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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

April 17, 2008

Mr. John R. Beaudoin
Commissioner
Rensselaer County Department of Social Services
133 Bloomingrove Drive
Troy, New York 12180

Dear Commissioner Beaudoin:

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
Carol Croak
Jerrod Ogden

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 Rensselaer 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 Rensselaer 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 April 2, 2008

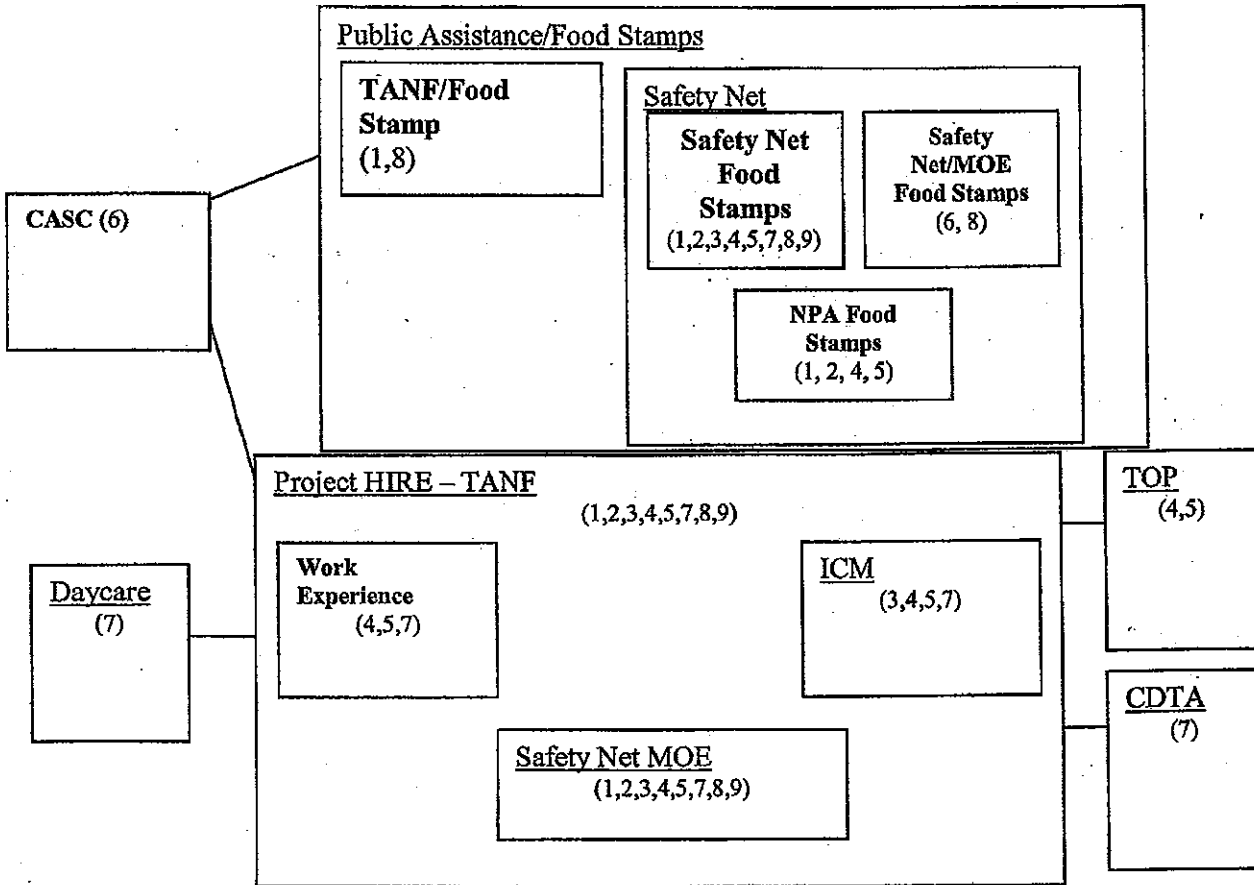
Section 2 Administration

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.

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WELFARE-TO-WORK DIVISION
APR 10 2008

ORGANIZATIONAL CHART



W.T.W. Services Key

- 1) Orientation
- 2) Assessment
- 3) Employability Planning
- 4) Assignment to Work Activity
- 5) Monitoring of Participation
- 6) Development and Monitoring treatment Plans for Exempt Individuals engaged in Treatment/Rehab to restore self-sufficiency
- 7) Coordination and Provision of Supportive Services
- 8) Disability Determinations as they relate to employability
- 9) Conciliation, sanction, dispute resolution

No Services Contracted Out

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.

RENSSELAER COUNTY DEPARTMENT OF SOCIAL SERVICES UNITS INVOLVED WITH WTW PROGRAM

TANF/FOOD STAMP TEAMS (2)
SAFETY NET UNIT
PROJECT HIRE
DAYCARE UNIT
TOP UNIT
SUBSTANCE ABUSE SPECIALIST

RENSSELAER COUNTY DEPARTMENT OF SOCIAL SERVICES WELFARE-TO-WORK ORGANIZATIONAL OVERVIEW

A. TANF and SAFETY NET-MOE EMPLOYMENT SERVICES - PROJECT HIRE

Contact: Carol L. Croak – Employment Coordinator

Additional Staff: 4 Caseworkers, 1 Social Welfare Examiner, 1 work experience coordinator, and one clerical staff person.

Services Offered: Case Management, Supportive Services, Employment Counseling, Assessments, Employment Plans, Job Placement and Post-Employment Services.

Population Served: TANF and SN-MOE

B. JOBS STAFF PERSON

Contact: Josephine McGuirk - New York State O.T.D.A.

Services Include: Supervised Job Search, Job Placement and employment follow up.

Population Served: TANF and SN-MOE

C. TOPS UNIT

Contact: Matt Herman - Top Coordinator

Additional Staff: 3 Social Welfare Examiners and 1 Clerical person

Services Include: Post employment Services and Supportive Services

Population Served: TANF and former TANF

D. SAFETY NET/ FOOD STAMPS

Contact: Mary Kay Cassidy – Principal Welfare Examiner

Additional Staff: 3 Senior Social Welfare Examiners, 9 Social Welfare Examiners and 3 Clerical Staff persons

Population Served: Safety Net, Food Stamps

Services Include: Safety Net Employment Program and Job Search

E. ADJUNCT SERVICES

1. Substance Abuse

Contact: Elisa Schneider – CASAC

Population Served: TANF, Safety Net, SN-MOE

Services Include : Substance Abuse Assessment and referral to and monitoring of treatment programs

2. Domestic Violence – Services Contracted From Unity House

Services Include: Employment Waiver Determinations and other appropriate interventions, counseling and referrals.

EXTERNAL AGENCIES INVOLVED WITH WTW

NEW YORK STATE O.T.D.A. JOBS WORKER

One staff person co-located with Project Hire who works on job search,

job development and Employment Follow up.

QUESTAR III – RENSSELAER/ COLUMBIA COUNTY BOCES PROGRAM (EDGE VI PROVIDER)

Reading and Math Skill Assessments

Family Literacy

Career Counseling

CAPITAL DISTRICT EDUCATIONAL OPPORTUNITY CENTER (BRIDGE PROGRAM PROVIDER)

Reading and Math Skill Assessments
 Job Readiness Training
 Case management
 Job Placement
 Vocational Training
 Post Employment Services

W.I.A. ONE – STOP – RENSSELAER COUNTY DEPARTMENT OF EMPLOYMENT AND TRAINING

Job readiness, job placement and job retention services
 Numerous other services provided by fellow partner agencies that are co-located at the one-stop to serve unemployed or underemployed individuals

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
	\$			
	\$			
	\$			

	\$			
	\$			
	\$			
	\$			
	\$			
Total	\$			

TABLE 2 – Other Service Providers

Provider	Funding Source(s) (if known)	Categories of Clients Served	Programs, Services or Activities Provided
Educational Opportunity Center (EOC)	OTDA	SN-MOE TANF	Bridge Program Provider, Vocational and Educational Training. Job Readiness training and E.S.L.
JOBS Staff Person	OTDA	SN-MOE TANF	(see section 2.3)
Questar BOCES	OTDA	200%	Adult Basic Education, GED, career counseling
Northeast Career Planning	OTDA	SN-MOE TANF	LIVES Program
Industrial Medical Associates	OTDA	SN SN-MOE TANF	Provides 2 nd medical opinions and disability analysis
Wheels to Work	OTDA	TANF, SN-MOE	Assists with transportation issues including helping in acquiring a vehicle and the maintenance of same.

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

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.)

_____ WTWCMS data entry for jobs related activity, employment follow up, and attending job fairs and other employer hiring events.

Jobs Program Staffing and Location (Address)

Number of Jobs staff : One

Locations

1. 1801 6th Ave. Troy N. Y. 12180
2. _____
3. _____

Jobs Program LDSS Staff Contact (Name & Phone Number)

_____ Carol L. Croak (518) 270- 3975

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.

Activities that bring about reductions in barriers to employment or increase self-sufficiency i.e. repairing or restoring the household vehicle to road readiness, English language instruction for speakers of other languages, participation in approved substance abuse rehabilitation programs. Also individuals enrolled in an approved 5/502 program for senior recipients over the age of 55 and individuals involved in family supportive or reconstructive activities will be considered as "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. The district orientation also includes information about child care in lieu of Assistance.

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.

TANF staff and Employment Unit Staff persons complete the orientation. Some of the orientation is done during the initial application process and other areas are completed during the employment assessment. The initial orientation is completed one on one. The orientation at the time of recertification is handled in a group setting. Re-orientation may occur at other occasions as needed and is utilized by the intensive case management team in their efforts to foster participation hours from the chronically non-compliant.

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:

Legal issues i.e. court appearances, court mandated activities, felony convictions and parole and/or probation status and names of officers these people may be working with.

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

The TABE test of Adult Basic Education, Basic Literacy test, and the New York Place test.

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))

The assessment tools listed in item "b" are administered by licensed educators. All other assessment components are done by Department of Social Services Caseworkers who at minimum have a bachelor's degree with a major in social work, social sciences, or Psychology.

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

Project HIRE unit of Rensselaer County Department of Social Services completes all TANF and Safety Net MOE cases. The Safety Net Unit conducts the assessments for Safety Net individuals and childless couples.

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:

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:

b. The district administrative unit or contractor that develops employability plans is (list 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):

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 district is actively involved in several efforts to meet Federal and State participation requirements. This has already impacted on how quickly we engage people in activity after the case has opened. The applicant job search we conduct means that most all applicants are engaged from the date of the case opening. Individuals whose status changes from exempt to non-exempt are sometimes slower in part because they may have limitations that must be accommodated and we are working to expand our capacities in this area.

The district's weekly participation standard for single caretaker households with a child under six years of age is 30 hours per week. For single caretakers where the youngest child is 6 years or older, the standard is 35 hours a week at minimum. For single individuals without children (SN) the basic requirement is 30 hours a week. For two-parent households the basic requirement is up to 40 hours per week regardless of the age of the youngest child in the household. However the need to fund any childcare expenses alters the participation hours to at

minimum 55 per week. The Safety Net MOE households are held to the same standards as their TANF counterparts. The Safety Net Non-MOE cases are engaged in approved activities for no more than 40 hours a week.

Generic Cognos Reports and WTCMS listings will be used as a tool for monitoring caseload participation.

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	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.

x	x	x	x	Subsidized Public Sector Employment	<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>
x	x	x	x	Work Experience	<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>

x	x	x	x	<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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X	X	X	X	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>
X	X	X	X	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>

x	x	x	x	Job Readiness Training (JRT)	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.
x	x	x	x	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 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.

X	X	X	X	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.
X	X	X	X	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, 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.

X	X	X	X	Secondary School	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.
				Provision of Childcare for Individual Participating in Community Service	Providing unpaid child care to enable another Temporary Assistance (TANF/MOE funded) recipient to participate in a community service program.
X	X	X	X	Treatment Plan for Substance Abuse	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.
X	X	X	X	Treatment Plan Other than Substance Abuse	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.
				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.

Local District Job Search Procedures:

The district assigns Temporary Assistance applicants to Job Search. Yes No

If yes, please describe the local district procedure for TA Applicant Job Search, including the generally required number of job search contacts and hours per week assigned. Also include a description of how often applicants are generally required to report job search outcomes and if activities other than job search are routinely expected of TA applicants during the application period.

The applicant job search is begun on the day an applicant applies and continues until the case opens. The applicant job searcher is expected to make at minimum two contacts a day and the assigned hours for this task at minimum would be 25 hours a week. The job search is assigned and directed and verified by the JOBS Staff person. Job contacts will be verified through a sampling of contacts submitted and subsequent employer contacts. Job Search efforts will be augmented with direct referrals to appropriate job openings along with job searching skills as deemed necessary to insure a more successful job search. .

The district assigns TA recipients to Job Search Yes No

If yes, please describe the local district procedures for TA Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often recipients are generally required to report job search outcomes.

The number of hours per week typically assigned for job searching would be 30. The participant job searcher will be assisted in their job search by the JOBS staff person who will train the participant in job search techniques and job search record keeping. The job Searcher will be seen at minimum weekly

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 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.

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

Section 3.6 Training Approval & 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:

The district identifies the need for Adult Basic Education, G.E.D., or ESL either through the assessment process and or through the client's own expression of need either in acknowledging their sense that their skills are not all that they wish them to be or they themselves and their employment caseworker feel their vocational goals are not realistically reachable with their current skill set. The district has our Bridge Provider (EOC) and has linkages to local school districts, BOCES, Literacy Volunteers, Hispanic Outreach and HVCC as well as contacts in neighboring counties and states that may better serve our geographically proximate clients.

- 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:

The district identifies clients who might be benefited by vocational education/job skills training through both the assessment process and informs clients of vocational training as an approvable, available, countable activity during orientation. The diversity of the offerings available and the different venues would also be addressed in developing an employment plan. In addition to the connections cited in section 3.6a above there are connections for career counseling and training through the One-Stop. Our only contractual services for Vocational education would be our Bridge provider but the district has had participants enrolled in programs throughout the area in BOCES, HVCC, SCCC, and private training providers at numerous healthcare providers and other programs through private training schools like Bryant Stratton etc. We are also pursuing re-training possibilities with our LIVES program and VESID for individuals with limitations.

- 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.

Rensselaer County has already informed our Bridge Provider of our intent to make additional referrals to their vocational programs and recruitment efforts in which we have engaged will be increased. Other training venues will also be informed. Our current enrollment based on data for 9/07 indicates a current rate of 7.5% of our participants was engaged in Vocational Education/Job Skills. That 7.5% represents 29 individuals. At minimum for this year we intend to reach 10% (or a total of 38 enrolled individuals in this type of activity). We will also seek to have prospective training participants or current training participants placed into work experience positions to serve as an "internship" to assist in choosing a career training path or to obtain hands on experience in their chosen field and provide the successful career candidate with a personal reference they can utilize as leverage in acquiring that post-training job entry. Several of our training providers already are contracted work sites for our individuals. Enhanced orientation will also occur when someone is enrolling in this activity will incorporate information about all manner of supportive services available from this agency, the One-Stop and from our training providers themselves to obtain and maintain employment.

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

Providers are evaluated not only by the quality and nature of their curriculum but also by their institutional accreditation and that the instruction enhances the enrollee's opportunities in entering the local job market in their chosen field. Included in this evaluation are the percentages of students who successfully complete the program and the rate of entries to employment stemming from that training coupled with the duration of job retention. All approved training should incorporate a strong emphasis on employment and self sufficiency during all phases of the program.

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

Training providers are discussed during orientation, assessment and during the formation of the employment plan. Also training options are discussed in response to client inquiry or a caseworker's determination of the timeliness of the same.

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

To be assigned to education/training activities the recipient must have the requisite reading and math skills to successfully complete the program. Needed supportive services must be in place and deemed reliable and sufficient to permit acceptable levels of program attendance. In addition, would be enrollees must have a reasonable chance of employment in the field they are choosing to pursue. If an individual is possessed of job experience or training which qualifies them for employment that they can reasonably hope to find in this region, then additional training will only be approved through a case-by-case determination by the local district.

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

An employment plan developed by the client and the caseworker constitutes approval of training. Participants are notified of their assigned work activity through discussing their work assignment with their Social Services caseworker. Additionally, other documents are given to the recipient specific to their work activity.

- 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:

- 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 district monitors school attendance of 16 -18 year olds at time of application and recertification when attendance records, enrollment records and report cards are submitted. And if said client uses day care funding through the day care unit then such verification is submitted monthly

- 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:

The work activity provider is notified in writing of limitations that the participant has. If the client chooses the medical statement can also be shared.

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:

Rensselaer County will perform a random sample of 10 cases per quarter for paid work activities. Both the temporary assistance and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms, and direct phone contact with the employer documented in case notes. 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.

Rensselaer County will perform a random sample of 20 cases per quarter for participation in unpaid work activities. 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 that documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

Rensselaer County will perform a random sample of 5 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 temporary assistance 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.

Rensselaer County will perform a random sample of 5 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 temporary assistance case file will be reviewed to ensure there is a birth certificate present to verify the child under the age of one.

Rensselaer County will assess and verify that participation in the work activities reported for work eligible individuals meets the Federal definition for the activity.

A summary report will be prepared following each review period, and forwarded to Kathy Nagy @ 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):

Rensselaer County does not currently have program providers who are responsible for collection of documentation or entry of data into WTCMS.

Sampling

Purpose

The purpose of this Audit Bulletin is to provide a non-technical overview on the use of sampling for collecting audit data.

Overview

What Is Sampling?

Sampling is a statistical practice used to select a limited number of units (sampled items) from a given population (universe) in order to yield some knowledge about the population.

Why Use A Sample?

Sampling can provide information about the population without having to evaluate every member of it.

Random Sampling

Random or probability sampling is a method of selecting a sample so that every member of the population has an equal chance of being included. Results from a random sample are statistically valid as bias is prevented from occurring in the selection process. Random samples can be obtained by using random number tables or computer programs such as Audit Command Language (ACL).

Types of Random Sampling

Simple Random Sampling

Simple random sampling consists of choosing a sample unit from a given universe where each unit is given an equally likely chance of being selected. Simple random samples are usually utilized when there is a relatively small variation in the range of unit values in the universe (e.g. payments made to recipients are roughly the same dollar amount). The advantage of using a simple random sample is that it is easier to: select the sample; extrapolate sample findings; and, clearly communicate the sample selection and projection steps.

Stratified Random Sampling By activity

Stratified random sampling consists of separating similarly valued units (i.e. homogeneous units) in a universe into a number of strata or zones and then selecting a simple random sample from each stratum. All units in some strata may be selected depending on the number and value of the units in the stratum. An example of this is to divide a universe of payments into five to ten strata by the dollar value of payments made to recipients. Random samples are then selected from all strata except for the top dollar range stratum where all units are selected.

Stratified random samples are often used when there are wide variations among units in the universe. Stratified sampling is more efficient than simple random sampling when wide variations exist because it can provide the same precision with a smaller sample size. The disadvantages of utilizing a stratified random sample are the additional administrative effort needed to: create strata; extrapolate sample findings; and, clearly communicate the sample selection and projection steps.

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):

All providers of other activities submit calendars to employment caseworker who system enter the data. Attendance monitoring visits will be scheduled for each semester. Cases will be examined from all providers over the course of a year however since the overwhelming majority of our provider based activities are located with our Bridge provider those cases will be weighted most heavily in the sampling.

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.).

Medical statements submitted by the client's doctor and/or from the county's contracted second opinion medical source are evaluated by the employment caseworker and discussed with the client. If the client is determined to be capable of engaging in some form of activity but with ongoing limitations the client will be evaluated for involvement with the LIVES program and/or VESID. All medical statements are requested to be updated in a timely manner by a separate social welfare examiner who oversees and tracks said updates.

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

Treatment plans are developed by client's physician or other health professionals to whom the client is referred.

- 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.:

Employment caseworkers incorporate treatment plans into employment plans and monitor attendance monthly whenever possible.

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.

All participants are counseled about attendance and have been informed about the more stringent requirements in this area. The day care coordinator will be checking with all daycare recipients about their back up childcare arrangements. We have acquired schedules from day care centers

and school districts so we can pre-plan with clients for these occurrences and or adjust work schedules when that would be helpful.

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:

At the time of the conciliation when non compliance is determined clients are encouraged to redouble their job search efforts. Direct referrals from their caseworker or the JOBS staff person are offered. Also the soon to be sanctioned individual is informed of supportive services available to an employed individual even after sanction is imposed. Ongoing attempts will be continued to work with sanctioned individual either by their employment caseworker or if they are chronically non-compliant by the Intensive Case Management Team.

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

Mailings are sent for new appointments and client will be directed to request to be added back into case and new participation expectations are established and re-orientation to maintaining compliance is completed this will be followed up on with phone and/or home visit by intensive case management workers

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

All methods listed above in "a" & "b".

Section 3.11 Diversion Strategies

District has no specific diversion strategies.

District's diversion strategies are described below:

The front desk screener is the main point where diversion strategies are utilized. All referrals for community-based assistance are made available as relevant. Additional problems with evictions, lack of childcare, transportation, job referrals, are representative of the diversion interventions used. Documentation of Employment or promise of employment would be sought in many instances. Other documentation could be utility shut-off notices, eviction notices, written statement of request from client for assistance in specific area (i.e. moving expenses) when accompanied by documentation of continued means of support. In addition the applicant

job search that we require applicants to participate in constitutes another form of diversion activity.

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: The local social services district will provide supportive services to participants to facilitate their participation in employment or other approved and verifiable work activities. Transportation assistance (see section "b" below), necessary clothing or tools up to a limit of \$150.00; this assistance is determined on a case-by-case basis by the local district.
- b. 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): Transportation assistance is available to enable participation in a work activity. Bus tokens or payments are placed in clients cases to fund activities that are approved. If no public transportation is available or other transportation alternatives (i.e. car pooling) are non-existent then mileage will be paid to the client at the rate of \$.40 per mile. Participants may also be assisted with car repairs to participate in an approved work activity if public transportation is not available. Cost estimates are needed prior to final determination being made on a case. Said determination to be made on a case-by-case basis by the local district. Car repair assistance is limited to \$500.00 and will only consist of payment necessary to make the car safe to operate.
- 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:

The district has in the past and continues to attempt to make worksites available in remote portions of the county. However in instances where client is unable to find a means of transport walking would be considered for up to 2 miles distant. Such walking requirements would be negotiable in regard to medical limitations and also for a parent walking with a young child or infant and during countervailing weather conditions.

- 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: These individuals will be interviewed and those who are about to start a verified new job or are attempting to retain an existing job but have a need that puts such employment at risk; (such as car repairs when public transportation is unavailable, lack of clothing or uniforms, lack of daycare funding) will be assisted in these areas provided documentation of the employment is submitted and when appropriate cost estimates for repairs or purchases. Repair assistance limited to no more than \$500.00 and clothing to no more than \$150.00.

- 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): In many instances provider agencies have bilingual staff persons who have been helpful. The agency also works with the community based Hispanic Outreach organization. If neither of these sources are available on a given occasion than the client is instructed to return with someone of their acquaintance who is competent to perform the translator function.

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:

Daycare, Transportation Assistance, Employment Counseling or other services available from community resources to which client could be referred with appropriate documentation. Other needs could be evaluated for additional assistance. These unspecified determinations would be evaluated by the district on a case-by-case basis.

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.

Former TANF recipients whose cases closed due to employment are able to access many forms of transitional supportive services for a period of up to 90 days from case closure (i.e. food stamps, childcare, and Medicaid, transportation and case management). These services are accessible from the county employment unit, the daycare unit, or the Jobs Staff person or the TOP Unit or the Bridge program provider and from other community sources to which the client may be referred. Safety Net MOE cases are able to access all of the above stated transitional support but the TOP program only serves former participants who were TANF.

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.

Childcare assistance and the Wheels for Work program

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:

The district will meet transportation needs by issuing payments for the purchase of bus passes or assistance with car repairs.

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

If recipients are eligible low income childcare and referral to other community agencies are made available. Other payments such as assistance with car repair are considered on a case-by-case determination. Gas money is not provided.

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:

Conciliation notices will be sent for non-compliance. Participants will have seven days to respond to the notice if they are safety net or safety net families and ten days for TANF

individuals. Failure to respond to the notice and a determination of lack of good cause based on available information will prompt a ten day notice to deny or sanction assistance.

The good cause/willfulness determination is made by:

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

Client's explanation and documentation are reviewed and the client is informed verbally and in writing of the determination of good cause or not and also informed in a like manner of the consequential aspects of that determination.

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:

Willing-to-comply sanctions (WEI) are ended with a client signing a willing to comply form. All others report to their welfare examiner and request to be added back into the case.

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)

The clients personal attestation and whatever accompanying documentation and any other available information will be considered in the good cause determination. Said determination is made by a social services caseworker. If a determination of non compliance without good cause is made the notice of adverse action would be sent within 10 days.

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.

The district first accepts medical statements from the client that they offer when informing this agency of their limitations. Or we issue a medical form to the client to take to their physician if they indicate a condition/limitation and have no information (or no recent information) available. They have ten days to submit such information and if necessary an extension of time may be granted when medical diagnosis is pending until a scheduled appointment. Client may be sent at that time to seek a medical opinion from our contracted 2nd medical opinion source if it will expedite the receipt of medical information. The contracted medical opinion source will also be utilized when submitted doctor notes are incomplete or fail to address limitations or treatment recommendations.

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:

For a TANF applicant or recipient the review of medical documentation is initially started by a social welfare examiner accepting an applicant/recipient verbal statement and/or a medical statement originating from the physician of said individual identifying a medical problem and or limitations stemming from said medical condition. In either case the individual is requested to have his or her physician to the state form (DSS 4526). Upon receipt of this completed form the social welfare examiner who is in the process of opening an applicant's case

or managing a recipient's case will choose the appropriate code and enter it on the system. The information will also be conveyed to the employment caseworker who will determine if there is a need for a second medical opinion so as to clarify medical limitations or treatment recommendations. When the results of the second medical opinion request are received the employment coordinator reviews them and submits a copy of said medical opinion to the employment caseworker who then makes appropriate referrals for client activity engagement if any. A copy of the second medical opinion is also forwarded to the social welfare examiner who is charged with monitoring statements to insure updates are acquired in a timely manner who also will "recode" the case in consultation with the employment caseworker and or the employment coordinator as needed. The SN-MOE cases are similarly handled except their social welfare examiner is in our Safety Net Unit and in this case the examiner often enters a exempt code based on the initial documentation submitted by the individual's physician although the state form will be issued will be issued to the client to be completed by the physician for further clarification. The second medical opinion request and subsequent re-coding if necessary is determined by the employment caseworker in consult with the employment coordinator. The Safety Net cases codes are determined by the Safety Net Social Welfare Examiner who handles all aspects of the case including employment. The examiner determines an employment code based on medical information from the physician's statement and consults the unit supervisor for a referral to the second medical opinion source. The second medical opinion source returns their findings to the unit Supervisor who informs the examiner to alter the code if necessary this information and to oversee appropriate treatment referrals and monitoring. In all cases the client notification form 4005 or 4005a are sent to the client.