, by phone or by mail explaining the circumstances surrounding the failure to comply and establishing a willingness to comply with the Employment Unit's requirements.

A SNAP recipient who refuses or fails to comply with a SNAP work requirement that is subject to conciliation and does not demonstrate compliance with the assigned SNAP work activity to avoid the SNAP employment sanction and does not document an exemption from SNAP work requirements would be subject to a SNAP sanction.

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

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

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

The district engages SNAP recipients to avoid a SNAP E&T related sanction by sending a conciliation notice and giving the recipient an opportunity to discuss and comply with the SNAP E&T non compliance. To avoid a SNAP E&T sanction, the recipient has 10 days to conduct 5 hours of job search to demonstrate compliance and avoid a SNAP E&T sanction.

## **Section 5.2 Sanctions**

- a. The district's procedure for determining compliance for those TA recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:  
TA recipients who wish to end their employment sanction may have their benefits restored once the minimum sanction duration has expired and the recipient demonstrates a willingness to comply with work requirements set by the district. The recipient has 10 days to demonstrate compliance by conducting 5 hours of job search. Once compliance is demonstrated the district will restore benefits retroactively to the date the individual indicated a willingness to comply with work requirements.
- 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:

SNAP recipients who wish to end their employment sanction may have their benefits restored once the minimum sanction duration has expired and the recipient demonstrates a willingness to comply with the work activity previously assigned by the district. The recipient has 10 days to demonstrate compliance with work requirements.

A SNAP recipient may be eligible to have SNAP benefits restored prior to the end of the minimum sanction duration if the individual documents he/she meets the criteria for a SNAP work exemption and is otherwise eligible for SNAP benefits.

### **Section 5.3 Dispute Resolution**

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

The grievance is mediated by:

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

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

(Reference 18 NYCRR 385.2)

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

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

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

The 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:

The district's review team is the Employment Unit staff designated by the Employment Unit Eligibility Specialist. Staff review the LDSS-4526 and/or other medical documentaion provided by the client's medical professional. Based on the medical evaluation submitted by the client's medical professional, designated staff will make an employability determination. Client is notified in writing of the determination using LDSS-4005 and LDSS-4005a Notification of a Temporary Assistance Work Requirement Determination -Exempt or Non-Exempt.

## **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.

Participants who indicate or appear to have a mental health concern that interferes with their ability to comply with program requirements including successful participation in work activities may be screened and referred to the on site mental health worker, the Behavioral Response Team or a mental health organization for further evaluation. Consistent with 15 ADM 04, the district may require the participant to comply with the mental health evaluation if the district's worker has reason to believe that the participant has a mental health condition that interferes with their ability to successfully comply with program requirements or to participate in a work activity. The district may require the participant to get further evaluations from a mental health professional of their choice or be referred to the district's designated mental health organization for further evalaution and an employability determination.

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:

The district uses Rockland County Document number 1592, " Mental Health Interventions".

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

Mental health evaluations may be requested by the participant or by the district worker as a result of a screening. Depending on the situation, the participant may be seen immediately by the staff mental health worker, the Behavioral Response Team or given an appointment to see

the staff mental health worker at a later date. The district will also refer participants to a mental health organization or a mental health professional of their choice.

### **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 County of Rockland will accept documentaion from medical professionals who have evaluated the participant's impairment and can properly determine the participant's employability, type of treatment and/or rehabilitation needed to improve the ability to work. The preferred accepted document is the LDSS-4526. The district will accept other forms of documentaion if it states all required data needed to properly make an employability determination. The required data includes but is not limited to medical condition, prognosis, treatment recommendations and physical and mental health functional limitations.

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

Mental and physical health treatment plans are developed through the recommendations of medical professionals. The participants's medical professional makes the appropriate referrals for further treatment and/or therapy. All treatment plans are entered into each participant's employment plan and monitored for attendance and progress.

- 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 tracks and monitors a participant's compliance with their treatment plans by obtaining monthly confirmation of attendance. Employment Unit staff maintain communication with all treatment providers who are responsible for monitoring



compliance. Treatment plans are reviewed according to length of time that their medical professional recommends. Participants will also be contacted by the Employment Unit by the conciliation process if attendance and progress is not meeting the requirements set forth in their treatment plans.