

Rockland County

Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan

January 01, 2024 - December 31, 2025

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1. Administration

1.1 Administrative Structure

- a. 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.
(Attachments must be uploaded to the system through the "Documents" screen prior to submitting the plan. Use the textbox below to provide any additional information.)

Please see attached organizational chart.

- b. Below 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 and include the responsibilities of each office.

The Rockland County DSS Employment Unit is solely responsible for the monitoring and tracking of the employment activities of TA and SNAP applicants and recipients. Our local One-Stop, Rockland Works Career Center, and community partners assist clients to meet the countable work activities mandates.

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

- a. 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 assessment 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. Districts must maintain proper monitoring and oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

Contracts or Agreements with Agencies Who Provide TA and SNAP Employment Services

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Community Outreach Center	\$41,750	Local	FA SNA Family SNA Individual SNAP TANF 200%	Assist the unemployed to obtain skills, training or education needed Assessments for job placement Assist with resume and interview skills
Martin Luther King Multipurpose Center	\$18,640	Local	FA SNA Family SNA Individual SNAP TANF 200%	Assistance conducting employment searches and creating resumes Access to computers and fax machine Assist youth prepare for employment
Westcop RCAP	\$45,710	Local	FA SNA Family SNA Individual SNAP TANF 200%	Offers job readiness workshops and job training programs Assistance with resume writing and interview skills Access to computers Dress for Success services
Haitian American Cultural and Social Organization	\$6,000	Local	FA SNA Family SNA Individual SNAP TANF 200%	Offers job development and job training assistance Assists with access to employment training support services
Rockland Urgent Care	\$7,500	FFFS Local	FA SNA Family SNA Individual SNAP TANF 200%	Conducts physical medical exams and makes employability determinations
Mental Health Association of Westchester	\$10,000	FFFS Local	FA SNA Family SNA Individual SNAP TANF 200%	Conducts mental health medical exams and makes an employability determinations
Rockland Community Development Center	\$41,250	Local	FA SNA Family SNA Individual SNAP TANF 200%	Conducts job skills screenings Assists with resume writing and interview skills Engages with potential employers Holds at least one job fair per year

- b. 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.

Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and TANF 200%.

Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Rockland Works Career Center	Others: Various funding sources including grants	FA SNA Family SNA Individual SNAP TANF 200%	Conducts employment screenings, offers job readiness training programs and job placement services, provides one on one career counseling, provides case management services and makes referrals to other community agencies or services as appropriate
Rockland BOCES	Others: Various funding sources	FA SNA Family SNA Individual SNAP TANF 200%	Offers Adult Education, TASC and ESL classes, offers Career Training Programs in various fields including healthcare, culinary/hospitality, and industrial trades

- c. Monitoring and Oversight of TANF and SNAP E&T Funded Contracts/Agreements

Described below is the process used to monitor district held contracts/agreements with providers that use TANF and SNAP E&T funds for employment services:

The Rockland County Operations, Analysis and Planning Unit is responsible for monitoring all district contracts/agreements to ensure contractors are in compliance with those written contracts/agreements. MHA of Westchester and Rockland Urgent Care are required to keep written records of services provided to clients. Personnel from OAP can review and audits these records, request reports of services provided, and physically inspect the premises where services are provided to ensure full compliance with contracts/agreements. MHA of Westchester and Rockland Urgent Care submit a voucher for payment for services rendered to OAP who confirms with the Employment Unit that the client was referred to them and completed medical paperwork was received and found to be acceptable.

1.3 OTDA Jobs Staff Agreement

- a. OTDA Jobs Program Services - Target Groups (reply yes or no to the options as they apply):

Services Provided by Jobs Staff

Yes or No:	Services Provided:
N/A	Assessment/Employment Plan
N/A	Supervised job search
N/A	Job readiness training
N/A	Job club
N/A	Job placement services
N/A	Grant diversion
N/A	Job development (employer outreach)
N/A	WOTC pre-certification

Jobs Staff Target Groups

Yes or No:	Target Groups:
N/A	Applicants
N/A	FA & SNA with children
N/A	SNA without children
N/A	SNAP
N/A	TANF 200%

- b. Described below are the additional services/duties Jobs Staff will be requested to perform (e.g., Welfare to Work Case Management System (WTWCMS) data entry, case conferencing, job fairs).

Rockland County does not participate in the OTDA Jobs Program Services.

1.4 Access to Services at New York State Career Centers

- a. Described below is how the district provides access to its programs and services with Career Center partners (reply yes or no to the options as they apply):

Programs and Services Provided at Career Centers

Yes or No:	Programs and Services Provided:
No	The district has employee(s) physically present at a Career Center
No	The district has contract staff physically present at a Career Center

Yes or No:	Programs and Services Provided:
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
Yes	Other (described here): The district makes direct referrals to the Rockland Works Career Center for TA applicants and recipients. The Employment Unit caseworker is the designated liaison to Rockland Works and works with their staff to track and follow up on client referrals.

- b. Described below is how the district coordinates with Career Center partners to provide services to the district’s clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

All non-exempt TA applicants and recipients who are placed on job search are referred to the Rockland Works Career Center. Referrals are emailed to Rockland Works and a copy is given/mailed to the applicant or recipient. Rockland Works meets with the client to discuss their educational and employment experiences and makes recommendations on services to increase employability. Rockland Works assists employment ready clients with job search. Rockland Works emails verification of referral compliance and client attendance to the Employment Unit.

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

- a. How does the district provide orientation (reply yes or no to the options as they apply)?

District Orientation Procedures

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district’s orientation provides the following: Employment orientation is conduct by Employment Unit staff. The TA worker refers the client to the Employment Unit at intake. Applicants are seen by Employment within 10 days of receipt of the referral. During orientation, clients are given information on services provided by the local One-Stop, Rockland Works Career Center, including their Youth Program Services, information on English as a Second Language and TASC classes, the child care subsidy program, home visiting services, substance abuse and mental health treatment programs.

- b. Described below is how the district completes the required orientation for all applicants and recipients of TA at application and recertification. Orientation can be held in-person, either in a group setting, individually, or a combination of both. It can also be held virtually, over the phone, or by sending orientation material to the client by mail. Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

All employment orientations are conducted individually at application or recertification regardless of whether or not the person is contesting employability. Employment orientations may be conducted in person or by phone. An Orientation to Employment Services packet is either given or mailed to clients which includes information on services provided by the local One-Stop, Rockland Works Career Center, including their Youth Program Services, information on English as a Second Language and TASC classes, the childcare subsidy program, home visiting services, and substance abuse and mental health treatment programs.

2.2 Temporary Assistance (TA) Employment Assessment

- a. How does the district conduct assessments as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

District Assessment Procedures

Yes or No:	How the district conducts assessments
Yes	The district enters assessments directly into WTCMS.
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.
No	The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. If applicable, the local equivalent contains additional elements beyond what is required:

- b. Described below is the district procedure for the completion of an employment assessment, including when initial assessments are conducted and whether an assessment is conducted in-person, virtually by phone, or a combination of both:

Employment assessments are completed for households with dependent children within 90 days of the case opening and within 1 year of case opening for households without dependent children. Staff assisted employment assessments are completed within 90 days of eligibility for 16 and 17 year-olds not in school. Assessments are completed in-person or by phone.

- c. Which district administrative unit or contractor is responsible for conducting assessments?

The Rockland County DSS Employment Unit staff conduct all assessments and enter the information directly into WTCMS.

- d. Described below are the minimum qualifications of the employees conducting the assessment (refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)):
- 1). a bachelor's degree;
 - 2). completion of 2 years of college and 1 year experience with employment interviewing or employment placement in a client service program with direct public contact;
 - 3). graduation from high school/GED program with 2 years' experience with employment interviewing or employment placement; or
 - 4). 4 years' experience in a client service program with direct public contact
- e. Are applicants in households with dependent children required to participate in completion of an employment assessment?

Yes

- f. Are applicants in households without dependent children required to participate in completion of an employment assessment?

Yes

- g. Are exempt adults in households without dependent children required to participate in completion of an employment assessment?

Yes

- h. How often and under what circumstances is the employment assessment updated?

Assessments are updated at least annually. Assessments are also updated at renewal of an exemption and any time a client reports a change in circumstance.

2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)

- a. How does the district develop individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

District Employment Plan Procedures

Yes or No:	How the district develops employment plans
Yes	The district enters employment plans directly into WTCMS.
No	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTCMS.
No	The district develops individual employment plans using a local equivalent tool. If applicable, the local equivalent contains the following additional elements beyond what is required:

- b. Who develops the employment plan (reply yes or no to the options as the apply)?

District Employment Plan Development

Yes or No:	Who develops the districts employment plans
Yes	The same administrative unit or contractor that conducts employment assessments also develops employment plans.
No	A different administrative unit or contractor develops employment plans and the contractor's qualifications include:

- c. Described below is the district procedure for the completion of an individual's employment plan:

The Rockland County DSS Employment Unit worker completes an employment plan at the time of assessment. The employment plan is entered directly into WTWCMS and is printed out and given/mailed to the client. Clients are encouraged but not required to sign the employment plan. A copy of the completed employment plan is scanned into the case record.

- d. How often and under what circumstances is the employment plan updated?

The employment plan is updated at least annually. Employment plans are also updated at renewal of an exemption and any time a client reports a change in circumstance.

3. Engagement

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

- a. Federal requirements state 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. The 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 4.1. Also included is pursuit of other forms of income such as SSI and SSDI.

- b. Described below is additional information regarding the district’s “Engaged in Work” requirements:

The Rockland County DSS Employment Unit adheres to the OTDA's definition of "Engagement in Work".

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

- a. Described below is how the district accommodates non-English speaking participants' access to employment activities and services:

Recipients who are non-English speaking are provided a translator by DSS which maintains a list of available staff who can serve as a translators for a variety of languages as needed. The Employment Unit utilizes a language line service that provides translators for a variety of languages for telephone interviews and appointments. DSS will also arrange for a translator from an outside agency if needed.

3.3 Strategies/Procedures for Increasing Program Attendance

- a. Described below are the district policies and/or procedures used to reduce the number of times participants fail to participate in work activities. This includes absences with good cause:

Participants are contacted directly by the Employment Unit using the conciliation process to ascertain the reason for the failure to participate in an assigned work activity and to determine if there was good cause for the failure. The importance of participating in assigned work activities is discussed with clients beginning at orientation and continuing through the conciliation/sanction process.

3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

- a. The following are strategies used to engage sanctioned participants. If a district uses one of the options, a description will be provided (reply yes or no to the options as they apply and provide a description for "yes" responses):

Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: Sanctioned individuals are contacted 30 days prior to the end of the sanction using Rockland County's Notice to End Your Sanction form and sent a referral for an employment assessment. Clients are offered a work activity to comply with the sanction at the time of the assessment.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Sanctioned individuals are contacted 30 days prior to the end of the sanction using Rockland County's Notice to End Your Sanction form and sent a referral for an employment assessment. Clients are offered a work activity to comply with the sanction at the time of the assessment.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Sanctioned individuals are contacted 30 days prior to the end of the sanction using Rockland County's Notice to End Your Sanction form and sent a referral for an employment assessment. Clients are offered a work activity to comply with the sanction at the time of the assessment. Sanctioned individuals can comply with their sanction at any time during the sanction period.

3.5 Strategies for Reducing the Need for TA

- a. Described below are the district’s strategies for reducing the need for TA:

TA applicants deemed employable at intake are immediately referred to the Employment Unit. The Employment worker conducts the employment services orientation and an intake screening and then assigns the client to job search as a diversion. Child Care Assistance is authorized if necessary. Clients are referred to Rockland Works Career Center and Rockland BOCES to become job ready and for assistance in finding employment. A one-time Emergency Assistance benefit may be offered if appropriate in lieu of ongoing TA benefits.

4. Work Activities

4.1 Allowable Work Activities

- a. Below is a list of activities available to individuals receiving Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), and Supplemental Nutrition Assistance Program (SNAP) benefits. In the chart below, the case type is listed next to each activity available to it in the district.

Allowable Work Activities by Case Type

Activity and Definition	Case Type
<p>Unsubsidized Employment – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Work Experience – 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>FA SNAFAM SNA SNAP</p>
<p>Job Search – 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>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p>Vocational Education – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training 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>	<p>FA SNAFAM SNA SNAP</p>
<p>Secondary School – 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 equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. 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>	<p>FA SNAFAM SNA SNAP</p>
<p>Job Skills Training – Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Education Training – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), 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>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p>Job Readiness Training (JRT) Activities – 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>FA SNAFAM SNA SNAP</p>
<p>Subsidized Private Sector Employment – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-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>	<p>FA SNAFAM SNA SNAP</p>
<p>Subsidized Public Sector Employment – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient 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>	<p>FA SNAFAM SNA SNAP</p>
<p>Community Service – 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>FA SNAFAM SNA SNAP</p>
<p>Provision of Childcare for Individual Participating in Community Service – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>FA SNAFAM</p>
<p>SNAP E&T Supervised Job Search – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>	<p>N/A</p>

Activity and Definition	Case Type
On-the-Job-Training (OJT) – 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.	FA SNAFAM SNA SNAP
Other – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.	N/A

4.2 Job Development

- a. Does the district conduct or access job development services to expand job opportunities for TA and SNAP participants?

Yes

How does the district participate in job development activities (reply yes or no to the options as they apply)?

How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: Rockland County DSS Employment Unit staff attend job fairs to meet employers and ascertain what jobs are available and what skills are needed for those jobs. The Employment Unit maintains regular contact with the Rockland Works Career Center and the Workforce Development Board of Rockland County who share information on employment opportunities, internships, and training opportunities.
Yes	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: The Rockland County DSS has an agreement with the Rockland Works Career Center which is our local One-Stop. The district has 6 Employment workers who refer applicants and recipients to Rockland Works for assistance with applying for jobs, job search and job readiness training. Rockland Works provides DSS information on job fairs, job opportunities, internships, and training opportunities.

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

- a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), 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. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.

Rockland County has contracts with local community based organizations which provide adult education, TASC and ESL programs. Clients are referred to an organization to enroll in a program and attendance and feedback is provided by the organization to DSS. Attendance is enrolled into WTWCMS.

- b. Described below is how the district identifies appropriate program 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. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

The Employment Unit reviews documentation from the educational institute or job skills training program including a detailed description of courses/services offered, completion requirements and if a certificate or placement is available upon completion. Any regionally recognized institute or program would be considered appropriate.

- c. Described below are the district's process and guidelines 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. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.

All recipients are interviewed using the WTWCMS Employment Assessment. If a recipient identifies or worker observes that the client has not attained a basic literacy level and/or attained a high school diploma or GED certificate, the client is referred to Rockland BOCES TASC program.

- d. Described below are the district's process and policy, including the guidelines 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 district would deny participation in educational activities.

While conducting the WTW Employment Assessment and developing the Employment Plan, the worker determines the client's education and job readiness levels. If the clients doesn't have a high school diploma or equivalent, the client is referred to a community agency to obtain one. Any barriers to employment or education such as childcare, substance abuse and physical/mental illness are addressed before a client is assigned to any activity.

- e. Described below is the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities.

While conducting the WTW Employment Assessment and developing the Employment Plan, the worker determines the client's education, certifications, and job readiness levels. Job skills and/or vocational education activities may be approved if appropriate and consistent with the individual's employment assessment and employment plan and results in a certification directly related to preparing for employment or the program directly relates to improving the client's overall employability.

- f. Described below are the standards by which education and training providers are evaluated.

The district refers clients to community agencies that offer education and training services. These agencies have a contract with DSS and go through a rigorous application process with the Legal Department and are reviewed periodically to ensure they are delivering contracted services as agreed upon by the Operations, Planning and Analysis Unit of DSS. These reviews include site visits and a review of on-site records.

- g. Described below is the district's procedure for advising participants of approved training.

Participants are notified verbally during orientation and during the Employment Assessment of approved trainings. Clients are also given informational flyers describing approved services from our community partners including the Rockland Works Career Center and Rockland BOCES.

- h. Described below is the district's procedure for notifying participants they are approved for training or enrollment in a work activity.

Participants are notified both verbally during a scheduled meeting with the Employment Unit and in writing either in person or by mail through a WTW referral that indicates the client is required to report to the approved training or activity. The notification to the client includes the name of the provider and the provider's address and phone number.

- i. Described below is how the district will monitor the high school attendance for 16-18 year-olds in order for them to retain their TA exempt status.

The district would only require acceptable verification of enrollment and participation in high school as determined by the school. Monthly attendance verification is not required. Individuals 16 or 17 years of age who are attending high school are exempt. If the parent or child claims the child is attending a full time secondary school, vocational school or technical school, documentation should be requested at application and recertification.

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

Before assigning a client with a health-related limitation to a worksite or other work activity site, the worksite would be notified in writing of the client's limitation and verify the site could accommodate the limitation to ensure the placement is appropriate.

4.4 Post-Secondary Education Approval and Enrollment Policies

- a. Described below is the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program (please ensure to include the current providers the districts partners with for the provision of post-secondary education programs in Table 1 or Table 2 under Section 1.2 of this plan):

The district may approve up to a 4 year degree college program directly related to improving employability on a case by case basis. The client must be in compliance with all activities mandated by the Employment Unit to be considered for approval. This is the highest level of post-secondary education that the district will approve.

- b. 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 described below (reply yes or no to options as they apply):

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

Yes or No:	Conditions for disapproval of work activity
Yes	It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
Yes	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.
Yes	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.
Yes	The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
Yes	The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
Yes	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.
N/A	Additional reasons as stated here:

5. Work Requirements

5.1 Meeting TA Work Requirements

- a. Described below is how the district plans to meet federal and State TA participation rate requirements. Included in this description is the weekly hours standard participation requirements 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 whose status changed from exempt to nonexempt. (Information regarding engaging exempt individuals is entered in Section 9).

The Employment Unit engages all newly opened cases within 1 month of activation and all individuals whose status changes from exempt to non-exempt within 1 month of the change in status. Appointment letters are mailed within 10 days of the case opening. All non-exempt clients are expected to participate in up to 40 hours per week of employment activities. Work Experience hours are calculated using the established formula of the total TA and SNAP benefits divided by NYS minimum wage divided by 4.333. Clients are assigned to job search and referred to the Rockland Works Career Center for assistance as well. Individuals' participation in activities is monitored by the Employment workers during weekly individual meetings with the client. At these meetings, documentation of activity hours is reviewed, and any concerns or barriers are addressed with the client.

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

Number of Individuals Who Receive Employment Services

Household Type	Number Served
Households with Dependent Children Average Monthly	142
Households without Dependent Children Average Monthly	123

- c. Described below is 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:

Both monthly and current COGNOS reports are utilized to identify clients who are either not counting or not meeting participation requirements. Workers review the case record to find out why the client is not meeting expectations. The client is given an appointment to meet with the worker so the client can be engaged and enrolled into the appropriate number of participation hours and potential barriers to full participation are evaluated and addressed if applicable.

d. Does the district assign TA applicants to Job Search?

Yes

If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Use the “Additional Information” column in the chart below to describe how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

Applicant Job Search

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	20	Clients report job search outcomes weekly on a job search log sheet. The 10 job contacts are online employment applications submitted through JobZone with confirmation of the submittal or in person employment applications submitted directly to the employer. The remaining 20 hours of job search can be done online or in person. Individuals are supervised on an ongoing basis no less frequently than daily. Employment workers meet with individuals on an ongoing basis no less frequently than weekly. Case management services provided include ongoing monitoring of job search progress, referrals to Rockland Works Career Center, discussing job search strategies and interview tips and addressing any identified barriers to employment.
SNA Individuals	10	20	Clients report job search outcomes weekly on a job search log sheet. The 10 job contacts are online employment applications submitted through JobZone with confirmation of the submittal or in person employment applications submitted directly to the employer. The remaining 20 hours of job search can be done online or in person. Individuals are supervised on an ongoing basis no less frequently than daily. Employment workers meet with individuals on an ongoing basis no less frequently than weekly. Case management services provided include ongoing monitoring of job search progress, referrals to Rockland Works Career Center, discussing job search strategies and interview tips and addressing any identified barriers to employment.

e. Does the district assign TA recipients to Job Search?

Yes

If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. 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 using the “Additional Information” column.

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	20	Clients report job search outcomes weekly on a job search log sheet. The 10 job contacts are online employment applications submitted through JobZone with confirmation of the submittal or in person employment applications submitted directly to the employer. The remaining 20 hours of job search can be done online or in person. Individuals are supervised on an ongoing basis no less frequently than daily. Employment workers meet with individuals on an ongoing basis no less frequently than weekly. Case management services provided include conducting an employment assessment, developing a personalized employment plan, ongoing monitoring of job search progress, referrals to Rockland Works Career Center, discussing job search strategies and interview tips and addressing any identified barriers to employment. Clients can be assigned to supervised job search for 12 weeks at most.
Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
SNA Individuals	10	20	Clients report job search outcomes weekly on a job search log sheet. The 10 job contacts are online employment applications submitted through JobZone with confirmation of the submittal or in person employment applications submitted directly to the employer. The remaining 20 hours of job search can be done online or in person. Individuals are supervised on an ongoing basis no less frequently than daily. Employment workers meet with individuals on an ongoing basis no less frequently than weekly. Case management services provided include conducting an employment assessment, developing a personalized employment plan, ongoing monitoring of job search progress, referrals to Rockland Works Career Center, discussing job search strategies and interview tips and addressing any identified barriers to employment. Clients can be assigned to supervised job search for 12 weeks at most.

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

The Employment Unit will approve self-employment conditionally if the client wishes to pursue self-employment. Clients are encouraged to certify their business with the County Clerk. The individual is asked to track and report earnings and hours worked to the Employment Unit each month. The expectation is that the client will earn minimum wage, or the client is assigned to additional work activities to ensure compliance.

5.2 Informing SNAP Applicants and Recipients of Work Requirements

The district informs SNAP households where at least one member is subject to a work requirement of the applicable work rules at certification, recertification, and when a previously exempt household member or new household member becomes subject to work requirements. Notification is provided verbally and in writing.

- a. Described below is how SNAP applicants and recipients are informed in writing of SNAP work requirements (reply yes or no to options as they apply).

Written Information Provided to SNAP Applicants and Recipients

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	Eligibility staff use the LDSS-5193 <i>Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD)</i> and the LDSS-5193A <i>Important Information about SNAP Work Rules (General and Mandatory E&T)</i> as appropriate.
No	Eligibility staff use a local equivalent consolidated work requirements notice to inform SNAP applicant and recipient households of their work requirements. Please attach a copy of the district’s OTDA approved local equivalent.

- b. Described below is the process eligibility staff follow to provide a comprehensive oral explanation to SNAP households of work requirements, including General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules which pertain to non-exempt individuals in the household.

The district informs SNAP households where at least one member is subject to a work requirement of the applicable work rules both in writing and verbally at application, recertification, change from exempt to non-exempt status, and new household member newly subjected to work rules. Verbal notification is done in person if applicable or by phone. Written notification is done by using the LDSS-5193A. Worker discussions with clients are documented in the case notes and a copy of the LDSS-5193A is scanned into the case record.

- c. Described below is how the district documents in the case record how the written information about SNAP work requirements was provided to the household (reply yes or no to options as they apply).

How the District Documents the Written Requirement in the Case Record

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	The district retains copies of all LDSS-5193/LDSS-5193A in the case record.
No	The district retains copies of local equivalent notices provided to the household in the case record.

- d. Described below is the district’s process for documenting in the case record how the oral explanation of SNAP work requirements was provided to the household (reply yes or no to options as they apply).

How the District Documents the Oral Requirement in the Case Record

Yes or No:	How oral information is provided to SNAP applicants and recipients
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
No	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
Yes	Eligibility staff document the case record through case notes/comments.

5.3 Meeting SNAP Work Requirements

- a. Described below is the extent to which the district requires NTA SNAP recipients to participate in SNAP E&T work activities. (Please note: Case management services must be provided to all participants enrolled in SNAP E&T activity):

The district does not require NTA SNAP recipients to participate in SNAP E&T work activities.

- b. If the district is offering Supervised Job Search as an E&T activity component, describe below how the job search activity will be supervised and tracked, including the frequency of monitoring the participant’s job search efforts.

The district does not require NTA SNAP recipients to participate in SNAP E&T work activities.

- c. If the district is not mandating SNAP E&T work activity assignments, please describe below 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 offer job search assistance to NTA SNAP applicants and recipients):

TA/SNAP workers inform clients of available SNAP E&T services at application, recert and intake. Clients are referred to the Employment Unit where they are provided information on job search and JobZone, offered job search assistance and connected to the Rockland Works Career Center. Information is provided verbally and in writing in the form of flyers

from Rockland Works Career Center and Rockland BOCES. A list of job search websites is also provided.

5.4 Advising Households of Employment and Training Services

At the time of recertification, non-exempt SNAP recipients who are members of certain TA/SNAP and NTA/SNAP households must be advised of the availability of employment and training services within the district and/or region. This requirement applies non-exempt recipients in households containing at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report.

- a. Described below is who the district provides information about employment and training services to (reply yes or no to the options as they apply):

Who the District Provides Employment and Training Services Information to

Yes or No:	Who the district provides employment and training services information to:
Yes	Required population only
No	Other groups described here:

- b. Described below is the method the district uses to advise SNAP recipients of available employment and training services at recertification (reply yes or no to the options as they apply):

How the District Provides Employment and Training Services Information

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
Yes	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website: Materials are available at rocklandgov.com/departments/social-services/eligibility-programs/#employment . Clients are verbally directed to the website by TA, SNAP, and Employment workers. Rockland is contracted with Rockland Works Career Center and Rockland BOCES to provide E&T services to non-exempt TA/SNAP and NTA SNAP recipients. Clients are provided with informational flyers about available services and contact information for these community partners.
Yes	Material and information provided via email.

5.5 Provider Determinations

- a. Not every activity assignment/referral to training might be the right fit for every participant. As such, districts are required per federal regulations at 7 CFR 273.7(c)(18) to have procedures in place for when a provider/contractor determines an individual is not a good fit for a particular activity or program they are referred or assigned to. This is called the provider determination process. Described below is the district's process for provider determination, including the process for screening individuals prior to referral to a provider, how to communicate information related to provider determinations with the district, how workers communicate information related to provider determinations with the client, and documenting provider determinations.

Employment workers use the employment assessment and employment plan to determine an appropriate work activity and placement if applicable for a client. The worker discusses with the client the recommended activity or placement and addresses any concerns or potential barriers to the client's participation. The worker contacts the provider by email or phone to discuss availability of placements and arrange for a start date. The provider notifies the worker by phone or email within 10 days of the determination that the client is not a good fit. The worker reaches out to the client within 10 business days of the provider notification. Feedback is provided to client on their performance and informed that no negative action will be taken on their benefits. Discussion is documented in the case notes. Client is given a referral to be assigned to work activities and a new placement is arranged or the client is assigned to a different activity if appropriate. If appropriate, the client will be screened for a medical exemption.

- b. Described below is the district process for informing providers of their authority and responsibility to determine if an individual is not a good fit for a particular activity or program.

The worker informs the provider in writing or verbally of their authority and responsibility to determine if a client is not a good fit for their program during the placement process.

- c. Described below is the district process for provider oversight to ensure that provider determinations are not unfair or used to discriminate against protected classes.

The Employment Unit Eligibility Specialist reviews all not a good fit provider determinations to ensure they are fair and not discriminatory. The Employment Unit Eligibility Specialist follows up with the provider and client as needed.

6. Quality Assurance/Work Verification

6.1 Quality Assurance Process - Random Case Sampling

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.

The district will sample cases from each month within the (6 month) semi-annual period. The October to March review will be due by May 20th. The April to September review will be due by November 20th. The results of these audits will enable the district to identify policies, processes or cases that may need corrective action.

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at AQI.WV.SelfAudits@otda.ny.gov 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 (QA) plan must include the following elements:

- 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 WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) 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 parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

- b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

- c. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA Employability Code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

- d. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 31 – “Parent or caretaker relative of a child under 12 months of age”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

The district will review district worker or approved provider/vendor collected documentation and data entry of the above listed elements. The district will assess and verify that participation in the reported work activities listed above meet the State approved definition for the activity.

6.2 Use of Outside Providers/Vendors

- a. Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?

No

- b. If Yes, does the district’s provider/vendor documentation collection, data entry and management of WTWCMS follow the same process that would be used by the district worker?

N/A

- c. If No, describe below the process used:

N/A

7. Supportive Services

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

- a. The district must provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide 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:

The district will provide bus tickets for individuals to participate in work activities. A taxi may be provided for a health-related evaluation if necessary. The district may authorize Extended Supportive Services to assist and support a client's move toward self-sufficiency.

- b. Indicated below are the services the district will use 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 (reply yes or no to the options as they apply).

Transportation Services Provided to Clients

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
No	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
No	Other mileage rate (the methodology used to establish reimbursement rate is described here):

- c. OTDA policy establishes a distance not to exceed two miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. Describe below the distance an individual may be required to walk, each way, to a work activity or to access public transportation:

The district requires clients to walk no more than 2 miles to participate in work activities and/or access public transportation. Workers will take into consideration additional factors such as inclement weather, ease of the terrain and safety when determining if the 2 mile maximum distance to participate in work activities and/or access public transportation should be waived.

- d. Described below are the services the district will provide to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:

Individuals at risk of needing TA will be assessed for barriers to obtaining and maintain employment. Based on the assessment, client will be referred to the appropriate community agencies to address identified barriers such as the Rockland Works Career Center, Rockland BOCES, mental health treatment providers and substance abuse treatment providers.

7.2 Post-Employment/Transitional Supportive Services

- a. Described below are the supports and strategies the district will provide to support job retention:

The district provides support services in the form of ongoing bus tickets so clients can continue employment and Extended Supportive Services up to a \$600.00 lifetime cap to cover the costs of work exams, uniforms, work boots, tools, and licensing fees.

- b. Described below are the support services (for up to 90 days after case closing) the district will provide to individuals whose TA cases have closed due to employment:

The district provides support services in the form of ongoing bus tickets so clients can continue employment and Extended Supportive Services up to a \$600.00 lifetime cap to cover the costs of work exams, uniforms, work boots, tools, and licensing fees.

7.3 Extended Support Services

- a. Described below are the support services the district will provide for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines. These services can be provided as long as funding is available (FFFS, etc.):

As long as funding permits, the district will consider assisting clients with paying for certification exams and fees, application fees, cost of uniforms and work boots and fees for background checks if it will lead to permanent employment. The district will assist with TA diversion payments such as rental arrears and payment to prevent utility termination.

8. Conciliation, Sanction and Dispute Resolution Procedures

8.1 Conciliation

- a. The district's conciliation process for TA applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(a). Indicate below how conciliations are conducted (reply yes or no to the options as they apply).

How the District Conducts Conciliation for TA Applicants and Recipients

Yes or No:	How conciliation is conducted
Yes	In person

Yes or No:	How conciliation is conducted
Yes	By phone
Yes	By mail

The districts process for conduction TA conciliations is described below:

Clients who fail to comply with a work activity are notified using the WTW Conciliation Notice. Clients are given 10 days to respond to the Conciliation Notice and may respond in person, by phone or by mail. All claims of good cause will be considered. The Employment worker makes a good cause determination and either positively resolves the conciliation or refers the client for sanction or denial.

- b. Who makes the TA good cause/willfulness determination (reply yes or no to the options as they apply)?

How the District Makes the Good Cause/Willfulness Determination for TA Applicants and Recipients

Yes or No:	Who makes the TA good cause/willfulness determination?
Yes	The client's employment worker
Yes	A supervisor in the district
No	A separate entity (described here):

- c. The district's conciliation process for SNAP applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(d). Indicate below how conciliations are conducted (reply yes or not to the options as they apply).

How the District Conducts Conciliation for SNAP Applicants and Recipients

Yes or No:	How conciliation is conducted
Yes	In person
Yes	By phone
Yes	By mail

The district's process for conducting SNAP conciliations is described below:

Clients who fail to comply with a work activity are notified using the WTW Conciliation Notice. Clients are given 10 days to respond to the Conciliation Notice and may respond in person, by phone or by mail. All claims of good cause will be considered. The Employment worker makes a good cause determination and either positively resolves the issue or refers the client for sanction. To avoid a SNAP sanction, the client has 10 days to conduct 5 hours of supervised job search.

- d. Who makes the SNAP E&T good cause/willfulness determination (reply yes or no to the options as they apply)?

How the District Makes the Good Cause/Willfulness Determination for SNAP Applicants and Recipients

Yes or No:	Who makes the TA good cause/willfulness determination?
Yes	The client's employment worker
Yes	A supervisor in the district
No	A separate entity (described here):

- e. Described below is the district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction:

The district engages the client using the established conciliation process described in section 8c during which the client is given the opportunity to discuss and comply with the SNAP E&T non-compliance. To avoid a SNAP sanction, the client has 10 days to conduct 5 hours of supervised job search.

8.2 Sanction

- a. Described below is the district's procedure for determining compliance for those TA 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:

TA recipients who wish to end their employment sanction may have their benefits restored once the sanction duration has expired and the client demonstrates a willingness to comply with required work requirements. The client has 10 days to conduct 5 hours of supervised job search to demonstrate a willingness to comply. Once compliance is demonstrated, TA benefits are restored retroactive to the date the individual indicated a willingness to comply but not before the end of the durational sanction period.

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

SNAP recipients who wish to end their employment sanction may have their benefits restored once the sanction duration has expired and the client demonstrates a willingness to comply with required work requirements. The client has 10 days to conduct 5 hours of supervised job search to demonstrate a willingness to comply. Once the compliance is demonstrated, benefits will be restored effective the first month following the month of compliance but no earlier than the expiration of the minimum duration period. A recipient may have their benefits restored prior to the end of the sanction duration if they document they now meet the criteria for a SNAP work exemption.

8.3 Dispute Resolution

- a. 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 must be conducted in accordance with 18 NYCRR 385.11(c). Indicate below who mediates the grievance (reply yes or no to the options as they apply).

Grievance Mediation

Yes or No:	Who makes the TA good cause/willfulness determination?
No	An independent entity which has an agreement with the district.
No	Supervisory staff who are trained in mediation and who have no direct responsibility for the individual’s case.
Yes	Designated supervisory staff who have no direct responsibility for the individual’s case and who are not trained in mediation.

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

- a. The district’s process for determining an individual’s disabilities and/or work limitations must be in accordance with 18 NYCRR 385.2(d). Indicate below what the district’s process is for determining an individual’s disabilities and/or work limitations (reply yes or no to the options as they apply).

Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual’s disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
Yes	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician’s statement provided by participant.
Yes	District accepts physician’s statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: If a client indicates they have a medical reason that prevents them from participating in work activities, the client is given a LDSS-4526 to have completed by their medical provider. The client is given a needs letter (LDSS-2642) for the completed medical form and has 10 days to submit the form to the Employment Unit. If the client indicates they can not participate in activities because they are needed in the home to care for a disabled family member, the same process is used except the client is given a Needed in the Home form to complete and return. The District contracts with two independent providers to conduct medical

Yes or No:	How the district determines an individual's disabilities and/or work limitation
	examinations to determine employability if a client does not have a medical provider. A copy of the Needed in the Home form has been uploaded to the Documents section of the plan.

- b. Described below is the district's procedure for notifying an individual of their exempt or non-exempt determination whenever an individual alleges to be unable to participate, or the individual otherwise participates in the employability disability review, including when an individual is notified that their status changes from exempt to non-exempt:

The Employment Unit Eligibility Specialist reviews the completed LDSS-4526 and/or other medical documentation submitted by the client's medical professional. Submitted documentation is compared to previously submitted documentation if applicable to see if the client's condition has improved or deteriorated over time. The case record is reviewed for worker observations of/interactions with the client and to see if the client has expressed difficulties complying with work activities. The Eligibility Specialist makes the eligibility determination on the request for a medical exemption from work activities. If submitted documentation is contradictory, the client may be requested to see the district's contracted medical provider at the Agency's cost. The Eligibility Specialist sends the determination to the caseload worker who notifies the client in writing using the LDSS-4005/4005a and assigns the appropriate employment code. Clients are notified in writing within 7 days of the determination being made of the decision.

- c. Described below is how the district notifies an individual of their exempt or non-exempt determination (reply yes or not to the options as they apply):

Process for Notifying an Individual of Their Exempt or Non-Exempt Status

Yes or No:	District's process for reviewing medical documentation
Yes	The district sends the LDSS-4005 or LDSS-4005a and retains a copy in the case record.
No	The district sends a local equivalent and retains a copy in the case record.

- d. Indicated below is the process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited and describe the process by which the determination is made (reply yes or no to the options as they apply).

Process for Reviewing Medical Documentation

Yes or No:	District's process for reviewing medical documentation
No	District directs the contracted physician or individual's physician to determine status.
Yes	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):

Yes or No:	District's process for reviewing medical documentation
Yes	Other process: The Employment Unit Eligibility Specialist reviews the completed LDSS-4526 and/or other medical documentation submitted by the client's medical professional. The Employment Unit Eligibility Specialist also reviews any previously submitted medical documentation as well as any previous medical exemption determinations to see if there has been any change in the client's physical or mental health functioning. The case record is also reviewed to see if there is any history of receipt of or application for SSI/SSD.

9.2 Mental Health Screening and Assessment

- a. In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?

No

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

N/A

- c. What screening tools does the district use (reply yes or no to the options as they apply)?

Screening Tools the District Uses

Yes or No:	Screening Tools
N/A	LDSS 5009 - Mental Health Screening Tool
N/A	The computer assisted version of the Modified Mini Screening tool (MMS)
N/A	Other Screening tool (described here):

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

N/A

- e. Describe below the procedure the district uses if the screening tool warrants a mental health evaluation referral:

N/A

9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))

- a. An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist them 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 the individual is participating in the assigned program.

Described below 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 9.1 of this Plan. Indicate who makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities (e.g., medical practitioner, employment worker, TA worker, local review team, etc.). Also indicate 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.).

The Employment Unit Eligibility Specialists reviews the completed LDSS-4526 and/or other medical documentation submitted by the client's medical professional. If the LDSS-4526 or other submitted documentation recommends rehabilitation treatment such as physical therapy, mental health treatment or substance abuse treatment, the district requires the client to comply with those recommendations.

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

The Employment worker requests a treatment plan and treatment schedule from the client's medical provider for any recommended rehabilitation treatment listed on the LDSS-4526 and/or other medical documentation submitted to the Employment Unit using a WTW referral.

- c. Described below is the district's procedure for tracking the participant's compliance with their 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.

Once a treatment plan and schedule are received for the client, the Employment worker enrolls the treatment in WTW and monitors attendance through the use of monthly attendance sheets. Clients submit completed and signed attendance sheets from their treatment provider to the Employment Unit. An Employment worker may contact the treatment provider directly to request attendance verification if needed. A client's progress is evaluated at assessment, exemption renewal and at the end of the expected duration of treatment as indicated by the treatment plan and schedule.

10. District Certification

10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Rockland County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2024 through December 31, 2025. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations, and provisions of this Plan.

1/10/2024
Joan Silvestri
Commissioner