

Allegany County

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

January 01, 2024 - December 31, 2025

Table of Contents

1. Administration	1
1.1 Administrative Structure	1
1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies.....	1
1.3 OTDA Jobs Staff Agreement.....	4
1.4 Access to Services at New York State Career Centers	5
2. Orientation, Assessment and Employment Plan	6
2.1 Orientation (Reference 18 NYCRR 385.5)	6
2.2 Temporary Assistance (TA) Employment Assessment.....	6
2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)	7
3. Engagement	9
3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)).....	9
3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency	9
3.3 Strategies/Procedures for Increasing Program Attendance	9
3.4 Strategies/Procedures for Engaging Sanctioned TA Participants	10
3.5 Strategies for Reducing the Need for TA.....	11
4. Work Activities	11
4.1 Allowable Work Activities	11
4.2 Job Development	14
4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)	15
4.4 Post-Secondary Education Approval and Enrollment Policies	18
5. Work Requirements	18
5.1 Meeting TA Work Requirements	18
5.2 Informing SNAP Applicants and Recipients of Work Requirements.....	21
5.3 Meeting SNAP Work Requirements	22
5.4 Advising Households of Employment and Training Services	23
5.5 Provider Determinations.....	23
6. Quality Assurance/Work Verification	24
6.1 Quality Assurance Process - Random Case Sampling.....	24
6.2 Use of Outside Providers/Vendors	26
7. Supportive Services	26
7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District.....	26
7.2 Post-Employment/Transitional Supportive Services	28
7.3 Extended Support Services.....	28
8. Conciliation, Sanction and Dispute Resolution Procedures	28

8.1 Conciliation	28
8.2 Sanction	30
8.3 Dispute Resolution	31
9. Disability Determinations, Documentation and Requirements of Exempt Individuals.....	31
9.1 Disability Determination Process and Tools	31
9.2 Mental Health Screening and Assessment.....	33
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	34
10. District Certification	36
10.1 Certification.....	36

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.)

Attached.

- 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 Allegany County Department of Social Services Employment Unit is a component of the Temporary Assistance Division. A Principal Social Welfare Examiner oversees the unit, consisting of four (4) Employment Specialists, one (1) JOBTRAK crew Supervisor who transports and supervises individuals assigned to work experience activities, one (1) contracted Agency Counselor who performs CASAC duties and Mental Health evaluations, and one (1) Case Manager who works with sanctioned individuals and those needing intensive case management to work towards employability and/or self-sufficiency. Attached is an organizational chart for the Allegany County Employment and Training Center as this agency provides many of our employment services.

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

- a. Table 1 lists the local contracts or agreements with agencies to provide employment services to TA and SNAP clients. These activities and services may include, but are not limited to: employability determinations; development of assessment and employment plans; conciliation and grievance activities; provision of work activities such as job readiness training; education and job skills training; monitoring and support for compliance with treatment plans for exempt individuals with the potential for restoration to self-sufficiency; job development; job placement and retention services; and other employment related activities.

Each contract listed in Table 1 contains an assurance that the activities are not otherwise available from that provider on a non-reimbursable basis, and, if not a performance-based contract, a statement regarding use of a cost allocation methodology that satisfies Generally Accepted Accounting Principles, as well as the requirements of U.S. Office of Management and Budget Circulars A-122 for nonprofit organizations, A-21 for educational institutions, or A-87 for State and local governments. Districts must maintain proper monitoring and oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA

Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

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

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Southern Tier Traveling Teacher	\$138,690	FFFS SNAP E&T Local	FA SNA Family SNA Individual SNAP TANF 200%	Identify and reduce barriers to self-sufficiency and job placement; job retention services; statistics and summary analysis of same. Evaluate for success in obtaining HSE and for job retention; provide materials and in-home tutoring for HSE, case management services; assess strengths and needs in both general functional areas and in employment specific areas and assist persons with improving areas of need.
Allegany Council on Alcoholism and Substance Abuse	\$118,299	Local	FA SNA Family SNA Individual TANF 200%	Agency Counselor: responsibilities include drug/alcohol assessments and mental health evaluations and referrals for treatment if needed.
Allegany County Employment & Training Center	\$586,521	FFFS SNAP E&T Local	FA SNA Family SNA Individual SNAP TANF 200%	Employment Assessments, related skills & aptitude testing (TABE), career counseling, employment plans; job skill readiness (JRT) and development & placement; referrals for supportive services; enroll in vocational/educational programs; SYEP and job search assessments.

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

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

Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Arc - Allegany/Steuben	Others: unknown	FA SNA Family SNA Individual SNAP	Residential supportive services
BOCES	Others: unknown	FA SNA Family SNA Individual SNAP	Adult education, career counseling
ACCES-VR	Others: unknown	FA SNA Family SNA Individual SNAP	Career counseling, education, training
ACCORD Corp.	Others: TANF	FA TANF 200%	Community Solutions for Transportation/WHEELS FOR WORK, ASSET Program
Literacy West, Inc./CORE The Learning Center	Others: unknown	FA SNA Family SNA Individual SNAP TANF 200%	Education, training, and HSE
LAWNY	Others: MA	FA SNA Family SNA Individual	Assistance in appealing SSI/SSD application process
AIM	Others: unknown	FA SNA Family SNA Individual SNAP	Assistance with the SSI/SSD application process
Clarity Wellness	Others: unknown	FA SNA Family SNA Individual TANF 200%	PROS (Day Treatment Program) and Mental Health

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
ACCORD Corp. Early Head Start and Head Start	Others: unknown	FA SNA Family SNAP	Home visiting services for families with young children
Healthy Families Allegany/Cattaraugus (Parent Education Program)	Others: unknown	FA SNA Family SNAP	Home visiting services for families with young children

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

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

The Allegany County E&TC, STTT, and ACASA provide us with monthly and quarterly reports. These reports include quantitative and narrative reports. We also case conference as necessary.

1.3 OTDA Jobs Staff Agreement

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

Services Provided by Jobs Staff

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

Jobs Staff Target Groups

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

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

N/A

1.4 Access to Services at New York State Career Centers

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

Programs and Services Provided at Career Centers

Yes or No:	Programs and Services Provided:
No	The district has employee(s) physically present at a Career Center
No	The district has contract staff physically present at a Career Center
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
No	Other (described here):

- 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.

The district contracts with the Allegany County Employment and Training Center for various services. Information is shared with the E&TC staff through WTWCMS, IEDR (case commenting), as well as by paper referrals. ACDSS also contracts with Southern Tier Traveling Teachers, located in Wellsville, NY. The Southern Tier Traveling Teachers meet with individuals at various locations. Information is shared via referral and case conferencing. Monthly and quarterly reports are submitted to the district by both entities per contract.

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

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

District Orientation Procedures

Yes or No:	District Orientation:
Yes	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
No	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 at application and recertification. Orientation can be held in-person, either in a group setting, individually, or a combination of both. It can also be held virtually, over the phone, or by sending orientation material to the client by mail. Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

ACDSS employment staff and Allegany County Employment and Training Center staff conduct orientations on a one-to-one basis for applicants starting at the time of their initial interview for assistance. Recipients receive additional individualized orientation from the TA Employment Unit before beginning a work experience program and at recertification, and/or as indicated on their individualized employment plan. Information is given to the clients both orally and in writing.

2.2 Temporary Assistance (TA) Employment Assessment

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

District Assessment Procedures

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

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

Employment assessments are completed after the initial application for benefits. Assessments are done on a one-on-one basis, and we do not allow for individual self-assessments. In instances where there are individuals on the case that are not in the office on the date of application, an appointment is scheduled within 10 days for completion of the assessment. The depth and variety of questions enables the worker to gain relevant information about the client's strengths and barriers in order to form a strategy to assist them in obtaining employment or self-sufficiency. During the assessment, parents of children under the age of five are provided with information on home visiting services and are offered a brochure detailing providers and services available locally. In addition to the WTWCMS assessment, the agency uses TABE tests, recert assessments, and self-sufficiency plans including goal setting activities.

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

DSS Employment Unit and Employment and Training Center staff.

- 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)):

Employment Specialists must have an Associates Degree or equivalent DSS experience, or higher title.

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

Yes.

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

Yes.

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

Yes.

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

Employment assessments are completed, at minimum every six months, including at recertification; except for the advanced age (60 years of age or older) population which will be reassessed annually. Employment assessments will also be updated whenever the client's employment status changes from exempt to non-exempt, or whenever there is a change in an individual's circumstances effecting their work activities.

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

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

District Employment Plan Procedures

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

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

District Employment Plan Development

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

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

Employment Unit staff complete an individual's employment plan as part of the assessment process.

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

The employment plan will be updated, at minimum every six months, including at recertification. Employment plans will also be updated whenever the client's employment status changes from exempt to non-exempt, or whenever there is a change in an individual's circumstances effecting their work activities.

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:

No additional information.

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:

We have contracts with interpreters who can provide qualified interpreter services. As described in our ADA policy, the Interpreter Services Poster is displayed in all client areas. The Interpreter Services desk guides are also available to all workers.

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:

Our orientation process strongly enforces the requirement of applicants/recipients to be engaged in work activities. Our Case Manager for the TA population also reinforces the need for applicants and recipients to comply with activities to which they are assigned. The Employment Specialists, in addition to the Case Manager, provide information to applicants/recipients on an ongoing basis, including supportive services such as childcare and transportation and the need to be engaged in work activities. For participants assigned to a work activity, timesheets are received monthly and monitored for attendance.

3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

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

Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	<p>Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: ACDSS utilizes intensive case management services for non-compliant families provided by a Case Manager (DSS employee). Home visits may be scheduled at initial referral (imposition of sanction) and to follow up to identify any needed services that will assist clients in compliance.</p> <p>Strategies utilized are:</p> <ul style="list-style-type: none"> - An intensive assessment to determine barriers to self-sufficiency, assess need for supportive services and make referrals as appropriate. - Enhanced case management to ensure individuals fully understand the work requirements and the impact of non-cooperation on their ability to become self-sufficient. Emphasis will be given to their need to remain compliant on an on-going basis - Information will be provided to explain the reason for the sanction, the impact of the sanction on their grant, and their ability to rectify the sanction. - Provide services to the individual/family that allow them to participate in work or work activities. There are a variety of methods used to initiate this activity, such as intensive job search, employer outreach, medical evaluations, etc. - For individuals/families that secure employment, job retention will be an ongoing activity.
Yes	<p>Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Enhanced case management by Case Manager (DSS employee) providing ongoing involvement to bring them to compliance. Information is provided regarding action(s) necessary to rectify the sanction and the positive financial impact of compliance. Referrals are provided for services that allow participation by the individual/family in work or work activities. Acceptance of needed services with the overall goal of self-sufficiency is the basis for continuation of the case management/client relationship.</p>
Yes	<p>Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Enhanced case management by Case Manager (DSS employee) providing ongoing involvement to bring them to compliance. Information is provided regarding action(s) necessary to rectify the sanction and the positive financial impact of compliance. Referrals are provided for services that allow participation by the individual/family in work or work activities. Acceptance of needed services with the overall goal of self-sufficiency is the basis for continuation of the case management/client relationship until this goal is attained or the TA case is closed.</p>

3.5 Strategies for Reducing the Need for TA

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

We provide applicant with supportive services (i.e. car insurance payment, car repairs, security guarantee or other help with shelter costs, etc.) to enable them to remain self-sufficient and not have to continue with their application for ongoing Temporary Assistance. These payments are made when our agency has documentation of employment or anticipated employment when the need is verified. We also provide information about other emergency assistance programs and the Child Care Assistance Program.

4. Work Activities

4.1 Allowable Work Activities

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

Allowable Work Activities by Case Type

Activity and Definition	Case Type
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.	FA SNAFAM SNA SNAP
Work Experience – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.	FA SNAFAM SNA SNAP
Job Search – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
<p>Vocational Education – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Secondary School – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Job Skills Training – Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Education Training – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p>Job Readiness Training (JRT) Activities – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Subsidized Private Sector Employment – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Subsidized Public Sector Employment – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Community Service – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Provision of Childcare for Individual Participating in Community Service – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
SNAP E&T Supervised Job Search – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.	N/A
On-the-Job-Training (OJT) – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.	N/A
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.	FA SNAFAM SNA SNAP

4.2 Job Development

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

Yes.

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

How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
No	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.:
Yes	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: Our contract with the Allegany County Employment and Training Center provides for 10% of their Job Developer's salary. This individual provides job development services as needed to assist referred individuals to obtain employment leading to financial self-sufficiency, including TEAP (Temporary Employment Assistance Program) contracts.

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

- a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.

Southern Tier Traveling Teachers and Literacy West, Inc./CORE The Learning Center are the primary entities clients are referred to for ABE, HSE and English Language Instruction. Referrals may be made based on the client's geographical location or availability of transportation. Literacy West, Inc./CORE The Learning Center, which provides ABE/HSE/ESL, has one location whereas Southern Tier Traveling Teachers provides home visits and is responsible for providing ABE/HSE/ESL. Allegany County is very rural with limited public transportation. Providers of educational services are identified by the Employment and Training Center who has a long working relationship with these entities.

- b. Described below is how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

Potential clients may be referred by ACDSS or E&TC, to a contracted staff person at the E&TC who approves schooling for vocational rehabilitation. Employment and Training Center staff have a roster of NYS Department of Education approved area providers that specialize in vocational education and job skills programs geared to our clients. This list is the result of a long-established relationship with these providers.

- c. Described below are the district's process and guidelines workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.

The department refers non-exempt recipients who have not attained their HSE to the Southern Tier Traveling Teachers for assistance in completing their HSE. This is a requirement that is incorporated into their employment plan. Non-exempt recipients who have not attained a basic literacy level are also referred to Southern Tier Traveling Teachers and Literacy West for an evaluation. Our county utilizes a TABE score of 9 or below for determining if someone has obtained a basic literacy level. These agencies will evaluate individuals to determine if they will work with them to increase their literacy level with the hope of attaining a HSE or if referrals need to be made to ACCES-VR or Arc-Allegany/Steuben to take advantage of their services. These activities are a requirement and incorporated into their employment plan.

- 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.

Through the assessment process the determination is made whether an individual has attained a basic literacy level or has not received their high school diploma. The employment worker will advise the individual that the improvement of basic literacy skills as well as job skills training can expand their employment opportunities. If the applicant is interested in attaining basic literacy levels or their high school diploma, we refer them to STTT or BOCES. The Literacy West in Allegany County was awarded a federal grant to provide educational and supportive services to individuals and families seeking pathways out of poverty. We have a close working relationship with them and utilize them as a resource for individuals who need additional assistance in securing their high school diploma or HSE. This educational activity is incorporated into their employment plan, as they have agreed to do this. For individuals not interested, we provide them with the employment opportunity mentioned above and advise if they become interested, they should contact their employment worker. However, this activity would not be incorporated into their employment plan.

An individual may be denied participation in educational activities if they have previously started but did not complete training(s) in the past with no reasonable explanation as to why they quit, if they already have three or four trainings making them currently employment ready, and/or if they request unsuitable training (training would not increase the employability of the individual).

- 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.

To determine an individual's participation in this program, the counselor will look at their current education, conduct a TABE test if necessary and inquire as to how the individual intends to pay for it. The major factor into whether this schooling is approved will be if it is an "in demand occupation". Dependent on the number of hours a week an individual will participate in a vocational education program, the department may assign an individual to work experience.

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

Providers who must possess a license or certification of the State Department of Education will hold a current license or certification. All providers, regardless of licensure or certification, must submit each curriculum to the Allegany County Employment and Training Center and it must meet the approval process of the local Work Investment Board's training policies and procedures. As set by program or contract, providers must meet performance standards, including but not limited to maximum costs per participant and required entries to employment.

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

In accordance with the WIOA requirements regarding approval of training providers, recipients will be informed of approved training providers by the E&TC. This information will be provided following assessment, during career counseling and/or development of individual employment plans.

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

- Educational/Training work experience or supervised job search, written notification by ACDSS
- Job readiness of other directly provided training - written notification by ACDSS or E&TC
- Education/training services provided by an approved provider - written notification by E&TC
- For self-initiated training, the recipient will be provided written notification regarding whether or not the training has been approved.
- Enrollment will be reflected in the individual's employability plan, a copy of which is provided to the enrollee

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

The DSS eligibility worker (SWE) assigned to the case is required to verify the student's attendance at initial application and each subsequent 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.

The district will inform work activity providers of an individual's work limitations identified as part of the disability review process, in writing. The following is a description of how the district will ensure that work sites are responding to notification of work limitation:

- Individuals determined to have work limitations will be requested to report to ACDSS any demand of a work activity provider which they consider not to be accommodating their medical limitations.

- Work activity providers will be contacted by ACDSS and be provided with information about ADA requirements, insurance and compensation considerations, and ACDSS requirements that the medical limitations be accommodated. A specific corrective action response will be required, verbally or in writing.

- If a work activity provider subsequently fails to accommodate the individual's medical limitation, the individual will be allowed to disenroll from the activity and will be reassigned. Any work activity provider who, after advisement by ACDSS, continues to fail to accommodate medical limitations will be discontinued as a provider.

4.4 Post-Secondary Education Approval and Enrollment Policies

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

The district will approve post-secondary level education as a work activity for a college program of up to a four-year college program.

- b. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student’s curriculum unless one or more of the following conditions applies as described below (reply yes or no to options as they apply):

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

Yes or No:	Conditions for disapproval of work activity
Yes	It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
Yes	A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
Yes	The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
Yes	The institution or student fails to monitor and report information regarding the student’s attendance and performance as required.
Yes	The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
Yes	The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
No	Additional reasons as stated here:

5. Work Requirements

5.1 Meeting TA Work Requirements

- a. Described below is how the district plans to meet federal and State TA participation rate requirements. Included in this description is the weekly hours standard participation requirements for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals whose status changed from exempt to nonexempt. (Information regarding engaging exempt individuals is entered in Section 9).

Non-exempt applicants are engaged in Job Readiness Training (JRT) and job search from

the date of assessment and have to meet with and provide the DSS Employment Unit or E & TC staff their job search verification weekly. Non-exempt TANF & SN households may be required to complete up to 35 hours of work-related activities with WEP hours being limited to the monthly PA grant plus the Supplemental Nutrition Assistance Program (SNAP) allotment divided by the State or Federal minimum wage, whichever is higher. However, hours of participation are determined on a case-by-case basis as appropriate due to work limitations, child under 6 in the household or other case circumstances.

Exempt clients are tracked and monitored by the Employment Unit and are engaged in countable activities once they become non-exempt. The district tracks participants through use of the various reports available (e.g. COGNOS), and plans to continue to maintain timely WTWCMS entries, and engage non-exempt clients in a timely manner to maximize countable participation.

The district engages individuals whose status changed from exempt to non-exempt by referring for an update to their employment assessment and plan. The individual is given at least 10 days' notice from the day the referral is made before the appointment to update their employment assessment and plan. Once the assessment and plan have been updated during that meeting, the individual will be engaged in work activities immediately.

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

Number of Individuals Who Receive Employment Services

Household Type	Number Served
Households with Dependent Children Average Monthly	21
Households without Dependent Children Average Monthly	15

- 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:

The Employment Unit staff receives the COGNOS reports on a regular basis They review the lists to determine if an individual is meeting the necessary requirements. They then would contact individuals that appear on the list that may not be fully engaged in an activity to their ability.

- 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:

Yes.

Applicant Job Search

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	20	20	Individuals are generally required to report job search outcomes weekly for four weeks then one week off; repeated until employment is obtained, case closing, or the individual is determined no longer employable.
SNA Individuals	20	20	Individuals are generally required to report job search outcomes weekly for four weeks then one week off; repeated until employment is obtained, case closing, or the individual is determined no longer employable.

- 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. Include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected using the "Additional Information" column.

Yes.

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	5	All non-exempt recipients are required to conduct an on-going job search. Required job search hours and required employer contacts per week will vary, depending on whether or not the client is enrolled in other employment activities. Recipients are required to report weekly with their completed job search logs which will be reviewed by Employment and Training Center staff. E&TC staff also performs random contacts with employers verify a job search.
SNA Individuals	5	5	All non-exempt recipients are required to conduct an on-going job search. Required job search hours and required employer contacts per week will vary, depending on whether or not the client is enrolled in other employment activities. Recipients are required to report weekly with their completed job search logs which will be reviewed by Employment and Training Center staff. E&TC staff also performs random contacts with employers verify a 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:

When an individual identifies to the Agency they are participating in self-employment, the Agency will accept all self-employment as an eligible work activity. The hours of eligible participation are determined by the reported self-employment income divided by the federal minimum wage. If the eligible hours are not sufficient to meet the individual's hourly participation requirements, the individual must participate in additional activities. The Agency will re-evaluate the income being generated by the self-employment on a quarterly basis and re-determine if the self-employment will be approved as a work activity.

5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

Written Information Provided to SNAP Applicants and Recipients

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

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

Eligibility staff provide a comprehensive oral explanation to SNAP households of work requirements pertaining to individuals in the household using the LDSS-4826C. This is provided at application, recertification, and whenever a household member's employability changes from exempt to non-exempt.

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

How the District Documents the Written Requirement in the Case Record

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

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

How the District Documents the Oral Requirement in the Case Record

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

5.3 Meeting SNAP Work Requirements

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

Allegany County does not mandate work activities for NTA-SNAP applicants or recipients.

- 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.

N/A

- 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):

Referrals are made to the Employment and Training Center where they are educated regarding services available and for assistance with job search activities.

5.4 Advising Households of Employment and Training Services

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

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

Who the District Provides Employment and Training Services Information to

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

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

How the District Provides Employment and Training Services Information

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
No	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website:
No	Material and information provided via email.

5.5 Provider Determinations

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

All providers that our agency collaborates with for work assignments complete a JobTrak Program Worksite Agreement which lists the type of tasks that would typically be assigned. With the combination of the physical examination, the individual's employment plan, and the worksite agreement, individuals are assigned to the provider that best suits their

physical and mental needs along with their employment goals to reach self-sufficiency. The agency's JobTrak Supervisor regularly visits the provider sites to follow up on the individual assigned to ensure compliance with policies and procedures. Our employment unit also maintains regular communication with clients regarding their progress. If/when a provider determines the individual is not a good fit, they will notify our DSS either verbally or in writing, within 10 days. Our agency will in turn notify the individual in writing within 10 calendar days of receiving the notification. The individual's case file will be notated to reflect when the client was informed and referred to another assignment.

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

A Jobtrak Program Worksite Agreement is completed by the provider/contractor and signed by both the provider/contractor and the agency. The provider/contractor also completes a Jobtrak Sponsor Profile indicating the type of tasks to be performed. Our Jobtrak Supervisor regularly communicates with both providers/contractors and clients to ensure compliance with the agreement and the fit of the individual(s) assigned there.

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

Although we have not experienced this issue, our Jobtrak Sponsor Contract reviewed and signed by both the provider and our agency includes the following provision: "There will be no discrimination on the grounds of race, color, religion, sex, sexual orientation, age, marital status, national origin, prior criminal record, mental or physical disabilities, or veteran status". Our Jobtrak Supervisor regularly visits provider sites to review participation, successes and any challenges. Should a participant claim unfair or discriminatory treatment our agency would review the assignment, address the issue with the provider, and if necessary, reassign the participant to another activity or provider. For non-contracted providers we follow a similar investigative process if the client alleges discriminatory treatment.

6. Quality Assurance/Work Verification

6.1 Quality Assurance Process - Random Case Sampling

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

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

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

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at AQI.WV.SelfAudits@otda.ny.gov for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

The Quality Assurance (QA) plan must include the following elements:

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
 - Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
 - Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
 - Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
 - Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
- 6
- b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

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

3

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

3

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

6.2 Use of Outside Providers/Vendors

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

Yes.

- 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.

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

N/A

7. Supportive Services

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

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

Based on individual assessment and as approved by ACDSS: One time related allowance,

such as payment of permit/driver's license fee, 5-hour course, car registration, car insurance, essential clothing (not to exceed \$150.00), safety equipment (not to exceed \$150.00) and car repairs which are necessary to accept employment (not to exceed \$1000 depending on the fair market value of the vehicle owned by the client).

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

Transportation Services Provided to Clients

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

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

The maximum distance a client would be expected to walk to a work assignment is 2 miles. However, a special consideration would be given to recipients with young children that need to go to daycare and recipients with physical limitations. Other factors such as weather conditions, terrain, safety of the route, etc. will also be considered when notified by the client that this is an issue.

- 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:

Our department can provide emergency assistance if the client is otherwise eligible. Also, employment counseling is available at the Allegany County Employment and Training Center to assist clients in securing full-time/part-time employment.

7.2 Post-Employment/Transitional Supportive Services

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

Any supportive service listed in 7.1, with the exception of gas vouchers or mileage reimbursement and costs of employer-specific prerequisite training expenses. For individuals with vehicles, we can provide a gas card to assist with gasoline expenses for the TANF and SN-MOE population. In addition to the supportive services previously described, the department will assist persons with transitional SNAP benefits, transitional Medicaid, transitional childcare and emergency assistance as eligible.

- 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:

Agency will provide transitional Medicaid, SNAP, and Child Care Assistance Program benefits. One-time diversion payments may be made for car repairs, insurance, or other job-related expenses if otherwise eligible.

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.):

Transportation and childcare assistance is available for individuals that meet the program eligibility requirements. These supportive services are provided through the Wheels to Work/Transportation Initiative Program (which is still active in Allegany County) and the Child Care Assistance Program.

8. Conciliation, Sanction and Dispute Resolution Procedures

8.1 Conciliation

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

How the District Conducts Conciliation for TA Applicants and Recipients

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

The districts process for conduction TA conciliations is described below:

Allegany County DSS will use the conciliation process as outlined in 385.11. Employment

Unit staff will issue a notice to an applicant/recipient who fails to comply with employment requirements. The notice will indicate that a failure has occurred and indicate that the individual has a right to provide an explanation for failure to participate. All recipients will have ten (10) days to contact a named DSS supervisor (Principal Social Welfare Examiner). The individual will provide verbally or in a written statement form describing the good cause claim with the appropriate documentation attached.

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

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

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

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

How the District Conducts Conciliation for SNAP Applicants and Recipients

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

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

Conciliation notices are sent based on a non-exempt individual's failure to comply with an assigned activity. When the agency becomes aware of the individual's potential failure to comply, the conciliation notice is sent. These notices are sent by the Department of Social Services and the Employment and Training Center. The person is given 10 days to respond to the conciliation notice. If the client does not contact this Department within the time frame outlined, Temporary Assistance staff is notified to send the sanction notice. The worker who initiated the conciliation will interact with the client to obtain information so a decision can be made. The worker will also seek information from other sources that may impact the determination. After information is gathered, a determination would be made if there was good cause/willfulness and a decision on whether or not to proceed with the sanction.

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

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

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

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

If a recipient claims to have good cause or claims to be exempt from SNAP work requirements, but the district subsequently determines that the recipient did not have or failed to document good cause/willfulness or an exemption, the recipient may then have up to an additional five days to demonstrate compliance in a SNAP work activity to avoid the SNAP sanction. When SNAP recipients are sent a conciliation notice, a directed job search log is also sent. This is done so that the individual has the opportunity to demonstrate compliance by doing a job search. If the individual responds to the conciliation within the 10 days allowed, they can demonstrate compliance by completing at least five job applications, which they document on the Job Search Log, and then send to their employment worker.

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:

Individuals are informed at the time of the sanction as to when and how they can end their sanction and become compliant. An individual whose TA case has been closed must serve the durational period, if any, reapply and comply with all program requirements to establish TA eligibility. Benefits for recipients who demonstrate compliance with assigned work requirements consistent with this section will be restored retroactive to the date the individual indicates a willingness to comply, but not before the end of the durational sanction. In all instances, the time period established for demonstrating compliance to the satisfaction of the district cannot exceed 10 business days.

- 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:

Individuals are informed at the time of the sanction as to when and how they can end their sanction and become compliant. An individual whose SNAP case has been closed must serve the durational period, if any, reapply and then must comply with all program requirements to establish SNAP eligibility, including applicant employment requirements.

Benefits for recipients who demonstrate compliance with assigned work requirements consistent with this section will be restored retroactive to the date the individual indicates a willingness to comply, but not before the end of the durational sanction. An individual may be eligible for SNAP benefits before the end of the durational sanction period if the individual documents the he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefits. In all instances, the time period established for demonstrating compliance to the satisfaction of the district cannot exceed 10 business days.

8.3 Dispute Resolution

- a. The district’s procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district’s response to their request for health-related accommodations must be conducted in accordance with 18 NYCRR 385.11(c). Indicate below who mediates the grievance (reply yes or no to the options as they apply).

Grievance Mediation

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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

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

Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual’s disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician’s statement provided by participant.
Yes	District accepts physician’s statement provided by participant but refers for an independent evaluation when deemed necessary.

Yes or No:	How the district determines an individual's disabilities and/or work limitation
Yes	<p>Other process: - A physical examination is required prior to any JOBTRAK assignment. Physicals are conducted by the Jones Memorial Walk-In Clinic unless the client chooses to go to their primary care provider.</p> <ul style="list-style-type: none"> - Any individual who claims to have a limitation or disability must provide the agency with the name(s) of his or her medical provider(s) and sign a release of information. - A participant claiming a limitation or disability may be required by ACDSS to make an appointment with his/her health care provider(s) to obtain current information about the person's health. It is the client's responsibility to provide documentation of this to the agency. The client must return the medical documentation within 10 days as requested on the LDSS-2642, and upon the discretion of ACDSS the district may allow an extended timeframe on a case-by-case basis. - If it is determined by the health care provider that the individual has no limitations, or can work with limitations, the individual will be assigned to appropriate work activities regardless of whether the individual has applied for SSI - If it is determined by the health care provider that the individual is unable to work, the district may refer the individual to a health care provider for a second opinion, and/or may require that the individual apply for SSI. - Each time that a determination or redetermination is made of an exempt or non-exempt status the appropriate LDSS-4005 or LDSS-4005(a) notice is sent to the individual - If there are no work activities that can safely accommodate the individual's limitations and/or plan of treatment, a person with medical limitations may be offered the option of proposing a community service plan as his/her work activity. However, if the individual is unable to arrange for community service, no negative action will be taken. - An individual with documentation of permanent and/or total disability will be referred to AIM and Legal Services, to pursue SSI. Such an individual will also be provided information regarding ACCES-VR services and the ADA, and will be encouraged to seek assistance for becoming self-supporting.

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

Applicants and recipients are notified in writing using the Notification of Temporary Assistance Work Requirements Determination (Exempt) (LDSS-4005) of the district's determination of their exempt or non-exempt status whenever they allege to be unable to participate, or the individual otherwise participates in the employability disability review procedure process.

Individuals whose status changes from exempt to non-exempt are notified in writing by using the Notification of Temporary Assistance Work Requirements Determination (Non-Exempt) (LDSS-4005(a)). They are also required to update their employment assessment/plan prior to being assigned any activities. During the updated employment assessment, the individual will be informed of the work requirements and of supportive services available to participate in the required activities.

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

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

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

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

Process for Reviewing Medical Documentation

Yes or No:	District’s process for reviewing medical documentation
No	District directs the contracted physician or individual’s physician to determine status.
No	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: A member of the DSS Employment Unit reviews the medical documentation for employability and then will track the individual and request new documentation as needed.

9.2 Mental Health Screening and Assessment

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

No.

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

N/A

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

Screening Tools the District Uses

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

Yes or No:	Screening Tools
No	Other Screening tool (described here):

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

N/A

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

N/A

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

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

Described below is the district’s procedure for determining if an individual, who is unable to work due to mental or physical impairment, has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual’s disability exemption as covered in Section 9.1 of this Plan. Indicate who makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities (e.g., medical practitioner, employment worker, TA worker, local review team, etc.). Also indicate the source and type of information used to make the determination (e.g., information from individual’s medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.).

Agency staff, including Employment Specialists and Case Manager, as well as other providers involved review with the client: their medical, mental health and appropriate information to determine likelihood of restoration to self-sufficiency. The agency will use the specialized Physical and Psychological Assessments to assist in making the most appropriate determination.

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

If an individual has the potential to be restored to self-sufficiency a treatment plan is developed based on the physician's recommendations and assessments completed by employment unit staff and other provider agencies. Participants are mandated to follow the recommended treatment plan and are monitored for compliance by the employment unit. If appropriate, participants may be referred to ACASA, ACCES-VR, ARC, Clarity Wellness or other providers as appropriate or indicated.

- 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.

The determination that an individual, who is unable to work, has the potential through treatment or other rehabilitative activities to improve the ability to work is determined by the Employment Specialists, Agency Counselor and Employment Unit Case Manager who carefully review the medical form completed by a medical provider. The district adheres to the recommendation of the medical provider regarding the need for treatment or rehabilitation activities. Client is required to provide proof of monthly attendance of both drug & alcohol and mental treatment. They are provided with monthly tracking sheets that must be returned to the agency by the 5th of the month following treatment.

10. District Certification

10.1 Certification

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

2/15/2024
Edna Kayes
Commissioner