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Eliot Spitzer
Governor

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

David A. Hansell
Commissioner

March 11, 2008

Mr. Jay LePage
Commissioner
Clinton County Department of Social Services
13 Durkee Street
Plattsburgh, New York 12901

Dear Commissioner LePage:

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
Kim Coryer
Keri Stark

bcc: S. Antos
D. Bloodstein

CLINTON COUNTY DEPARTMENT OF SOCIAL SERVICES

13 DURKEE STREET
PLATTSBURGH, NY 12901



TELEPHONE: (518)565-3300
FAX: (518)561-8101

JAY T. LePAGE
COMMISSIONER

February 21, 2008

Barbara C. Guinn, Director
Employment & Advancement Services
NYS Office of Temporary and Disability Assistance
40 North Pearl Street, 11th Floor
Albany, New York 12243

Dear Ms. Guinn:

The attached revised Employment Plan for Clinton County is submitted.

If you have any questions, please call me at (518) 565-3321.

Sincerely,


John Redden
Deputy Commissioner

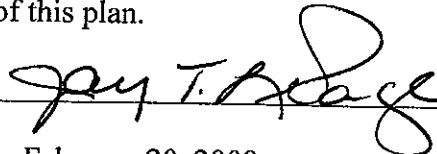
Cc: Keri Stark, Technical Advisor

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**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 Clinton 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 Clinton 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: February 20, 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.

Employment programs are administered by the Employment and Assistance Unit (E&A) and the Food Stamp/Medicaid Unit (FS/MA). E&A consists of 14 Social Welfare Examiners (SWE), four Senior SWEs and one Principle SWE. Three SWEs are assigned the responsibility to work with TA clients on an on-going basis, provide case management services, supportive services and monitor employment compliance. There are 16 SWEs, three Senior SWEs and one Principle SWE assigned to the FS/MA unit. All SWEs are responsible for employment activities. In addition, the Employment and Training Agency located at the local One-Stop conducts workshops, develop employment plans and assist individuals in obtaining/retaining employment.

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.

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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
CCETA	\$100,000	FFFS	FA, 200%, SN-families	Job Prep, Job Search, assessments, job placement
CCETA	\$9,000	FFFS	FA	Subsidized Employment
ETC	\$20,000	FFFS	FA	Mental Health Assessments to determine employability/services needed
	\$			
	\$			
	\$			
	\$			
	\$			
	\$			
Total	\$			

TABLE 2 – Other Service Providers

Provider	Funding Source(s) (if known)	Categories of Clients Served	Programs, Services or Activities Provided
VESID	NYSED	FA/200%	Work Prep/Voc Ed/training/case management/Job Development.
CV-Tech	EDGE	FA/200%/FS	GED prep/parenting skills/job placement/retention
OneWorkSource	WIA	FA/SN/FS/200%	Job Search/workshops/assessments/training/job placement
Literacy Vol		FA/FS/SN/200%	Literacy/English as a second language
Clinton Community Col	NYSED	FA/FS/SN/200%	Vocational Training, college prep
CV-Tech	NYSED	FA/FS/SN/200%	Vocational Training/Career Life Skills

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> </u>	Applicants	<u> X </u>
Supervised Job Search	<u> X </u>	TANF (inc. SN fam.)	<u> X </u>
Job Readiness Training	<u> X </u>	Safety Net Singles	<u> X </u>
Job Club	<u> </u>	Food Stamps	<u> X </u>
Job Placement Services	<u> X </u>	200% of Poverty	<u> X </u>
Grant Diversion	<u> </u>		
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.)

In addition, Jobs staff may be required to participate in case conferencing.

Jobs Program Staffing and Location (Address)

Number of Jobs staff 1.4

Locations

1. One full time assigned to DSS

2..4 assigned to OneWorkSource

3.

Jobs Program LDSS Staff Contact (Name & Phone Number)

John Redden, (518)565-3321

Carla Dubrey, (518)565-3364

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: Any person engaged/referred to any activity identified in this plan or their Employment Plan in order to meet Federal and State participation rates or an individual enrolled in a program to their capacity as documented by the medical review team that will lead to self-sufficiency. Participants may be required to participate in one or more activities in order to meet Federal and State participation rates. Individuals actively engaged in substance/mental health treatment will be considered engaged in work if treatment will lead to employability

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.

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.

Each new applicant/recipient will be advised of all services provided at the OneWorkSource (One-Stop) located in Plattsburgh NY. Each individual, if determined to be job ready, will be referred to the OTDA Jobs staff and the Employment and Training Agency and advised of their responsibility to cooperate with these agencies.

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 individually at Social Services by Social Welfare Examiners assigned to the Employment and Assistance Unit. Orientations are conducted the same when individuals recertify.

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:

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

The Department uses assessment/employability plans located on WTWCMS

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)

Social Welfare Examiner – Associate degree in Human Services or related field; high school diploma with two years of human services experience.

Employment and Training Counselor – Bachelor's Degree

Employment and Training Assistance – High School Diploma plus two years experience in employment and training or community action agency dealing with employment and training of economically disadvantaged, low income individuals

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

Clinton County Department of Social Services – Employment and Assistance Unit
Clinton County Employment and Training, if needed.

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:

Supportive service needs

Prior work experience and skills

Training and Vocational interests

Family circumstances as they relate to WTW participation
 Financial analysis
 Referral and coordination of services
 Identification of career interests/aptitudes
 Pre-employment/work maturity and job specific skill deficiencies

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

Applicants receiving emergency assistance with a non-exempt employment status are engaged in work experience and/or job search within a week of interview date. All other individuals with a non-exempt status are enrolled in an activity within two weeks from case opening date. Individuals enrolled in an activity must complete at a minimum of 35 hours per week. Two parent household receiving child care must perform at a minimum of 55 hours per week. Once an individual's status changes from exempt to non-exempt the period is usually one to two weeks before they become engaged in an activity. Happily sanctioned clients are required to attend an eligibility review once a month. Failure to attend results in case closing. In addition, home visits are conducted until individual is willing to comply. Staff monitors participation rates utilizing all available computer generated products.

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.
☒	☒	☒		Subsidized Public Sector Employment	Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient. 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.

X	X	X	X	<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>
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>

X	X	X		<p>Community Service</p>	<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	<p>Job Search</p>	<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	<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>
X	X	X	X	<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>☒</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>☒</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>

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.
X		X	X	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.

Upon initial contact, applicants are referred to the Jobs staff that are assigned to the local district. Jobs staff will work with applicant on identifying valid job openings and make the necessary referral. Applicants are required to contact at least 15 employers per week, 30 hours per week. Number of contacts may change due to amount of time required for each contact; however, applicants must participate at a minimum of 30 hours. Staff will meet with applicants weekly in order to verify job contacts/hours. Verification of job contacts will be conducted by either DSS staff, Jobs staff or staff at the local one-stop.

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.

Upon determining a recipient is job ready the Employment SWE meets with the individual and explains all Job Search requirements and what is expected of the individual. Recipients are required to contact at a minimum of 15 employers per week, 30 hours per week. Number of contacts may change due to amount of time required for each contact; however, recipients must participate at a minimum of 30 hours. Staff will meet with recipients weekly in order to verify job contacts/hours. Verification of contacts will be conducted by either DSS staff, Jobs staff or staff at the local one-stop

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:

Jobs Staff coordinate Job Development with Employment and Training staff assigned to the local one-stop

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:

Employment Social Welfare Examiners refer individuals to appropriate work activities based on the assessment. The District has Memorandum of Understandings with CV-Tech for GED (EDGE) and Adult Basic Education, Literacy Volunteers, Behavioral Health Services North, North Country Center for Independence, and VESID. The Districts contract agency for Job Readiness Training (Employment and Training) makes appropriate referrals to these agencies based on outcome of JRT.

- 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:

Employment Social Welfare Examiners will discuss appropriate training programs with the client based on the assessment. The District utilizes trainers that are approved by the local one-stop (WIA). The District has/requires an MOU for each provider.

- 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.

The District will review with individuals every 3-6 months on what type of training programs are available, if appropriate for the individual. The District contracts with the Employment and Training Agency (ETA) located at the local one-stop for services covered under WIA. ETA provides JRT services and makes appropriate referrals to VESID, EDGE or CV-Tech based on progress/goals made in JRT. Goal of the District is to increase enrollments by 15 individuals.

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

- Each provider must submit a written description of their proposed training to the Department. The description of the program must include the requirements for satisfactory progress. Catalogs which contain the necessary information will be accepted in lieu of a written narrative.
- The Principle Social Welfare Examiner or Senior Social Welfare Examiner will review each new program to assure that it complies with federal and state regulations and the local Employment Plan. The program must enhance a participant's opportunity to obtain unsubsidized employment, either on its own merits or as part of a comprehensive plan.
- Following the review a letter will be sent to the provider notifying them whether or not the training program has been approved. In cases where the program outline is disapproved, the provider will be advised of their right to request a meeting to review the reasons for disapproval.
- The Department will also evaluate providers past performance.

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

Each participant/applicant will be advised of approved WIA training providers during an Employment Assessment/Orientation, if appropriate.

- f. Participants must meet the following requirements in order to be assigned to education/training activities:
- An Employment Plan must be completed prior to enrollment into a training program.
 - Each participant must possess at a minimum a GED if pursuing a degree program or a certificate program that could lead to a degree program.
 - Exempt teens that do not adhere to the school district's attendance policy will lose their exempt status.
 - The district must approve any training program and must determine that completion of said program will/should result in sustainable employment.
 - Each participant/applicant will have an Employment Assessment/Orientation conducted by District staff or staff from Employment and Training.
 - Clients past performance in work activities will be reviewed in order to make a decision on approving a request for education/training.
- g. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

Each participant/applicant will be notified at the conclusion of their Employment Assessment/Orientation conducted by District staff or staff from Employment and Training. Individuals will be given a copy of assigned activities in which they must participate in order to become self sufficient.

- 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:

District will follow/adhere to the school attendance policy. Time sheets are 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:

Limitations are documented by a medical review team based on medical documentation provided. Worksites are notified, in writing of the individual's limitation. Individuals are notified of the site assignment and advised if they do not agree with the assignment to notify the Social Welfare Examiner. In addition, individuals are advised to contact their SWE if the worksite is not adhering to the documented limitations.

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 WTWCMS, 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):

Time Sheets/attendance sheets/pay stubs/documentation, are received by a clerk assigned to the Employment Unit and updated into WTW CMS. Once updated, all documentation forwarded to Employment Social Welfare Examiners (SWE) for review/verification of compliance. Once verified, all documentation is scanned into an electronic case file that is maintained locally. Provider agencies notify the District when individuals do not comply with work requirements. All wage data is forwarded to the Employment SWE. Employment SWE verifies data in WTW CMS with hours budgeted in PA budget. Wages are verified at recertification—TA requirements are followed. A random review of 5 cases per quarter will be conducted to ensure that pay stubs, employer verification forms or any employer correspondence is properly documented and recorded. The review will ensure the hours of employment on the ABEL budget is consistent with documentation on file and the hours reported on WTW CMS.

The medical review team reviews all documentation for individuals exempt from work requirements due to a disabled household member (Employment Code 38). The Senior SWE assigned to the Employment and Assistance Unit will perform a random sample of 5 cases per quarter to ensure there is medical documentation in the case file that supports the exemption, timeframe for the exemption and the individual is the appropriate caretaker. A review of WTW CMS to ensure all data is accurate will be accomplished.

The Senior SWE will conduct a random review of 10 individuals not fully participating/exempt each quarter to determine if appropriate. The review will ensure that the reason for the exemption is valid, documentation on file and WTW CMS reflects appropriate/accurate data.

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 are advised that they must submit all attendance documentation to the Employment Unit each month. Employment and Training is the only provider authorized to update WTW CMS. All attendance documentation will be forwarded to the Employment Unit each month to verify accuracy of WTW CMS. Employment and Training staff will monitor each provider/worksites at least once a year in order to validate attendance reporting. Employment staff will contact providers as problems occur in order to correct such problems.

A random sample of 15 employment case file per quarter will be reviewed. Review will ensure that the monthly attendance sheet reporting actual hours has been updated correctly in WTW CMS, excused absences and holiday time are reported and documented correctly and reported on WTW CMS in accordance with federal limitations.

The Senior SWE will perform a random review of 5 cases per quarter for cases coded employability code 31-caretaker of a child under the age of 12 months. Review will be done to ensure that a valid birth certificate is on file and the child is still less than a year old.

All reviews will be documented and a report forwarded to the Office of Temporary and Disability Assistance.

The District will ensure that individuals participating in activities are in fact participating and the activity meets State and local work definitions. This will be accomplished through random sampling of cases, review of approved activities.

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.):

The medical review team, which consists of the Deputy Commissioner, a Senior Social Welfare Examiner and a Public Health Nurse, makes a determination based on medical documentation provided by service agencies, Social Welfare Examiners, medical specialists or Primary Health Care Providers. Based on all available information individuals are referred to appropriate treatment or if determined that treatment will not lead to employability the individual is referred to Disabled Client Assistance Program (DCAP).

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

Based on medical documentation and input from service providers a treatment plan is developed. Based on all available information a SWE meets with the individual to discuss the plan. Staff provides the individuals with a referral to the appropriate service provider.

- 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.:

The District has agreements with each service provider. The provider forwards an update/evaluation to the individual's worker on a monthly basis unless the individual is non-compliant at which time the service provider notifies the worker. If problems arise the client is notified for an explanation

Section 3.9 Strategies/Procedures for Increasing Program Attendance

Describe district policies and/or procedures in place to reduce the amount of time participants fail to participate in work activities, including absences that are with good cause.

The District will conciliate individuals as soon as the District is made aware of an individual's failure to participate. The supervisor of the Employment Unit (Senior Social Welfare Examiner) will identify individuals who fail to participate in work activities and arrange for a home visit by a Social Welfare Examiner to determine barriers that prevent the individual from participating, what services are available to overcome the barriers, and the consequences of not complying with work requirements.

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:

- Staff contacts the sanctioned individual and schedules an employment review/interview to discuss why the individual was sanctioned and what actions must be taken to correct the problem
- Individuals who fail to correct the problem are scheduled every three months for an eligibility review to determine how basic needs are met based on a reduced grant.
- Home visits are conducted at least quarterly to identify additional barriers and what support services may be provided to remove barriers.

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

Upon completion of a durational sanction individuals are scheduled for an employment interview and assigned to an appropriate work activity.

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

- Individuals are scheduled every three months for an employment review. Employment worker discusses strategies on removing the sanction or becoming self sufficient
- Home visits are conducted to determine barriers

Section 3.11 Diversion Strategies

District has no specific diversion strategies.

District's diversion strategies are described below:

During the initial contact with the local District staff determine if any supportive services will assist the individual in maintaining employment. If services such as car repairs, insurance, etc will keep individuals employed the Social Welfare Examiner will authorize payment.

If supportive services will not assist the individual an interview will be scheduled. Applicants will be required to contact five employers that have job openings. Social Welfare Examiners will provide the applicant with name/location of employer. Applicants will be required to show proof that they applied for employment before an interview.

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 allowance for actual expense (AAA rate), CART rate reimbursement or CART tokens, gas coupons
- Clothing /uniform allowance not to exceed \$100.00
- Licensing fees
- Hygiene items for non-cash recipients, if needed, not to exceed \$20.00
- Relocation assistance to include security deposit in order to overcome remoteness/transportation problems
- Car repair, not to exceed \$900.00 and car insurance not to exceed \$400.00 or three months.
- Tools and equipment
- Legal services in order to overcome legal barriers to employment. Legal services will be provided by North Country Legal Services or The Rural Law Center. Services may include assistance with tenant/landlord disputes, bad credit, DMV issues, etc.

All services will be provided to participants on a case-by-case basis.

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):

- CART Tokens
- Gas coupons
- Mileage reimbursement for actual expense (AAA rate)
- Referral to Wheels-to-Work program.
- Car repair/car insurance

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:

District staff will attempt to assign individuals to a work experience site as close to the individual's residence. Staff will discuss possible relocation assistance to include security deposit, moving expenses. Individuals will be required to walk no more than

two miles to a work site or public transportation access. District staff will discuss reimbursement options for transportation to include referral to the Wheels-to-Work program.

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:

- Car insurance not to exceed \$400.00
- Car repairs not to exceed \$900.00
- Assistance with Drug/Alcohol outpatient services
- Tools and equipment
- Gas coupons
- Hygiene products
- Clothing/uniform assistance not to exceed \$100.00
- Transportation assistance for actual expenses (AAA rate)
- Housing assistance

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):

[x] 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:

- Car insurance not to exceed \$400.00
- Car repairs not to exceed \$900.00
- Assistance with Drug/Alcohol outpatient services
- Tools and equipment
- Gas coupons
- Clothing/uniform assistance not to exceed \$100.00
- Transportation assistance for actual expenses (AAA rate)
- First months rent not to exceed \$500.00
- Case management services
- Job Related training

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.

- Car insurance not to exceed \$400.00
- Car repairs not to exceed \$900.00
- Assistance with Drug/Alcohol outpatient services
- Tools and equipment
- Gas coupons
- Hygiene products
- Clothing/uniform assistance not to exceed \$100.00
- Transportation assistance for actual expenses (AAA rate)
- First months rent not to exceed \$500.00
- Case management services

Services will be determined on a case-by-case basis

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 not to exceed \$400.00
- Car repairs not to exceed \$900.00
- Assistance with Drug/Alcohol outpatient services
- Tools and equipment
- Gas coupons
- Hygiene products
- Clothing/uniform assistance not to exceed \$100.00
- Transportation assistance for actual expenses (AAA rate)
- First months rent not to exceed \$500.00
- Case management services
- Vocational training with an approved WIA training agency

Services will be determined on a case-by-case basis

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:

- CART Tokens
- Gas coupons
- Mileage reimbursement for actual expense (AAA rate)
- Referral to Wheels-to-Work program.
- Car repair/car insurance

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

- Car insurance not to exceed \$400.00
- Car repairs not to exceed \$900.00
- Assistance with Drug/Alcohol outpatient services
- Tools and equipment
- Gas coupons
- Hygiene products
- Clothing/uniform assistance not to exceed \$100.00
- Transportation assistance for actual expenses (AAA rate)
- Housing assistance
- Vocational training with an approved WIA training agency

Services will be provided on a case-by-case basis

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 (if unable to attend in person)
- by mail, etc.
- other as described below:

The good cause/willfulness determination is made by:

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

Three Senior Social Welfare Examiners reviews the individual's explanation and determines if good cause is appropriate.

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:

An Employment worker meets with the individual and explains all requirements in order to end the employment sanction. If the individual is willing to comply a referral is made to the appropriate work activity. Once verification is received that the individual did in fact show up to the assigned work activity on the first day scheduled then the sanction is removed. The sanction will not be removed by signing a willing to comply statement.

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)

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:

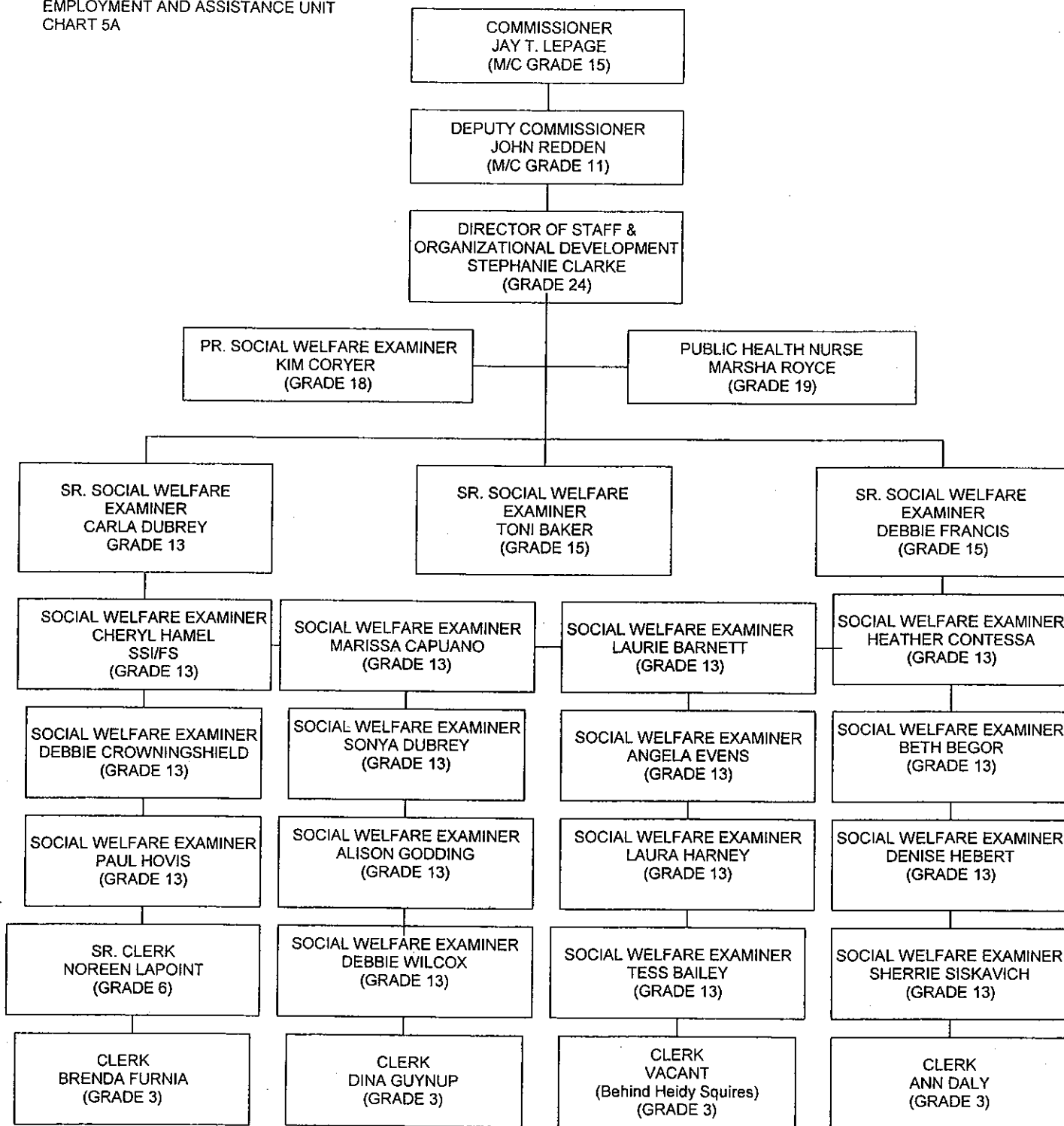
- District participates in the OTDA managed contract for independent medical evaluations.
- District contracts directly with a physician to provide independent medical evaluations.
- District accepts physician's statement provided by participant.
- District accepts physician's statement provided by participant 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:

Upon return of the DSS 4526, the Medical Review Team (consisting of the Deputy Commissioner, a Registered Nurse in charge of DCAP and a Senior Social Welfare Examiner) meets to review the case and make a determination on employability. If the client disputes the medical determination, the client is advised of his/her rights.

CLINTON COUNTY DEPARTMENT OF SOCIAL SERVICES
 EMPLOYMENT AND ASSISTANCE UNIT
 CHART 5A



CLINTON COUNTY DEPARTMENT OF
SOCIAL SERVICES
FS/MA
CHART 5B

