

**Temporary Assistance and Food Stamps Employment Plan
January 1, 2012– December 31, 2013**

Section 1 Assurances/Signature

As a condition of the receipt of federal and State funds the Wayne County Department of Social Services submits this Temporary Assistance and Food Stamp Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for Temporary Assistance (TA) and Food Stamps (FS) applicants and recipients for the period January 1, 2012 through December 31, 2013. As Commissioner of Wayne County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

_____, Social Services Commissioner

Date "[Click here and indicate the date signed]"

Section 2 Administration

Section 2.1 Administrative Structure

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

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

Workforce Development works with all non-exempt clients in order to engage and participate in employment activities.

WFD staff performs the DSS Orientation for all applicants applying for cash assistance.

WFD staff performs assessments for applicants/recipients.

DSS staff determines the client's employability status and tracks medical and treatment plans.

WFD staff refers non-compliant clients for sanction.

DSS staff imposes sanction.

DSS staff notifies WFD when a sanctioned client wishes to re-engage in employment activities.

WFD staff contacts client in an attempt to bring them into compliance.

Section 2.2 TA and FSET Provider Agencies

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

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 (e.g., WIA programs, SED funded services, OTDA Wage Subsidy providers).

TABLE 1 - Contracts Associated with TA and FS Employment Programs and Services

Provider	Total Contract Cost (per yr.)	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Wayne ARC	\$75,000	ICS3 per 08LCM-13	TANF/SN-MOES	Intensive case management for noncompliant/sanctioned recipients
Wayne ARC	\$61,250	FFFS Funding	TANF/SN-MOES	Intensive case management for working impaired recipients
Wayne ARC	\$75,000	FFFS Funding	TANF/SN-MOES	Child only
Wayne County Workforce Development		Local Funds	SN	2 Day Jobseekers Workshop and intensive case management for nonexempt recipients
Wayne County Workforce Development	\$70,000	FFFS Funding	TANF/SN-MOES	Summer Youth Employment for TANF Youth ages 14-20
Wayne County Workforce Development	\$500,000	FFFS Funding	TANF/SN-MOES	Wage Subsidy/Subsidized Employment/ 2 Day Jobseekers Workshop and intensive case management for non exempt recipients. Orientation
Wayne Area Transportation System (WATS)	\$71,000	Community Solutions for Transportation	TANF/SN-MOES	On demand transportation service for work-related activities
Catholic Charities	\$40 per assessment	Admin.	SN/TANF/SN-MOES	Drug/Alcohol assessments
Clifton Springs Hospital	\$40per assessment	Admin.	SN/TANF/SN-MOES	Drug/Alcohol assessments
FLACRA	\$40per assessment	Admin.	SN/TANF/SN-MOES	Drug/Alcohol assessments
Wayne County Action Program	\$5,150	FFFS	TANF/SN-MOES	On demand transportation service for work-related activities

Total:	857,400			
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TABLE 2 – Other Service Providers

Provider	Funding Source(s) (if known)	Categories of Clients Served	Programs, Services or Activities Provided
Catholic Family Services	Wheels For Work	TANF/200% TANF	Low interest loans for used vehicle purchases and vehicle repairs
NYS JOBS Provider	OTDA	TANF/SN-MOES/SN	Supervised Job Search, Job Readiness Training, and Job Placement Services
Wayne/Finger Lakes BOCES	Educational Resources Grant	TANF/200% TANF	Educational and Vocational Training

Section 2.3 OTDA Jobs Staff Agreement

OTDA Jobs Program Services – Target Groups

(“X” signifies those that apply in this district)

Services		Target Groups	
Assessment/Employment Plan	<u> x </u>	Applicants	<u> X </u>
Supervised Job Search	<u> x </u>	TANF (inc. SNF)	<u> X </u>
Job Readiness Training	<u> x </u>	SNA non-MOE Singles	<u> X </u>
Job Club	<u> x </u>	Food Stamps	<u> </u>
Job Placement Services	<u> x </u>	200% of Poverty	<u> </u>
Grant Diversion	<u> </u>		
Job Development (employer outreach)	<u> </u>		
WOTC pre-certifications	<u> x </u>		

Other Services Requested

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

OTDA Jobs Program Staffing and Location

**Please list staff location address and indicate
of staff at that location.**

1.Finger Lakes Works Career Center

1519 Nye Rd. Floor 2

Lyons, NY 14489

2.

3.

District Staff Contact for OTDA Jobs Program (Name & Phone Number)

Mary Lee Lippert, Director of Temporary Assistance, Wayne County DSS, (315)-946-
7602_____

Jennifer Weaver, Sr. Employment & Training Counselor, Wayne County Workforce Development, (315)-
946-
7708_____

Section 3 Engagement and Work Preparation

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

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

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

"[Click here and identify the additional items included]"

Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Check one of the following:

The district provides orientation in accordance with Dept. Reg. 385.5 and no additional information is provided at orientation.

In addition to the requirements outlined in Section 385.5 of the regulations, the district’s orientation provides the following.

1. Description of alternative programs to temporary assistance, including child care in lieu of temporary assistance.
2. Description of transitional services.
3. Review and signing of individual responsibility agreement by client.

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

Wayne DSS views orientation as a front door activity often resulting in diversion. Therefore, each client’s initial orientation is scheduled prior to the eligibility interview for temporary assistance. All temporary assistance applicants, regardless of their employability status, are required to attend the same orientation. Orientations are done in a group setting and are scheduled twice per week. Orientations are conducted by Wayne County Workforce Development WTW staff. When a recipient recertifies, the TA worker conducting the recertification interview will review the orientation with the client one on one. Applicants/recipients who initially deem themselves employable at orientation (upon review of employability screening form) are assigned to attend the 2 Day Jobseekers Orientation Workshop conducted by Workforce Development.

Section 3.3 Assessment and Employment Planning

Temporary Assistance Assessment (Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

The district conducts assessments in accordance with 18 NYCRR 385.6(a) and 385.7(a) with no additional requirements.

In addition to the requirements outlined in 18 NYCRR 385.6(a) and 385.7(a), the district's assessment also includes the following elements:

"[Click here and identify the elements]"

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

1. TABE, administered by district's Workforce Development agency during the 2 Day Jobseekers Workshop.
2. Employment Screening form for applicants completed during applicant orientation.

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

The employment assessment is completed during the eligibility process by a Workforce Development Employment & Training Counselor. TA applicants are made aware of the assessment requirement during applicant orientation and again at the eligibility interview. Initial Employment assessments are completed for all TANF and Safety Net applicants. Individuals who have completed their eligibility interview will then be referred by DSS Intake staff to WFD Account Clerk so an assessment appointment can be scheduled to have an assessment completed. Assessment appointments are scheduled within 7-10 business days from the date of the eligibility interview. Workforce Development allots 1 hour for the completion of each assessment although some may take less time to complete. Under certain circumstances some exempt SN individuals may be assessed by a SWE at the time of recertification. All non-exempt TANF and SN recipients receive case management services from the district's Workforce Development agency. Clients also receive case management services through the district's ARC programs for the work impaired and sanctioned clients. Through the provision of the services provided by the E&T Counselors at WFD and the case managers of the previously mentioned program, the agency is able to address the needs of families with multiple and/or significant barriers and update employment assessments and employment plans as necessary.

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

Yes No

Applicants in households without dependent children are required to participate:

Yes No

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

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

Amendment Effective Date _____

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

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

"[Click here and provide additional information]"

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

"[Click here and describe ONLY if different from those performing assessments]"

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

"[Click here and describe ONLY if different from those performing assessments]"

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

a. Described below is how the district plans to meet federal and State Temporary Assistance participation rate requirements. Included is the weekly hours standard participation requirement for individuals in the different case and household types, along with the typical time period it takes for nonexempt individual to be engaged in activities for both newly opened cases and individuals who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 3.6

The local district plans to meet the Federal and State Temporary Assistance participation rate requirements by making sure that all non-exempt recipients are participating in countable work activities for the required number of hours. The district anticipates that all non-exempt individuals will be engaged in countable work activities with 14 days of case opening and for recipients whose employability status changes from exempt to non-exempt, within 7 days of the change in status. The local district will monitor engagement in activities and participation rate through utilization of the COGNOS reports. The local district will also monitor engagement and participation on an ongoing basis. The district reserves the right to assign any client to participate up to 40 hours per week in work activities if deemed necessary and appropriate.

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

Sr. Employment and Training Counselor as well as the WFD Employment Coordinator utilize Cognos and CMS weekly to monitor client’s participation as well as client who are non-participating. Cognos is also utilized to ensure client’s activity hours match in the CMS and WMS systems. Cognos is used by Senior WFD staff to refer non-participating clients to WFD Counselors for placement in activities for participation. Cognos is used as a supervisory tool for case management.

- c. Describe the extent to which the district requires Non-Temporary Assistance Food Stamp applicants and recipients to participate in FSET work activities. If the district is not mandating FSET work activity assignments, please describe how NTA Food Stamp work registrants are informed of the services available, upon request, for assistance with job search activities. Please note: At a minimum, districts are required to make available job search as an FSET activity to food stamp applicants and recipients.

Upon request of Food Stamp applicant/ recipient, DSS provides information to the Finger Lakes Works Office @ 1519 Nye Rd. Lyons, NY for job searching with the New York State Department of Labor and Wayne County Workforce Development.

- d. The allowable work activities that are available in the social services district are listed and defined as follows. An “X” in the appropriate column indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNF), Safety Net Assistance for households without children (SNA), and/or Food Stamp (FS) benefits.

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

FA	SNF	SNA	FS	Activity	Definition
X	X	X		Unsubsidized Employment	Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self employment and/or paid internships.

X	X	X	Subsidized Private Sector Employment	Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized private sector employment will include positions subsidized through grant diversion/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.
X	X	X	Subsidized Public Sector Employment	Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient. Subsidized public sector employment will include positions subsidized through grant diversion/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.
X	X	X	Work Experience	<p>Unpaid work performed at a public or not-for-profit organization to enable participants who cannot find unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire the general skills, training, knowledge and work habits necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>

X	X	X	On-the-Job Training (OJT)	<p>Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment due to the fact that the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
X	X	X	Community Service	<p>A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community Service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, Americorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency, but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>

X	X	X	X	Job Search	The act of seeking or obtaining employment or preparing to seek or obtain employment and will include looking for suitable job openings in a group or individual setting, making contact with potential employers, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, preparing to or applying for and/or interviewing for jobs and related activities.
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X	X	X	<p>Job Readiness Training Activities</p>	<p>Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> • Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance. • Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual’s daily life functions, ability to work, looking for work or the ability to retain employment.
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X	X	X	Vocational Education	Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training other than a baccalaureate or advanced degree. Vocational education does not generally include basic or remedial education or ESL but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/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.
X	X	X	Job Skills Training	Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post secondary education courses leading to a bachelor's or other advanced degree or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.

X	X	X	Education Training	Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, English as a Second Language (ESL) instruction and education leading to a GED or HS equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision making skills.
X	X	X	Secondary School	Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a general equivalence diploma (GED), in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a GED as determined necessary by the educational institution. Secondary School or GED programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.
X	X	X	Provision of Childcare for Individual Participating in Community Service	Providing unpaid childcare to enable another Temporary Assistance (TANF/SNA MOE funded) recipient to participate in a community service program.
X	X	X	Other	Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and state participation rates.

Local District Job Search Procedures:

The district assigns Temporary Assistance applicants to Job Search. Yes No

If yes, please describe the local district procedure for TA Applicant Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often applicants are generally required to report job search outcomes and if activities other than job search are routinely expected of TA applicants during the application period.

Wayne County refers all TA applicants who are determined to be nonexempt to the 2 Day Jobseekers Workshop which is operated by the district's Workforce Development agency. The workshop is 2 days in length. Participants in the workshop receive TABE testing and job readiness instruction and are given a minimum of 5 valid job referrals which they must follow up on.

The district assigns TA recipients to Job Search. Yes No

If yes, please describe the local district procedures for TA Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often recipients are generally required to report job search outcomes and who in the agency is responsible for monitoring the job search.

Nonexempt TANF and SN-MOE recipients will be enrolled in job club which meets on a weekly basis. Each week at job club the participant will meet with their job counselor from the district's Workforce Development agency and be given 5 job referrals to follow up on. Participants may make additional job search contacts if they wish. Participants will be required to document their job search on a job search log which they will provide to their counselor each week at job club. The log will include the dates, times and all other pertinent information regarding their job contacts. The job counselor will assist the client with any obstacles they may be encountering in their job search and provide them with 3 new job referrals to be contacted prior to the next week's job club. It is expected that participants will spend a minimum of 10 hours per week on job search activities.

Nonexempt SN recipients will be required to make a minimum of 5 job search contacts per week. They will meet with their Workforce Development Employment and Training Counselor on a bi-weekly basis at which time they will submit a job search log which will document the dates, times, and all other pertinent information regarding their job contacts for that week. It is expected that participants will spend a minimum of 10 hours per week on job search activities.

The district will continue to utilize the state-designed job search log to monitor job search participation.

Section 3.5 Job Development

Yes No The district conducts or receives job development activities to expand job opportunities for TA and FS clients, either directly or by contract or agreement.

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

District staff contact employers to solicit jobs for Temporary Assistance participants. Below is the description of how this is done, including number of staff, frequency of contacts, etc:

"[Click here and describe]"

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

The local district utilizes the services of 1 job developer at the county's Workforce Development agency to establish OJT placements and other job development efforts. The job developer makes approximately 20 employer contacts per month.

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

"[Click here and provide additional information]"

Section 3.6 Training Approval & Activity Enrollment Policy (Reference 18 NYCRR 385.9)

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

The district has established relationships with Wayne/Finger lakes BOCES, Finger Lakes Community College, and Literacy Volunteers. These educational program providers supply the district with information regarding their program offerings and program schedules/locations. In addition to already established relationships the district's employment coordinator is responsible for outreaching throughout the community to identify other educational programs that may be available for our clients. The employment coordinator will meet with newly identified providers and gather information regarding the program(s) offered and target population(s). The employment coordinator will disseminate the information to WFD employment staff so they may discuss all options with clients at assessment and reassessment. WFD employment staff also meets quarterly with educational program providers to discuss program needs, referrals, scheduling and other issues impacting client participation in educational program. WFD employment staff and educational training providers also communicate on an as-needed basis.

- b. Describe how the district identifies appropriate education 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:

The employment coordinator is responsible for outreaching throughout the community to identify vocational education and job skills training programs that may be available for our clients. When a new program is identified the employment coordinator meets with the provider and gathers information about the program and target population. The employment coordinator will disseminate the information to WFD employment staff so they may discuss all options with clients at assessment and reassessment. The district's workforce development agency may refer clients to job skills/vocational training when deemed appropriate for clients who have enrolled in programs independently. Quarterly meetings are held at the district's one stop location between WFD employment staff, WFD staff and training providers, including vocational and job skills training providers, at which time training program needs, referral processes, training schedules and other pertinent issues are discussed.

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

Temporary Assistance applicants are informed of the option to participate in educational activities at orientation and during the initial employment assessment. Applicants whose assessments' indicate the need for ABE, GED, and/or ESL training are encouraged to contact one of the district's educational providers. Recipients are referred to programs by the DSS employment worker or case manager at Workforce Development or ARC.

Clients may also be enrolled in educational programs throughout their participation in the district's ARC program

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

Any client, exempt or non-exempt, whose assessment indicates a need for basic literacy, GED, or ESL training will have enrollment in appropriate educational training incorporated into their employment plan. Clients will be provided with referrals to service providers and their enrollment in these activities will be approved. The district will coordinate the client's educational training with other countable work activities in order to accomplish required participation rates. Examples of how the district currently coordinates educational training with other work activities is the combination of GED and ESL classes, along with Cornell Cooperative's Eat Smart NY and job club at the district's one stop location and the combination of educational classes and Work Experience a ARC. It is expected that the district's transitional jobs program will also accommodate participation in educational training.

- e. Describe what steps the district will take to increase or maintain high levels of engagement by participants in vocational education and job skills training programs. Such steps may include increased use of such contracted services through local training providers, including WIA funded services and State Education Department funded training programs. Districts should consider additional blending of activities such as

work experience or employment with job skills training in fields that would improve participants' ability to obtain employment or increase wages or hours of employment.

Wayne County will maintain, and attempt to increase, the number of participants engaged in vocational education and job skills training programs. The district will accomplish this goal through enrollments in WIA funded ITA's and other available resources.

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

1. Be licensed by the State Dept. of Education or sponsored by a government agency.
2. Be willing to cooperate with local district in the planning of programs and the achievement of mandated work/participation requirements.
3. Provide the local district with necessary information i.e.,: attendance and progress reports.
4. Provide clients with training that meets needs of the local economy.

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

1. During orientation
2. During assessment and during development of employment plan.
3. Via posting of available training and providers in agency lobby.
4. Via mailings to clients providing information on upcoming training programs.
5. Via information provided at district's one-stop location.

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

1. A need for education/training must be demonstrated through client's assessment and employment plan.
2. Client must demonstrate willingness and the ability to enroll in and successfully complete training.
3. Client has prior history of complying with work requirements.
4. Client's training will better prepare client to compete for employment in the local economy.
5. Only programs of study that directly relate to the preparation of individuals for current or emerging occupations requiring other than a baccalaureate or advanced degree will be approved.

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

The DSS employment staff member assigned to the case utilizes WTCMS to prepare a referral for enrollment letter that is either hand delivered or mailed to the client. Appearance at the provider on the indicated date and time indicates compliance with the referral for enrollment. The employment activity provider notifies the DSS employment staff member of the client's compliance or non-compliance via fax.

For those individuals who are already involved or enrolled in activities at the time of application, the district utilizes a specific letter format that has been created for the purpose of notifying clients of their approval for enrollment into an allowable work activity that meets the requirements of participation policy.

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

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

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

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

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 a work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.

Additional reasons as stated below:

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

The teen must be considered a student in good standing by the school. The district will verify the student's standing at each application and recertification via written documentation of the student's status from the local school district.

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

The local district will inform the worksite and/or training provider in writing, at the time of the activity assignment, of any health-related limitations of the assigned individual and any special accommodations that must be made.

Section 3.7 Work Verification

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

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

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

The Quality Assurance plan must explain how staff will:

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCM, NYCWAY or other automated system used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the caretaker of a disabled household member (Employability Code 38), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

Please describe the process the district will use to review district worker collected documentation and data entry of the above listed elements (include a description of how a case sample for review will be selected, sample size and frequency of reviews):

Wayne County will perform a random sample of 4 cases semi-annually for participation in paid work activities. Both the temporary assistance and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms, and direct phone contact with the employer documented in case notes. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTCMS and documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

Wayne County will perform a random sample of 4 cases semi-annually for participation in unpaid work activities. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTCMS, excused absences and holiday time are documented in the case file and correctly reported on WTCMS in accordance with federal limitations, and that documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

Wayne County will perform a random sample of 2 cases semi-annually in which a case member is reported as an employability code 38-needed in the home fulltime to care for a disabled household member. The temporary assistance case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

Wayne County will perform a random sample of 2 cases semi-annually in which a case member is reported as an employability code 31-caretaker of a child under the age of 12 months. The temporary assistance case file will be reviewed for footprint documentation, documentation from the hospital, or a birth certificate(s) as acceptable documentation.

Wayne County will assess and verify that participation in the work activities reported for work eligible individuals meets the Federal definition for the activity.

Wayne County will maintain the supporting documentation for participation in paid and unpaid work activities and make it readily available for review by A&QI auditors upon request. In addition, documentation related to the caretaker of a child less than 12 months of age or caretaker of a disabled household member exemptions/exclusions will also be retained and made available upon request.

A summary report will be prepared following each review period, and forwarded to Kathy Nagy @ Kathleen.Nagy@otda.state.ny.us and Kim Roblin @ Kimberley.Roblin@otda.state.us.

Please describe the process the district will use to review district worker collected documentation and data entry of the above listed elements (include a description of how a case sample for review will be selected, sample size and frequency of reviews):

Wayne County does not currently have program providers who are responsible for collection of documentation or entry of data into WTCMS.

Section 3.8 Requirements for Exempt Temporary Assistance Participants
(Reference 18 NYCRR 385.2 (e))

An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist the individual in recovering from a mental or physical impairment, accept referral to and enrollment in a program of vocational rehabilitation, training, and/or other essential rehabilitation, and provide requested evidence that he/she is participating in the assigned program.

- a. Following is the district's procedure for determining if a disabled individual has the potential to be restored to self-sufficiency. This determination is different from the determination of the individual's disability exemption as covered in Section 6 of this plan. Included here is who (e.g., physician, employment worker, Temporary Assistance worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also included is the source and type of information used to make the determination (e.g., information from individual's physician, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

Local district will obtain medical/psychiatric report from individual's primary physician. TA/employment worker will review diagnosis and prognosis found in report to determine if individual has potential to be restored to self-sufficiency. Specific recommendations by physician for treatment/vocational rehab will be taken into consideration.

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

Treatment plan will be based primarily on recommendations of primary physician and referral made based on primary physician's recommendation(s) for appropriate treatment, etc

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

District will require individual to submit updated medical report at each 6 month recertification, or sooner if situation requires. If participating in rehab, monthly verification of attendance and progress will be required

Section 3.9 Strategies/Procedures for Increasing Program Attendance

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

The district will emphasize the importance of employment program attendance with clients beginning at the district's client orientation. The district's workforce development agency will also place emphasis on the importance of program attendance during the Job Connection Workshop for nonexempt applicants. All program providers will be required to stress the importance of program attendance at initial client contact and program orientation sessions. Case managers through the district's intensive case management program with workforce

development and through the district's Wayne ARC's impaired programs and will work with individual clients to deal with specific attendance problems.

Section 3.10 Strategies/Procedures for Engaging Sanctioned Temporary Assistance Participants

District has no specific strategies to engage sanctioned participants.

"[Click here and describe the procedure]"

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

At the time the sanction is processed, referrals are made by the WFD employment worker to the district's service provider for case management for sanctioned clients, Wayne ARC. The case manager schedules an in-home meeting to gather information. The case manager will assess interest, abilities, goals, and limitations. Barriers that are preventing the individual's compliance will be identified and a plan developed to achieve compliance. The following services will be provided as needed:

1. Assessments of ability, interests and aptitudes, as well as full vocational assessments
2. Work experience placement and monitoring
3. Assistance with filing for VESID
4. Classroom instruction on career counseling, including job readiness training
5. Counseling focusing on individual's strengths and increasing self-esteem
6. Mentoring

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

"[Click here and describe the procedure]"

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

For clients who choose not to participate in the district's case management program for sanctioned clients as described previously in this section the following strategy is used:

Clients who are on their first sanction, or until compliance, are approached at each client contact about the benefits of getting into compliance and are offered the opportunity to do so. If a client has a durational sanction that has expired and the client has still not gotten into compliance, the District will have a home visit completed by its fraud investigation unit to review with the client how household needs are being met and to discuss any issues/circumstances that may be preventing the client from complying with employment requirements.

Section 3.11 Diversion Strategies:

[] District has no specific diversion strategies.

[x] District's diversion strategies are described below:

The district offers diversion payments as specified in Section 4.1(d) of this plan. In order for a TA applicant to receive said diversion payments the individual must provide verification of employment or the offer of employment, and verification of the necessary diversion expense such as; car repair cost, uniform/tools cost, etc.

The district also views orientation and applicant job search as diversion activities. Orientation is held prior to the applicant's eligibility interview. During the orientation prospective applicants are informed of alternative programs to cash assistance resulting, in some instances, in their decision not to pursue cash assistance. Applicants who are successful in obtaining employment during applicant job search often eliminate their need for cash assistance.

Section 4 Support Services (Reference 18 NYCRR 385.4)

Section 4.1 For Temporary Assistance and Non-Temporary Assistance Food Stamp Applicants and Recipients in Work Activities

a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide to participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, work activities and activities to restore self sufficiency:

1. Expenses related to childcare such as registration, application, or service fees to secure or hold a daycare slot.
2. Fees and licenses necessary for employment.
3. Testing fees necessary to complete training or secure employment.
4. Up to \$200.00 for clothing necessary to participate in approved training or secure and/or maintain employment.
5. Up to \$500.00 for tools, equipment, and/or supplies necessary to participate in approved training or secure and/or maintain employment.

*Exceptions to the above guidelines may be made on a case by case basis and only upon approval by agency's Director of Temporary Assistance or Senior Employment & Training Counselor who directly supervises the Workforce Development Employment Unit. .

b. The district will use the following approach to assist those participants who need transportation to and from a work activity site, including any applicable mileage reimbursement rate. OTDA policy establishes a mileage reimbursement rate of no less than the IRS established rate for medical/moving purposes unless the district can document an acceptable methodology for applying a lower rate. (The IRS medical/moving rate effective 7/1/11 is 23.5 cents per mile.

c. Transportation is discussed with applicants/recipients at Orientation as well as the 2 Day Jobseekers Workshop at WFD. Transportation needs are met by the district when possible with the utilization of the Wayne Area Transportation System) WATS system. Transportation is scheduled by WFD with WATS for attendance to work activities. WFD also dispenses monthly and single bus passes to assist with transportation needs. Mileage is also reimbursed using the IRS established rate of 23.5 per mile. WFD assesses client's transportation needs and bases their decision on which method of transportation to utilize in accordance with what is most affordable to the county. Please refer to attachment A for further guidance.)

d. The district will use the following approach for those individuals who reside in an area where public transportation is not available. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment. Please identify the maximum distance the participant would be expected to walk, if applicable:

Wayne County provides an on demand transportation program funded through Community Solutions for Transportation (CST) for TANF recipients. This program was developed specifically to deal with the public transportation limitations in our rural county. The program provides expanded service by our local public transportation provider, Wayne Area Transportation System (WATS), so that individuals who live in rural areas that are not on the established bus routes can still be transported to employment related activities. Wayne County would require individuals who live within 2 miles of their work activity assignment to walk. This policy aligns with local school district policies for students. Wayne County will provide accommodations on a case by case basis for individuals with limitations who walk to work activities.

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

1. Diversion payments for nonrecurring employment related expenditures such as uniforms, tools, fees or other items needed to enable an individual to maintain employment.
2. Diversion transportation payments for nonrecurring employment related transportation expenses such as the cost of public transportation, car insurance, and car repairs
3. Diversion payments for nonrecurring, short-term expenses directly associated with resolving a housing crisis such as moving expenses and storage fees.
4. Diversion rental payments for nonrecurring short-term payment of rent or rental arrears.

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

Wayne DSS has bilingual staff that is able to assist with interpretation for Spanish speaking clients when necessary. The agency also utilizes a Spanish version of the Employment Screening Form (attached). In the rare instances where the agency is

dealing with an individual who speaks neither English nor Spanish, the district will make arrangements to have an interpreter present and pay for the service if there is a charge. Information for the Language Line will also be made available.

[] The district does not generally find the need to provide services to individuals who do not speak English (never or rarely have occasion to serve such individuals).

Section 4.2 Transitional Support Services

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

The district makes referrals for transitional childcare for all potentially eligible clients at the time of case closure. Transportation, post employment services are provided by WFD on a case by case basis.

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

At this time, the local district will not provide any transitional supportive services following case closure aside from transitional childcare and transitional medical assistance.

The local district reserves the right to review the necessity of providing additional transitional supportive services to closed cases in the future. Should the district's policy regarding this issue be altered then proper amendments to this plan would be submitted at that time.

Section 4.3 Extended Support Services

As long as funding is available (through FFFS, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines.

The local district utilizes FFFS to provide extended supportive services for individuals who are 200% TANF eligible on an as needed basis for items of need necessary to assist the individual maintain employment.

Section 5 Temporary Assistance Conciliation and Dispute Resolution Procedures; Food Stamp "Good Cause" Determination Procedures (Reference 18 NYCRR 385.11 and 385.12)

Section 5.1 Conciliation

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

Amendment Effective Date _____

- in person
- by phone
- by mail, etc

In accordance with Section 385.11 of the current regulations, clients who fail or refuse to comply with their work activity assignment will be sent written notification of their right to conciliation. Conciliation notices to clients will be generated by the worker through WTWCMS.

Clients will be informed of the specific non-compliance including the work activity and date(s) of non-compliance. Clients will be informed of the time frame in which they must respond to notice of conciliation; 10 days for Family Assistance households and 7 days for Safety Net households, including Safety Net Families. Clients will also be informed of the potential consequences of not responding to the conciliation notice.

The good cause/willfulness determination is made by:

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

If the client responds, the Supervisor/Employment Worker will review all pertinent information relating to the non-compliance. If the Supervisor/Employment Worker determines there was good cause for the non-compliance, then the conciliation process terminates. If the employment worker determines that the non-compliance was willful and without good cause, the employment sanction will be imposed.

If the client does not respond, the Supervisor/Employment Worker will review all available information to determine if there was good cause for the non-compliance. If the determination is that the non-compliance was willful and without good cause, the employment sanction will be imposed and the client notified of their right to a fair hearing.

Section 5.2 Sanction

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

When feasible, the district requires that an individual who wishes to end their employment sanction comply with the employment activity which they failed to comply with originally. The district generally requires compliance with the activity for 10 consecutive working days to demonstrate their willingness to comply ongoing. In such instances where it is not feasible for the client to comply with the original activity, such as a sanction for a voluntary job quit by a recipient, the district will assign the client to another work activity (i.e.: work experience) and require that the client demonstrate compliance with that activity.

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).

Section 5.3 Dispute Resolution

The district's procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district's response to their request for health-related accommodations is conducted in accordance with 18 NYCRR 385.11(b).

The grievance is mediated by:

- an agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
- designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

Section 5.4 Food Stamps Good Cause Determination

The district's procedure for determining if good cause exists for applicants and recipients who fail to comply with Food Stamp Program employment requirements is in accordance with 18 NYCRR 385.12(c) and is conducted:

- conciliation is offered in the same manner as described in Section 5.1 of this plan;
- by the Employment worker using available information, including that provided by the participant, if any, to determine if there was a good cause reason.
- Other (described below)

"[Click here and describe the procedure]"

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

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

The local process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited is as follows:

- District directs the contracted physician or individual's physician to determine status
- District review team reviews and determines status (described below)
- Specialized disability/medical staff or unit reviews and determines status (described below)
- Other

Local district TA eligibility worker will inquire whether the applicant/recipient has a physical or mental impairment which would limit his/her ability to participate in work activities. Such inquiry will be made at application, recertification or when there is reason to believe an applicant/recipient has impairment.

When an applicant/recipient claims to have a mental or physical impairment, he/she will be given written notification the he/she has ten calendar days, from the date of written notice, to present medical documentation from his/her health care practitioner. The documentation must include a specific diagnosis, specify work limitations and specify the length of time the impairment will prevent the applicant/recipient from taking part in work activities. The district will not assign the applicant/recipient to work activities while waiting for medical documentation or while the district is conducting a review of the medical documentation.

The district will assess the information submitted by the applicant's/recipient's health care practitioner and determine if the applicant/recipient is disabled, work-limited or not disabled. Written notice of the results of the determination and the right to a fair hearing to contest the determination will be provide to the client, via the LDSS 4005 and 4005(a) forms.