

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

January 1, 2022 - December 31, 2023

## **Westchester County**

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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.)*

DOCUMENTS ATTACHED: Updated Employability Statement 02.21; WCDSS OTFS-Central Office Org Chart, WCDSS Office of Work Activities Org Chart, WCDSS Yonkers Family Investment Org Chart, WCDSS Mount Vernon Family Investment Org Chart, WCDSS White Plains Family Investment Org Chart, WCDSS Peekskill Family Investment Org Chart, WCDSS OTHA Family Investment Org 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 Office of Work Activities (OWA) 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. Since the last Biennial Plan 2020 -2021, the COVID 19 Pandemic has changed the way in which WCDSS engages customers in the employment process. Standard activities such as orientation, assessment, medical evaluations, and referrals for activities have continued throughout the 2020-2021 pandemic. Face-to-face contact was waived for much of the time period, and most services have been offered telephonically with remote learning and telehealth options. OWA has three units of Department of Social Services personnel and five contracted agencies under our contractor/vendor operations. The three DSS distinct units consist of workers who perform specific functions: Social Case Workers (OWA RISE), Employment Counselors (OWA DRIVE) and Eligibility Examiners (OWA POWER).

OWA Social Case Workers (RISE / Rise Into Stable Employment) perform the following functions with TA applicants: Upfront Engagement of applicants, DSS Employment focused orientations, initial assessments, re-assessments, referrals to the Career Center, create enrollments for activities, referrals to contractors for medical, psychological and/or substance abuse, including alcohol, evaluations, and requests for code changes. In addition, they also send documentation requests for information on employment, disabled household members, medical/mental health information to be relayed to certification or the appropriate Eligibility unit. The Social Case Workers work with applicants until the case has been appropriately coded and approved. If contesting or exempt, the customer may be reassigned to another OWA unit or our exempt contractor. Once approved, the nonexempt cases are referred to the OWA Employment Counselors for enrollment in a work activity. They also refer nonparticipating customers to the Employment Counselor once the reassessment has been completed. Social Case Workers engaging homeless customers in our shelter system perform all the above functions but the cases remain with the Worker until the customer is permanently housed. The work of the RISE unit is monitored by a Supervisor of Case Work who oversees Senior Social Case Workers and Social Case Workers. All Workers are co-located within our four District Offices and an OWA Senior Social Case Worker supervises each sub-division.

OWA Employment Counselors (DRIVE / Determination Resilience Integrity Vocation & Empowerment) perform the following functions with TA nonexempt applicants and recipients: Applicant Supervised Job Search in the Career Centers, enrollment of recipients into approved work activities such as Community Work Experience Programs, Job Readiness Training, Vocational / Educational / Job Skills Training. Customers are triaged into the appropriate program based on the components in the assessment. The Employment Counselors monitor the customers engagement closely to provide guidance, ensure supportive services are in place, and address any issues that may arise when a customer is newly placed. The work of the DRIVE unit is monitored by an Eligibility Supervisor. The OWA POWER Eligibility Unit performs eligibility and employment functions. This unit works with nonexempt customers housed in Westchesters White Plains and Peekskill catchment areas. They also enter actual hours for treatment for customers with work limitations. There are specialized workers that monitor substance abuse treatment enrollments for customers coded 63 who participate in full-time outpatient treatment in Westchester and also those in residential facilities outside of the County. Other workers in this unit monitor customers with domestic violence waivers to ensure that this vulnerable population is coded properly and re-referred for evaluation when needed. OWA POWER also reviews Emp Code 32 cases to identify cases eligible for SSI. This unit processes vendor transactions, continuously works on special projects and conducts internal auditing for the Department.

Within the District Offices, OWA works in collaboration with other sub-division Employment Unit Eligibility Examiners who perform the following functions TA recipients: referral of customers to Employment Counselors for placement in a work activity, referrals to contractors for medical, psychological and/or substance abuse evaluations for contesting customers, create activity enrollments and monitor attendance in WTWCMS. They are responsible for recouplements, Eligibility Call Ins, IMA follow-up, fair hearings, ABAWD related activity and under-care functions for those working with employed cases. Their functions also include processing supportive services such as clothing, transportation, and childcare; transactions such as code changes, budgeting, re-budgeting, closings, reactivations, lifting sanctions, dispute resolutions; including noncompliances, conciliations, and sanctions for customers who fail to comply. The Employment Unit Examiners also process all transactions for exempt and nonexempt cases referred from contracted agencies. Each district sub-division is supervised by a Supervising Eligibility Examiner and a Temporary Assistance Manager.

Depending on case circumstances, members from each unit interface with other departments within DSS such as certification, recertification, the SNAP center, Adult Protective Services and Child Welfare. WCDSS personnel work together in order to provide quality customer service and meet the immediate needs of those vulnerable in our communities.

Part of the WCDSS TA Population is case managed and monitored by our contractor the Urban League of Westchester County. Depending on the code and circumstances, customers are in either the Urban League H.E.A.L or P.W.W. program.

HEAL, EMPOWER AND LIFT: H.E.A.L. is the program that works with exempt recipients with employment codes 36, 41, 42 & 43. H.E.A.L. Case Managers review initial treatment plans and medical recommendations from IMA, SHAC, and/or DCMH CASAC. Based on these recommendations they enter health related enrollments in WTWCMS and monitor the customers' attendance and compliance with treatment on a monthly basis. Customers may require re-evaluation if the exemption expires or if other issues are presented. H.E.A.L. also

conducts reassessments which may highlight these issues or require a code change. The goal is to aide customers in their treatment until they become employable and require a code change. Customers who fail to comply are referred to Eligibility for sanction. Customers deemed permanently disabled with a recommendation to apply for Supplemental Security Income are referred to Maximus the SSI Advocacy Contractor.

PUTTING WESTCHESTER to WORK - P.W.W. is the Job Development program that works with nonexempt recipients. P.W.W. consists of a Job Development component where customers are engaged in supervised job search and meet with Job Developers regularly for placement into employment. They also work with the underemployed to find better and more stable employment, which includes job retention. P.W.W. also conducts a STRIVE Intense Attitudinal Job Readiness Training every other month. Customers successfully completing STRIVE are referred immediately for job placement. For customers who require more hard skills development, P.W.W. will refer to vocational opportunities or Community Work Experience sites they have developed.

The Urban League monitors customers' treatment plans through progress reports they receive from the treating entity, CWEP attendance from weekly attendance reports. IMA, SHAC and CASAC send confirmation that customers kept their appointment.

## **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.

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Westchester Community College/ Job S.T.A.R. Program	\$613,347	<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 checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job STAR provides Vocational and Educational Programming for the WCDSS population. Services include but are not limited to : Educational Assessments, TABE Testing, Adult Basic Education, skill enhancement training, credit-bearing certificate programs, food preparation and computer training, CWEP/Internships, and post-placement -Job Advancement Services
Westchester County Department of Community Mental Health/ CASAC	\$744,438	<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%	DCMH Credentialed Alcoholism and Substance Abuse Counselors (CASAC) conduct Drug And Alcohol assessments for appropriate applicants and recipients on Temporary Assistance. Services include referrals to outpatient programs, Inpatient rehab, detox and residential treatment programs. DCMH CASAC's conduct conferences on crisis cases, monthly monitoring of all customers, discharge planning and referrals to programs with higher levels of care. In collaboration with the treatment programs, DCMH works on developing a plan with the customer that leads to self-sufficiency.
Westchester County Department of Parks / Advancement Through Parks	\$180,312	<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 type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	WCDSS entered into an Interdepartmental Cooperative Agreement with Westchester Parks Department to provide on-the-job training and employment placement and retention services for TANF (FA) and SAFETY NET FAMILIES (SN MOE) customers on work experience assignments in various County parks. Customers learn work related skills in the following: building maintenance, grounds keeping, horticulture, customer service, clerical, food service etc

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
IMA Industrial Medicine Associates	\$200,000	<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%	IMA performs medical, psychological and IQ testing for applicants and recipients on public assistance. IMA also provides a specialized evaluation to help identify if homeless customers understand their consequences for failures to comply with housing and employment rules.
Mount Vernon/Greenburgh Health Center	\$1,075,696	<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%	Mount Vernon/Greenburgh Health Center provides physical medical evaluations for WCDSS Homeless Singles residing in homeless shelters. This evaluation is part of the SHAC assessment that is submitted to WCDSS to determine employability codes and ensure that customers are placed in housing suitable for their medical conditions.
Maximus	\$500,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input checked="" type="checkbox"/> Other State and Federal	<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%	Maximus accurately screens and identifies potentially SSI/SSDI eligible TANF participants to increase the number of approved applications and maximize resources.
M.H.A. Mental Health Association	\$422,043	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	MHA provides case management, CASAC and mental health services to the Single Homeless population residing in Temporary Housing shelters.
Urban League of Westchester/ P.W.W.- Putting Westchester to Work	\$1,799,750	<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 checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	PUTTING WESTCHESTER to WORK - P.W.W. is a Job Development program that works with nonexempt recipients. The P.W.W. team is comprised of Case Managers who conduct assessments, refer customers to work activities such as vocational training and Community Work Experience Programs. The team also includes Job Developers who recruit employers that are hiring individuals with our participants' skill sets and who offer part and full time hours, competitive wages/benefits and opportunities for advancement. The Job Developers engage participants in supervised job search and meet with them regularly for placement into employment. P.W.W. works with the underemployed population to assist them in obtaining better

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
				and more stable employment opportunities, that will lead to self-sufficiency. The P.W.W. Retention Specialist supports program participants after their DSS case has been closed due to employment. At the local Career Center P.W.W. conducts a STRIVE Intense Attitudinal Job Readiness Training every other month. Customers successfully completing STRIVE are referred immediately for job placement from a list of interested employers seeking job ready and willing applicants.
Urban League of Westchester / H.E.A.L. - Heal, Empower, And Lift	\$1,000,175	<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%	HEAL, EMPOWER AND LIFT: H.E.A.L. is the program that works with exempt recipients with employment codes 36, 41, 42 & 43. H.E.A.L. Case Managers review initial treatment plans and medical recommendations from IMA, SHAC, and/or DCMH Substance Abuse. Based on these recommendations they enter health related enrollments in WTCMS and monitor the customers attendance and compliance in treatment monthly. Customers may require re-evaluation if the exemption expires or if other issues are presented. H.E.A.L. also conducts re-assessments which may highlight these issues or require a code change. The goal is to aide customers in their treatment until they become employable and require a code change. Customers who fail to comply are referred to Eligibility for sanction. Customers deemed permanently disabled with a recommendation to apply for Supplemental Security Income are referred to Maximus the SSI Advocacy Contractor.

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Yonkers Chamber of Commerce (SNAP E&T)	\$600,000	<input type="checkbox"/> FFFS <input checked="" 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 checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Yonkers Chamber of Commerce SNAP Employment and Training (SNAP E&T) Program. Provision of SNAP Employment and Training 50% Certified Training and Job Placement Program for Non-Temporary Assistance SNAP Recipients

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.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
SUNY Westchester Educational Opportunity Center (WEOC)	Others: State and Federal	<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%	Westchester Educational Opportunity Center (WEOC) provides tuition-free academic and vocational training, college preparation, and workforce preparation programs and services to adults. These certified, credential earning programs include vocational and educational training for Security Guard, CDL, OSHA30, HSE, and English as a New Language (ENL). They also offer training for HHA, CNA, EMT, Pharmacy Technician, and other health related occupations. Customers receive a credential or certificate of completion upon graduating from these courses.
VIVE SCHOOL Pathways to Success	Others: State and Federal	<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%	Housed at the Vive School, Pathways to Success offers Basic Skills, High School Diploma Preparation (TASC and NEDP), and English as a New Language (ENL) The credentialed Vocational Training includes Culinary Arts, Microcomputer Applications, Retail trades, OSHA 10, CPR, Barbering, PCA and Medical Billing. Customers receive a credential or certificate of completion upon graduating from these courses.
Westchester/Putnam Career Center Network	Others: State and Federal	<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%	The Westchester-Putnam Career Center Network is made up of four physical locations that provide free resources and services to both job seekers and employers. The Career Centers are primarily staffed by Westchester County, Putnam County, and New York State Department of Labor employees and include a state-of-the-art resource room, workshops, employment counseling, and career and training services for youth, adults, and employers. The Career Centers also include staff from partner agencies and a referral network to provide expanded services. Resources can also be accessed on this website.

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:

Each month contractors are required to submit Performance Measurement Indicator Statistics (PMIs). These PMIs allow DSS Management to get an overview of numbers served, specific services rendered and any possible red flags in the referral process. The OWA Program Administrator communicates regularly with Contractor management regarding new State guidance, changes in County procedures, unexpected situations like increasing caseloads and developing more effective ways to provide services. Programs may be asked to submit additional information on specific areas of their work as part of OWA's quality assurance process. Periodically, random case samples are pulled for review and submitted to the Contractor for Corrective Action.

### 1.3 OTDA Jobs Staff Agreement

a. OTDA Jobs Program Services - Target Groups. Check all services and target groups that apply:

Services:

- Assessment/Employment Plan
- Supervised Job Search
- Job Readiness Training
- Job Club
- Job Placement Services
- Grant Diversion
- Job Development (employer outreach)
- WOTC pre-certifications

Target Groups:

- Applicants
- FA & SNA with children
- SNA without children
- SNAP
- TANF 200%

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

## 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 (select 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. 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.

Nonexempt TA applicants are referred during upfront engagement to the OWA Employment Counselors in the local Career Centers. Customers are referred to orientations, workshops, on-site trainings, job fairs, and appointments with members of the Business Team that serve as job developers. Applicants and recipients are assessed for Individual Training Accounts (ITAs) and other grant funded programs. OWA Employment Counselors support customers in their job search efforts by referring them to various work-related workshops and trainings, accessing websites such as [westchesterputnamonestop.com](http://westchesterputnamonestop.com) and [JobZone.ny.gov](http://JobZone.ny.gov). TA and SNAP customers have access to all services offered by the career centers including occupational skills training, JobZone, department of labor employment counselors in addition to the career center partners such as ACCES-VR. In addition, these customers must comply with their job search requirements by submitting monthly job logs. OWA contracted vendor, the Urban League, operates their STRIVE Intense Attitudinal Job Readiness Training directly out of the Mount Vernon Career Center. Urban League staff utilize a training room specifically designated for their program and STRIVE participants utilize the additional resources offered through the Center.

## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

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

- b. Described below is how the district completes the required orientation for all applicants and recipients of TA (e.g. in a group setting, individually, or a combination of both). Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

The orientation is conducted primarily on the phone. At orientation, OWA RISE Social Case Workers provide all applicants with a MS PowerPoint presentation. If the customer does not have a working phone, arrangements are made for the customer to safely come to their Local District office to complete Orientation. The Orientation is usually conducted one-on-one using a computer. If a customer wanted a hard copy of the presentation it was emailed or mailed to their address. The Orientation presentation has been translated into Spanish both in the printed and PowerPoint versions. If a customer speaks and/or understands a language other than English or Spanish, the worker will use the Language Line translators. Orientation for exempt and nonexempt individuals are the same. Upon completion of the Orientation, the applicant will be asked to complete an Employability Statement which indicates if there are any issues with enrolling in a work activity. If the applicant provides information on a medical, psychological and/or drug and alcohol use, the applicant can submit a LDSS 4526 or a referral is made for further evaluation with IMA or CASAC. If the customer provides information on a medical, psychological and/or drug and alcohol abuse issue, a referral is made for further evaluation and the case might be referred to ULW HEAL for assessment. (Urban League HEAL works exclusively with exempt individuals)

## **2.2 Temporary Assistance (TA) Employment Assessment**

- a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:
- The district enters assessments directly into WTWCMS
  - The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
  - The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. Please attach the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them below:
- b. Described below is the district procedure for the completion of an employment assessment:

Upon completion of the Orientation, applicants with and without dependents will be referred to complete an assessment within 30-45 days of application approval. If the applicant discloses a medical and/or psychological issue they will be assessed by ULW HEAL Case Managers. All other applicants are assessed by the OWA Social Case Workers. Social Case Workers and HEAL Case Managers conduct the full initial assessment (inclusive of all required elements) to gather information on family circumstances, educational and work history, including strengths, needs and barriers toward seeking gainful employment.

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

OWA RISE, Social Case Workers are responsible for conducting upfront applicant assessments. Customers who contest employability for mental health and/or physical conditions are referred upfront to the ULW H.E.A.L. Case Management unit for assessment.

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)):

All staff conducting assessments completed WTWCMS systems training through OTDA. They have also received District coordinated informal training from workers who have completed ESTI (Employment Services Training Institute) training. DSS workers possess a minimum of a bachelors degree. Contracted vendors possess a minimum of high school diploma or equivalency. However, many of the employment staff from all units possesses 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 JobSTAR personnel are graduate level administrators with degrees in education and psychology. All personnel administrating assessments either have been trained in motivational interviewing or have demonstrated effectiveness in evaluating employability and plan development to prepare the assessments and plans required by this section.

e. Are applicants in households with dependent children required to participate in completion of an employment assessment?

Yes

No

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

Yes

No

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

Yes

No

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

Assessments are updated at minimum yearly for individuals with and without dependent children. However, they can be updated within the year if circumstances change i.e. code changes, life circumstances change, discharge from residential treatment, newborn etc. Depending on the customer's availability reassessments are conducted in person or over the phone. OWA Social Case Workers and Employment Counselors complete the majority of reassessments. However, there are instances where Eligibility Examiners may complete reassessments if needed. Case Managers from both Urban League programs reassess customers enrolled in their programs. Cases with Employment Codes 32, 43, 44 and 54 are initially assessed and do not require reassessment.

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

- a. The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:
- 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 tool. If the local equivalent contains additional elements beyond what is required, list them 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:
- c. Described below is the district procedure for the completion of an individual's employment plan:

Nonparticipating nonexempt customers are referred to an OWA Worker or a contracted employment worker to be placed in an activity. Employment Plans are completed in conjunction with the customer in a conversational manner using motivational interviewing skills. Depending on system availability, the Employment Worker will complete the Employment Plan in WTCMS or use the printed LDSS 4978 (NYS Employment Plan). If using the printed version, the information is entered into WTCMS when a computer is available.

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

Employment Plans are updated when the customer is initially placed in an activity and when the activity changes i.e. job search to vocational training, CWEP to Employment.

## 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 district's local "engaged in work" requirements also include the following: Drug/Alcohol Treatment to restore a person to employability; Medical treatment/rehabilitation to restore a person to employability; Remedial education, adult basic education, TASC (formerly GED) or education in English proficiency to enable a person to attend vocational training or to achieve employability; Participation in ACCES-VR (formerly VESID); Providing care for another member of the household who has a verified mental or physical impairment.

### **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:

WCDSS utilizes licensed and certified providers such as EOC, Yonkers Public Schools VIVE program that provide English as a New Language (ENL) instruction. When possible, non-English Speakers are referred to sites where someone on-site speaks the same language i.e. Spanish speaking customer is referred to CWEP at the Hispanic Coalition.

### **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:

Opportunities are available via virtual/remote learning for vocational and educational training. It was imperative that the Workers spoke to the customers about whether they had access to a functional computer, reliable Internet Service and enough minutes on their telephone. If possible, customers are referred to the activity and attendance is monitored through communication with the Activity Provider. During the placement interview, customers develop an Employment Plan with the Employment Counselor or ULW PWW staff to help identify any barriers and supportive services needed to comply with the work activity. Customers also review and sign a TA Activity Agreement that outlines key factors such as having a back-up plan for childcare, being accountable and responsible with lateness and absences, identifying bus routes ahead of the first day etc. Once the customers are placed at a site, the Employment Counselors or PWW staff monitor the activity closely during the initial weeks for lateness, absences, supportive services or any issues that may arise. This also includes regular, sometimes-daily, communication with the site coordinator. Most sites have good working relationships with both units and feel comfortable reaching out immediately if there are any concerns. In order to remain in compliance with work requirements customers are informed that they may have to make up hours for their absences. The DSS Pride in Our Parks and Roads program addresses the transportation barrier by picking up and dropping off customers at a central location close to their residence.

Monthly meetings are held with DSS staff and vendor staff identifying specific cases that are not meeting participation rate requirements. The primary focus is to examine and strategize those cases in noncompliance and those with excessive absences. The discussion identifies

paths to move these hard to serve 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 WTCMS reports are utilized in assisting case managers with their caseloads.

### 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

a. Select all that apply:

- Described below are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:

As soon as WE1 sanction is imposed, eligibility workers send family assistance customers a letter to come in to District Office and discuss compliance. If customer keeps the appointment and is willing to comply and it is not a durational sanction, compliance requirement is discussed with customer. Depending on why the sanction was implemented, assessment or participation in a work activity, customer is advised of what is needed. If an assessment is needed, once customer is assessed, referral to examiner to lift sanction is sent. If customer is sanctioned due to participation in a work activity, sanctioned individual is referred to the Career Center for assistance with job search and assignment of an applicable work activity. The customer will work with the Career Center Employment Counselors on fulfilling one week of Job Search, 20-40 hours depending on the employment code and individual circumstances. Once the requirement of job search has been met, the Employment Counselor will make a request to eligibility to have the sanction lifted. Participation in the new work activity identified by the employment counselor will also be assigned for on-going compliance. If a Safety Net Individual has been newly sanctioned WE1, they will have to continue on sanction for 90 days. An enrollment for Job Search will be created with schedules and actual hours will also be entered. All actions performed will be noted in WTCMS.

- Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:

Eligibility coordinates a Sanction Call-In with Employment staff for durationally sanctioned individuals. Eligibility sends out the call in letters to discuss compliance. If customer is willing to comply, customer is informed of what is needed for compliance. Once the eligibility part of the appointment is completed, the customer is referred to meet with an Employment Counselor on-site for immediate referral to a work activity or referral to the Career Center for supervised job search. The customer will work with the Career Center Employment Counselors on fulfilling one week of Job Search, 20-40 hours depending on the employment code and individual circumstances. Once the requirement has been met, the Employment Counselor will make a request to eligibility to have the sanction lifted if the customer has met their durational time frames i.e. 90 or 180 days.

- Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in 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:

Whenever possible, the employment staff explores all 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 Temporary Assistance and Supplemental Nutrition Assistance Program. Referring customers to the Career Centers to meet with employment counselors encourages individuals to find employment to avoid the need for TA. During this time employed cases are reviewed for small deficits. Workers encourage customers to increase their hours of employment, work along with the Office of Child Support Enforcement, apply for Section-8 and Childcare Subsidies, or other affordable housing options, apply for SNAP and/or Medicaid only in order to eliminate the need for TA. 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 may have a crisis or episode of immediate need. This need can be met immediately during certification, therefore diverting the individual from the need for ongoing assistance

## 4. Work Activities

### 4.1 Allowable Work Activities

- a. Please select all the 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.

Case Type	Activity and Definition
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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.

Case Type	Activity and Definition
<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>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 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>
<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>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>

Case Type	Activity and Definition
<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 checked="" 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>
<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 TA (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>SNAP E&amp;T Supervised Job Search</b> – 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input type="checkbox"/> SNA Ind <input 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>
<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>

## 4.2 Job Development

- a. Does the district conduct or access job development services to expand job opportunities for TA and SNAP participants?
- Yes  
 No

If Yes, select how the district participates in job development activities.

District staff contacts employers to solicit jobs for TA and SNAP Participants. Describe below how this is done, including number of staff, frequency of contacts, etc.

WCDSS has members of the Business Team who serve as Job Developers located at the local Career Centers. Job ready customers referred to the Employment Counselors are referred to the Business Team that consists of a Career Coach, a Program Specialist and a Community Work Assistant. If customers are deemed eligible for either training or immediate placement, they are referred for enrollment in WIOA approved occupational training or grant funded job readiness training. The Career Coaches and Employment Counselors are co-located enabling effective and consistent weekly communication on the customer's progress and barriers towards self-sufficiency. In addition to activity monitoring by the Employment Counselors, Career Coaches will reach out to the customer weekly and every 60 to 90 days to review progress benchmarks, workplace related issues and additional supports. When cases close for TA, customers are encouraged to continue visiting the Career Center to participate in job fairs and use available resources and services.

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Describe below how this is done, including number of staff, frequency of contacts, etc.

Employment Counselors refer job ready nonexempt customers to the Urban League Putting Westchester to Work Program-P.W.W. which has case managers, job developers and a retention specialist who outreach to employers and solicit jobs for TA customers. P.W.W. 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.

## 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, 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 refers TA applicants to our contracted provider Westchester Community College / JobSTAR program for TABE testing. TA recipients who meet the education requirements are referred to JobSTAR Program, to enroll in the Adult Basic Education (ABE) classes.

WCDSS utilizes licensed and certified providers such as EOC, Yonkers Public Schools VIVE program to provide Adult Basic Education, Test Assessing Secondary Completion (TASC) preparation, and English to Speakers of Other Languages (ESOL) instruction.

- 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:

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 the Vocational Education or Job Skills Training definition. Customers referred to the local Career Centers are assessed for ITAs (Individual Training Accounts) for occupational skills training. These trainings are reviewed for appropriateness and potential for immediate and successful job placement.

- c. Described below are the 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:

During the assessment of applicants, workers will refer all customers with a High School Diploma, its equivalency or less to TABE testing offered through JobSTAR at WCC. IMA provides IQ testing for customers exhibiting severe literacy deficits. Customers are referred to JobSTAR's ABE class or to MAXIMUS vendor to assist in applying for SSI if the IQ tests reflect scores of 3.0 or below. All TA recipients without high school diplomas or its equivalent are TABE tested before referral to one of the educational programs listed in either Table 1 or Table 2. The worker can also make a referral to IMA for IQ testing if a recipient exhibits deficits while engaged in a work activity.

- 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:

All TA recipients without a high school diploma or its equivalent 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 or misuse.

- 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:

Employment Counselors and PWW staff use the WTWCMS Assessment to identify customers who would benefit from engagement in job skills and/or vocational educational activities. Critical factors include the customer's interests and ability to work. This also includes whether the requested training is required to prepare the recipient for specific work identified in the individual employment plan. The recipient must have the following: Minimum reading and math scores required for the requested specific program, no previous education, training certificate or degree in the same field as the proposed training, and interests including short or long-term goals in which the training is essential in order to meet self-sufficiency objectives.

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

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

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

As part of orientation, applicants are informed of the approved training providers based on the individual's employability assessment and plan. Recipients who meet the requirements for vocational/educational training described above are also informed of approved training providers along with the programs available. Employment Counselors review training options prior to placing customers in activities. If customers show a specific interest in an occupational area, the Employment Counselor will work with the customer to identify potential training opportunities.

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

Customers are notified of approval from their Employment Workers who receive confirmation of the customer's enrollment from the provider using the WTW feedback form. Providers also confirm acceptance via email, phone calls or their agency created approval letter. Many of the providers reach out directly to the customer to notify them of approval and entrance in the program.

- 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:

Non-Employment Eligibility Workers monitor school attendance every six months at the time of case 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:

OWA Employment staff including the Urban League, notify the providers when calling to place recipients in work activities. The customers' limitations are also noted on the WTW referral letters under Worker Remarks to Provider. To ensure that providers are responding to notifications of work limitations, staff speak at length with the customers to inquire about conditions and tasks being assigned at the site.

#### **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:

WCDSS will consider approving a two or four 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. For non-contracted institutions of higher education, documentation of hours of participation may be established by submitting initial documentation of enrollment hours along with any other documentation gathered by the participant monthly as confirmation of actual attendance. WCDSS will report unsupervised homework or study time for up to one hour for each hour of class time towards the hours of participation in an educational activity, provided that the total number of hours of homework/study time do not exceed the documented hours expected by the educational provider. PWW staff and OWA employment counselors have regular ongoing contacts (No less than a bi-weekly basis) with program participants to establish adequate evidence that the participants are maintaining satisfactory attendance and making satisfactory academic progress.

- b. Described below is 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:

Employment staff will meet with customers who have exceeded or who are about to exceed the 12 month Vocational Education time limit. In order to meet compliance with participation, these customers will be advised that they are required to engage in a CORE activity equaling 20 hours weekly. In addition to their college courses, customers can be assigned to work study or internship through the school. Referrals to a Work Experience Program or Community Service can meet the 20 hours of CORE activity needed to meet participation. Customers are encouraged to consider evening, weekend and online alternatives that will enable them to comply with WCDSS employment requirements.

- c. 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 (Select all that apply):
- It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
  - 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:

## 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. Include in this description 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).

WCDSS plans to meet with Federal and State Temporary Assistance participation rate requirements by interviewing and engaging recipients as quickly as possible usually within no more than 10 days of assessment/re-assessment 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 hours 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 for:

Household Type	Number Served
Households with Dependent Children Average Monthly	709
Households without Dependent Children Average Monthly	794

- 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:

COGNOS reports are run by management in OWA and the Urban League. 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 H.E.A.L. program 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, analyzed, and sent to individual units for clarification or correction on cases. Corrective actions are imposed based on findings from the report reviews. There are instances where staff training is required or a modification in service provision in order to address the issues hindering efforts to meet engagement/participation goals. Issues are reviewed in monthly meetings between departments and inter-unit conferences with management and direct line staff.

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

The district assigns TA applicants to Job Search.

Yes

No

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	5	20	Applicants with school aged children are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 25-40 hours of job search weekly if possible. The Applicants' Job Search is monitored by the OWA Employment Counselors who are co-located at the Career Center. Applicants without school-aged children; not enrolled in full time school or daycare are encouraged to engage in a minimum of 20 hrs weekly. If the applicant has reliable childcare for a young child, they are encouraged to participate in as many Career Center activities as possible. Job Search performed for customers without school-aged children is monitored by Employment Workers at the District Office until the application is approved. The District engages with the customer weekly while they conduct Job Search.

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
SNA Individuals	15	30	Single applicants are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 30-40 hours of job search if possible. The Applicant Job Search is monitored by the OWA Employment Counselors who are co-located at the Career Center. The District engages with the customer weekly while they conduct Job Search.

- e. Does the district assign TA recipients to Job Search? If yes, describe the 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:

The district assigns TA recipients to Job Search.

Yes

No

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	10	20	Recipients with school aged children are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 25-40 hours of job search if possible. The Recipient Job Search is monitored by the OWA Employment Counselors, ULW PWW staff or other Employment Staff who are co-located within the District Offices. Recipients with children not enrolled in full time school or daycare are encouraged to engage in a minimum of 20 hrs weekly. If the recipient has reliable childcare for a young child, they are encouraged to participate in as many Career Center activities as possible. The Recipient Job Search is monitored by the OWA Employment Counselors, ULW PWW staff or other Employment Staff who are co-located within the District Offices. Job Search is usually added to another activity such as CWEP, Employment or Vocational Education. Customer will be eligible for child care supportive services for participating in any of the work activities identified. The District provides supportive services needed for the customer to attend the work activity regardless of the type of the work activity assigned or the number of hours of participation. The District engages with the customer at minimum bi-weekly while they conduct Job Search.

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
SNA Individuals	20	35	Single recipients are referred to the Career Center for job search to utilize the many resources such as Job Zone, Workshops, Individual Training Accounts etc. These customers are encouraged to engage in 35-40 hours of job search if possible. The Recipient Job Search is monitored by the OWA Employment Counselors, ULW PWW staff or other Employment Staff who are co-located within the District Offices. The District provides supportive services needed for the client to attend the work activity regardless of the type of the work activity assigned or the number of hours of participation. The District engages with the customer at minimum bi-weekly while they conduct Job Search.

- 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.

Self-employment is accepted as long as the 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. If the calculation of wages divided by the federal minimum wage does not satisfy minimum hours required for participation; the customer will be required to supplement the hours with an additional activity. Customers are also assisted in finding better paying, more reliable employment in a similar field.

## 5.2 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):

Since Non-TA SNAP Recipients are not mandated to participate in E & T activities, the four eligibility offices reception areas post information on Career Centers. A flyer listing Career Center locations, services and resources is made available. If the customer is enrolled in a SNAP E & T activity in addition to referral and placement, the customer will also receive case management services.

- 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.

Since Non-TA SNAP Recipients are not mandated to participate in E & T activities, the four eligibility offices reception areas post information on Career Centers. A flyer listing Career Center locations, services and resources is made available.

- 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):

Flyers listing job search services with their location are made available to SNAP applicants and recipients in our four District Offices reception areas. The District offers and provides job search services.

## **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](mailto: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, 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 parent 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.
- 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.  
35 cases
  - 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.  
35 cases
  - 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.  
15 cases
  - d. Below is the number of random sample cases in which a case member is reported as an 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.  
15 cases

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?
  - Yes
  - 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?

Yes

No

c. If No, describe below the process used:

## 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:

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 who are unable to make child day care arrangements on their own and who are in receipt of TA, to the Child Care Council of Westchester, Inc. The Council will assist the customer in identifying at least 3 providers in the appropriate area, with vacancies verified by the Child Care Council. Personal providers such as friends or family can apply to be Legally Exempt Providers through the Child Care Council. However, until these personal providers are approved as Legally Exempt Providers, customers are encouraged to register with a regulated licensed daycare center. While the application is in certification, this will allow them to remain in compliance with work activities. Payment will not be authorized to the Legally-Exempt Provider until the Child Care Council approves their application and they are issued a vendor contractor number through Westchester County.

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. (Select all that apply)

Bus pass/token

Gas card/voucher

Mileage reimbursement at IRS Business rate (effective 1/1/21 is 56 cents/mi)

Mileage reimbursement at IRS Medical/Moving rate (effective 1/1/21 is 16 cents/mi)

Other mileage rate (please explain methodology used to establish reimbursement rate):

- 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:

Recipients will not be expected to walk more than approximately 1 mile to a work assignment. Each recipient is evaluated individually for their ability to walk to sites. Recipients with limitations or health related issues that impact walking distances would be assigned to the work activities nearest to their home consistent with individual limitations as outlined by their IMA evaluation or LDSS 4526. WCDSS does not anticipate assigning recipients to work activities in any remote areas where access to public transportation would be a hardship. If recipients obtain employment in a remote area, we will use the strategies described above to address their transportation needs.

- 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:

Applicants at risk of needing public assistance to improve their opportunities are referred to the Westchester-Putnam Career Centers 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 Child Care Subsidies unit for potential subsidized childcare.

## **7.2 Post-Employment/Transitional Supportive Services**

- a. Described below are the supports and strategies the district will provide 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 TA cases have closed due to employment.

- 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:

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.

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 TA cases have closed due to employment.

### 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.):

One - Time Employment Related Expenses: Clothes, transportation, fees for clinical tests needed for employment, payment for a license or a certificate for guaranteed employment

## 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. (Select all that apply and describe the procedure below).

- In person
- By phone
- By mail

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

- b. Who makes the TA good cause/willfulness determination? (Select all that apply)
  - The client's employment worker
  - A supervisor in the district
  - A separate entity (describe below):

A designated Eligibility Examiner reviews documents submitted and determines whether noncompliance was willful and without good cause.

- 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. (Select all that apply and describe the procedure below)

- In person
- By phone
- By mail

TA/SNAP recipients who are subject to SNAP work requirements and fail to comply with a TA work requirement, willfully and without good cause, are offered an opportunity to avoid a SNAP sanction through the conciliation process. Recipients are issued a conciliation notice (LDSS4230) advising of the ability to avoid a SNAP E & T sanction through compliance with a SNAP work activity. Recipients have 10 days to respond to the conciliation notice and provide good cause; and if not provide Job search logs in 10 days to avoid a SNAP sanction.

- d. Who makes the SNAP E&T good cause/willfulness determination? (Select all that apply)
- The client's employment worker
  - A supervisor in the district
  - A separate entity (describe below):

A designated Eligibility Examiner that is not directly responsible for the monitoring of TA employment work activities.

- 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:

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 a SNAP work activity, and also the opportunity to participate in conciliation. Recipients have 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 the SNAP work activity. WCDSS assigns the recipient to a minimum of 10 Job Search contacts to avoid a SNAP sanction.

## 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:

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. 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:

Recipients who want to comply to end their SNAP sanction must complete the job search logs with the 10 required contacts in order to have their sanction lifted. After the recipient complies SNAP benefits will be restored for the month following the month, but not earlier than the expiration date of the minimum duration period. If recipient is on a sanction and claims to be exempt from SNAP work requirements and provides documentation of the exemption, sanction will be lifted as of the date that the customer claimed 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.
- An independent entity which has an agreement with the district
  - 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

## 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. (Select 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

During the application process, customers complete the Employability Statement indicating why they are unable to participate in a work activity. Applicants and Recipients can submit a completed LDSS-4526 from a licensed health care practitioner within 10 days or request an extension if the 10 days is not attainable. The LDSS-4526 must clearly list the diagnosis, prognosis, medications, treatment recommendations, work, limitations, duration of the condition and recommendations for SSI.

If the LDSS-4526 is not clear or if the Applicant/Recipient does not have a primary physician, they will be referred to Industrial Medical Associates (IMA-OTDA Contractor). IMA performs medical, psychological and intelligence evaluations for WCDSS applicants and recipients.

When referred to IMA, customers are informed to bring prescriptions and supportive documentation from their personal practitioner to share with the IMA practitioner. All homeless singles who claim an exemption receive their medical, psychological and substance abuse evaluations through the SHAC process. The Mental Health Association MHA completes the mental health and CASAC portions of the evaluation. Greenburgh Health Center completes the physical portion. The final document is referred to as the SHAC and it is used to determine employability status and recommendations for treatment. Applicants who fail to comply with these evaluations can be denied until compliance. Recipients can be closed or sanctioned until compliance.

- b. 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. (Select all that apply)
- 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

Referring workers from Eligibility Units, Employment Counselors, Social Case Workers and ULW Case Managers review evaluations and supportive medical documentation that lists the specific diagnosis, prognosis, medications, work limitations, duration of the condition and recommendations for SSI. Using the LDSS LDSS-4925/4926 to determine the TA Emp Code and LDSS-5062A for SNAP codes, Workers change codes to classify the customer as nonexempt, exempt or work limited.

## 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?
- Yes
  - No
- b. Describe the district's policy for determining when a program participant is offered a mental health screen:
- c. What screening tools does the district use? (Select all that apply)
- LDSS 5009 - Mental Health Screening Tool
  - The computer assisted version of the Modified Mini Screening tool (MMS)
  - Other Screening tool (describe below)
- d. If using the MMS, indicate below the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation.
- e. Describe below the procedure the district uses if the screening tool warrants a mental health evaluation referral

## 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.).

Customers requesting an exemption due to mental/psychological barriers can submit a LDSS 4526, official supportive documentation from their medical practitioner or are referred to IMA. All sheltered homeless Single customers are assessed by SHAC (Single Homeless Assessment Center). The SHAC assessment is comprised of a medical evaluation conducted by Greenburgh Health Center and MHA (Mental Health Association) completes the mental health, CASAC and case management components. After review from either a Social Case Worker, an Employment Counselor, an Eligibility Worker or vendor staff, the results from the IMA evaluations or SHAC assessments are used to determine exempt status. When customers are found to be exempt from employment requirements due to medical or psychological reasons they are monitored by DSS employment vendor ULW's HEAL Program. IMA will make medical recommendations and the HEAL staff refers customers to their health insurance representative who assists in identifying a list of in-network providers. SHAC will make direct referrals to providers in the community that could best serve the customer based on their preliminary diagnosis. If the customer was previously receiving treatment, they can continue with the practitioner if they are benefiting from the treatment and services. Regardless of the disabling diagnosis, HEAL requires that customers submit a Monthly Treatment Plan from their practitioner that supports their diagnosis, prognosis, prescribed medications, frequency of medical visits and compliance with recommended treatment. HEAL monitors the customers compliance with recommended treatment as noted in WTCMS CLIENT NOTES and attendance to visits are entered in as Treatment Plan Other Than Substance Abuse enrollments. Customers are also encouraged to participate voluntarily when possible in vocational opportunities such as with ACCESS-VR, the Career Center and Good Will job postings for persons with disabilities. Customers with severe and permanent conditions are referred to contracted vendor Maximus for SSI Advocacy.

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

WCDSS employment vendors: The Urban League of Westchester's H.E.A.L. program develops medical treatment plan with the recipient based on the IMA or SHAC recommendation and monitors compliance monthly so recipients can return to employability. Those with permanent disabilities are referred to the SSI contractor Maximus. H.E.A.L. staff motivates and supports recipients to schedule and keep appointments with specialists (if necessary), determine compliance with treatment recommendations/medication and rehabilitation services.

- 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.

Designated Employment Unit Eligibility Examiners, OWA POWER Eligibility staff, RISE

SCW working with the homeless and ULW H.E.A.L. Case Managers monitor customers with treatment plans and these units conduct the following:  
Determine Employability Codes based on recommendations from the IMA/SHAC/DCMH Final Rec. Create enrollments in WTWCMS based on the information provided from the IMA/SHAC/DCMH Final Rec evaluations.

Develop timelines and regular intervals for recipients to be re-evaluated prior to the employment code expiration date. Monitor compliance with re-evaluation appointments. Request updated monthly treatment plan from treatment provider. Monitor bi-weekly outpatient substance abuse treatment attendance from provider that is entered directly into WTWCMS. 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. Customers deemed permanently unemployable are referred to the SSI Vendor Maximus.

## **10. District Certification**

### **10.1 Certification**

As a condition of the receipt of federal and State funds the Local District Commissioner of Westchester 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, 2022 through December 31, 2023. 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.

1/20/2022  
Leonard Townes  
Commissioner