

RECEIVED MAR 4 - 2008



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

Eliot Spitzer
Governor

David A. Hansell
Commissioner

February 28, 2008

James Davis
Commissioner
St. Lawrence County Department of Social Services
6 Judson Street
Canton, New York 13617

Dear Commissioner Davis:

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,

A handwritten signature in black ink, appearing to read 'RSY', written over a horizontal line.

Russell Sykes
Deputy Commissioner
Center for Employment and Economic Supports

Enclosure

cc: Barbara Guinn
John Manson
Kelly Friot
Jerrod Ogden

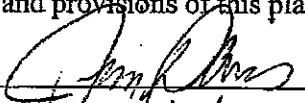
"providing temporary assistance for permanent change"

bcc: S. Antos
D. Bloodstein

**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 St. Lawrence 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 the St. Lawrence 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 2/4/08

Section 2 Administration

Section 2.1 Administrative Structure

This agency's organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district's employment program.

Following is a description of the office(s) in and/or outside of the Department of Social Services that are involved in the operation of the district's employment program. The responsibilities of each office are described below.

The responsibilities of the Commissioner and Deputy Commissioner are self-explanatory. The Accounting office processes payment of all validated childcare requests, and serves as the fiscal office for the District. Karen Dupree is responsible for the direct supervision of the Employment Unit supervisors. Kelly Friot and John Manson are responsible for the supervision of Employment Unit staff and the day to day operation of the Unit. Employment Unit staff are responsible for the day to day services and support service delivery to DSS applicants and recipients. There are no outside operators. The total number of full time employees of the local Department of Social Services is 247.

Section 2.2 TA and FSET Provider Agencies

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

exempt individuals with the potential for restoration to self-sufficiency, job development, job placement and retention services, and other employment related activities.

Each contract listed in Table 1 contains an assurance that the activities are not otherwise available from that provider on a non-reimbursable basis and, if not a performance-based contract, a statement regarding use of a cost allocation methodology that satisfies Generally Accepted Accounting Principles, as well as the requirements of U.S. Office of Management and Budget Circulars A-122 for nonprofit organizations, A-21 for educational institutions, or A-87 for State and local governments.

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

TABLE 1 - Contracts Associated with Employment Programs and Services

Provider	Total Contract Cost (per yr.)	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
	\$			
	\$			
	\$			
	\$			
	\$			
	\$			
	\$			
	\$			
	\$			
Total	\$			

TABLE 2 – Other Service Providers

Provider	Funding Source(s) (if known)	Categories of Clients Served	Programs, Services or Activities Provided
SLL BOCES	BOCES	FA, SN-MOE, SN NON-MOE, FSET	EDUCATIONAL TRAINING
VESID	VESID	FA, SN - MOE, SN NON-MOE, FSET	ASSESSMENT, CAREER PLANNING, JOB SEARCH, PLACEMENT, JOB COACHES, VOCATIONAL TRAINING, SUPPORT SERVICES
DOL	DOL	FA, SN - MOE, SN NON-MOE, FSET	JOB LISTINGS
SLC OED	SLC OED	FA, SN - MOE, SN NON-MOE, FSET	CAREER PLANNING, JOB SEARCH AND PLACEMENT

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	<u>X</u>	Safety Net Singles	<u>X</u>
Job Club	<u>X</u>	Food Stamps	<u>X</u>
Job Placement Services	<u>X</u>	200% of Poverty	<u> </u>
Grant Diversion	<u>X</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.)

Provide bi-weekly client statistical reports and monthly employer contact statistical reports. Provide "front door" services to new applicants. Provide services in "the field" to applicants and recipients. Resume creation in conjunction with clients. Case conferencing with DSS examiners and employment counselors.

Jobs Program Staffing and Location (Address)

Number of Jobs staff 2

Locations

1.CANTON ONE STOP CAREER CENTER	GOUVERNEUR BOCES
1 STAFF PERSON 5 DAYS/WEEK	1 STAFF PERSON – 1 DAY/WEEK
2.OGDENSBURG BOCES	MASSENA DOL
1 STAFF PERSON 2 DAYS/WEEK	1 STAFF PERSON – 1 DAY/WEEK
3.NORWOOD BOCES	
1 STAFF PERSON – 1 DAY/WEEK	

Jobs Program LDSS Staff Contact (Name & Phone Number)

KELLY FRIOT 315-386-3276 EXT.

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Section 3 Engagement and Work Preparation

Section 3.1 Federal "Engaged in Work" Requirement (Reference 18 NYCRR 385.2 (f))

For purposes of satisfying the federal requirement which states that parents or caretakers must be engaged in work as soon the district determines they are ready, but no later than within 24 months of receiving federally funded assistance, the district's definition of "Engaged in Work" is:

Compliance with assessment, employment planning, and 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.

The district will also provide information about the new child care in lieu of TA receipt. This is done at the applicant eligibility interview.

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.

A combination of both methods may be used as deemed necessary by the E&T Counselor. Group orientations are done for identified non-exempt applicants. Individual orientations are done for those individual applicants contesting employability or considered to be exempt. At the time of re-determination for Public Assistance and Food Stamps; the appropriate employment counselor has already established a working relationship with both exempt and non-exempt recipients. Available support services and allowable activities are communicated to the recipient on an ongoing basis.

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):

PHYSICAL AND MENTAL HEALTH EVALUATIONS, IQ TESTING - DONE LOCALLY AND THROUGH IMA. THIS IS IN CONJUNCTION WITH THE CMS ASSESSMENT OVERVIEW AND ACCOMPANYING FIELDS.

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)

Assessments are conducted in conjunction with the client by an E&T counselor. All have been found eligible and have taken the prescribed NYS Civil Service Exam.

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

ST. LAWRENCE COUNTY DSS EMPLOYMENT UNIT

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

Yes No

Applicants in households without dependent children are required to participate:

Yes No

Food Stamps Assessment

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

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

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

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

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

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

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

The district uses the CMS EP exclusively.

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

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

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

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

The District engages clients directly upon day of application. This process enhances counselor/client problem solving of such issues as childcare and transportation, etc. We also inform individuals of the need to document alleged disabilities, as well as our ability to refer them to mental health and medical specialists for evaluation when none has been done. In cooperation with their E&T counselor, referrals to appropriate activities take place after completion of their EP. Personal barriers possessed by our TANF and SN-MOE population oftentimes prevent this from happening. This process is also used when exempt recipients are about to become non-exempt. Input of the CMS is used to show client service and referrals. A TANF/SN-MOE recipient with an employability code of 29 is required to do a minimum of 20 hours of core activity with enrollment in other activities when appropriate. Other non-core activities may be assigned as appropriate. A TANF/SN-MOE recipient with an employability code of 20 is required to do a minimum of 20 hours of core activity with more assigned if the budget allows. Ten (10) or more hours of non-core activities are assigned as necessary. In both cases the “deeming” provision is recognized with appropriate non-core activities assigned, as needed.

A SN NON-MOE recipient is required to participate in work activities. A SN NON-MOE non-exempt recipient, who is not work-limited, will be required to participate for a total of 35 hours weekly. Work-limited non-exempt SN Non-MOE recipients will be required to participate in

accordance with accommodation to their employment limitations. Exempt SN NON-MOE recipients will be required to participate in treatment plans and other activities as specified by a physician, mental health professional, or the legal system. This public assistance population is engaged upon the day of application.

Cognos reports are used extensively in the monitoring process. The advent of various Current Reports on Cognos has enabled us to be more timely and accurate in determining our position with respect to work participation requirements.

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

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

FA	SNF	SNA	FS	Activity	Definition
X	X	X	X	Unsubsidized Employment	Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self employment and/or paid internships.
X	X	X	X	Subsidized Private Sector Employment	Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized private sector employment will include positions subsidized through grant diversion, supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.

X	X	X	X	Subsidized Public Sector Employment	<p>Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient. Subsidized public sector employment will include positions subsidized through grant diversion, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
X	X	X	X	Work Experience	<p>Unpaid work performed at a public or not for profit organization to enable participants who cannot find unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire the general skills, training, knowledge and work habits necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships will be reported as employment.)</p>

X	X	X	<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 may be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment due to the fact that the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
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X	X	X	X	Community Service	<p>A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community Service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, Americorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
X	X	X	X	Job Search	<p>The act of seeking or obtaining employment or preparing to seek or obtain employment and will include looking for suitable job openings in a group or individual setting, making contact with potential employers, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, preparing to or applying for and/or interviewing for jobs and related activities.</p>

X	X	X	X	Job Readiness Training (JRT)	Participation in programs that include seeking and preparing for work. Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, <u>life skills essential to workplace success</u> , time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.
X	X	X	X	Vocational Education	Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training other than a baccalaureate or advanced degree. Vocational education does not generally include basic or remedial education or ESL but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SN MOE client, is determined necessary by the program provider, and is limited in hours to less than one-half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.

X	X	X	X	Job Skills Training	<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>
X	X	X	X	Education Training	<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	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	

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.

As outlined in 3.4(a), the District engages applicants during the day of application. Non- Exempt TA clients are placed in an immediate job search. There is a minimum five (5) employer contacts requirement prior to their next appointment which is scheduled within the next week. Contacts are reviewed at the ensuing meetings, which occur weekly until the applicant becomes an active recipient.

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.

Recipients are referred to opportunities as they arise and are given OJT solicitation cards to use while independently looking for employment.

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:

There are 8 E&T counselors who job develop in the following manner:

- a. Coordinate with local WIA partner staff to receive job listings and knowledge of referrals for mutual clients.
- b. Referral of clients to job fairs and specific employer outreach days.
- c. Specific personal and/or telephone contacts for individual clients.

This is done on an ongoing basis with no specific timeframes.

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 work in coordination with E&T counselors in various areas of the county to enhance job entry possibilities for our clients.

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:

Applicants who indicate less than a H.S. education or GED attainment are automatically referred to the SLLBOCES recruiter to gain access to the various centers to work on literacy or their GED.

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

The DSS Employment Unit is co-located with the various SLLBOCES training centers throughout the county. Thus we receive first hand information on upcoming vocational education and job skills training opportunities. Local 2-yr. post-secondary training opportunities are known since they are a WIA partner here at the One Stop Career Center. Client needs for attainment of long term employment goals drive their potential access to such opportunities.

- 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.

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.

We have requested that the SLLBOCES create and propose new vocational training and job skills training opportunities for our clients. Two year post secondary availability will be increased and more readily facilitated. This new emphasis should increase our numbers in such activities for our clients.

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

Documented effectiveness of training either by obtaining summary of classroom training records or demonstrated effectiveness through positive outcomes such as job placement and enhanced skills for the workplace.

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

This is done during orientation and as necessary throughout case management.

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

Training may be approved by a DSS Employment Unit Supervisor upon recommendation of an E&T counselor who has consulted with the particular client requesting the training. Partner staff working with a mutual client may recommend such activities also. Client aptitude, record of previous success in other programs, and local demand of employers are factors when considering the request.

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

CMS letter of enrollment or in person and noted in client notes.

- h. In accordance with 18 NYCRR 385.9 (b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as check below:

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

A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector

The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.

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

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

The student has previously enrolled in a work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.

Additional reasons as stated below:

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

The individual student's attendance is checked and verified on a monthly basis through contact with the appropriate school's Guidance Office by a SLLBOCES liaison collocated with this Unit at the Canton One Stop Career Center.

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

The E&T counselor advises the work site about client work limitations. Client feedback is also used to monitor site adherence to accommodating the limitation(s).

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):

Subsidized and non-subsidized employment is monitored through the use of initial client or employer attestation, the WMS, and the COGNOS "Income in Budget and No Enrollment Report". During the 1st ten days of the month, the E&T counselor checks the WMS for budget and hour changes for each active employed recipient; and makes changes on the CMS when the change is expected to last. There is also a memo from examiners to the counselors alerting them to these changes as they occur. During any given month, when a recipient informs the E&T counselor of changes by providing a pay stub or employer statement; this documentation is given to the appropriate examiner. All documentation of employment is scanned into the local OnBase system. We will monitor a random sample of 16 cases per quarter for paid work activities to ensure that the system outlined above is indeed providing accurate actual hours of employment.

Other core and non-core activities will be monitored with weekly timesheets. The E&T counselors will identify holidays and excused absences during review of the timesheets. Counselors also frequently visit provider sites to review timesheets and activity content. The timesheets must be signed by both the supervisor and the client. An exception to this is when a site submits timesheets showing client non-attendance/abandonment of the activity. Again these timesheets are scanned into the District OnBase system. We will monitor a random sample of 28 cases per quarter for these other activities to ensure that actual hours and other outlined information is present on CMS and OnBase.

The "Omission of Hours Report" is also a tool used after the 1st of every month by E&T counselor to identify the need to obtain the documentation.

The District's Employment Unit staff is thoroughly trained in the Federal definitions of a work activity to include what is core and non-core by case type. Due to the ever changing nature of the rules and regulations, this training is ongoing. Assessment of the quality and knowledge gained from this training will be made using results of random sample monitoring.

The Employment Unit supervisors are given the appropriate Audit and Quality Improvement paperwork by the E&T counselors when a client is to be designated as an employability code 38. If the paperwork is complete, the client is given the employability code. The "Employment Code Duration Report" is used to alert the counselors that updated paperwork is necessary for the client to maintain his/her employability code 38 exemption. We will monitor a random sample of 8 cases per quarter which are categorized by Employment Code 38, to ensure proper documentation exists on CMS and OnBase.

We will monitor a random sample of 8 cases per quarter which contain an individual with an Employment Code of 31.

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):

Provider data, when received, is reviewed by the E&T counselors for accuracy and entered into the appropriate CMS case file.

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 District Employment Unit supervisors use all available professional evaluation data when determining the employability status of a client. The Employment Unit has the following evaluation materials completed, as needed by an appropriate professional: mental health report (employment), IMA mental health, physical, and IQ evaluations, county physical evaluation (employment), and ailment specific professional evaluations as submitted by clients. In-patient discharge summaries are also used when provided.

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

When all available information is gathered the E&T counselor, in conjunction with the client, makes proper referrals to other agencies for rehabilitative services.

- 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.:

Attendance at rehabilitative appointments is mandatory and written into the client's EP. Time sheets are used when the client is enrolled. According to the client employment code the E&T

counselor enters the dates of exemption in the health history screen. (ie. code 41=11/08/2007 to 2/08/2008) This enables the CMS tickler to pop up when another evaluation is due. In most cases the counselor has already been alerted through the use of the "Employability Code Duration Report". The counselors also attempt to make contact with each exempt client on a monthly basis via telephone or personal appointment as a follow-up to the referral for services.

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.

In rural St. Lawrence County this is an ongoing problem. Little or no public transportation, lack of taxi service, and expanse of the county make getting to and from an activity a task for most. Inadequate availability of child care is also a persistent problem affecting full participation. Getting a primary child care provider is tough; let alone back-up child care. Other personal circumstances inherent in the lives of our clients tend to cause major disruption in full participation. That being said, the Employment Unit works very closely with clients to facilitate overcoming personal barriers impeding participation. Referrals to other agencies for other services are common. The District has also made it inviting for individuals with vehicles to carpool our clients. The driver receives .20 cents/mile; and with one rider receives .40 cents/mile; and having 2 or more riders allows the driver to receive a .505 cents/mile payment. The maximum will continue to follow the federal mileage reimbursement rate. The District is also working very closely with the SLC Planning Department to create a "bus run" from our southern tier to the Watertown area; where the economy is booming due to many factors.

Once in an activity (except for Subsidized Private/Public Sector Employment)), we are implementing a weekly timesheet system which will allow for rapid response to attendance problems. It will also enable us to pay support services in a more timely fashion. The Employment Unit has also implemented a process whereby non-exempt non-participating clients are set up for weekly appointments until they are in an activity. Non-exempt not counting clients are outreached bi-weekly at a minimum or as needed to review the problems/excuses for lack of full participation. This new appointment system has the possibility of fostering more of a client/counselor relationship; which in turn it is hoped will cause the client to interact voluntarily with the counselor.

Section 3.10 Strategies/Procedures for Engaging Sanctioned Temporary Assistance Participants

District has no specific strategies to engage sanctioned participants.

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

The District contacts "sanctioned until compliance" clients within two (2) weeks and allowed to "cure" as soon as in compliance. The District facilitates compliance with the availability of support services.

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

These clients are sent a letter to come to an appointment with their E&T counselor within a week of the end of their durational sanction. The first appointment occurs in the field for client ease. Any subsequent appointments occur at the Canton One Stop Career Center and are done weekly.

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

Sanctioned individuals are mandated to meet with their E&T counselor on a weekly basis until compliance or case closing due to being a NS/NC at one(1) of the appointments. Subsequent meetings after the first Canton meeting occur with all individuals in the case accompanying the client in sanction; and are done only in Canton.

Section 3.11 Diversion Strategies

District has no specific diversion strategies.

District's diversion strategies are described below:

The District has been meeting applicants the day of application. This is done to inform each applicant of other possible choices and services provided by other Systems. We will also now reinforce the day care in lieu of TA program. The District intends to have JRT/JS group sessions for all applicants with a special emphasis on the SN NON-MOE applicants. With their 45 day wait we have more opportunity for successful diversion into the workplace.

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: support services may include, but are not limited to,

transportation assistance, nonrecurring payments such as car repair, clothing, payments to obtain a permit or license, certification/licensing fees, etc. These services are reviewed on a case by case basis with respect to need, and with the intent to allocate payments when another system, or agency providing an activity, are unable to do so. Activity sites are expected to provide the equipment, etc. to allow for limitations of clients being served.

- 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): The base mileage reimbursement rate is .20 cents/mile. The District has made it inviting for individuals with vehicles to carpool our clients. The driver receives .20/mile; and with one rider receives .40 cents/mile; and having 2 or more riders allows the driver to receive a .505 cents/mile payment. The maximum will continue to follow the federal mileage reimbursement rate. The District also attempts to use what little public transportation exists as well as taxi service where available. The district will provide mileage reimbursement upon receipt of proper documentation. The reimbursement will occur at a minimum bi-weekly or when \$10.00 or more is owed to the client; whichever comes first.

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

The District does not allocate transportation support services for a participant if he/she resides within a 1 mile radius of the work activity site. Personal disabling circumstances and child care provider location are cause for exceptions to this rule. Other exceptions are reviewed as they occur. This rule serves as a motivation for our participants to learn the art of networking, which as we know is crucial for the attainment of employment and retention in the workplace.

- 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: The District refers individuals for service with other Agencies. The District also supervises Job Search for applicants and provides support services as needed.

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

In the past year we have had occasion to serve one non English speaking person. The participant's husband speaks broken English, so a common worksite was found. The participant was also referred and accepted into an ESL program.

[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:

Employed active recipients may have the full array of support services available to them; as well as continued services by an E&T counselor. These services consist of, but are not limited to, the following: transportation assistance, car repair, clothing, permit or license fees, etc. Documentation of attendance at work is necessary before mileage reimbursement is made.

The district may 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 full array of support services may be available for these citizens. These services consist of, but are not limited to, the following: transportation assistance, car repair, insurance costs, clothing, etc. Documentation of attendance at work is necessary before mileage reimbursement is made. Child care is available through the Child Care unit housed within the DSS Accounting Office complex.

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.

The District has the CST program through which we plan to provide mileage reimbursement at a rate of .15 cents/mile.

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:

FSET individuals are afforded transportation services in the same manner as active TA recipients.

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

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:

The good cause/willfulness determination is made by:

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

An Examiner/Employment Coordinator conducts the Conciliation and makes the determination.

Section 5.2 Sanction

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

The District will consider a sanctioned person to be in compliance in the following manner. The person must successfully complete all assigned hours during the first week of 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)

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

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

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

The District refers individuals for mental health evaluations and accepts the conclusions. The District also accepts evaluations and discharge conclusions of in-patient care facilities.

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:

The District Employment Unit supervisors are tasked with interpreting and accepting physical and mental health employment determinations received from appropriate professionals.

**ST. LAWRENCE COUNTY DOSS
ORGANIZATION CHART**

