

**Temporary Assistance and Supplemental Nutrition Assistance Program  
Employment Plan  
January 1, 2018 – December 31, 2019**

**Westchester County**

## **Contents**

### **Section 1- Assurances**

### **Section 2 Administration**

Section 2.1 Administrative Structure

Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies

Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services

Table 2 – Other Service Providers

Section 2.3 OTDA Jobs Staff Agreement

Section 2.4 Access to Services at Comprehensive Career Centers

### **Section 3 Engagement and Work Preparation**

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

Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Section 3.3 Assessment and Employment Planning

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

Section 3.5 Job Development

Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

Section 3.7 Work Verification

Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

Section 3.9 Strategies/Procedures for Increasing Program Attendance

Section 3.10 Strategies/Procedures for Engaging Sanctioned Temporary Assistance Participants

### **Section 4 Support Services** (Reference 18 NYCRR 385.4)

Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District

Section 4.2 Transitional Support Services

Section 4.3 Extended Support Services

### **Section 5 Conciliation, Sanction and Dispute Resolution Procedures**

(Reference 18 NYCRR 385.11 and 385.12)

Section 5.1 Conciliation

Section 5.2 Sanctions

Section 5.3 Dispute Resolution

### **Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals**

(Reference 18 NYCRR 385.2)

Section 6.1 Disability Determination Process and Tools

Section 6.2 Mental Health Screening and Assessment

Section 6.3 Requirements for Exempt Temporary Assistance Participants (Reference 18 NYCRR 385.2 (e))

**Temporary Assistance and Supplemental Nutrition Assistance Program Employment Plan  
January 1, 2018– December 31, 2019**

**Section 1- Assurances**

As a condition of the receipt of federal and State funds the Westchester County Department of Social Services submits this Temporary Assistance and Supplemental Nutrition Assistance Program Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) applicants and recipients for the period January 1, 2018 through December 31, 2019. As Commissioner of Westchester 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

11/15/17, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## **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 Office of Work Activities in the Westchester County Department of Social Services (WCDSS) has programmatic responsibility for the operation of the Welfare To Work (WTW) program for all Temporary Assistance (TA) customers. The Office of Work Activities has a unit of Social Case Workers (RISE) that works specifically with nonexempt TA applicants and recipients. This unit also referred to as OWA RISE operates out of our 4 district offices working very closely with eligibility and other partners to foster engagement and participation. OWA POWER another unit under the Office of Work Activities works with a fraction of the exempt population. OWA POWER monitors the following employment codes 24, 31, 32, 35, 38, 44, 47, 48, 49, 54, 58 and inpatient code 63's. OWA POWER is a combined employment and eligibility unit that performs certain necessary transactions on a case such as change codes, closings, reactivations and sanctions. OWA DRIVE is a unit comprised of Employment Counselors working out of the One Stop Centers and District Offices. This unit works with nonexempt applicants engaging customers in intense job search activities. OWA DRIVE also engages job ready recipients in special One Stop grant funded programs. OWA also has another unit dedicated to placing nonexempt singles in CWEP called Pride in Our Parks and Pride in Our Roads. These nonexempt recipients develop marketable skills performing genuine work tasks under Supervision of the Westchester County Department of Parks and the Department of Public Workers. WCDSS also contracts with Urban League of Westchester to engage the remainder of the exempt TA population. The Urban League personnel are co-located in all the district office to engage applicants and recipients. On a monthly basis the Urban League monitors activity enrollments and treatment compliance for employment codes 36, 41, 42, 43, 45 and out-patient code 63's. WCDSS has contracted Westhab, Inc. to provide job development services that include job development, job placement, training opportunities, retention services and Strive (intense attitudinal job readiness training) to TA recipients in all catchment areas. The Office of Work Activities provides the following services:

- Upfront Engagement
- Employment Orientation
- Pre-Employment Services
- Comprehensive Assessment
- Development of Individual Employment Plan"self-sufficiency plan"
- Intensive Job Readiness Training(STRIVE)
- Assignment to work activities such as Vocational Education and Job Skills Programs
- Referral to Educational Training and Remedial Services, as appropriate
- Independent and Supervised Job Search
- Job Development and Placement in Unsubsidized Employment
- Worksite Development and Enrollment in Community Work Experience Program
- Job Coaching
- Employment Retention Services
- Frequent contact with TA recipients and close contact with service providers
- Track and Monitor TA recipients in work activities and/or treatment
- Entry of all TA recipients data into WTW automated system and other employment support systems

Each employment unit works to engage each individual recipient in a process leading toward self-sufficiency. Employment staff ensures that individuals are connected to appropriate activities (i.e., job search, training,

education, work experience, etc.). They identify barriers and develop strategies to overcome them. In addition, the employment staff is responsible for monitoring progress, attendance, and outcomes associated with the individual's particular employment plan.

The case manager performs the duties stated above and utilizes referral mechanisms for specialized recipient needs (i.e., child welfare, drug/alcohol, domestic violence, medical/psychiatric, and individuals with learning disabilities). Family Assistance (TANF), Safety Net Family (SNF) and Safety Net Adult (SNA) recipients see the employment staff for all their employment related needs.

This model begins with a comprehensive assessment conducted by the employment staff geared toward identifying:

- Employment history
- Educational background
- Barriers
- Health history
- Supportive service needs such as transportation and daycare

The DSS TA staff is responsible for all traditional aspects of eligibility and interfaces with employment staff. The DSS TA staff also has responsibility to collaborate with the following programs: Child Welfare, Adult Protective Services, Child Support, Community Medicaid, and Community Partners.

**Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies**

**Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services**

Table 1 lists the local contracts or agreements with agencies to provide employment services to TA and SNAP clients. These activities and services may include, but are not limited to: employability determinations; development of assessments and employment plans; conciliation and grievance activities; provision of work activities such as job readiness training; education and job skills training; 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.

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Urban League of Westchester County, Inc.	\$1,375,000.00	<input checked="" type="checkbox"/> FFFS <input checked="" type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Provision of employment related services to adult recipients of temporary assistance who are exempt from participation in public assistance work activities.

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Westhab, Inc.	\$1,097,200.00	<input checked="" type="checkbox"/> FFFS <input checked="" type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	To provide Job Development Services to adult recipients of temporary assistance.
Westchester Community "Job Star Program"	\$678,786.00	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assessment, Skill Enhancement Training, Credit-Bearing Certificate Programs, Post Placement/Job Advancement Services and Food Preparation Vocational Program
Westchester County Department of Community Mental CASAC Program	\$673,364.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Non-Services- Conduct Drug And Alcohol Assessments On Appropriate Applicants or Recipients Of Public Assistance
Westchester County Department of Parks "Advance Through Parks" Program	\$158,363.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Community Work Experience Program with On-The-Job Training and Job Placement Services
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Total	\$3,982,713.00			

**Table 2 – Other Service Providers**

Table 2 includes agencies/providers that offer services to participants and to which the district expects to refer participants but which have no direct financial agreement with the district.

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Educational Opportunity Program "EOC"	Unknown	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Academic and Vocational Training Programs
Yonkers Public School "VIVE"	Unknown	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Academic and Vocational Training Programs
Westchester One Stop Employment Center	Unknown	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Career services such as employment workshops, training opportunities, grant funded WIOA programs, job development and placement
Mental Health Association "MHA"	Unknown	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Provides medical/mental health/CASAC assessment services for single homeless individuals (SHAC- Single Homeless Assessment Center)
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

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

Services		Target Groups	
Assessment/Employment Plan	<input type="checkbox"/>	Applicants	<input type="checkbox"/>
Supervised Job Search	<input type="checkbox"/>	FA & SNA with children	<input type="checkbox"/>
Job Readiness Training	<input type="checkbox"/>	SNA without Children	<input type="checkbox"/>
Job Club	<input type="checkbox"/>	SNAP	<input type="checkbox"/>
Job Placement Services	<input type="checkbox"/>	TANF 200%	<input type="checkbox"/>
Grant Diversion	<input type="checkbox"/>		
Job Development (employer outreach)	<input type="checkbox"/>		
WOTC pre-certifications	<input type="checkbox"/>		

#### Other Services Requested

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

### Section 2.4 Access to Services at Comprehensive Career Centers

In New York State, TANF is a required WIOA partner and must coordinate access to TANF services with the comprehensive Career Centers.

- a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:
- The district has employee(s) physically present at a Career Center
  - The district has contract staff physically present at a Career Center
  - The district makes available direct access to its program staff via phone or technology at a Career Center
  - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
  - Other:
- b. Please provide a description of how the district coordinates with Career Center partners with providing services to the district's clients, including referral and information sharing mechanisms.

Nonexempt TA applicants are referred during upfront engagement to the OWA Employment Counselors in the One Stops. Customers are referred to orientations, workshops, on-site trainings, job fairs, and appointments with job developers. Applicants and recipients are assessed for Individual Training Accounts and other grant funded programs (i.e. Jobs Waiting). Customers are supported in their job search efforts on sites like westchesterputnamonestop.com, JobZone.ny.gov

and onetcenter.org with assistance from DSS Employment Counselors. ABAWD recipients are referred to the Community Outreach Worker at the One Stop to meet their AWABD requirements. ABAWD customers have access to the other One Stop resources used by TA customers but in addition these comply with their job search requirements by submitting monthly job logs and utilizing JobZone.ny.gov.

### **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 as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance, district’s definition of “Engaged in Work” is:

Compliance with assessment, employment planning, all activities included in the individual’s Employment/Self-Sufficiency plan including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 3.4. Also included is pursuit of other forms of income such as SSI and SSDI.

Include any additional information regarding the district’s local “engaged in work” requirements:

- Drug/Alcohol Treatment to restore a person to employability
- Medical treatment/rehabilitation to restore a person to employability
- Remedial education, adult basic education/GED or education in English proficiency to enable a person to attend vocational training or to achieve employability
- Participation in ACCESS-VR (formerly VESID)
- Providing care for another member of the household who has a verified mental or physical impairment

#### **Section 3.2 Orientation (Reference 18 NYCRR 385.5)**

Check one of the following:

- The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.
- In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

Social Case Workers present the Orientation using a MS PowerPoint presentation usually on computer but using paper if a computer is not available. This PowerPoint outlines benefits, roles of departments, services offered such as Child Care, participation expectations, community resources such as the One Stop and denial circumstances. Upon completion of the Orientation, all applicants are required to sign an Employability Statement indicating any medical, mental health and/or substance abuse barriers that impact their ability to participate.

Described below is the manner in which the district completes the required orientation for all applicants and recipients of Temporary Assistance (e.g., in a group setting, individually, or a combination of both), including the orientation procedure for exempt individuals and non-exempt individuals, if different:

Social Case Workers present the Orientation using a MS PowerPoint presentation individually. This Orientation is provided to all applicants of Temporary Assistance at the time of application regardless of employability status or case type.

### Section 3.3 Assessment and Employment Planning

#### Temporary Assistance Assessment

(Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):

The district enters assessments directly into WTCMS

The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.

The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.

The local equivalent does not contain additional elements other than what is required.

The local equivalent does contain additional elements beyond what is required, listed below:

b. Describe the local district procedure for the completion of an employment assessment:

Based on the Employability Statement, the initial assessment for applicants indicating no barriers are conducted by the Social Case Workers. Customers who report a medical, mental health and/or substance abuse barrier at application are referred to the Urban League for assessment. Social Case Workers and Urban League Employment Workers conduct the full initial assessment to gather information on family circumstances, educational and work history, including strengths, needs and barriers toward seeking gainful employment. The assessment summary also includes information on educational levels achieved in school, employment related skills, prior work experience, training and vocational interests. All new TA recipients receive an individual assessment within 30 days of case opening. Recipients are re-assessed periodically by their respective units when the code changes, life circumstances change, cases are re-activated or the case is transferred to another unit.

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

The Office of Work Activities RISE Social Case Workers assess the non-exempt customers. The Urban League of Westchester Employment Workers assesses exempt customers.

d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]

All staff conducting assessments completed WTCMS and ESTI training through OTDA. DSS Social Case Work staff possesses a minimum of a bachelor's degree. Contracted vendors possess a minimum of high school diploma or equivalency. However, many of the Employment staff from both units possess graduate level degrees in social work or other human related fields. Other partners that contribute information to the assessment are New York State Certified School Counselors or New York State Certified Adult Job Readiness Instructors. Westchester Community College Job Star personnel are graduate level administrators with degrees in education and psychology.

- e. Applicants in households **with** dependent children are required to participate in completion of an assessments:  Yes  No
- f. Applicants in households **without** dependent children are required to participate in completion of an assessments:  Yes  No
- g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:  Yes  No

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

- a. Check one of the following:  
The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):  
 The district enters employment plans directly into WTCMS.  
 The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTCMS.  
 The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent.  
 The local equivalent does not contain additional elements other than what is required.  
 The local equivalent does contain additional elements beyond what is required, listed below:
- b. Check one of the following:  
 The same administrative unit or contractor that conducts employment assessments also develops employment plans.

- A different district administrative unit or contractor develops employment plans, and their qualifications include:

**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 weekly hours standard participation requirement for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

WCDSS plans to meet with Federal and State Temporary Assistance participation rate requirements by interviewing and engaging recipients as quickly as possible usually within one week in order to ensure full participation in countable activities. The goal of WCDSS is to engage every non-exempt FA, SNF, and SNA recipients in a countable work activity for at least 30 hrs per week but not more than 40 hours weekly. TA recipients are often assigned to independent job search while arranging childcare or awaiting the start of a training or educational program.

- b. Estimate the number of individuals expected to receive employment services:

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals		10%

- c. Described below is a description of how the district uses work participation management reports available through Cognos or other reports and activities to monitor district progress toward meeting work participation requirements and ensuring full engagement by adults in work or work preparation activities:

Cognos reports are ran by management in OWA, Urban League and Westhab. The primary reports ran to measure progress with participation and engagement are the Preliminary Not Countable reports (bi-weekly), Non-Participating reports (monthly), Activity Status of Adults (monthly) and the Earned Income Employment reports (monthly). These reports are pulled weekly, bi-weekly or monthly. The Urban League utilizes the Employability Code Change and Duration reports. OWA Management will run other periodic reports specifically based on codes, income, or activities. These reports are reviewed and analyzed and sent to individual units for clarification or correction on cases. OWA Management is seeking an explanation on the lack of engagement and corrective action measure to meet engagement/participation goals. Issues are reviewed in monthly meetings between departments and inter-unit conferences with management and direct line staff.

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) applicants and recipients to participate in SNAP E&T work activities. If the district is not mandating SNAP E&T

work activity assignments, please describe how NTA SNAP work registrants are informed of the services available, upon request, for assistance with job search activities. (Please note: At a minimum, districts are required to make available job search as a SNAP E&T activity to NTA SNAP applicants and recipients):

Flyers listing job search services with their location are made available to SNAP applicants and recipients in our 4 District Offices reception areas. The County has a designated Community Outreach Worker, engaging AWABD's in job search activities and other employment services at the One Stop.

- e. Please describe the local district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

- 1. The district assigns TA applicants to Job Search.  Yes  No

If yes, the process for engaging TA applicants is:

Nonexempt applicants are referred to the OWA DRIVE Employment Counselors located in the local One Stops and Yonkers District Office. These Employment Counselors assist the customers with completing resumes, applying for jobs, referrals to job fairs, enrolling in job search workshop, monitoring job search activities and overall employment related compliance. Applicants are assessed for Individual Training Accounts and other grant funded programs (i.e. Jobs Waiting). Applicants are supported in their job search efforts on sites like westchesterputnamonestop.com, JobZone.ny.gov and onetcenter.org with assistance from DSS Employment Counselors. Applicants are given job search logs as the first step to engagement in meeting participation rate and helping applicants become less dependent on TA. The applicant is required to complete a job search log of a minimum 20 weekly contacts equaling 40 hours of participation per week. They report the names, address and contact information along with time spent searching. This time may include travel time between potential employers. The job search log will be reviewed by the Employment Counselors to assess the extent to which a reasonable number of contacts were made during the time reported. Attention will be given to the amount of time required to identify, apply and interview for a job as well as time spent preparing and sending follow-up materials to an employer. Employment staff will review time logs for completeness and integrity. Hours of participation reported by the applicant that are determined to be incomplete or not reasonable must not be reported as actual hours of participation.

The Employment Counselors will contact a sample of employers periodically to verify that the participant actually contacted the employer about a job. However, such reviews will not occur in those instances when the staff determines that conducting such direct employer contact for documentation would jeopardize current or future job entry efforts by other Temporary Assistance (TA) applicants. Face-to-face contact with job search participants must occur no less than once a week.

Applicant Job Search	Number of Contacts	Number of Hours	Additional Information
TANF and SNA MOE	20	40	

SNA Individuals	20	40	
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2. T

he disDistrict assigns TA **recipients** to Job Search.  Yes  No

If yes, the process for engaging TA **recipients** is: Recipients are assigned and monitored in job search by the OWA RISE Social Case Workers. Recipients that are Safety Net adults (SNA) or require additional hours to supplement work experience to meet participation are given job search logs. The recipient is required to participate up to 40 hours per week. They report the names, address and contact information along with time spent searching. This time may include travel time between employers. The job search log will be reviewed by the employment staff to assess the extent to which a reasonable number of contacts were made during the time reported. Attention will be given to the amount of time required to identify, apply and interview for a job as well as time spent preparing and sending follow-up materials to an employer. Employment staff will review time logs for completeness and integrity. Hours of participation reported by the recipient that are determined to be incomplete or not reasonable must not be reported as actual hours of participation. The staff will contact a sample of employers periodically to verify that the participant actually contacted the employer about a job. However, such reviews will not occur in those instances when the staff determines that conducting such direct employer contact for documentation would jeopardize current or future job entry efforts by other Temporary Assistance (TA) recipients. Face-to-face contact with job search participants must occur no less than once a week. Contracted vendor Westhab will assign their customers to job search using the same process pending job placement or vocational training.

f. Describe the district's process and policy, including the guidelines workers follow, when determining whether participation in self-employment is approved as part of an individual's required work activities. If the district always approves self-employment as part of an individual's required work activities, please note this policy below.

Self-employment is accepted as long as customer is able to meet federal minimum participation hours and minimum wage requirements. There is an exception for customers performing childcare and adult care services. Customers must provide an attestation of this employment which is submitted to eligibility for budgeting.

g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An "X" in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

<b>Activity and Definition</b>	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Unsubsidized Employment</b> - 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.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Subsidized Private Sector Employment</b> - 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-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Subsidized Public Sector Employment</b> - 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 in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p><b>Work Experience</b> - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references 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 are to be reported as employment.)</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>On-the-Job Training (OJT)</b> - 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 since 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p><b>Community Service</b> - 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Job Search</b> - 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 and applying for, and/or interviewing for jobs and related activities.</p>

<b>Activity and Definition</b>	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Job Readiness Training (JRT) Activities</b> - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>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> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such 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.</li> <li>Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Vocational Education</b> - 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 up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (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/SNA 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Job Skills Training</b> - 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Education Training</b> - 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, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision making skills.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Secondary School</b> - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, 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 HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p><b>Provision of Childcare for Individual Participating in Community Service</b> - Providing unpaid childcare to enable another Temporary Assistance (TANF/SNA MOE funded) recipient to participate in a community service program.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p><b>Other</b> - 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.</p>

### Section 3.5 Job Development

The district conducts or accesses job development services to expand job opportunities for TA and SNAP clients.  Yes  No

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

- District staff contacts 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.:

WCDSS has Job Development staff located at the local One Stops (3 Job Developers). Customers referred to the OWA DRIVE Employment Counselors (7 Employment Counselors) are referred to this Job Development unit after being assessed for job readiness and immediate placement. The Job Developers and Employment Counselors are co-located enabling effective and consistent weekly communication on the customer's progress and barriers towards self-sufficiency. Coaches will reach out the customer weekly and every 60 to 90 days to review progress benchmarks, workplace related issues and additional supports. Customers are also encouraged to continue visiting the One Stop to participate in job fairs and use the resource services.

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

Nonexempt customers who are job ready are identified by the OWA RISE staff and referred to Westhab. Westhab, the contracted Job Development vendor has a job bank of employers throughout the community that they continuously cultivate to refer job ready customers for job placement. The job developer is expected to meet with TA recipients that are classified as job ready at least once a month.

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

### Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

- a. Describe how the district identifies appropriate education program providers for services of Adult Basic Education, High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:

WCDSS utilizes providers such as EOC, Yonkers Public Schools VIVE program that are licensed to provide Adult Basic Education, GED preparation, and English language instruction.

WCDSS also refers TA recipients to Westchester Community College JobSTAR Program, a contracted provider that offers Adult Basic Education classes.

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

WCDSS maintains a contract with Westchester Community College's JobSTAR program to provide such services to our TA recipients. In addition, EOC, provider listed on table 2 is also utilized at no cost to Westchester County. When recipients enroll themselves in training programs that are not county offerings, the courses are evaluated individually as to whether the curriculum meets Voc-Ed or Job Skills definition. Customers referred to the local One Stops are assessed for ITA's (Individual Training Accounts) for occupational training. These trainings are reviewed for appropriateness and potential for immediate and successful job placement.

- c. Describe the process and guideline workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity:

During the assessment for applicants, workers will refer customers with limited education to TABE testing offered through Job Star at WCC. Customers exhibiting severe literacy deficits will be referred to IMA for IQ testing. Depending on the results of the evaluations customers may be referred to Job Stars ABE class or referred to the MAXMUS vendor to assist in applying for SSI. All TA recipients without GED or High school diplomas are TABE tested first before encouraged to attend one of the educational programs listed in either Table 1 or Table 2. If a deficit is observed while working with a recipient, a referral to IMA for IQ can also be made by the worker.

- d. Describe the district's process and policy, including the guideline workers follow, when determining whether participation in educational activities is approved for individuals who have not attained a high school diploma who are interested in participating in an educational activity. Include in this section instances when the agency would deny participation in educational activities:

All TA recipients without GED or High school diplomas are strongly encouraged to attend one of the educational programs listed in either Table 1 or Table 2. We do not deny recipients from participating in such program unless the recipient demonstrates a pattern of non compliance/misuse.

- e. Describe the district's process and policy for determining whether or not a participant is approved/assigned to participate in job skills or vocational education activities:

A comprehensive assessment is completed and reviewed to determine the recipients ability to work and whether training is needed to prepare the recipient for specific work identified in the individual employment plan. The recipient:

Must have minimum reading and math scores required for the specific program being requested.

Must have no previous education, training certificate or degree that prepares them to work as determined by WCDSS.

Must not already have a significant work history or marketable job skills for jobs in demand in the local economy as determined by WCDSS.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:

WCDSS will consider approving a two year college degree as a work activity on a case by case basis for individuals who are enrolled in college at the time of application and recipients with a 3.0 gpa or better.

- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12 month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:

For those recipients who have exceeded the 12 month VOC ED time, the employment staff will meet with the recipient to review the employment program requirements, have the customer sign a form confirming that they understand and agree with the requirements, and encourage recipients to take classes during the evening so they can be available during the day to comply with work rules. Recipients will need to enroll in another core activity for at least 20 hours per week.

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

- Must be licensed by the New York State Department of Education or other appropriate licensing agency for the type of training provided;
- Must have a demonstrable record of success in placing their graduates in Employment;
- Must not require participants to take out a student loan to pay for the cost of the program;
- Customers seeking to participate in trainings where there is a cost are counseled on their responsibility to pay fees. They also sign a waiver of understanding that WCDSS is not responsible for any fees or penalties they may incur as part of participation in training opportunity.
- Must offer courses of study leading to employment for jobs in demand in the local economy;
- Must have established procedures approved by DSS for reporting attendance and satisfactory progress to DSS for students who are DSS recipients

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

As part of orientation, recipients are informed of the approved training providers based on the individual employability assessment and plan. Recipients who meet the requirements for education/training described above are also informed of approved training providers along with the programs available.

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

The recipients are notified of approval for enrollment in an activity by a copy of the assignment letter which is sent to the provider.

- k. 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 checked below:

- It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased Temporary 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.
- The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
- The student fails to progress toward the completion of a course of study without good cause, as determined by the district.

- The student has previously enrolled in 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. To verify continued exempt status, the local district will monitor the high school attendance of 16-18 year old students in the following manner:

At application and recertification, the case manager uses the "School Attendance Verification" form, DSS-3708 or a current letter from the school, in order to verify that the teen is still attending school.

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

OWA RISE Social Case Workers notify the providers when calling to place recipients in work activities and/or on the placement letters. Providers are always notified in writing by vendor case managers about recipients' health related limitations on the referral. To ensure that providers are responding to notifications of work limitations, OWA monitors the site for compliance.

### **Section 3.7 Work Verification**

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

Each district must describe how it will conduct periodic self audits to determine that system entries are consistent with documentation in case files. The district must also explain how it will choose the sample size, select sample cases and establish the review period (no less frequently than semi-annually). The plan must indicate the district will maintain documentation on all pertinent findings produced through its self audit process and that case records for all reviewed cases will be available for State and other auditors in their review of the local work verification system for the standard 6 year period associated with such reviews.

After each self audit is completed, the district must submit a summary of findings for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

The Quality Assurance plan must explain how staff will:

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;

- Ensure 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 meets the approved federal definition for the activity;
- Assess that the data entered into either WTCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), 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):

The district will perform a random sample of (35) cases semi-annually for paid work activities to review district worker collected documentation and data entry. Both the temporary assistance and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTCMS and documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

The district will perform a random sample of (35) cases semi-annually for participation in unpaid work activities to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTCMS, excused absences and holiday time are documented in the case file and correctly reported on WTCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

The district will perform a random sample of (15) cases semi-annually in which a case member is reported as an employability code 38-needed in the home fulltime or employability code 48-time limit exemption to care for a disabled household member to review district worker collected documentation and data entry. The temporary assistance case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

The district will perform a random sample of (15) cases semi-annually in which a case member is reported as an employability code 31-caretaker of a child under the age of 12 months to review district worker collected documentation and data entry. The temporary assistance case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. Temporary assistance records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12 month lifetime limit.

In each of the above samples, the district will assess and verify that participation in the reported work activities meets the State approved definition for the activity.

The district will sample cases from each month within in the (6 month) semi-annual period. The October to March review will be due by May 20<sup>th</sup>. The April to September review will be due by November 20<sup>th</sup>. The district will maintain supporting documentation for the cases that are reviewed and make them readily available for review by A&QI auditors upon request.

The results of these audits will enable the district to identify policies, processes or cases that may need corrective action. The district will ensure that a summary report will be prepared following each review period and forwarded to: [otda.sm.AQI.WV.SelfAudits@otda.ny.gov](mailto:otda.sm.AQI.WV.SelfAudits@otda.ny.gov)

Does the district utilize and separate providers to collect documentation and enter data directly into WTWCMS?

Yes       No

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

WCDSS Office of Work Activities will validate attendance reporting by monitoring visits to providers and viewing attendance rosters for training. Employment vendors will do their own internal reviews, but it will be the responsibility of the WCDSS Office of Work Activities to do a quality assurance review of each of the employment programs under contract. The monitoring visits will occur quarterly.

### **Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency**

Following is a description of how the district accommodates the needs of Non-English speaking participants in accessing employment activities and services:

During assessment and re-assessment customers are asked about their language preferences and comfortability in terms of verbal and written communication. It is noted in multiple systems if the customer requires notifications in languages other than English. For Spanish speaking customers, WTWCMS referrals and other notifications are sent in both Spanish and English.

WCDSS has increased the number of bilingual staff in the field offices as well as expanding its access to additional interpreters of various languages via various community resources and faith based organizations to service our diverse TA population. Each OWA RISE Unit has a combination of either bi-lingual Supervisors, Senior Social Case Workers or Social Case Workers who speak another language. OWA POWER AND OWA DRIVE also have bi-lingual workers.

In addition, our contracted vendors employ bilingual staff who are available to assess and refer recipients to various work activities. We also foster a good relationship with community partners that offer free ESL Program services.

Employment Staff are also encouraged to use the Language Line.

### **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:

Monthly meetings are held with DSS staff and vendor staff identifying specific cases that are not meeting participation rate requirements. Cases in noncompliance, excessive absences etc. are focused on and strategies are discussed to successfully move the customers toward self-sufficiency. WCDSS intervenes on recipients' behalf, whenever possible, to reduce absences for appointments with legal entities, government agencies and other vendors. COGNOS and WTWCMS reports are utilized assisting case managers with their caseloads.

### **Section 3.10 Strategies/Procedures for Engaging Sanctioned Temporary Assistance Participants**

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

Sanctioned individuals may be asked by eligibility staff periodically to demonstrate how they are meeting expenses on a reduced grant and provide documentation to describe this. There are monthly efforts to reach out to customers on a WE-1 sanction once the sanction is imposed. Customers are sent a referral to engage in a work activity.

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

Sanctioned individuals are assessed by employment staff for re-engagement as soon as the sanction period has ended.

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

Sanctioned individuals may be asked by eligibility staff periodically to demonstrate how they are meeting expenses on a reduced grant and provide documentation to describe this. When possible prior to the end of WE-2 and WE-3 durational sanctions customers are sent a referral to engage in a work activity. Customers who genuinely seek to engage in an activity or employment must provide proof of enrollment or hire letter to access supportive services.

### **Section 3.11 Strategies for reducing the need for Temporary Assistance**

District's strategies for reducing the need for Temporary Assistance are described below:

Whenever possible, the employment staff explores all possible resources in order to divert the customer from temporary assistance, and directly into employment. Diversion is done in tandem with meeting any emergent needs of the applicant, thereby providing short-term assistance versus ongoing/recurring temporary assistance. Referring applicants to the One Stop to meet with the Employment Counselors fosters withdrawals by encouraging customers to find employment prior to application approval and accessing One Stop resources to aid self-sufficiency instead of TA. Customers who fail to comply with intense supervised job search leads to application denials.

The short term assistance is generally less than 90 days and must not extend more than four months in duration. For example, the individual will be employed and will have a crisis situation or episode of immediate need, which can be met and will divert the individual from the need for ongoing assistance

For A/R households, WCDSS will meet the cost of rent security, brokers fees, home repairs, moving costs and other expenses necessary to enable a household to retain the home or relocate to housing which is more convenient to work.

- Expenses for the maintenance of a motor vehicle when the vehicle is essential to enable the individual to work, there is no public transportation available, and the work hours do not conform to the public transportation schedule.
  - o Allow up to \$1500 or the retail value as listed in the NADA Appraisal Guide, whichever is less for the repairs if the A/R has a job or bona fide offer of employment.
  - o Up to \$1500, or the minimum down payment, whichever is less, towards an annual liability insurance premium or other insurance related fees excluding comprehensive and collision insurance premiums for an A/R owned motor vehicle which has passed NYS inspection.
  - o Up to \$3000 for the purchase, or up to \$3500 for the purchase and concomitant repair of a motor vehicle that will pass NYS inspection for a recipient who has a full time job or bona fide offer of employment if a motor vehicle is otherwise essential..
  - o Funds to cover the cost of vehicle registration
  - o Funds for obtaining or renewing a NYS motor vehicle operator license including fees for the mandatory five hour class when needed to get or keep a job.
  - o Gas expenses (at IRS Business Rate) for participation in an employment activity that will lead to a job or to cover the cost of transportation until the individual receive his/her first full paycheck.
  
- Funds to provide for the cost of public transportation until the individual receives his/her first full paycheck;.

**Section 4 Support Services** (Reference 18 NYCRR 385.4)

**Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District**

- 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 for participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, approved work activities and activities to restore self-sufficiency:

WCDSS will provide child day care subsidies for children until the age of 13 in households programmatically and financially eligible for a subsidy. When programmatically eligible, WCDSS will also subsidize child day care for special needs children over age 13. WCDSS will refer families to the Child Care Council who are unable to make child day care arrangements on their own and who are in receipt of TA or who are determined eligible for a child care subsidy by WCDSS. The name of at least 2 providers in the appropriate area, with vacancies verified by the Child Care Council, will be made available to the household. Child Care providers found by the recipients that are not licensed or registered must be approved by the Child Care Council after a referral by WCDSS. Until this Child Care Provider is approved by the Child Care Council, customers will be encouraged to use a licensed agency during the certification period to remain in compliance with work activities. Child day care subsidies will be paid at rates that are in compliance with the rates set forth in regulations 18NYCRR section 415.9.or the provider will be paid the actual cost of care, whichever is less. The rates paid to licensed or registered providers with contracts with WCDSS shall not exceed the negotiated contract rates and shall be in compliance with the regulations set forth in section 415.9. A parent share, based on the parent's/guardian's income, shall be deducted from the payment made by WCDSS and the parent shall be responsible for paying the parent-share directly to the provider. Active Temporary Assistance recipients will not be required to pay a parent share.

The district will also provide to participants the following support services which the district deems necessary for the individual to participate in orientation, assessment, employment planning, work activities and activities to restore self-sufficiency:

For TANF Recipients:

- Clothing necessary for participation in approved employment or training activities (not to exceed \$300 per activity).
- Up to \$200.00 for each license or for the other work-related fees necessary for participation in employment or activities.
- Tools, Equipment & Supplies necessary to participate in employment or training activities (not to exceed \$750).
- Payments for summer camp as a child care arrangement for children of TANF recipients participating in an approved employment or training activity, up to the market rate for full time child care in a day care center.

For Safety Net Assistance (SNA) Recipients:

- Clothing necessary for participation in approved employment or training activities (not to exceed \$300 per activity).
- Up to \$200.00 for each license or for the other work-related fees necessary for participation in employment or activities.
- Tools, Equipment & Supplies necessary to participate in employment or training activities (not to exceed \$500).
- Payments for summer camp as a child care arrangement for children of SNF recipients participating in an approved employment or training activity, up to the market rate for full time child care in a day care center.

All of the above amounts can only be issued once in a 12 month period.

Please Note: The above payout points are guidelines. Staff has the discretion to authorize these amounts at any point that they determine need has been established.

**ONE-TIME EMPLOYMENT RELATED EXPENSES** – In addition to the support services listed above, WCDSS will provide the one-time employment related expenses listed below to applicants and to recipients of TA if determined to be necessary to enable them to obtain, accept or retain employment, and if funds from other sources are insufficient to meet the recipient's needs.

- Job related safety equipment, up to a maximum of \$500.00 for each entry to employment;
- Clothing, including but not limited to uniforms and footwear, up to a maximum of \$500.00 for each entry to employment;
- Tools and equipment, up to a maximum of \$750.00 during any period of continued eligibility for TA;
- Up to \$200.00 for each license or for other work related fees;

Reasonable costs of necessary repairs to a WTW participant's automobile, up to a maximum of \$1000.00 or the retail value of the automobile if that value is less, during any period of eligibility for TA and legally required automobile insurance, up to a maximum of \$1,500.00 during any period of eligibility for TA.

- b. The district will use the following approach to assist those participants who need transportation to and from an approved work activity site, including any applicable mileage reimbursement rate, and the method used by the district to arrive at that reimbursement rate. OTDA policy establishes a mileage reimbursement rate of no less than the IRS established rate for medical/moving purposes. In all instances, should the actual cost of transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, the district will reimburse for the actual costs based on reasonable documentation submitted by the work activity participant.

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/17 is 53.5 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/17 is .17 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):

Public transportation is generally available throughout Westchester. Recipients may be given bus tickets, metro cards or the equivalent cost will be authorized in addition to their cash grant. A customer going to the first interview at an activity site is given \$5.50 which is the cost of a round trip ticket. The cost of a monthly bus pass is issued to customers enrolled in ongoing work activities, in the amount of \$121.00 per month. When public transportation is not available, Westchester will reimburse for the use of motor vehicle on IRS standard mileage rate for business miles.

- c. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below each way to a work activity or to access public transportation:

**Recipients will not be expected to walk further than approximately 1 mile to a work assignment. Each recipient is evaluated individually for ability to walk to sites. Recipients with limitations or health related issues that limit walking distances would be assigned to the work activities nearest their home consistent with individual limitations. Recipients are given listings for childcare in close proximity to their homes. For recipients with a worksite near their home but childcare at a distance, they would be given transportations as noted in section 4.1 b.**

**WCDSS does not anticipate assigning recipients to work activities in any remote sites. If recipients obtain employment in a remote area, we will use the strategies described above to address their transportation needs.**

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

Applicants at risk of needing public assistance to improve their opportunities are referred to the Westchester One Stop Employment Center for assistance with resumes, job search for better paying jobs etc. Referrals can be made to clothing closets for business attire. Referrals can be made to the Daycare Subsidies unit for potential subsidized childcare.

## **Section 4.2 Transitional Support Services**

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

- Funds to provide for the cost of public transportation for up to 90 days after case closing if needed.
- Expenses for uniforms, books or necessary clothing, up to \$750, required for employment.
- Expenses to cover the cost of exams that result in the awarding of professional certifications, licenses, renewals, etc.
- Expenses for tools and equipment, up to \$750, necessary to enable the individual to secure employment.

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

Transitional Medical Assistance is provided for up to 6 months under the Low Income Families (LIF) Medicaid program to TANF recipients who lose Medicaid eligibility due to excess income from employment or from a combination of employment and unearned income, including child support payments.

## **Section 4.3 Extended Support 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:

See Section 4.1 above, One - Time Employment Related Expenses

## **Section 5 Conciliation, Sanction and Dispute Resolution Procedures**

(Reference 18 NYCRR 385.11 and 385.12)

### **Section 5.1 Conciliation**

The district's conciliation process for Temporary Assistance applicants and recipients is in accordance with 18 NYCRR 385.11(a). Conciliations are conducted (check all that apply, and describe the procedure.):

- in person
- by phone
- by mail, etc.:

Eligibility staff review documents submitted and determines whether the noncompliance was willful and without good cause.

The Temporary Assistance good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

A specialized unit with eligibility staff that is not directly responsible for the case management.

The district's conciliation process for SNAP recipients is in accordance with 18 NYCRR 385.11. Conciliations are conducted (check all that apply, and describe the procedure.):

- in person
- by phone
- by mail, etc.:

Eligibility staff review documents submitted and evaluate for good cause. The determination of when non compliance is willful and without good cause includes but is not necessarily limited to identifying a pattern of the recipient's failure to take reasonable steps to address issues within the recipient's control that may prevent the recipient from complying with employment requirements. Determinations are made on a case by case basis and steps that a recipient takes to address issues within the recipient control which has prevented him or her from complying with the employment requirements are explored in each instance of noncompliance.

The SNAP E&T good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

A specialized unit with eligibility staff that is not directly responsible for the case management.

The district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is:

WCDSS offer all SNAP recipients who fail or refuse to comply with an assigned work activity an opportunity to avoid a SNAP sanction by demonstrating compliance. To meet this requirement, WCDSS will issue a conciliation notice (LDSS4230) advising the recipient of his/her ability to avoid a SNAP E & T sanction through compliance with SNAP work activity, and also the opportunity to participate in conciliation. Recipients has ten days to respond and either provide good cause, provide documentation of exemption from participation in SNAP E & T activities, or initiate the demonstrated compliance process by complying with SNAP work activity. WCDSS assign the recipient to a minimum of 10 Job Search contacts to avoid a SNAP sanction.

## Section 5.2 Sanctions

a. The district's procedure for determining compliance for those Temporary Assistance recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:

Recipients who were sanctioned for failure to comply with a work activity must perform an acceptable activity for a minimum of 5 consecutive days as assigned to be in compliance and end the sanction. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period). Recipients who failed to comply with assessment may have their sanction lifted once the assessment or reassessment is complete.

b. The district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:

Recipients who were sanctioned for failure to comply with a work activity who are found to be conciliated for TA and SNAP must perform job search indicating 5 job searches to be in compliance and end the sanction and retain their SNAP benefits. Recipients who failed to comply with assessment must comply with assessment or reassessment to maintain their SNAP benefit. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period). Recipients who failed to comply with assessment may have their sanction lifted once the assessment or reassessment is complete.

### **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.

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 and who are not trained in mediation

## **Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals**

(Reference 18 NYCRR 385.2)

### **Section 6.1 Disability Determination Process and Tools**

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, and describe the process:

- 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 (please describe):

Applicants/recipients (A/R) contesting employability status for medical reasons are required to return the LDSS#4526 from their doctor when claiming a disability and/or work limitations. If the medical condition is expected to exceed 4 months, WCDSS will refer to Industrial Medical Association (IMA), contractor of OTDA, for a physical examination. WCDSS refers all A/R's contesting employability for psychological and intelligence assessment to IMA for determination of employability. Customers who do not have a current primary physician are also referred to IMA.

All homeless single A/R contesting employability undergo a employability determination review at the Single Homeless Assessment Center(SHAC) which is provided by our vendor, Mental Health Association (MHA). MHA -SHAC serves newly and chronically homeless individuals who were placed by WCDSS for housing and comprehensive services. MHA evaluation covers different spheres: mental health, physical health, education/vocation and substance abuse. MHA consist of Masters/Doctoral level therapists,medical doctors, licensed mental health professionals and a psychiatrist.

Temporary Assistance staff determines employability status using documentation collected from LDSS#4526, doctor's statements, IMA, monthly treatment plans and SHAC as provided. Eligibility staff will share any documentation of disability or any determination of work limitation to the employment unit.

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:

Upon receipt of completed LDSS#4526, IMA or SHAC assessment, the employment staff notifies A/R in writing of the disability determination. All limitations are noted for recommended accommodations. Such as, if the recommendations are that A/R should not do heavy lifting, pushing, pulling etc., that customer would not be sent to a job requiring those activities. Psychological barriers preventing a customer from full engagement would receive appropriate referrals for that accommodation. Such as, an A/R who is unable to tolerate being in large groups would be sent to a site with a smaller number of attendees.

### **Section 6.2 Mental Health Screening and Assessment**

The district is administering a screening tool for Temporary Assistance participants to help determine whether a referral for a mental health evaluation is warranted, in addition to screening for a disability that occurs as part of the application or disability determination process

- Yes       No *(If No, section 6.2 is complete)*

If yes: Describe the district's policy for determining when a program participant is offered a mental health screen.

If yes: Does the district use the LDSS 5009 - Mental Health Screening Tool and/or the computer assisted version of the Modified Mini Screening tool (MMS)?

- Yes       No

If using the MMS, indicate the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation:

If using a screening tool other than the MMS, indicate the screening tool used:

Describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result:

### **Section 6.3 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 an individual who is unable to work due to mental or physical impairment has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 6.1 of this plan. Included here is who (e.g., medical practitioner, 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 medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

Recipients claiming to be exempt due to physical/mental barriers are referred to IMA or SHAC for assessment and at times required to submit a LDSS#4526 from their physician/clinician. The results are used to determine exempt status. When recipients are found to be exempt from employment requirements they are monitored by employment vendor Urban League of Westchester. Recipients found to be exempt due to Substance Abuse histories are referred by a licensed mental health professional (SHAC or CASAC) to outpatient or long term treatment programs. These programs are monitored by the Office of Work Activities via OWA POWER and the Urban League. Treatment is also monitored by contracted inter-departmental agency DCMH (Department of Community Mental Health). Attendance is entered weekly into WTCMS by the treatment providers, changes are reported and if required the mental health professional is involved with approving the change in level of care.

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

WCDSS employment vendors: Urban League of Westchester, staff develops medical treatment plan with recipient based on IMA or SHAC recommendation and monitors compliance monthly so recipients can return to employability. Urban League of Westchester staff motivates and supports recipients to schedule and keep appointments with specialists (if necessary), determine compliance with treatment recommendations/medication and rehabilitation services.

c. Following is the district's procedure for tracking the participant's compliance with the treatment plan, including who in the district is responsible for monitoring compliance. Include elements such as monthly confirmation of attendance at rehabilitation or other factors to judge participation and progress, along with how often the treatment plan is updated:

OWA POWER and the Urban League are the units monitoring customers with treatment plans and these units conduct the following:

- Based on recommendations from the IMA, SHAC or LDSS#4526 an enrollment is entered in WTCMS;
- Develop timelines and regular intervals for recipients to be re-evaluated and ensure compliance with appointments;
- Request updated monthly treatment plan from treatment provider;
- Monitor bi-weekly outpatient substance abuse treatment attendance from provider which is entered directly into WTCMS;
- Follow up with customer on missed appointments, highlighting the need for compliance and consequences for failing to comply;
- Report progress and/or non-compliance timely to DSS eligibility staff;
- Based on new information from medical documentation or other sources, customers may be re-evaluated to determine a change in treatment plan;
- Upon successful completion of their treatment, recipients will be returned to the employable roster;