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David A. Paterson
Governor

NEW YORK STATE
OFFICE OF TEMPORARY AND DISABILITY ASSISTANCE
40 NORTH PEARL STREET
ALBANY, NEW YORK 12243-0001

David A. Hansell
Commissioner

June 18, 2008

Mr. Anthony Restaino
Commissioner
Niagara County Department of Social Services
P.O. Box 506
Lockport, NY 14095

Dear Commissioner Restaino:

I am pleased to inform you that your Temporary Assistance and Food Stamp Employment Plan for the period January 1, 2008 through December 31, 2009 is approved by the Office of Temporary and Disability Assistance (OTDA). A copy of your final plan is enclosed.

The plan will be made available to our Office of Administrative Hearings for use by administrative law judges when conducting employment-related fair hearings. Any amendments necessary to reflect changes to your district's policies or procedures that are covered by the plan must be submitted to your OTDA Employment Technical Advisor for approval.

We look forward to continuing our work over the next few years as we work to continually enhance employment services provided to low-income individuals so they are prepared to retain employment and access the array of work supports available in New York. As always, feel free to contact me or Barbara Guinn at (518) 486-6106 for any assistance to support your efforts.

Sincerely,

Russell Sykes
Deputy Commissioner
Center for Employment and Economic Supports

Enclosure

cc: Barbara Guinn
Pamela Gatto
Philip Alterio
Darcell McDonald

bcc: S. Antos
D. Bloodstein

“providing temporary assistance for permanent change”

**Temporary Assistance and Food Stamps Employment Plan
January 1, 2008 – December 31, 2009**

Section 1 Assurances/Signature

As a condition of the receipt of federal and State funds the **Niagara County** Department of Social Services submits this Temporary Assistance and Food Stamp Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of the employment services for Temporary Assistance (TA) and Food Stamp (FS) applicants and recipients program for the period January 1, 2008 through December 31, 2009. As Commissioner of **Niagara 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.



_____, Social Services Commissioner

Date: 6/5/08

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 Niagara County Department of Social Services has three offices located within the county. The offices are located at:

1. **Human Resources Building, 301 Tenth Street, Niagara Falls, NY**
2. **Trott Access Center, 1001 Eleventh Street, Niagara Falls, NY**
3. **Lockport DSS, 20 East Avenue, Lockport, NY**

The Employment Units are located at the three sites listed above. Employable applicants and recipients are served at the Trott Access Center and at the Lockport locations. Individuals claiming a work exemption are served at the 10th Street and the Lockport locations, where their exemption is monitored—medical treatment and substance abuse treatment. The Employment Unit receives referrals from both the Intake and Undercare Units within the Department. Employment Specialists conduct assessment interviews and develop employability plans in consultation with the participant. These plans detail the steps necessary for the participant to attain self-sufficiency. Employment Specialists assign participants to appropriate work activities or discuss the findings of the medical professional or substance abuse provider that detail the best way for the individual to obtain self-sufficiency. The activity assignments are made in consultation with the participant. Employment

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Specialists continually monitor client participation and progress in these assigned work activities and/or the required treatment recommendations. The TOP Unit is also located at the Trott Access Center. The TOP Unit Job Developer assists individuals with earned income in their efforts to obtain additional hours of employment in order to attain self-sufficiency. In addition, individuals who have recently lost their jobs are referred to the Job Developer for job leads in order that they may re-enter the labor force as quickly as possible. Employment Unit Job Developers work closely with the TOP Job Developer to ensure that participants are made aware of job openings within Niagara County.

The total number of employees of the local Department of Social Services is 427.

Section 2.2 TA and FSET Provider Agencies

Table 1 lists the local contracts or agreements with agencies to provide employment services to TA and FS clients. These activities and services may include, but are not necessarily limited to, employability determinations, development of assessments and employment plans, conciliation and grievance activities, provision of work activities, 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.

Agencies/providers that offer services to participants but which have no direct financial agreement with the district are included in Table 2 (e.g., Bridge, EDGE, OTDA Wage Subsidy, etc.).

TABLE 1 - Contracts Associated with Employment Programs and Services

Provider	Total Contract Cost (per yr.)	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Niagara County Legal Aid Society	\$48,000.00	FFFS	TANF	SSI appeals for denied SSI applicants, Orientation Presentation for individuals claiming a work exemption.
Niagara County Drug Abuse Program	\$90,000.00	FFFS	TANF/SNA	Substance abuse assessments for applicants and recipients

TABLE 2 – Other Service Providers

Provider	Funding Source(s) (if known)	Categories of Clients Served	Programs, Services or Activities Provided
Lockport City School District	EDGE	TANF/200%	Educational Services, Job Placement, Job Retention, and TABE testing for individuals under age 21
Every Woman's Opportunity Center	Wheels to Work	TANF/200%	Transportation services—car loan program, and displaced homemaker services which include but are not limited to training, educational tutoring, clothing and work essentials. (Also a PWP work site)
JOBS Staff	OTDA	TANF/Safety Net/FS/200%	Job Placement Services
Niagara Falls Community Education Center		TANF/SNA	Training and Job Placement Services
VESID		TANF/SNA	Training and Rehab Services
Niagara County Mental Health		TANF/SNA	Mental Health Services
Orleans/Niagara BOCES		TANF/SNA	TABE Testing for individuals over age 21
Niagara Falls Memorial Medical Center		TANF/SNA	Medical evaluations for persons claiming a medical exemption and second opinion on questionable medical limitations such as outdated, little or no progress in treatment, refusal of medical professional to submit
Fellowship House Foundation, Inc		TANF/SNA	Educational services and Rehab
Orleans/Niagara BOCES	BOCES uses their funding	TANF/SNA	TABE Testing and Front Door/Job Readiness Program, literacy to individuals scoring below 9 th grade level on TABE testing and for those that score above a 9 th grade level

Section 2.3 – Jobs Agreement

Jobs Program Services – Target Groups

("X" signifies those that apply in this district)

Services	Target Groups
Assessment/Employability Plan _____	Applicants <u> X </u>
Supervised Job Search _____	TANF (inc. SN fam.) <u> X </u>
Job Readiness Training _____	Safety Net Singles <u> X </u>
Job Club _____	Food Stamps <u> X </u>
Job Placement Services <u> X </u>	200% of Poverty <u> X </u>
Grant Diversion _____	
Job Development (employer field visits) _____	

Other Services Requested

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

Jobs Program Staffing and Location (Address)

Number of Jobs staff 2

Locations

1. Trott Office	1001-11 Street, NF, NY
2. Lockport Office	20 East Avenue, Lockport, NY

Jobs Program LDSS Staff Contact (Name & Phone Number)

Pam Gatto, Director of Eligibility, 716-278-6801

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 the district determines they are ready, but no later than within 24 months of receiving federally funded assistance, the district's definition of "Engaged in Work" is:

Compliance with assessment, employment planning, any activity included in the individual's Employment/Self-Sufficiency plan, or any of the work activities listed in Section 3.4. Also included is pursuit of other forms of income such as SSI and SSD.

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, the district's definition of "Engaged in Work" is "Engaged in Work" includes, but is not limited to referral and/or enrollment in any of the work activities that count toward the attainment of required State and/or Federal participation rates. In addition, referral to and/or enrollment in any program approved by the Employment Unit of the Niagara County Department of Social Services intended to lead participants to employment and ultimately financial independence from Temporary Assistance will meet the definition of "Engaged in Work". Referral to and/or enrollment in an orientation, assessment or the development of an individual's employability plan will also be considered as meeting the definition of "Engaged in Work". For exempt individuals, "Engaged in Work" will include activities such as the pursuit of SSI and any other appropriate benefits. In addition, active participation in treatment programs or vocational rehabilitation programs that can assist the individual in his/her efforts to be restored to self-sufficiency will meet the criteria of being "Engaged in Work".

Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Check one of the following:

The district provides orientation in accordance with Dept. Reg. 385.5 and no additional information is provided at orientation.

In addition to the requirements outlined in Section 385.5 of the regulations, the district's orientation provides the following.

Niagara County holds 2 separate orientation programs—1) persons who qualify for a work exemption and 2) persons that are non-exempt. At the "exempt" orientation, a representative from Legal Aid attends to describe their role in helping with successful SSI appeals. VESID representatives are also invited to attend and a CASAC is invited to attend to describe program requirements for substance abuse treatment. The Niagara Falls Housing Authority attends to present information about ATTAIN Lab Services. Information is provided by NCCC about educational programs available to work exempt individuals. We are in the process of creating a handout for non-custodial parents and parents about the child support regulations and compliance with requirements or appointments.

Described below is the manner in which the district completes the required orientation, e.g. done in a group setting or individually or a combination of both.

Niagara County conducts orientation in a group setting.

As part of our revised Front Door process, all applicants are scheduled for TABE testing to determine skill level. On the eastern end of the county, TABE tests are conducted every Friday. The remaining applicants are TABE tested on Mondays and Tuesdays at the Trott location in Niagara Falls. TABE tests help the agency establish which job readiness classes an individual will attend. Applicants are scheduled into the next available group orientation in their area—usually within 2 weeks. Job readiness classes follow the orientation. Individuals that score above a 9th grade level attend job readiness classes conducted by the Niagara County Employment and Training Department. Individuals that score below a 9th grade level attend job readiness classes with BOCES, which includes a literacy component in conjunction with job readiness. TABE test are re-administered monthly.

All applicants are assigned to attend a group orientation. In the Eastern part of the County, group orientations are held every Monday in Lockport—for work exempt individuals it is conducted on Monday morning and for employable individuals it is conducted on Wednesday mornings. The remainder of the applicants are scheduled to attend the group orientation held on Wednesday in Niagara Falls—for work exempt individuals it is conducted in the morning and for employable individuals it is conducted on Wednesday mornings. Applicants, at their application interview are scheduled for the next available TABE/orientation in their area of the County based on their potential employment code. Usually they are scheduled within a week of their application interview date. BOCES conducts the TABE testing and either a Job Developer or an Employment Specialist assigned to the Employment Unit conducts the orientations. At recertification, orientation information is discussed individually with the recipient during his/her recertification interview and individuals are referred to the Employment worker for assistance with services.

Section 3.3 Assessment and Employability Planning

Temporary Assistance Assessment (Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

The district conducts assessments in accordance with 18 NYCRR 385.6(a) and 385.7(a) with no additional requirements.

In addition to the requirements outlined in 18 NYCRR 385.6(a) and 385.7(a), the district's assessment also includes the following elements:

Click here and type the elements

b. A copy of the assessment tool used by the district is attached. Additional assessment tool(s) used by the district is (are):

TABE

c. The qualifications of the employees administering the assessment tool(s) are at minimum: (Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c))

Required: Graduation from a regionally accredited college or university or one accredited by the New York State Board of Regents to grant degrees with a Bachelor's Degree in business, education, behavioral science, human services, or related field **and** one (1) year of experience in a counseling field such as employment, teaching, guidance, social services or related field; **OR**

Graduation from a regionally accredited college or university or one accredited by the New York State Board of Regents to grant degrees with an Associate's Degree in business, education, behavioral science, human services, or related field **and** three (3) years of experience in a counseling field such as employment, teaching, guidance, social services or related field.

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

Niagara County Employment Unit uses Employment Specialists or Case Managers to conduct Assessments.

Testing component:

1. Orleans/Niagara BOCES – TABE– COPS and COPES
2. Niagara Falls Community Education Center—under 21 years of age – TABE
3. Lockport City School District—under 21 years of age – TABE

e. Applicants in households with dependent children are required to participate:

Yes No

Applicants in households without dependent children are required to participate:

Yes No

Food Stamps Assessment

A district may require a food stamp work registrant to participate in an assessment.

a. The district does does not require work registrants to participate in a formal employment assessment.

b. If assessment is required, the assessment includes the following elements:

~~Click here and type the elements~~

Temporary Assistance Employability Plans (Reference 18 NYCRR 385.6(b) and 385.7(b))

a. A copy of the district's employability plan is attached and:

The district completes employment plans in accordance with 18 NYCRR 385.6(b) and 385.7(b) and no additional information is contained in the plan.

In addition to the requirements outlined in 18 NYCRR 385.6(b) and 385.7(b), the employability plan includes:

TOP Unit uses the attached Self-Sufficiency Plan (forms attached) though this could change when WTWCMS is updated to the longer assessment tool. We have permission to use the longer assessment in WTWCMS from our TOP advisors.

b. The district administrative unit or contractor that develops employability plans is (list only if different from those performing assessments):

~~Click here and type ONLY if different from those performing assessments~~

c. The qualifications of the employees developing employability plans are (list only if different from the requirements for those performing assessments):

~~Click here and type ONLY if different from those performing assessments~~

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








a. Described below is how the district plans to meet federal and State Temporary Assistance participation rate requirements. Included is the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals whose status changes from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 3.6

The typical time period it takes to engage nonexempt individuals in activities for both newly opened and individuals whose status changes from exempt to nonexempt is between two and four weeks. The development of an Employability Plan and the assignment to a work activity such as Supervised Job Search can be accomplished more quickly than can the assignment to another activity (i.e. work experience) where the assignment may involve additional factors (a suitable worksite, more extensive supportive services). The importance of the monitoring of participation rate performance along with the tracking of individuals engaged in activities cannot be overstated. The local district's Chief Employment Specialist makes extensive use of State provided management reports through COGNOS. In addition, the WTWCMS Tickler/Alert notification system is very useful in terms of monitoring engagement issues. Niagara County's weekly standard participation requirement varies. First and foremost, individuals are assigned to at least the minimum number of hours needed for their respective case to count in the participation rate. Individuals assigned to the work experience program will usually be assigned to the maximum number of hours that the TA grant and Food Stamp benefits will allow (not to exceed 40 hours per week). Individuals with a child under six will be expected to participate for a minimum of 20 hours per week. Many times they participate for additional hours—those engaged in literacy as part of their job readiness continue literacy in addition to their PWP assignment. BOCES administers the literacy classes around their PWP assignments. Participants are required to share their work schedule with the literacy instructor. This determination is made on a case-by-case basis and is incorporated into the individual's employability plan. TANF individuals employed 30 hours per week or more are referred to the TOP Unit for additional case management services. The ultimate goal for these individuals is financial self-sufficiency. TOP clients are also offered literacy courses to upgrade their employability value.

b. The allowable work activities that are available in the social services district are listed and defined as follows. An "X" in the appropriate column indicates the activity is available for individuals receiving FA, SNF (indicating SN households with children or Safety Net Families), SNA, (SN households without children), and/or FS (indicating NTA Food Stamp).








If a column is blank it indicates that the activity is not available for that household/case type.








FA	SNF	SNA	FS	Activity	Definition
X	X	X	X	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.
X	X	X		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-e. Subsidized private sector employment will include positions subsidized through grant diversion, 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>Subsidized Public Sector Employment</p>	<p>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. Subsidized public sector employment will include positions subsidized through grant diversion, 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>
				<p>Work Experience</p>	<p>Unpaid work performed at a public or not for profit organization to enable participants who cannot find unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire the general skills, training, knowledge and work habits 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 will be reported as employment.)</p>

				<p>On-the-Job Training (OJT)</p>	<p>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 due to the fact that 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>
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			Community Service	<p>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>
			Job Search	<p>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 to or applying for and/or interviewing for jobs and related activities.</p>

				Job Readiness Training (JRT)	<p>Participation in programs that include seeking and preparing for work. 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>
				Vocational Education	<p>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 other than a baccalaureate or advanced degree. Vocational education does not generally include basic or remedial education or 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/SN 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>

  		<p>Job Skills Training</p>	<p>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>
   		<p>Education Training</p>	<p>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, English language instruction and education leading to a GED or HS 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>

<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	Secondary School	<p>Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school leading to a general equivalence diploma (GED), 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 GED as determined necessary by the educational institution. Secondary School or GED 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>
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	Provision of Childcare for Individual Participating in Community Service	<p>Providing unpaid child care to enable another Temporary Assistance (TANF/MOE funded) recipient to participate in a community service program.</p>
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	Treatment Plan for Substance Abuse	<p>Substance Abuse 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. For FA families with dependant children this activity will be deemed to be Job Readiness Training within participation rate reporting. For SN households without children this activity will be deemed to be community service.</p>
<input checked="" type="checkbox"/> <input checked="" type="checkbox"/> <input checked="" type="checkbox"/>	Treatment Plan Other than Substance Abuse	<p>Physical health treatment and rehabilitation services including attending necessary physical therapy, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary. For FA families with dependant children this activity will be deemed to be Job Readiness Training within participation rate reporting. For SN households without children this activity will be deemed to be community service.</p>

Section 3.5 Job Development

Yes No The district conducts or receives job development activities to expand job opportunities for TA and FS clients, either directly or by contract or agreement.

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

District staff contact employers to solicit jobs for Temporary Assistance participants. Below is the description of how this is done, including number of staff, frequency of contacts, etc:

District staff work with other area Job Developers through a Job Developer Group that meets monthly at the county's One Stop Center. District staff also participate in job fairs and planning of these bi-annual events. Employer contacts are made at the Job Fairs and through the One Stop Center where space is made available for area employers to conduct job interviews.

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

Niagara County also has an Intensive Case Management grant that includes an additional Job Developer. This Job Developer (hired through Orleans/Niagara BOCES) works with area employers to develop internships and with the Case Managers assigned to work with sanctioned individuals or individuals at risk of sanction. The Case Managers follow-up on individuals that fail to show up for PWP, Voc Ed classes or literacy classes needed to secure employment. Through telephone contacts and home visits, the Case Managers are able to encourage the learning of new skills for these individuals and the Job Developer is able to encourage employers to hire newly skilled individuals by the promise of follow-up and assistance to overcome barriers that employees face. The Job Developer works with employees to become productive, dependable employees that the employer will be satisfied with. Through the grant, Niagara has contracted with BOCES to provide 2 Case Managers and one Job Developer. The frequency of contact depends on the individual and their lack of participation. If they stay engaged the contact is less than if they fail to participate because they are contacted on the day they fail to attend a required activity.

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

[Click here and type additional information](#)

Section 3.6 Training Approval & Activity Enrollment Policy. (Reference 18 NYCRR 385.9)

- a. Describe how the district identifies/provides appropriate education (Adult Basic Education, GED preparation), and English language instruction, program services that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:

Niagara County identifies providers in the area through participation in the county's One Stop Center meetings. Niagara County identifies appropriate education and English language instruction needs at the applicant stage or at the change in employment status through mandatory TABE testing as part of the orientation, job readiness requirement. Needs of recipients are identified at assessment and referred to the on-going classes that applicants attend through our agreement with Orleans/Niagara BOCES who we have an agreement with to meet the needs of ESL participants. In some situations it is more convenient for a person to attend another area provider's ESL classes due to location or because they are already enrolled. Niagara has a partnership with BOCES and Employment and Training to work together to meet the needs of applicants and recipients of DSS. Through that partnership, BOCES and Employment and Training also work with Niagara County Community College and other area providers such as Everywoman's Opportunity Center to meet the needs of all the participants.

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

Niagara County in partnership with Orleans/Niagara BOCES and Niagara County Employment and Training (using COPS and COPES) plan training classes in conjunction with the needs of the Employer community and the results of the individual testing results and/or completion of literacy courses. BOCES, in conjunction with Niagara County Community College are currently conducting on-going Office Assistant training that includes headset training, telephone etiquette, basic computer skills and customer service training as requested by area employers. BOCES and Employment and Training are currently matching individuals that would be appropriate for a building maintenance program that will begin in the first quarter of 2008.

- c. OTDA is requesting each district to increase the number of vocational training or job skills enrollments by at least 20 percent by January 2009 (generally as compared to September 2007) as one method to increase the skill development of recipients to support improved job entries. Districts that have at least

Describe what steps the district will take to increase the number of participants engaged in vocational education and job skills training programs. Such steps may include increased use of contracted services through local training providers, including WIA funded services, or use of OTDA funded Bridge or EDGE training programs. Districts should consider additional blending of activities such as work experience or employment with job skills training in fields that would improve participants' ability to obtain employment or increase wages or hours of employment.

Niagara County feels confident that they will be able to increase their participation by 20% (21) based on our current collaboration with Orleans/Niagara BOCES and Niagara County Employment and Training. The building maintenance training scheduled to begin in the first quarter of 2008 looks promising and as part of our collaboration all 3 agencies will continue to work with area employers and participants to develop additional vocational training or job skills course enrollments. The current Office Assistant course has been perfected at the Lockport location and will be implemented at the Niagara Falls location in 2008. Niagara County also encourages individuals to participate at the Niagara Falls Housing Authority ATTAIN lab and will promote increased participation at that site.

- d. Education and training providers are evaluated by the following standards:

State Education standards.

- e. The district procedure for advising participants of the approved training providers is:

Individuals are referred to the Employment worker when they are requesting training or when they are recommended to training through their job readiness classes and a referral is given to the individual to provide to the sponsor agency. When individuals request training they are informed of the decision verbally in person or by phone and it is noted in the case narrative.

- f. Participants must meet the following requirements in order to be assigned to education/training activities:

They must not have exceeded their voc-ed limit and the desired training must be for something that could result in job placement—ie: an area employer desires the skill that will be acquired from the education/training.

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

Verbally in person or by phone with a notation to the case narrative.

- h. 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 check below:

It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased Public Assistance.

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.

Failure of the institution or student to monitor and report information regarding the student's attendance and performance as required.

Failure of the student to progress toward the completion of a course of study without good cause, as determined by the district.

The student has previously enrolled in a 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:

[Click here and type the procedure](#)

- i. In order to verify continued exempt status, the local district will monitor the high school attendance of 16-18 year old students in the following manner:

The Social Services Worker in the TA unit obtains verification of school attendance/enrollment at application and recertification. Using Anticipated Future Action code 335, workers are able to send a request for verification of continued school attendance/enrollment. Clerical staff sends LDSS-3708 School Attendance Verification Form to last school of record to determine is still enrolled. Follow up referral to Employment unit worker if Social Services Worker determines 16 to 18 year old no longer in school.

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

Individuals are not assigned to a site that cannot accommodate the limitation. Sites are given notification in writing of an individual's health-related limitations or necessary accommodations.

Section 3.7 Work Verification

Consistent with Work Verification Plan (WVP) requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan for addressing the work participation rate it reports. The plan must include the district's procedure for monitoring attendance in paid employment and work activities and the controls in place to ensure that federal exclusions from work participation rate requirements are accurately made, work eligible individuals are correctly identified, hours of attendance reported by providers is accurate and documented, data entry is accurate and that the district and its providers adhere to approved district and State policy for work activity definitions and the determination of excused absences and holiday reporting. Districts must describe how it will determine that system entries agree with documentation in case files. The district must also explain how it will sample cases, the sample size, and how frequently cases will be reviewed.

After the reviews are completed, the district should provide a summary of findings for management and State review, including errors identified. In addition, the district must include the corrective action it will take when monitoring reveals substantial problems.

The Quality Assurance plan must explain how staff will:

- Assure that documentation of wages and actual hours of employment are verified and accurately projected/reported and present in the case file;
- Assure 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 meet the federal definition for the activity;
- Assess that the data entered into either WTCMS, NYCWAY or other automated system used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and,
- Make sure that documentation necessary to exempt an individual due to being the caretaker of a disabled household member (Employability Code 38) is present in the case file and that individuals meet the exempt status based on the required documentation.

Please describe the process the district will use to review district worker collected documentation and data entry of the above listed elements (include a description of how a case sample for review will be selected, sample size and frequency of reviews):

Niagara County will perform a random sampling of 4 cases per quarter for paid work activities. Both the TA and Employment cases will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms, direct phone contact with employer-documented in case notes or through TALX. The review will insure the hours of employment on ABEL are consistent with the hours reported on WTCMS and the documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS are consistent with the documentation.

Niagara County will perform a random sampling of 4 cases per quarter for participation in unpaid work activities. The employment case files will be reviewed. Attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time will document actual hours of attendance. 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 the at documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff. The reviewer will verify that the number of reported hours an individual is participating in an activity meets the state approved definition for the activity as part of the review and indicate it on the bottom of the review sheet.

Niagara County will perform a random sample of 2 cases per quarter in which a case member is reported as an employability code 38-needed in the home fulltime to care for a disabled household member. The

Employment file and the TA file will be reviewed to ensure there is a 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.

Niagara County will perform a random sample of 2 cases per quarter in which a case member is reported as an employability code 31-caretaker of a child under the age of 12 months. The Employment file and the TA file will be reviewed to ensure that there is a birth certificate present to verify the child under the age of one.

Niagara County will perform a random sample of 3 cases per quarter in which a case member is reported to be incapacitated to determine if s/he remains incapacitated or is now a work eligible person. Niagara County's Employment Unit (Work Exempt division) has dedicated staff to monitor these cases so the Employment record will be reviewed to ensure there is medical documentation present to support the exemption and that the documentation has a timeframe for the exemption. Further review will be done of the TA case if necessary.

We will use the attached review form to complete our quarterly reviews. A summary report will be prepared following each review period and a copy will be forwarded to Kathy Nagy at Kathleen.Nagy@otda.state.ny.us.

Please describe the process the district will use to review provider collected documentation and data entry of the above listed elements (include a description of how a case sample for review will be selected, sample size and frequency of reviews):

Niagara County will use Cognos and/or SOS to pull a random sample of these cases.

Section 3.8 Requirements for Exempt Temporary Assistance 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 a disabled individual has the potential to be restored to self-sufficiency. This determination is different from the determination of the individual's disability exemption as covered in Section 6 of this plan. Included here is who (e.g. physician, employment worker, Temporary Assistance 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 physician, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

Niagara County has dedicated staff in the Employment Unit that is responsible for reviewing and monitoring work exemption claims. The employment workers at the 10th Street office in Niagara Falls and in the Lockport office monitor treatment and rehabilitation individuals need to be restored to self-sufficiency. All applicants are screened for possible substance abuse and assessed by a CASAC at Niagara County Drug Abuse Program. Recipients are screened at recert only if the worker has a reason to suspect substance abuse due to the individual's documented behavior at the interview or documented behavior at a job site or employment.

Individuals that submit medical verification that exempts them from employment activities are referred to the 10th Street office in NF or the Lockport office to have their medical rehabilitative activities monitored or their SSI process monitored. Individuals denied for SSI are referred to Legal Aid for assistance in the appeal process.

Niagara County has a contract with the Family Practice Center in Niagara Falls to obtain a second opinion on medical exemption claims or for individuals that have a disability but are currently not under a physician's care for treatment of their disability.

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

If assessed for needing treatment, individuals are told by the CASAC at the assessment and noticed by the Employment worker (for recipients) or the TA worker (applicants) that enrollment in treatment is a requirement of receiving assistance. Once enrolled in mandatory treatment, the Employment worker monitors the client's recommended treatment and attendance and approves level of care changes. A representative from the Employment Unit also attends area Drug Court meetings and Substance Abuse Provider Network meetings.

- c. Following is the district's procedure for tracking the participant's compliance with the treatment plan. Include if monthly attendance at rehabilitation is received, etc.:

Providers are required to submit copies of the individual's treatment plan and monthly attendance by the 10th of each month. A clerical staff member in the Employment Unit enters attendance into WTWCMS. Treatment Plans are reviewed quarterly or at level of care changes to monitor progress.

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.

Niagara County is in the process of completing an amendment to the FFFS Plan that will include Walmart gift cards to individuals that will be given to TANF/MOE individuals that successfully obtain employment and then when they maintain employment (comparable to or more than their scheduled hours of participation) for 90 days and every subsequent 90 days until they have remained off of cash assistance for 90 days.

Applicants and recipients that are deemed work eligible attend a 3-hour orientation. During that orientation, the Work Experience Program Aids and Job Developers discuss with the participants the value of compliance with work requirements and the necessity to fulfill the obligations as it relates to their ability to achieve self-sufficiency. Individuals are reminded at every client contact by the Employment Specialist and the Work Experience Program Aids, the importance of securing reliable day

care and back up daycare to the primary care giver. The individuals are encouraged to participate in workshops conducted by Employment and Training, Everywoman's Opportunity Center, Employers and other partners in the One Stop Center on how to be a quality employee, how to achieve a success in a job interview, etc. Flyers about the workshops are posted in every DSS waiting area and interview areas at all sites.

Section 3.10 Strategies/Procedures for Engaging Sanctioned Temporary Assistance Participants

District has no specific strategies to engage sanctioned participants.

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

The Case Managers assigned to the Intensive Case Management Initiative are informed of the TANF/MOE individuals that are sanctioned by the Employment worker.

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

[Click here and type the procedure](#)

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

Niagara County has implemented Project SOURCE (Self-sufficiency, Opportunity, Understanding, Resources, Case Management, and Economic Independence) that is designed to engage sanctioned participants. The Job Developer assigned to the County's TOP Unit administers the program. Sanctioned individuals are called in for a group orientation to the program and are then assigned to a monthly group session. Barriers to employment, the cause of the sanction and how to comply are discussed. Referrals are made to appropriate community agencies to assist with any issues that may have contributed to the noncompliance. The Job Developer assists the sanctioned individuals by providing both job leads and job search assistance.

Section 3.11 Diversion Strategies

District has no specific diversion strategies.

District's diversion strategies are described below:

Niagara County provides supportive services to divert applicants from needing Temporary Assistance. These supportive services are provided on a case-by-case basis and are only approved for individuals who are either already employed or have a promise of employment. Verification of employment (current pay stub) or a statement on the company's letterhead indicating a promise of employment (with an expected start date) is required in order for the individual to be considered for these services.

Section 4 Support Services (Reference 18 NYCRR 385.4)

Section 4.1 For Temporary Assistance Applicants and Recipients in Work Activities

- 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 to participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, work activities and activities to restore self-sufficiency:
- 1) Transportation
 - 2) Work-related expenses (including uniforms, tools, license and test fees)
 - 3) Case management services

The district will use the following approach to assist those participants who need transportation to and from a work activity site (including any applicable mileage reimbursement rate and the method used by the district to arrive at that reimbursement rate):

- b. Whenever possible, public transportation will be used to transport individuals who need transportation to and from their work activity site. The Department will provide participants with bus passes or bus tokens depending upon the duration of the work activity assignment. Individuals who have access to an automobile will be provided a mileage allowance. The mileage will be based upon the Medicaid transportation mileage rate (currently 50.5 cents per mile).

In addition, Niagara County has a Wheels-to-Work transportation grant. This grant is administered by the Everywoman's Opportunity Center, Inc. This grant targets TANF individuals and 200% of poverty level individuals who are employed full-time. Participants may be eligible for a car loan of up to \$4,000.00.

Niagara County also has a CST grant that provides bus passes and gas cards to individuals up to 150% of the poverty level.

Also, Niagara County, whenever possible, attempts to assign individuals who reside in rural areas of the county, where public transportation is often lacking, to work experience worksites that are in close proximity to their homes.

- c. The district will use the following approach for those individuals who reside in an area where public transportation is not available. In those instances where the district would require a participant to walk to a work activity assignment, please identify the maximum distance the client would be expected to walk, along with a rationale for the maximum distance:

Niagara county will use the CST grant to provide gas cards to those individuals that have a vehicle or have access to use of a vehicle whenever possible. In some situations Niagara County will use taxis to accommodate individuals. Individuals will be required to walk to their work activity assignment if it is within 1.5 miles of their home. This is the same distance that the school district uses in determining the bus transportation needs of their students in our county.

d. The district will provide the following services to assist individuals at risk of needing public assistance to improve their opportunities for employment or to maintain their employment:

1. Transportation expenses
2. Employment-related expenses (including uniforms, tools, license and test fees)

e. Following is a description of how the district accommodates the needs of non-English speaking participants in accessing employment activities and services (or see below):

Niagara County maintains a list of translators. When needed a translator is made available to the participant and appears with the individual during the assessment interview. This ensures that the participant has the opportunity to access the appropriate employment-related activities and the necessary supportive services. This is a relatively rare need in Niagara County.

[] This is not generally applicable in our area (never or rarely have occasion to serve such individuals).

Section 4.2 Transitional Supportive Services

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

- 1) Transportation (90 days for Families, 30 days for cases without a child)
- 2) Work-related expenses (may include uniforms, tools, license and test fees)
- 3) Case management services to households containing a child up to 1 year after case closes.
- 4) Walmart Gift Card (Every 90 days for Families up to 3 months after the case closes)

The district will provide the following supportive services, for up to 90 days after case closing, to individuals whose Temporary Assistance cases have closed due to employment.

Transportation (for Families)
Walmart Gift Card (1 90 days after the case closes)

Section 4.3 Extended Supportive 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.

- 1) Transportation

- 2) Case management services to household with a child up to 1 year after case closes.

Section 4.4 Supportive Services for Food Stamp Employment & Training (FSET) Participants:
 (Reference 18 NYCRR 385.4(b))

The district provides necessary childcare in accordance with the childcare section of the Child and Family County Services Plan.

- a. Following is the district’s policy for providing transportation services for FSET participants:

Niagara County will refer eligible FSET participants to services provided by the Wheels-to-Work grant. Whenever possible, FSET participants will be encouraged to utilize public transportation. In instances where mileage reimbursement is the most cost effective and efficient method of transportation, the Department will follow the guidelines set forth in Section 4.1 above.

- b. The district will provide the following supportive services in addition to transportation:

Childcare: FSET funds will only be used for childcare for services not covered under the Child Care Block Grant or if the individual is not eligible for those services.

Section 5 – Temporary Assistance Conciliation and Dispute Resolution Procedures; Food Stamp “Good Cause” Determination Procedures (Reference 18 NYCRR 385.11 and 385.12)

Section 5.1 Conciliation

The district’s conciliation process is in accordance with 18 NYCRR 385.11(a).
 Conciliations are conducted (check all that apply.):

- in person
- by phone
- by mail, etc.
- other as described below:

Click here and type the procedure

The good cause/willfulness determination is made by:

- client's employment worker
 a supervisor
 separate entity (please describe below)
 other (please describe below)

[\[Click here and type the process\]](#)

Section 5.2 Sanction

The district's procedure for determining compliance for those individuals who wish to end their employment sanction (18NYCRR 385.11(b), 385.12) is:

Niagara County has the individual sign a willing to comply (waiver) form that provides for an opportunity to remind the individual of the importance of compliance and the participation requirements. An individual is also considered in compliance when they obtain employment that meets their participation requirement, but as still asked to sign the waiver as an assurance of understanding of the program requirements. Upon signing, the waiver form is forwarded to the eligibility worker indicating that the date the client can be added to the case is the date of the signed form.

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(b).

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 but who are not trained in mediation

Section 5.4 Food Stamps Good Cause Determination

The district's procedure for determining if good cause exists for applicants and recipients who fail to comply with Food Stamp Program employment requirements is in accordance with 18NYCRR 385.12(c) and is conducted:

- conciliation is offered in the same manner as described in Section 5.1 of this plan;
 by the Employment worker using available information, including that provided by the participant if any, to determine if there was a good cause reason.
 Other (described below)

~~Click here and type the procedure~~

Section 6 – Disability Determinations (Reference 18 NYCRR 385.2(d))

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:

- 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, described below.

~~Click here and type the process~~

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, described below:

Medical documentation is submitted by applicants to the TA worker who make the initial determination (often in consensus with the Employment worker). The medical verification is attached to the Employment referral to the Employment worker who reviews the verification and determination and has then follows up with the client or makes the necessary and final determination of employability. The Employment worker makes all employment code determinations for all recipients.

COMMISSIONER OF SOCIAL SERVICES ANTHONY J. RESTAINO

NIAGARA COUNTY

