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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

May 30, 2008

Mr. Christopher Cunningham
Sullivan County Department
of Health and Family Services
Box 231
Liberty, New York 12754

Dear Commissioner Cunningham:

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
Deborah Lyden
Janet Scherf
Keri Stark

S-6-9-08

"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 Sullivan 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 Sullivan 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: May 27, 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.

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.

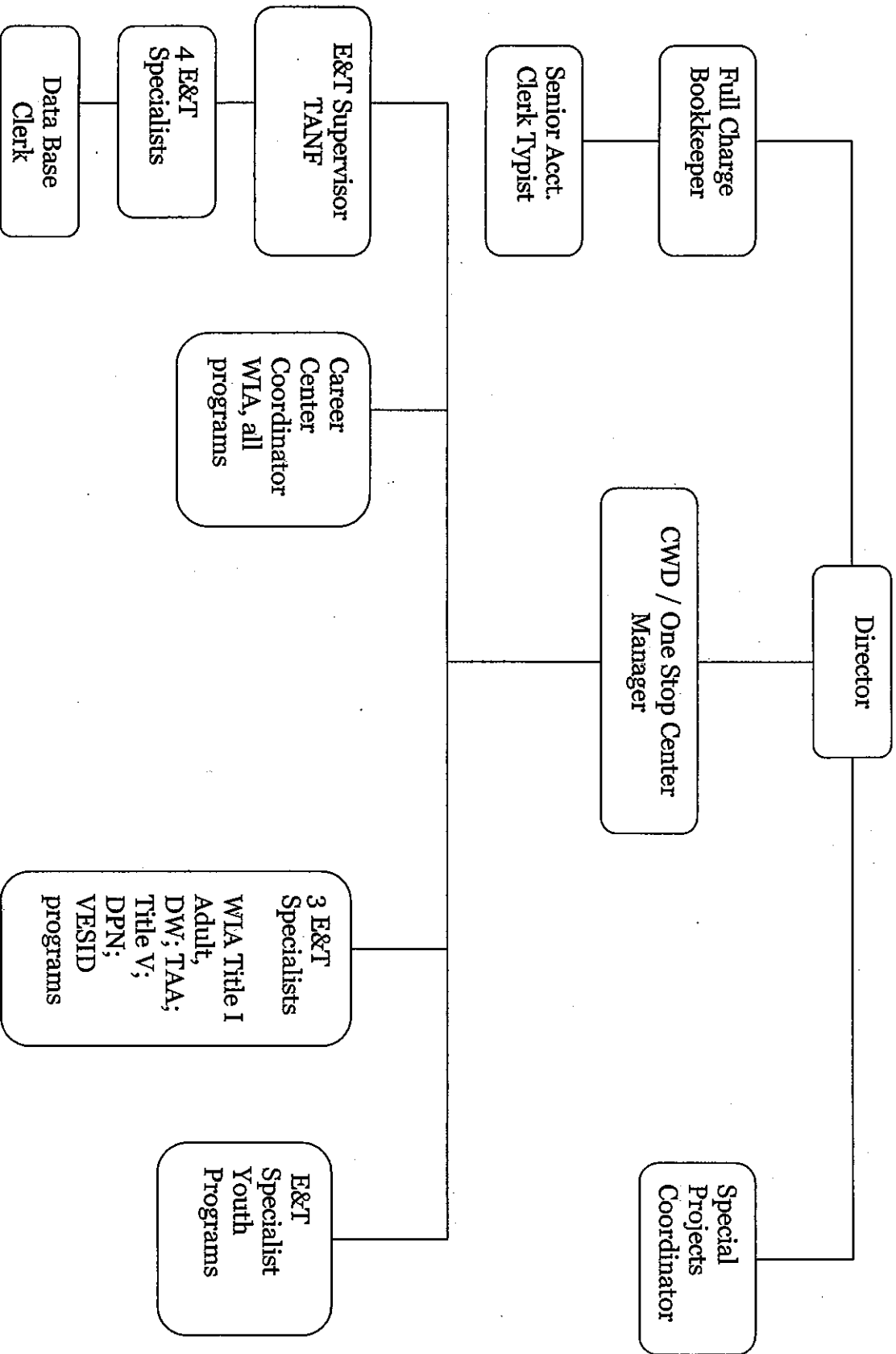
Workers from Family Services schedule the initial orientation appointment which starts the process.

CWD conducts group orientation, assessment, and Individual Employment Plan (IEP) development at the One Stop Center. Customers meet with Employment Specialists to receive direct job referrals as well as to identify and enroll in suitable activities. Long and short-term employment goals are identified through the development of the IEP and supportive service needs are assessed. CWD staff provides case management services on an on-going basis. TABE reading and math locators are administered and interpreted during orientation. Activity enrollment in the WMS/CMS subsystem occurs as soon as a customer completes orientation and is enrolled in an approved activity.

A representative from the Jobs Program is located at the One Stop Center with CWD. Individuals identified as job ready meet with the Jobs Program representative who provides direct referrals to job openings. Diversion from Public Assistance occurs when employment is obtained prior to case opening

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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
Center for Workforce Development	\$373,000.	FFFS	TANF; SNA; SNF	Orientation, assessment, IEP, training and education referrals, case management, job development, job placement, OJT development
	\$			
	\$			
	\$			
	\$			
	\$			
	\$			
	\$			
Total	\$ 373,000			

TABLE 2 – Other Service Providers

Provider	Funding Source(s) (if known)	Categories of Clients Served	Programs, Services or Activities Provided
BOCES Center for Career Development	Grant funded purchased service	FA, SN, FS	Various training and education programs
BOCES Center for Career Development	Grant funded	FA	EDGE, HHA/CNA
BOCES Center for Career Development	Grant funded	FA, SN	Evenstart Family Literacy
Cornell Cooperative Extension		FS	FS Education program
Sullivan County Transportation	purchased service	FA, SN, FS	Transportation Services
Sullivan County Department of Community Services		TA, SN	Intensive Psychiatric Rehabilitation Treatment Program
SUNY University Center for Academic and Workforce Development		TA, 200%	ATTAIN Lab

Section 2.3 – Jobs Agreement

Jobs Program Services – Target Groups

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

Services		Target Groups	
Assessment/Employability Plan	_ <u>x</u> _	Applicants	_ <u>x</u> _
Supervised Job Search	_ <u>x</u> _	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	_ _ _
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., WTCMS data entry, case conferencing, job fairs etc.)

_____ WTCMS data entry;
 _____ Case Conferencing

Jobs Program Staffing and Location (Address)

Number of Jobs staff **1**

Locations

- | | |
|-----------------------------------|---------------------------------------|
| 1. Sullivan Works One Stop Center | 50 North Street, Monticello, NY 12701 |
| 2. | _____ |
| 3. | _____ |

Jobs Program LDSS Staff Contact (Name & Phone Number)

_____ Janet Scherf, 845-292-0100 x 2336 _____

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:

The district's definition of "Engaged in Work" for employable customers shall include the activities listed below. All activities will be identified in the Individual Employment Plan (IEP) and are developed based on the results of objective assessment, work history, skill and education levels, career and life goals, and where possible, the preferences of the customer.

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.

- a. Even Start Program and GED programs offered through BOCES Adult Family and Literacy Center.
- b. Intensive Psychiatric and Rehabilitative Treatment (IPRT) that provides full time intensive, goal oriented programs for individuals diagnosed with mental illness.
- c. In cases where a customer is limited due to health problems, the number of hours he/she will be engaged in work will be dependent upon their ability to participate as defined and documented by a licensed medical professional.
- d. ATTAIN Lab activities

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.

1. The strong message of the importance and value of work versus welfare and how work is key to achieving their goals and the goals they have for their families.
2. An understanding of their responsibilities and obligations related to compliance and the subsequent consequences and procedures. This will also address the time limit for receipt of benefits.
3. The services that are now available to them through the One Stop Career Center and that these services are available to them as they move off of welfare and grow their income.

4. Referrals to other One Stop system partner agencies and community service providers.
5. For individuals that have been identified as homeless, they will be provided information on laws, landlord and tenant expectations and rights, how to be a good tenant and how to effectively seek housing and secure a lease.
6. For individuals in need of childcare, a representative from the Child Care Council is there to provide referrals.

Center for Workforce Development conducts weekly orientations. Should the employment status change, a new referral is made for orientation and assessment with CWD.

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.

Orientations are conducted a minimum of once per week. Orientation is conducted in a group setting followed immediately by individual assessment and employability planning. Orientation and Assessment appointment is scheduled at the time of application and/or recertification.

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:

1. Identification of available childcare and modes of transportation.
2. Initial phase of job development which will include screening for possible OJT/Employer referral.
3. Formal referral to the Jobs Program staff for supervised job search activities.
4. Screening for the need for work readiness skill development.
5. Determination of the impact that employment income will have on a budget.

b. The District uses the CMS Assessment and employability plan. Additional assessment tool(s) used by the district is (are):

- TABE locator (Spanish and English)
- Full TABE
- ATTAIN lab instruments
- Interest surveys
- Career Zone

- Washington State Learning Disabilities Screening Tool

- 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 employee charged with administering the assessment tool(s) at a minimum will have an Associate degree with two years experience evaluating education and vocational levels of customers.

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

The Sullivan County Center for Workforce Development and UCAWD ATTAIN Lab will be responsible for conducting employment related assessments

- 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:

No assessment is required.

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:

- The customers skills and education levels; basic skill proficiency, work history, prior training, vocational interests and current family situation.
- When appropriate the availability of scholarships and grants.

- c. Customer's medical condition(s), if any, and any associated work limitations.
 - d. Plans for back up childcare and transportation. Plans should include steps for long term solutions to these issues.
 - e. Long term plan of action to achieve self sufficiency that includes reduction in reliance on government assistance. Goals should reflect steps needed to be taken after moving off of TANF and/or Safety Net.
 - f. The employment shall be explained to the customer and the customer shall receive a copy of the plan. In addition, all changes shall be mutually agreed upon, signed off on and the customer will receive a copy of any plan changes.
 - g. Referral, if appropriate to the Collaborative Employment Project.
- b. The district administrative unit or contractor that develops employability plans is (list only if different from those performing assessments):
- N/A
- c. The qualifications of the employees developing employability plans are (list only if different from the requirements for those performing assessments):

N/A

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

Non exempts are sent to Center for Workforce Development for Orientation and Assessment and they are placed immediately in an activity. The time frame to be sent for orientation is approximately 2 weeks. Upon completion of the orientation process non-exempts are placed in a countable activity. The time period is governed by the activities that they have been placed in. CWD staff is contracted to monitor the participation rates and the activity engagement.

If an individual has an open case and the status changes from exempt to non-exempt they are referred to CWD within two weeks of the status change. They will, at orientation, be placed in appropriate activities within a week. Although child care, transportation and medical limitations can make that engagement in activities two weeks in length.

The districts weekly standard participation requirement for the various case and household types is as follows:

- Households with no children under six years of age: 35 hours
- Single caretaker with a child under one: 20 hours
- Single caretaker with a child under six: 35 hours
- Two parent households: 35 hours each
- Safety Net households: 35 hours




The CWD TANF Program Supervisor monitors participation and engagement via COGNOS and WTW CMS reports and listings.

- 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.
				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><input checked="" type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>	<p><input checked="" type="checkbox"/></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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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	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>

<input checked="" type="checkbox"/>		<p>Job Readiness Training (JRT)</p>	<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>
<input checked="" type="checkbox"/>		<p>Vocational Education</p>	<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>☒</p>	<p>☒</p>	<p>☒</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>☒</p>	<p>☒</p>	<p>☒</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"/>	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.	
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	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.

TA applicant job search is conducted by the Center for Workforce Development and the One Stop. The job search booklets, number of contacts and time frames are determined by the representative in the One Stop. The applicant is required to report back to the One Stop in the prescribed time frame.

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.

As above this is contracted to the One Stop. The determination is made at the time the recipient sees the One Stop representative. The representative determines the length of time, the hours and the time frames to return the job search outcomes. As a general rule the individual is required to make 12 contacts weekly, and participate for up to 30 hours weekly. Hours/Contacts assigned may fluctuate depending on case circumstances. Jobs Staff reviews, monitors and tracks participants on a weekly basis in partnership with CWD program supervisor.

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.

The District contracts with the Center for Workforce Development (CWD) for Job Development services including OJT opportunities. The CWD Supervisor refers appropriate job ready clients to the Job Developer who regularly meets with the Supervisor to review job leads.

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 Department of Family Services contracts with the Center for Workforce Development (CWD). All applicants are sent to CWD for an assessment. At the assessment a plan is completed. During this planning a determination is made with regard to programs that the individual may be interested in. Programs are established based on a number of factors: i.e. education level, interest in the program, cost appropriate, job availability as well as job retention.

- 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:

As above a plan is completed with the individual to determine the best program for that person. This is established using various testing methods i.e. TABE, GED, etc.

- 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.

Sullivan County is using the ATTAIN Lab as a resource for individuals to gain skills in a number of areas. By increasing the individual's skill level this will enable them to obtain and maintain employment.

The ATTAIN lab has computer programs available to improve job skills.

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

Sullivan County has on staff an individual who does all contract monitoring. Should there be no contract with the agency another staff person has been assigned to make spot checks of the program to insure that it is meeting the necessary criteria.

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

Sullivan County is a rural area with limited education and training providers. The local community college and the local BOCES adult center are the main training providers. Information about approved training providers and programs are discussed during the development of the Individual Employment Plan. TANF recipients can access brochures, flyers and can schedule an appointment to meet with representatives from the training providers through the One Stop Career Center. Upcoming training and job opportunities are made available at the orientation.

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

In order to be assigned to education/training activities, participants must meet the following requirements:

- i. Assessment results must meet the requirements for the education/training program.
- ii. Chosen program must enhance the achievement of goals set forth in the Individual Employment Plan.
- iii. Customer must be found suitable for the training activity.
- iv. Chosen training activity must be in a demand occupation.

- v. The customer cannot have a history of repetitive failure of participation and completion of approved DFS sponsored training.
 - vi. Customer must not be in default status with a student loan if referred for financial aid eligible programs.
- g. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

Approval of work activities are done primarily face to face during orientation and follow up meetings with the Specialists and/or Job Developer. The customer and staff develop the Individual Employment Plan and when training or educational program are identified, a Tuition Approval form is completed. The training program must lead to skill development for a demand occupation. The Tuition Approval form list the following information:

- Name of service provider
- Length of training
- Course of study
- Length of training
- Hours and days per week
- Associated costs including child care and transportation
- Tuition, books, fees and supplies

The Specialist and customer meet periodically to update the IEP. Any changes are noted and when necessary an approval form is completed. Customers sign off on all documents and receive copies. A copy is forwarded to Family Services for placement in the customers file. Changes may also be made through phone contact when necessary.

- 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.

[X] 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:

Agency does school verification to insure school attendance. If the student is not attending the worker does follow up with the recipient and if necessary makes referral for other alternatives.

- 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:

Medical documentation is requested and based on the information received; the agency determines client's ability to perform work activity. This information is shared with the CWD who ensures that the recipient's limitations are accommodated. Any limitations or restrictions that participant has are relayed to the work assignment supervisor and or training provider in writing. No disclosures of medical conditions are released without written permission from the participant.

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):

Sullivan County will perform a random sample of 5 cases per quarter for paid work activities. Both the temporary 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 case file to support the hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

Sullivan County will perform a random sample of 5 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 the documentation of actual of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

Sullivan 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 full time 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.

Sullivan 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.

Sullivan County will perform a random sample of 5 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. 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.

Sullivan 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):

While reviewing work eligible cases for district worker collected documentation as per the review described above, the designated district staff person will also review all provider collected documentation and data entry. All cases selected for the review above will also be reviewed for provider documentation and data entry. The providers will be requested to provide their documentation for each case reviewed.

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 verification as provided by a licensed medical practitioner. Upon receipt of the medical from the medical provider, the determination is based on the medical and what, if any rehabilitation has been recommended. We do have a contracted provider should we feel that a second opinion is needed. The examiner assures code changes and CWD referral is made for the placement in activities.

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

Medical verification. The treatment provider has the responsibility for developing a treatment plan and making the appropriate referral recommendation.

- 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.

Medical verification from treatment facility. The treatment facility provides a progress report to the worker on a monthly basis or less. The treatment drives the time frame for the progress reports.

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.

Several years ago the district established the Accountability for Sanctioned Adults program which works with sanctioned persons to get them into compliance. The district also has applied for and been approved for the Intensive Case Management Services grant. With this grant we will be able to place more emphasis on those persons who are failing to participate in work activities.

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:

As mentioned in Section 3.9 the district has developed the Accountability for Sanctioned Adults (ASA) program to assist in getting the sanctioned adults into countable work activities or employment. We are also using the Intensive Case Management grant to reduce some of the barriers that prevent participation.

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

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

Section 3.11 Diversion Strategies

District has no specific diversion strategies.

District's diversion strategies are described below:

The district assesses each case for possible diversion from continued public assistance. The district will provide as diversion payments including the following but not limited to:

Auto insurance payments

Auto repairs/fuel

One time rental, fuel, electric payment

Clothing/shoes assistance to maintain or obtain employment

Public transportation

The criteria for providing these services are prescribed in the Social Service regulation and Employment Regulations.

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:

Transportation is provided as needed using the most cost effective mode to ensure that applicants/recipients attend orientation, assessment and work activities. This may include:

Travel allowance – mileage/gas for work related activities at current county mileage rate of 50 1/2 cents per mile.

Purchase of bus tickets

Van transportation

Taxi cabs

\$50 fee for vehicle repair estimate

- 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): Sullivan County currently provides the necessary reimbursement to assure that the participants get to and from the work activity. We provide gasoline vouchers, mileage reimbursement up to county mileage rates or flat dollar amount as calculated by mileage needed to travel and vehicle used), bus tickets, cab fares. This is determined at the time the work activity is assigned.

- 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:

Sullivan County is a rural county and many of the participants do not have any form of public transportation available. As stated above agency will provide the necessary means to get the participants to the assigned work activity. In some instance it is necessary for the participant to walk to meet public transportation, should this occur and no day care is needed, the district would set a ½ mile max to meet that transportation. In all instances, individuals with limitations would be accommodated.

- 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. Fees related to employment and/or vocational certification.
2. Driver training/driver license to improve employability
3. Referral to Wheels for Work car loan program, when appropriate
4. Uniforms as required.
5. Appropriate clothing for job interviews, on the job when required specifically by employer or work site supervisor.
6. Vehicle repairs up to \$1,000 when repairs do not exceed the value of the vehicle.
7. Vehicle insurance up to \$1,000 when costs do not exceed value of the vehicle. Vehicle must be registered in customer's name.
8. Vehicle registration fees to improve employability.

- 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):

The majority of non-English individuals that access services have Spanish as their primary language. The Sullivan County Center for Workforce Development has two Spanish speaking Specialists. The One Stop Center also has InterpreTalk, a service that can provide access to interpretation services in over 70 languages.

[] 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:

Gasoline vouchers, car insurance, car repairs, bus tickets, cab fare, clothing and footwear. We will address any reasonable request to support job retention.

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.

The district will provide to individuals whose cases have been closed due to employment, the following supportive services for up to 90 days after case closing: Assistance with car insurance, vehicle repair, and any service necessary to prevent them returning to Public Assistance.

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.

- Car insurance payment not to exceed \$1000.00
- Vehicle repair not to exceed \$500.00
- Vehicle evaluation not to exceed \$50.00
- Purchase of necessary clothing to maintain employment i.e.: uniforms, work boots.
- Assistance to obtain driver's license if required by the employer or necessary to maintain employment.
- Child Care assistance through the Working Parent Child Care Fund

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:

Mileage cost to another for transportation, taxi, bus fares.

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

Car insurance not to exceed \$1000
Auto repair not to exceed \$1000
Car purchase not exceed \$1000
Job related expenses

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:

Non-compliance referral is generated by the Center for Workforce Development (CWD).

Referral is sent to Department of Family Services

Family Service staff sends a Conciliation Notice to the recipient.

FA recipient has 10 days to respond.

SN recipient has 7 days to respond.

If recipient does not respond a 10-day notice for Discontinue Benefits is sent.

If recipient contacts the agency a discussion takes place regarding reason for no-compliance.

The Family Services person designated to work with conciliation issues determines whether failure to comply was willful or without good cause.

If the issues are resolved at this point, the recipient is referred again to CWD.

The recipient must comply with employment requirements.

If there is no resolution to the non-compliance issue, a Discontinuance Notice is sent.

Sanction occurs.

The recipient than has the option to request a fair hearing.

The good cause/willfulness determination is made by:

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

If client contacts agency within the required timeframe, a determination will be made if the individual's non-compliance was willful and without good cause. Documentation will be requested in regard to illness within the family, a household emergency, childcares issues and any other issue that was beyond the household's control which prevented compliance. If good cause is determined the supervisor will contact the employment contractor to re-enroll the individual in an activity.

If the client has been determined non-compliant, the supervisor will refer to the examiner so that required sanction may be imposed.

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:

If a sanction is "until compliance", the individual will be referred back to the activity they were enrolled in and at the time of compliance the sanction is lifted. In the event of a durational sanction and the case remains open (generally cases with children) there are two procedures employed by the district. First, examiners utilize Anticipated Future Action Codes to identify when a sanction will conclude. At this time the non-complaint individual will be referred back to the employment contractor. Second, the employment contractor utilizes WTWCMS to identify sanctioned individuals. When the employment worker identifies an individual whose sanction is concluding and the examiner hasn't referred them back to the contractor, the CWD worker will call them in. If and when the compliance occurs and the durational period has ended the sanction will be lifted. By utilizing these two strategies the agency insures all clients have the opportunity to comply as soon as the sanction period has ended and participation in employment activities may occur.

In the event a case is closed due to a sanction (generally SNA clients) the examiner will send LDSS-4231, Option to End Your Sanction notice to the non-compliant individual. The district defines compliance as 1 week attendance in a work activity.

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)

Dispute resolution is offered to recipients who wish to challenge a work assignment.

The recipient has the option to meet with the appropriated Family Services staff and a mediator. The mediator is a designee of the county with direct responsibility for the FA/SN case. If the issue is not resolved, the recipient is offered the option of a Fair Hearing. Disputing a work assignment is not considered as "failing to comply". When the district determines that a client has a health limitation that must be accommodated and the client claims the work site is not accommodating the health-related limitation, the client is not required to perform tasks at the worksite that are in question until the district has determined that the limitation is being appropriately accommodated.

The worksite supervisor will be advised in writing of any limitation of the participant.

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 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:

TA eligibility worker reviews and determines status.

Family Services issues a Medical Evaluation form that must be completed and returned to the agency within 10 days. A licensed practitioner must complete the form. The form must document medical impairment or work limitations. If the form is not returned within the required time period, the public assistance application will be denied or the case will be closed.

If medical documentation is received, based on the findings of the medical providers, the district will determine the individual's work requirements based on the findings of the medical professional. Notification of Temporary Assistance Work Requirements Determination Non-Exempt or Exempt is issued based on the district's determination