

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

January 1, 2020 – December 31, 2021

Westchester 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	6
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	6
Table 2 – Other Service Providers.....	9
Section 2.3 OTDA Jobs Staff Agreement.....	10
OTDA Jobs Program Services – Target Groups.....	10
Other Services Requested.....	10
Section 2.4 Access to Services at New York State Career Centers	10
Section 3 Engagement and Work Preparation.....	12
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))	12
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	12
Section 3.3 Assessment and Employment Planning.....	13
TA Assessment.....	13
TA Employment Plan	14
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9).....	15
Section 3.5 Job Development	22
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)	22
Section 3.7 Work Verification	26
The Quality Assurance (QA) plan include the following elements:	26
The District’s Quality Assurance Process is as follows:.....	27
Use of Outside Providers/Vendors.....	27
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency	28
Section 3.9 Strategies/Procedures for Increasing Program Attendance	28
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	29
Section 3.11 Strategies for reducing the need for TA	29
Section 4 Support Services	31
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District	31
Section 4.2 Transitional Support Services	32
Section 4.3 Extended Support Services.....	32
Section 5 Conciliation, Sanction and Dispute Resolution Procedures	33
Section 5.1 Conciliation.....	33
Section 5.2 Sanctions.....	34
Section 5.3 Dispute Resolution	34
Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....	35
Section 6.1 Disability Determination Process and Tools.....	35
Section 6.2 Mental Health Screening and Assessment	36
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	36

Section 1- Assurances

As a condition of the receipt of federal and State funds the Westchester 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 Westchester 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/ Commissioner's Initials 03/02/2020

Kevin M. McGuire, Social Services Commissioner

, 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 Office of Work Activities (OWA) in the Westchester County Department of Social Services (WCDSS) has programmatic responsibility for the operation of the Welfare To Work (WTW) program for all Temporary Assistance (TA) customers. Since the last Biennial Plan 2018 -2019, there have been significant modifications that have changed the program structure including staff roles and responsibilities. OWA has three units of Department of Social Services personnel and five contracted agencies under our contractor/vendor operations. The three DSS distinct units consist of workers who perform specific functions: Social Case Workers, Employment Counselors and Eligibility Examiners.

OWA Social Case Workers (RISE / Rise Into Stable Employment) perform the following functions with TA nonexempt applicants and recipients: Upfront Engagement of applicants, DSS Employment focused orientations, initial assessments, re-assessments, referrals to the Career Center, create enrollments for activities, referrals to contractors for medical, psychological and/or substance abuse evaluations, requests for code changes, referrals for noncompliance, requests for denials and reactivations. In addition, they also send documentation requests for information on employment, disabled household members, medical/mental health information to be relayed to certification or the appropriate Eligibility unit. The Social Case Workers work with applicants until the case has been appropriately coded and approved. If contesting or exempt, the customer may be reassigned to another OWA unit or our exempt contractor. Once approved, the nonexempt cases are referred to the OWA Employment Counselors for enrollment in a CORE work activity. They also refer nonparticipating customers to the Employment Counselor once the reassessment has been completed. The Social Case Workers are co-located within our four District Offices and an OWA Senior Social Case Worker supervises each sub-division.

OWA Employment Counselors (DRIVE / Determination Resilience Integrity Vocation & Empowerment) perform the following functions with TA nonexempt applicants and recipients: Applicant Supervised Job Search in the Career Centers, enrollment of recipients into approved work activities such as Community Work Experience Programs, Job Readiness Training, Vocational / Educational / Job Skills Training. Customers are triaged into the appropriate program based on the components in the assessment. The Employment Counselors monitor the customers' engagement closely for the first 2 weeks of placement to provide guidance, ensure supportive services are in place, and address any issues that may arise when a customer is newly placed. Customers who fail to comply are referred for noncompliance to the Eligibility Examiners. The Employment Counselors are supervised by the OWA Program Administrator for Employment & Training.

The Department of Social Services Eligibility Unit has a sub-division of Employment Unit Eligibility Examiners who perform the following functions with nonexempt TA recipients: referral

of customers to Employment Counselors for placement in a work activity, referrals to contractors for medical, psychological and/or substance abuse evaluations for contesting customers, create activity enrollments and monitor attendance in WTWCMS. They are responsible for recoupments, Eligibility Call In's, IMA follow-up, fair hearings, ABAWD related activity and undercare functions for those working with employed cases. Their functions also include processing supportive services such as clothing, transportation, and childcare; transactions such as code changes, budgeting, rebudgeting, closings, reactivations, lifting sanctions, dispute resolutions; including noncompliance's, conciliations, and sanctions for customers who fail to comply.

Depending on the situation with a case, members from each unit interface with other departments within DSS such as certification, recertification, the SNAP center, Adult Protective Services and Child Welfare. WCDSS personnel work together in order to provide quality customer service and meet the immediate needs of those vulnerable in our communities.

The Employment Unit Examiners also process all transactions for exempt and nonexempt cases referred from contracted agencies. Each district sub-division is supervised by a Supervising Eligibility Examiner and a Temporary Assistance Manager.

Part of the WCDSS TA Population is case managed and monitored by our contractor the Urban League of Westchester County. Depending on the code and circumstances, customers are in either the Urban League H.E.A.L or P.W.W. program.

HEAL, EMPOWER AND LIFT: H.E.A.L. is the program that works with exempt recipients with employment codes 36, 41, 42 & 43. H.E.A.L. Case Managers review initial treatment plans and medical recommendations from IMA, SHAC, and/or DCMH Substance Abuse. Based on these recommendations they enter health related enrollments in WTWCMS and monitor the customers' attendance and compliance in treatment monthly. Customers may require re-evaluation if the exemption expires or if other issues are presented. H.E.A.L. also conducts re-assessments which may highlight these issues or require a code change. The goal is to aide customers in their treatment until they become employable and require a code change. Customers who fail to comply are referred to Eligibility for sanction. Customers deemed permanently disabled with a recommendation to apply for Supplemental Security Income are referred to Maximus the SSI Advocacy Contractor.

PUTTING WESTCHESTER to WORK - P.W.W. is the Job Development program that works with nonexempt recipients. P.W.W. consists of a Job Development component where customers are engaged in supervised job search and meet with Job Developers regularly for placement into employment. They also work with the underemployed to find better and more stable employment, which includes job retention. P.W.W. also conducts a STRIVE Intense Attitudinal Job Readiness Training every other month. Customers successfully completing STRIVE are referred immediately for job placement.

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
Urban League of Westchester County, Inc./ Heal Empower And Lift	\$750,131	<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%	Provision of employment related services to adult recipients of temporary assistance who are exempt from participation in public assistance work activities.
Urban League of Westchester County, Inc./ Putting Westchester to Work.	\$1,125,196	<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%	To provide Job Development Services including Attitudinal Job Readiness Training to adult recipients of temporary assistance.
Westchester Community "Job S.T.A.R. Program"	\$678,786	<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%	Assessment, Skill Enhancement Training, Credit-Bearing Certificate Programs, Post Placement/Job Advancement Services and Food Preparation Vocational Program

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
Westchester County Department of Community Mental CASAC Program	\$735,473	<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%	Non-Services- Conduct Drug And Alcohol Assessments On Appropriate Applicants or Recipients Of Public Assistance
Westchester County Department of Parks "Advance Through Parks" Program	\$176,223	<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%	Community Work Experience Program with On-The-Job Training and Job Placement Services
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$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
Educational Opportunity Program "EOC"		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Academic and Vocational Training Programs
Yonkers Public School "VIVE"		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Academic and Vocational Training Programs
Westchester / Putnam Career Center Network		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Career services such as employment workshops, training opportunities, grant funded WIOA programs, job development and placement
Mental Health Association "MHA"		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Provides medical/mental health/CASAC assessment services for single homeless individuals (SHAC- Single Homeless Assessment Center)
IMA Industrial Medicine Associates		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Provides Employability Evaluations for WCDSS applicants and recipients. These evaluations assess the customer's physical and psychological capacity including IQ testing.
		<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)

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)

N/A

Section 2.4 Access to Services at New York State Career Centers

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

- a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:
 - The district has employee(s) physically present at a Career Center
 - The district has contract staff physically present at a Career Center
 - The district makes available direct access to its program staff via phone or technology at a Career Center
 - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
 - Other:

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

The Westchester-Putnam Career Centers in White Plains and Mount Vernon fall under WCDSS operations. Nonexempt TA applicants are referred during upfront engagement to the OWA Employment Counselors in the local Career Centers. Customers are referred to orientations, workshops, on-site trainings, job fairs, and appointments with members of the Business Team that serve as job developers. The Business Team consists of a Career Center Employment Counselor, a Program Specialist and a Community Work Assistant. Applicants and recipients are assessed for

Individual Training Accounts (ITA's) and other grant funded programs such as Jobs Waiting/Tech Hire. OWA Employment Counselors support customers in their job search efforts by referring them to various work-related workshops and trainings, accessing websites such as westchesterputnamonestop.com, JobZone.ny.gov, and onetcenter.org. ABAWD applicants and recipients are referred to the OWA Community Work Assistant at the Career Center to meet their ABAWD requirements. ABAWD customers have access to the other Career Center resources used by TA customers but in addition, these customers must comply with their job search requirements by submitting monthly job logs and utilizing JobZone.ny.gov.

In addition, OWA contracted vendor, the Urban League operates their STRIVE Intense Attitudinal Job Readiness Training directly out of the Mount Vernon Career Center. Urban League staff utilize a training room specifically designated for their program and STRIVE participants utilize the additional resources offered through the Center.

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:

- Drug/Alcohol Treatment to restore a person to employability
- Medical treatment/rehabilitation to restore a person to employability
- Remedial education, adult basic education, TASC (formerly GED) or education in English proficiency to enable a person to attend vocational training or to achieve employability
- Participation in ACCESS-VR (formerly VESID)
- Providing care for another member of the household who has a verified mental or physical impairment

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:

At Orientation, Social Case Workers provide all applicants with a PowerPoint presentation. It is usually conducted one-on-one on the computer but they will utilize a printed version if a computer is not available. This PowerPoint outlines benefits, roles of departments, time limits, customer rights, participation expectations such as attendance in work activities, referrals to Child Support Enforcement, childcare assistance, resources at the Career Center and denial circumstances. Upon completion of the Orientation, all applicants are required to sign an Employability Statement that determines whether the customer is deemed employable or unemployable. The Orientation presentation has also been translated into Spanish both in the printed and PowerPoint versions. If a customer speaks and/or understands a language other than English or Spanish, the worker will use the Language Line translators.

Section 3.3 Assessment and Employment Planning

TA Assessment

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

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

— The district enters assessments directly into WTCMS

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

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

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

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

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

Based on the Employability Statement, the initial assessment for nonexempt applicants indicating no barriers are conducted by the Social Case Workers. This assessment is completed during the application period. Customers who report a medical, mental health and/or substance abuse barrier at application are referred to the Urban League H.E.A.L. program for assessment. Social Case Workers and H.E.A.L. Case Managers conduct the full initial assessment to gather information on family circumstances, educational and work history, including strengths, needs and barriers toward seeking gainful employment. All new TA recipients receive an individual assessment within 30 days of case opening. Re-assessments focus primarily on the required elements from the Assessment Summary of Questions that includes information on educational levels, employment related skills & interests, supportive service needs and health. Recipients are re-assessed at minimum every 6 months or when the code changes, life circumstances change, cases are re-activated or the case is transferred from another unit.

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

Assessments and re-assessments are completed by Office of Work Activity Workers, and re-assessments are completed by Eligibility Examiners.

Case Managers from both H.E.A.L. and P.W.W. programs re-assess customers assigned to their units who are enrolled in their programs.

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)]

All staff conducting assessments completed WTCMS systems training through OTDA. They have also received District coordinated informal training from workers who have completed ESTI (Employment Services Training Institute) training. DSS workers possess a minimum of a bachelor's degree. Contracted vendors possess a minimum of high school diploma or equivalency. However, many of the employment staff from all units possesses graduate level degrees in social work or other human related fields. Other partners that contribute information to the assessment are New York State Certified School Counselors or New York State Certified Adult Job Readiness Instructors. Westchester Community College Job Star personnel are graduate level administrators with degrees in education and psychology. All personnel administering assessments either have been trained in motivational interviewing or have demonstrated effectiveness in evaluating employability and plan development to prepare the assessments and plans required by this section.

- 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 minimum every 6 months if there are no significant changes. However, they are also updated when the code changes, life circumstances change, cases are re-activated or the case is transferred from another unit. Depending on the customers, availability re-assessments are conducted in person or over the phone.

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.

Nonparticipating customers are referred to an OWA Worker or a contracted employment worker to be placed in an activity. Employment Plans are completed in conjunction with the customer in a conversational manner using motivational interviewing skills. Depending on system availability, the Employment Worker will complete the Employment Plan in WTCMS or use the printed LDSS 4978 (NYS Employment Plan). If using the printed version, the information is entered into WTCMS when a computer is available. A copy of the completed plan is printed out for the customer.

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

Employment Plans are completed when the customer is initially placed in an activity or when the activity changes due to any change in life circumstances.

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:

WCDSS plans to meet with Federal and State Temporary Assistance participation rate requirements by interviewing and engaging recipients as quickly as possible usually within no more than 10 days of assessment/re-assessment in order to ensure full participation in countable activities. The goal of WCDSS is to engage every non-exempt FA, SNF, and SNA recipients in a countable work activity for at least 30 hours per week but not more than 40 hours weekly. TA recipients are often assigned to independent job search while arranging childcare or awaiting the start of a training or educational program.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly

Individuals	825	455
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- c. Describe below how the district uses work participation management reports available through COGNOS or other reports and activities to monitor district progress toward meeting work participation requirements and ensuring full engagement by adults in work or work preparation activities:

COGNOS reports are run by management in OWA and the Urban League. The primary reports ran to measure progress with participation and engagement are the Preliminary Not Countable reports (bi-weekly), Non-Participating reports (monthly), Activity Status of Adults (monthly) and the Earned Income Employment reports (monthly). These reports are pulled weekly, bi-weekly or monthly. The Urban League H.E.A.L. program utilizes the Employability Code Change and Duration reports. OWA Management will run other periodic reports specifically based on codes, income, or activities. These reports are reviewed, analyzed, and sent to individual units for clarification or correction on cases. Corrective actions are imposed based on findings from the report reviews. There are instances where staff training is required or a modification in service provision in order to address the issues hindering efforts to meet engagement/participation goals. Issues are reviewed in monthly meetings between departments and inter-unit conferences with management and direct line staff.

- 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):

Since Non-TA SNAP Recipients are not mandated to participate in E & T activities, the four eligibility offices reception areas post information on Career Centers. A flyer listing Career Center locations, services and resources are made available.

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):

Flyers listing job search services with their location are made available to SNAP applicants and recipients in our four District Offices reception areas. The District offers and provides job search services.

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

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

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

Once an applicant has been assessed, nonexempt customers are enrolled into supervised job search with OWA District Office Staff or referred to Employment Counselors at the Career Center. Applicants referred to Career Center are usually singles or families with school-aged children. Applicants engaged with District Office staff are those with young children and lack childcare resources. Applicants are assigned to make a minimum of 20 job contacts within 20-40 hours weekly using a job search log. They report the names, addresses and contact information along with time spent searching. This time may include travel time between potential employers. All customers are provided with a sample log and informed about job search resources, (e.g., the library, Career Centers, job fairs, job specific websites etc). They review resume development, completing job applications and any open job orders. Each week they return the log and meet with a worker to discuss their searches. The job search log is reviewed to assess the extent to which a reasonable number of contacts were made during the time reported. Attention is paid to the amount of time required to identify, apply and interview for a job as well as time spent preparing and sending follow-up materials to an employer. Employment staff will review time logs for completeness and integrity. Hours of participation reported by the applicant that are determined to be incomplete or not reasonable must not be reported as actual hours of participation. Applicants who submit inaccurate or false entries on their log can have their application denied. Periodically, a sample of employers will be contacted to verify that the participant actually sought out a job with that employer. However, such reviews will not occur in those instances when the staff determines that conducting such direct employer contact would jeopardize current or future job opportunities for other customers. Those applicants referred to the Career Center are assisted with resumes, applying for jobs, referrals to job fairs, and enrolling in work-related workshops. Applicants are also assessed for Individual Training Accounts (ITA) and other grant funded programs (i.e. Jobs Waiting). Customers are supported on-site in their job search efforts on sites like westchesterputnamonestop.com, JobZone.ny.gov and onetcenter.org with assistance from DSS Employment Counselors.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	20	20	Hours can be increased up to 30 depending on child care circumstances
SNA Individuals	20	40	

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

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

Recipients are assigned and monitored in job search by the OWA Employment Workers. Recipients that are Safety Net adults (SNA) or require additional hours to supplement work experience to meet participation are given job search logs. The recipient is required to participate up to 40 hours per week or less depending if the job search is supplementing another activity. Customers report on the job search log; the names, address and contact information along with time spent searching. This time may include travel time between employers. The job search log will be reviewed by the employment staff to assess the extent to which a reasonable number of contacts were made during the time reported. Attention will be given to the amount of time required to identify, apply and interview for a job as well as time spent preparing and sending follow-up materials to an employer. Employment staff will review time logs for completeness and integrity. Hours of participation reported by the recipient that are determined to be incomplete or not reasonable must not be reported as actual hours of participation. The staff will contact a sample of employers periodically to verify that the participant actually contacted the employer about a job. However, such reviews will not occur in those instances when the staff determines that direct contact with the employer would jeopardize job entry efforts by other Temporary Assistance (TA) recipients. Face-to-face contact with job search participants must occur weekly or every other week. Our contracted vendor P.W.W. also uses supervised job search for customers who are underemployed, those needing hours to be fully participating and as an extension of their job readiness training.

- 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 accepted as long as the customer is able to meet federal minimum participation hours and minimum wage requirements. There is an exception for customers performing childcare and adult care services. Customers must provide an attestation of this employment which is submitted to eligibility for budgeting. If the calculated of wages divided by the federal minimum wage does not satisfy minimum hours required for participation; the customer will be required to supplement the hours with an additional activity. Customers are also assisted in finding better paying, more reliable employment in a similar field.

- 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	
<ul style="list-style-type: none"> <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>

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — 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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — 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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — 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>
<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>

Activity and Definition	
<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>
<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.

Activity and Definition	
<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>
<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.:

WCDSS has members of the Business Team who serve as Job Developers located at the local Career Centers. Job ready customers referred to the Employment Counselors are referred to the Business Team that consists of a Career Coach, a Program Specialist and a Community Work Assistant. If customers are deemed eligible for either training or immediate placement, they are referred for enrollment in WIOA approved occupational training or grant funded job readiness training such as the Jobs Waiting Tech Hire program. The Career Coaches and Employment Counselors are co-located enabling effective and consistent weekly communication on the customer's progress and barriers towards self-sufficiency. In addition to activity monitoring by the Employment Counselors, Career Coaches will reach out to the customer weekly and every 60 to 90 days to review progress benchmarks, workplace related issues and additional supports. When cases close for TA, customers are encouraged to continue visiting the Career Center to participate in job fairs and use the resource services.

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.

OWA Employment Counselors refer job ready nonexempt customers to the Urban League Putting Westchester to Work Program-P.W.W..P.W.W. has 4 staff members (1 Retention Specialist & 3 Job Developers) who outreach to employers and solicit jobs for TA customers. has a job bank of employers throughout the community that they continuously cultivate to refer job ready customers for job placement. The Job Developer is expected to meet with TA recipients that are classified as job ready at least once a month.

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

Not Applicable

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:

WCDSS utilizes licensed and certified providers such as EOC, Yonkers Public Schools VIVE program that to provide Adult Basic Education, Test Assessing Secondary Completion (TASC) preparation, and English to Speakers of Other Languages (ESOL) instruction.

WCDSS also refers TA recipients to the Westchester Community College Job STAR Program, a contracted provider that offers Adult Basic Education (ABE) classes.

- 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:

WCDSS maintains a contract with Westchester Community College's Job STAR program to provide such services to our TA recipients. In addition, EOC, provider listed on table 2 is also utilized at no cost to Westchester County. When recipients enroll themselves in training programs that are not County offerings, the courses are evaluated individually as to whether the curriculum meets the Vocational Education or Job Skills Training definition. Customers referred to the local Career Centers are assessed for ITA's (Individual Training Accounts) for occupational training. These trainings are reviewed for appropriateness and potential for immediate and successful job placement.

- 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:

During the assessment for applicants, workers will refer all customers with a High School Diploma, its equivalency or less to TABE testing offered through Job STAR at WCC. IMA provides IQ testing for customers exhibiting severe literacy deficits. Customers are referred to Job STAR's ABE class or to MAXIMUS vendor to assist in applying for SSI if the IQ tests reflect scores of 3.0 or below. All TA recipients without high school diplomas or its equivalent are TABE tested before referral to one of the educational programs listed in either Table 1 or Table 2. The worker can also make a referral to IMA for IQ testing if a recipient exhibits deficits while engaged in a work activity.

- 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:

All TA recipients without a high school diploma or its equivalent are strongly encouraged to attend one of the educational programs listed in either Table 1 or Table 2. We do not deny recipients from participating in such program unless the recipient demonstrates a pattern of non-compliance or misuse.

- 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:

Enrollment eligibility into a Vocational/Job Skills Training program is determined based on the completion of a comprehensive assessment. Critical factors the customer's interests and ability to work. This also includes whether the requested training is required to prepare the recipient for specific work identified in the individual employment plan. The recipient must have the following:

- Minimum reading and math scores required for the requested specific program

- No previous education, training certificate or degree in the same field as the proposed training
 - Interests including short or long-term goals in which the training is essential in order to meet self-sufficiency objectives.
- 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:
WCDSS will consider approving a two year college degree as a work activity on a case by case basis for individuals who are enrolled in college at the time of application and recipients with a 3.0 gpa or better.
- 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:
Employment staff will meet with customers who have exceeded or who are about to exceed the 12 month Vocational Education time limit. In order to meet compliance with participation, these customers will be advised that they are required to engage in a CORE activity equaling 20 hours weekly. In addition to their college courses, customers can be assigned to work study or internship through the school. Referrals to a Work Experience Program or Community Service can meet the 20 hours of CORE activity needed to meet participation. Customers are encouraged to consider evening, weekend and on-line alternatives that will enable them to comply with WCDSS employment requirements.
- h. Education and training providers are evaluated by the following standards:
- Must be licensed by the New York State Department of Education or other appropriate licensing agency for the type of training provided;
 - Must have a demonstrable record of success in placing their graduates in employment;
 - Must not require participants to take out a student loan to pay for the cost of the program;
 - Customers seeking to participate in trainings where there is a cost are counseled on their responsibility to pay fees. They also sign a waiver of understanding that WCDSS is not responsible for any fees or penalties they may incur as part of participation in training opportunity.
 - Must offer courses of study leading to employment for jobs in demand in the local economy;
 - Must have established procedures approved by DSS for reporting attendance and satisfactory progress to DSS for students who are DSS recipients
- i. The district procedure for advising participants of approved training providers is:
As part of orientation, applicants are informed of the approved training providers based on the individual's employability assessment and plan. Recipients who meet the requirements for vocational/educational training described above are also informed of approved training providers along with the programs available. Employment Counselors review training options prior to placing customers in activities. If customers show a specific interest in an occupational area, the Employment Counselor will work to identify training potential opportunities.

- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

Customers are notified of approval from their Employment Workers who receive confirmation of the customer’s enrollment from the provider using the WTW feedback form. Providers also confirm acceptance via email, phone calls or their agency created approval letter. Many of the providers reach out directly to the customer to notify them of approval and entrance in the program.

- 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:

- l. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:

Non-Employment Eligibility Workers monitor school attendance every six months at the time of case recertification.

- m. The district’s procedure for ensuring that an individual’s health related limitations are accommodated when assigning the individual to a work activity is:

OWA Employment staff including the Urban League, notify the providers when calling to place recipients in work activities. The customers limitations are also noted on the referral letters. To ensure that providers are responding to notifications of work

limitations, staff speak at length with the customers to inquire about conditions and tasks being assigned at the site.

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 (35) 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 (35) 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 (15) 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 (15) cases semi-annually in which a case member is reported as an employability **code 31-caretaker of a child under the age of 12 months** to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. TA records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12-month lifetime limit.

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

Use of Outside Providers/Vendors

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

Yes No

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

Yes No

If No, please describe the process used below:

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:

During assessment and re-assessment, customers are asked about their language preferences and comfortability in terms of verbal and written communication. It is noted in multiple systems if the customer requires notifications in languages other than English. For Spanish speaking customers, WTCMS referrals and other notifications are sent in both Spanish and English.

WCDSS has increased the number of bilingual staff in the field offices as well as expanding its access to additional interpreters of various languages via various community resources and faith based organizations to service our diverse TA population. Each DSS Unit including OWA has a combination of bi-lingual managers, supervisors and front-line staff who speak other languages.

In addition, our contracted vendors employ bilingual personnel who are available to assess and refer recipients to various work activities. We also foster a good relationship with community partners that offer free ESOL educational services.

Employment Staff are also encouraged to use the Language Line.

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:

During the placement interview, customers develop an Employment Plan with the Employment Counselor to help identify any barriers and supportive services needed to comply with the work activity. Customers also review and sign a TA Activity Agreement that outlines key factors such as having a back-up plan for childcare, being accountable and responsible with lateness and absences, identifying bus routes ahead of the first day etc. Once the customers placed at a site, the Employment Counselors monitor the activity closely for 2 weeks for lateness, absences, supportive services or any issues that may arise. This also includes regular sometimes-daily communication with the site coordinator. Most sites have good working relationships with the Employment Counselors and feel comfortable reaching out immediately if there are any concerns. In order to remain in compliance with work requirements customers are informed that

they may have to make up hours for their absences. The DSS Pride in Our Parks and Roads program addresses the transportation barrier by picking up and dropping off customers at a central location close to their residence.

Monthly meetings are held with DSS staff and vendor staff identifying specific cases that are not meeting participation rate requirements. The primary focus is to examine and strategize those cases in noncompliance and those with excessive absences. The discussion identifies paths to move these hard to serve customers toward self-sufficiency. WCDSS intervenes on recipients' behalf, whenever possible, to reduce absences for appointments with legal entities, government agencies and other vendors. COGNOS and WTWCMS reports are utilized assisting case managers with their caseloads.

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:

Monthly a review is conducted in order to immediately engage new WE-1 customers as soon as the sanction has been imposed. Eligibility workers refer these sanctioned customers to the Career Center for engagement in 1-week of supervised job search. On the 5th day of compliance, a request is made to lift the sanction. At the same time, the customer is assigned to a new work activity. Customers who fail to comply continue on their sanction until the quarterly mass sanction call in conducted at the District Office.

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

Periodically, Eligibility will coordinate a Sanction Call-In with Employment staff. Every other month, efforts are coordinated to reach out to customers on WE-2 & WE-3 sanctions whose duration has expired. This also includes WE-1 customers who failed to respond to previous outreach attempts. These individuals have scheduled appointments to provide documentation to demonstrate how they are meeting expenses on a reduced grant. Once the eligibility part of the appointment has completed, the customer meets with an Employment Counselor on-site for immediate referral to a work activity or referred to the Career Center for supervised job search.

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

Eligibility Examiners will interview sanctioned individuals to demonstrate how they are meeting expenses on a reduced grant and provide documentation to describe their maintenance. When possible prior to the end of WE-2 and WE-3 durational sanctions customers are sent a referral to the Employment Counselors to engage in a work activity. Customers who genuinely seek to engage in an activity or employment must provide proof of enrollment or hire letter to access supportive services.

Section 3.11 Strategies for reducing the need for TA

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

Whenever possible, the employment staff explores all possible resources in order to divert the customer from temporary assistance, and directly into employment. Diversion is done in tandem with meeting any emergent needs of the applicant, thereby providing short-term

assistance versus ongoing/recurring temporary assistance. Referring customers to the Career Centers to meet with employment counselors encourages individuals to find employment to avoid the need for TA.

During this time employed cases are reviewed for small deficits. Workers encourage customers to increase their hours of employment, work along with the Office of Child Support Enforcement, apply for Section-8 and Childcare Subsidies, or other affordable housing options, apply for SNAP and/or Medicaid only in order to eliminate the need for TA.

The short-term assistance is generally less than 90 days and must not extend more than four months in duration. For example, the individual will be employed and may have a crisis or episode of immediate need. This need can be met immediately during certification, therefore diverting the individual from the need for ongoing assistance

For Applicant/Recipient households, WCDSS will meet the cost of rent security, brokers fees, home repairs, moving costs and other expenses necessary to enable a household to retain the home or relocate to housing that is more convenient to work.

- Expenses for the maintenance of a motor vehicle when the vehicle is essential to enable the individual to work, there is no public transportation available, and the work hours do not conform to the public transportation schedule.
- Allow up to \$1500 or the retail value as listed in the NADA Appraisal Guide, whichever is less for the repairs if the Applicant/Recipient has a job or bona fide offer of employment.
- Up to \$1500, or the minimum down payment, whichever is less, towards an annual liability insurance premium or other insurance related fees excluding comprehensive and collision insurance premiums for an Applicant/Recipient owned motor vehicle that has passed NYS inspection.
- Up to \$3000 for the purchase, or up to \$3500 for the purchase and concomitant repair of a motor vehicle that will pass NYS inspection for a recipient who has a full time job or bona fide offer of employment if a motor vehicle is otherwise essential..
- Funds to cover the cost of vehicle registration
- Funds for obtaining or renewing a NYS motor vehicle operator license including fees for the mandatory five-hour class when needed to get or keep a job.
- Gas expenses (at IRS Business Rate) for participation in an employment activity that leads to a job or to cover the cost of transportation until the individual receives his/her first full paycheck.
- Funds to provide for the cost of public transportation until the individual receive his/her first full paycheck

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:

WCDSS will provide child day care subsidies for children until the age of 13 in households programmatically and financially eligible for a subsidy. When programmatically eligible, WCDSS will also subsidize child day care for special needs children over age 13. WCDSS will refer families to the Child Care Council of Westchester; Inc. who are unable to make child day care arrangements on their own and who are in receipt of TA. The Council will assist the customer in identifying at least 3 providers in the appropriate area, with vacancies verified by the Child Care Council. Personal providers such as friends or family can apply to be Legally Exempt Providers though the Child Care Council. However, until these personal providers are approved as Legally Exempt Providers, customers are encouraged to register with a regulated licensed daycare center. While the application is in certification, this will allow them to remain in compliance with work activities. Payment will not be authorized to the Legally-Exempt Provider until the Child Care Council approves their application and they are issued a vendor contractor number through Westchester County.

- 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:

Recipients will not be expected to walk further than approximately 1 mile to a work assignment. Each recipient is evaluated individually for ability to walk to sites. Recipients with limitations or health related issues that limit walking distances would be assigned to the work activities nearest their home consistent with individual limitations. Recipients are given listings for childcare in close proximity to their homes. For recipients with a worksite near their home but childcare at a distance. WCDSS does not anticipate assigning recipients to work activities in any remote sites. If recipients obtain employment in a remote area, we will use the strategies described above to address their transportation needs.

- 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:

Applicants at risk of needing public assistance to improve their opportunities are referred to the Westchester-Putnam Career Centers for assistance with resumes, job search for better paying jobs etc. Referrals can be made to clothing closets for business attire. Referrals can be made to the Daycare Subsidies unit for potential subsidized childcare.

Section 4.2 Transitional Support Services

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

- Funds to provide for the cost of public transportation for up to 90 days after case closing if needed.
- Expenses for uniforms, books or necessary clothing, up to \$750, required for employment.
- Expenses to cover the cost of exams that result in the awarding of professional certifications, licenses, renewals, etc.
- Expenses for tools and equipment, up to \$750, necessary to enable the individual to secure employment.

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:

Transitional Medical Assistance is provided for up to 6 months under the Low Income Families (LIF) Medicaid program to TANF recipients who lose Medicaid eligibility due to excess income from employment or from a combination of employment and unearned income, including child support payments.

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:

See Section 4.1 above, One - Time Employment Related Expenses

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

Eligibility staff review documents submitted and determines whether the noncompliance was willful and without good cause.

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

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

A designated Examiner reviews documents submitted and determines whether noncompliance was willful and without good cause.

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

TA/Snap recipients who are subject to Snap work requirements and fail to comply with a TA work requirement, willfully and without good cause are offered an opportunity to avoid a Snap sanction thru the conciliation process.

Recipients are issued a conciliation notice (LDSS4230) advising of ability to avoid a Snap E & T sanction through compliance with Snap work activity. Recipients have 10 days to respond to conciliation notice and provide good cause and if not provide Job search logs in 10 days to avoid a Snap sanction.

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

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

A designated Examiner that is not directly responsible for the monitoring of TA employment work activities.

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

WCDSS offer all SNAP recipients who fail or refuse to comply with an assigned work

activity an opportunity to avoid a SNAP sanction by demonstrating compliance. To meet this requirement, WCDSS will issue a conciliation notice (LDSS4230) advising the recipient of his/her ability to avoid a SNAP E & T sanction through compliance with SNAP work activity, and also the opportunity to participate in conciliation. Recipients has ten days to respond and either provide good cause, provide documentation of exemption from participation in SNAP E & T activities, or initiate the demonstrated compliance process by complying with SNAP work activity. WCDSS assign the recipient to a minimum of 10 Job Search contacts to avoid a SNAP 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:
Recipients who were sanctioned for failure to comply with a work activity must perform an acceptable activity for a minimum of 5 consecutive days as assigned to be in compliance and end the sanction. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period). Recipients who failed to comply with assessment may have their sanction lifted once the assessment or reassessment is complete.
- 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:
Recipients have 10 days to respond to the conciliation notice and provide good cause. They are provided with Job Search logs to complete within 10 days to avoid a SNAP sanction. eligible for SNAP benefits before the end of the durational period if the individual documents that they are exempt from SNAP work requirements and is otherwise eligible for SNAP benefits.

Section 5.3 Dispute Resolution

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

The grievance is mediated by:

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

Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals

(Reference 18 NYCRR 385.2)

Section 6.1 Disability Determination Process and Tools

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

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

Applicants/Recipients claiming a medical or mental health condition must adhere to the following process:

#1: Complete the Employability Statement indicating why they are unable to participate in a work activity

#2: Return a completed LDSS-4526 from a licensed health care practitioner within 10 days or request an extension if the 10 days is not attainable

#3: Based on the information listed in the LDSS-4526 a determination will be made as to whether the customer requires an Industrial Medical Association (IMA) appointment (OTDA Contractor). IMA performs medical, psychological and intelligence evaluations for WCDSS applicants and recipients.

#4: Customers are informed to bring prescriptions and supportive documentation from their personal practitioner to share with the practitioner at the IMA appointments.

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:

Our contractor, The Mental Health Association (MHA) conducts an employability determination review for all homeless single A/R's at the Single Homeless Assessment Center (SHAC). MHA - SHAC serves newly and chronically homeless individuals who are placed by WCDSS for housing and comprehensive services. The comprehensive MHA evaluation also referred to as SHAC covers mental health, physical health, substance use disorders, education/vocation, and case management narratives. MHA consists of Masters/Doctoral level therapists, medical doctors, licensed mental health professionals, Credentialed Alcohol and Substance Abuse Counselors and a psychiatrist.

Employment staff determines employability status using documentation collected from IMA and SHAC. Additional verification from the LDSS# 4526, doctor's statements, monthly treatment plans and/or progress notes inform on the customers compliance with treatment recommendations and may warrant a re-evaluation or addendum from IMA or SHAC for a change in 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.

N/A

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:

N/A

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

N/A

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

N/A

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.):

Recipients claiming to be exempt due to physical/mental barriers are referred to IMA or SHAC for assessment and at times required to submit a LDSS#4526 from their physician/clinician. The results are used to determine exempt status. When recipients are found to be exempt from employment requirements they are monitored by employment vendor Urban League of Westchester. Recipients found to be exempt due to Substance Abuse histories are referred by a licensed mental health professional (SHAC or CASAC) to outpatient or long term treatment programs. These programs are monitored by the Office of Work Activities via OWA POWER and the Urban League. Treatment is also monitored by contracted inter-departmental agency DCMH (Department of Community Mental Health). Attendance is entered weekly into WTWCMS by the treatment providers, changes are reported and if required the mental health professional is involved with approving the change in level of care

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

WCDSS employment vendors: The Urban League of Westchester's H.E.A.L. program develops medical treatment plan with the recipient based on the IMA or SHAC recommendation and monitors compliance monthly so recipients can return to employability. Those with permanent disabilities are referred to the SSI contractor Maximus. H.E.A.L. staff motivates and supports recipients to schedule and keep appointments with specialists (if necessary), determine compliance with treatment recommendations/medication and rehabilitation services.

- 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:

- Designated OWA Employment Workers and the Urban League H.E.A.L. program Case Managers monitor customers with treatment plans and these units conduct the following:

- Based on recommendations from the IMA or SHAC the employability code is determined.
- An enrollment in WTWCMS is also created if this information is provided from the IMA, SHAC and/or DCMH SUD evaluations
- Develop timelines and regular intervals for recipients to be re-evaluated and ensure compliance with appointments;
- Request updated monthly treatment plan from treatment provider;
- Monitor bi-weekly outpatient substance abuse treatment attendance from provider that is entered directly into WTWCMS;
- Follow up with customer on missed appointments, highlighting the need for compliance and consequences for failing to comply;
- Report progress and/or non-compliance timely to DSS eligibility staff;
- Based on new information from medical documentation or other sources, customers may be re-evaluated to determine a change in treatment plan;
- Upon successful completion of their treatment, recipients will be returned to the employable roster;
- Customers deemed permanently unemployable are referred to the SSI Vendor Maximus