

# **Chautauqua County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

- a. This agency's organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district's employment program.  
*(Attachments must be uploaded to the system through the "Documents" screen prior to submitting the plan. Use the textbox below to provide any additional information.)*

Chautauqua County Department of Mental Hygiene and Social Services - See Attachment A  
Workforce Investment Board - See Attachment B

- 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 Chautauqua County Department of Mental Hygiene and Social Services has case managers based in both the Jamestown and Dunkirk offices. In the Employment Team (Attachment A), 9 case managers are based in the Jamestown office along with one supervisor and one support staff at this time. In Dunkirk, there are 4 case managers and one supervisor. In February, 2013, the Department began contracting with the Workforce Investment Board (W.I.B.) (Attachment B) to provide Employment Services in the five following areas: Job Readiness Training, Work Experience Program, Services to Work Limited Individuals, Job Placement/Subsidized Employment Services, and Targeted Training. The W.I.B. has offices both in Jamestown and Dunkirk which are within walking distance from the Department. The primary responsibility for the operation of Chautauqua County's employment program rests with the case managers within the Division of Temporary Assistance. The responsibilities of the case managers include: conducting orientation and job search, working with applicants and recipients to complete Employment Assessments and Individual Employment Plans; authorizing supportive services; maintaining case records in WTCMS; making referrals to programs such as Job Readiness Training (JRT), Work Experience Program (WEP), and Subsidized Employment Programs such as Transitional Employment Advancement Program (TEAP), educational programs, rehabilitative programs, and targeted training programs. Case managers determine employability status based on medical evidence, in addition to monitoring the progress and/or barriers to progress of the recipient toward self-sufficiency. Case managers are also responsible to conciliate cases where there has been non-compliance. Dispute resolution will be managed by the employment supervisors.

## 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
Workforce Investment Board	\$350,000	FFFS Local Others: State	FA SNA Family SNA Individual SNAP	Job Readiness Training, Work Experience Program, Services to Work Limited Recipients, Targeted Training, Management of Subsidized Employment Programs, Job Placement Services, SSI Initial Referral
Industrial Medical Associates/S AAM	\$235,000	FFFS Local	FA SNA Family SNA Individual	Substance abuse assessments, employability determinations, drug testing, and monitoring of treatment
Legal Assistance of	\$90,000	Local	FA SNA Family SNA Individual	Provide for the representation of persons whose federal disability

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Western New York				benefits including Supplemental Security Income (SSI) and Social Security Disability Insurance (SSDI) have been denied or may be discontinued for the purpose of representing these persons in appropriate proceedings, in addition to assisting new applicants who are referred for assistance in applying for SSI and SSDI.

- 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**

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
The Resource Center	Others: unknown	FA SNA Individual	Basic skills, job readiness, supportive employment, placement, counseling services, job coaching
Southern Tier Environments for Living (STEL)	Others: unknown	FA SNA Family SNA Individual	Basic skills, assessment, job readiness, supportive employment, housing
OTDA Jobs Program	Others: unknown	FA SNA Family SNA Individual SNAP	Supervised job search and job placement for TA applicants and recipients, job search orientation and monitoring for job search for ABAWDS, various workshops geared towards obtaining and maintaining employment
Catholic Charities	Others: unknown	FA SNA Family SNA Individual SNAP	Good vouchers, counseling, assistance in obtaining personal items, home repairs

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Community Helping Hands	Others: unknown	FA SNA Family SNA Individual SNAP	The Depot - clothing, furniture, household items
Love, Inc.	Others: unknown	FA SNA Family SNA Individual SNAP	A collaboration of churches who offer a variety of services to meet client's needs.
Chautauqua County Rural Ministry	Others: unknown	FA SNA Family SNA Individual SNAP	Food kitchen, clothes closet, assistance in locating housing, transitional housing
Chautauqua Opportunities, Inc. (COI)	Others: unknown	FA SNA Family SNA Individual SNAP	Case management, housing, budgeting, Child Care Council, Child Care Enrollment Agency, DADS program
St. Susan Center	Others: unknown	FA SNA Family SNA Individual SNAP	Food kitchen
UCAN City Mission	Others: unknown	FA SNA Family SNA Individual SNAP	Faith based support group and also run the UCAN Mission for Men
Mental Health Association	Others: unknown	FA SNA Family SNA Individual SNAP	Assist with legal services, resume preparation, disability services
Health Homes of Upstate New York (HHUNY)	Others: unknown	FA SNA Family SNA Individual SNAP	Provide Care Management services for individuals with medical, mental health and substance abuse issues, as well as assistance in obtaining housing assistance, legal assistance, food, goal setting
Southwestern Independent Living Center	Others: unknown	FA SNA Family SNA Individual SNAP	Assist with legal services, resume preparation, disability services
Housing Options Made Easy (HOME)	Others: unknown	FA SNA Family SNA Individual SNAP	Rental assistance and security deposits for individuals with mental health issues

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
The Salvation Army	Others: unknown	FA SNA Family SNA Individual SNAP	Clothing, household supplies, holiday and clothing give aways
Erie 2 Chautauqua/Cattaraugus BOCES	SNAP E & T	FA SNA Family SNA Individual SNAP	High School Equivalency, GRASP, ESL, Literacy, TABE, Best Plus, Career Exploration, various vocational and certificate programs, Family Learning Center-Spanish speaking support, ESL, Case Management Services
Chautauqua Works	Others: unknown	FA SNA Family SNA Individual SNAP	All One Stop services
Cornell Cooperative Extension	Others: unknown	FA SNA Family SNA Individual SNAP	Budgeting and nutrition classes, Jobs in Agriculture for Spanish speaking New Americans
Chautauqua Home Rehabilitation and Improvement Corporation (CHRIC)	Others: unknown	FA SNA Family SNA Individual	Housing upgrades and repairs
Learning Disabilities Association of WNY	Others: unknown	FA SNA Family SNA Individual	Family support services, case management, information and referral, educational advocacy, parent advocacy training and transitional services, inclusive children's after school program and summer program, youth therapeutic recreation, community employment services, supported work, adult basic education (basic skills), HSE preparation classes, career development support, adult recreation, bi-lingual services, residential services, habilitation services, speaker's bureau, professional trainings



<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Jamestown Community Learning Council (JCLC)	Others: unknown	FA SNA Family	Parents as Teachers; Healthy Families NY. Promotes healthy pregnancies, improved birth outcomes, healthy child development, increased parent knowledge of early childhood development and possible delays, improve child safety and reduce maltreatment, improve school readiness.
Healthy Community Alliance Inc.	Others: Unknown	FA SNA Family	Perinatal Infant Community Health Collaborative (PICHC)-supports Mother's, Father's and families to achieve positive health outcomes through nutrition and breastfeeding programs, assistance in finding medical/dental providers, birth control, transportation and other community services.
Chautauqua County Department of Health	Local Others: State Aid	FA SNA Family	Early Intervention Services, Lactation Home Visiting, Newborn Screens, New Mom's education, Well Baby program, Licensed Health Care Agency.

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:

DSS meets at least quarterly with the W.I.B. to review the programs being administered and address any concerns, issues, new information, success stories and to brainstorm new ideas and develop new processes if needed. Monthly reports and vouchers are submitted to DSS for review and approval, and at the end of each contract year the W.I.B. submits an Outcomes Report that is reviewed and discussed.

DSS also meets at least quarterly with LawNY to review referral numbers, discuss any concerns, issues and successes. LawNY submits monthly reports for referrals received and the invoice and backup documents for review and approval.

In addition, DSS is in constant communication with IMA. Meetings are scheduled at least quarterly to review and discuss all issues and concerns, new policies and changes that affect how we do business, staffing and success stories. Employment supervisors monitor the appointment schedules for medical, psychological and drug and alcohol very closely. Monthly reports are received and reviewed, and monthly invoices for services provided are reviewed closely for correctness before being approved for payment.

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

**Jobs Staff Target Groups**

Yes or No:	Target Groups:
Yes	Applicants
Yes	FA & SNA with children
Yes	SNA without children
Yes	SNAP
No	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).

Safety net applicants and Family Assistance applicants and recipients who are work ready are referred to the Jobs Program staff. The goal is to divert the applicant from the use of Temporary Assistance funds or reconnect recipients to the workforce. The Jobs Program staff works closely with the DSS staff to coordinate any diversion funds that may be needed to get the applicant employed and to keep them employed. The Jobs staff provides a weekly orientation for one hour for new applicants. At that time, each applicant is assigned to complete a minimum of 10 job search contacts. Each applicant is scheduled for a one hour weekly session to review their job search logs. After the first week, applicants are assigned to complete 5 new and 5 follow-up job search contacts each week. The Jobs staff continues to meet with each individual until their case is determined. They then make a mandatory follow-up contact at 90 days and again at 180 days.

All ABAWD individuals who are not included in a waiver or exclusion are required to

participate in qualifying activities. Jobs Program staff will be conduct job search orientations as needed in Jamestown and in Dunkirk. A maximum of 20 individuals will be scheduled per session. One on one assistance may be provided to any individuals requiring additional assistance. Individuals who are participating in the Jobs Program job search are required to complete 80 hours of job search per month. The Jobs Program job search will be a job search through the Workforce Innovation Opportunity Act (WIOA) for the 80 hour per month requirement.

## 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
Yes	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 currently contracts with the W.I.B. to provide five employment services programs (Self-sufficiency Center Programs). All Self-sufficiency Center (SSC) staff provide services at the Career Centers in a fully integrated service delivery system. Clients sign Release of Information forms allowing partner staff to work together to determine the most effective referrals and services for each customer. Referrals are made and include outreach to a designated partner referral liaison and follow-up. Referrals are designed to be a "warm hand-off" embracing the intent of WIOA.

## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

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

#### District Orientation Procedures

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: How a client would notify the Department if they have a conflict with their activity assignment after the assignment is made and how to resolve this matter. The work activity conciliation and dispute resolution processes. Information on Child Care in Lieu of Temporary Assistance. Transitioning from Temporary Assistance to employment. Supportive Services.

- 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:

Orientation is conducted by the DSS case managers on an individual basis for applicants and recipients. This orientation includes: explanation of work requirements, supportive services available, a brief overview of the conciliation/sanction process and dispute resolution, excused vs. unexcused absences, available training and educational opportunities, work activities available, extensive explanation of job search requirements, explanation of requirements for exempt individuals, and an overview of child care. Individual orientation sessions are offered both in Jamestown and Dunkirk.

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

- 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:

All adult household members including, 16 and 17 year old's who are not in school, are scheduled by the eligibility examiner at the time of their eligibility appointment for an individual appointment with a Case Manager to complete an employment assessment. Appointments are scheduled to be seen within 1-2 weeks depending on availability and can be phone or face to face appointments depending on client preference and/or need. At this time, the CM's are completing the local equivalent tool with the client and entering the data into WTWCMS at a later time. The assessment consists of reviewing the client's English fluency, education levels, basic skills, work history, training interests, family circumstances (any special needs), medical/mental health status, and supportive services that may be needed, such as child care. The CM also completes the Employment Plan (Attachment D) during this appointment. If a client indicates they are work limited or unable to work, the CM will provide the appropriate document for the client to have completed by their physician and returned within the required timeframe. If the client does not have an established relationship with a physician, the CM will schedule an appointment for an evaluation with IMA. If no medical is needed the CM will refer the client for weekly job search. Clients are screened for Drug and Alcohol issues and scheduled for appointments as needed at the initial eligibility interview with the Examiner.

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

The Department of Mental Hygiene and Social Services Employment Unit/Case Managers

- 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)):

Case Managers - see job description Attachment E.

Educational Assessment Specialists at Erie2 Chautauqua Cattaraugus BOCES administers the TABE test.

IMA credentialed alcohol and substance abuse counselors administer the drug and alcohol assessments.

- 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?

All non-exempt individuals will be reassessed every 6 months and all exempt individuals will be reassessed yearly unless changes are reported that would necessitate the need to update a client's circumstances and/or work experience activity prior to the normally scheduled reassessment.

### 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
No	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.
Yes	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: The local equivalent does not contain additional elements other than what is required. Attachment C.

- 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:

At assessment and reassessment the case manager jointly with the client discuss goals, work activities, barriers, supportive services, and the client's interests. For some clients this discussion may involve a review of rehabilitation to return to self-sufficiency.

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

The employment plan is updated at reassessment, when there is a change of an employability status, when there is a new requirement to attend treatment and/or there is a change in the client's interests/need. All clients are given a copy of their employment plan each time it is updated.

### **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:

As listed above. No additional requirements.

#### **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:

The District has Spanish versions of State-approved and local equivalent forms. Each of our client service offices has bi-lingual staff for interpreting, as well as 1 Spanish speaking case manager in the Dunkirk location, and 1 Spanish speaking case manager in the Jamestown location. While limited, we do have some worksites that can accommodate non-English speaking individuals. Our Contract Agency also offers Spanish speaking orientations in their Jamestown and Dunkirk locations. The district may utilize a language line service or interpreters to assist individuals with limited English proficiency other than Spanish.

#### **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:

The Department contracts with the W.I.B. for five employment services; Job Readiness Program, Work Experience Program, Subsidized Employment, Services to Work Limited recipients, and Targeted Training. Provision of employment services will be more seamless with all services being provided by one contractor. The W.I.B. will educate the worksite supervisors on the proper reporting of absences and on the need for worksite supervisors to counsel recipients when there is initial non-compliance. The need for appropriate childcare and a backup plan is discussed with the recipient at assessment, reassessment, WEP interview, JRT, and work limited orientation. Conciliation notices are sent out, in most instances, within 2 business days after notification to the Department of non-compliance. In the case of an applicant for or recipient of Family Assistance or Safety Net Assistance, the individual must respond to and request a conciliation within the 10-day time frame. For FA

cases, it is expected that the case managers contact the individual by phone to conciliate as soon as possible. When there is non-compliance and it has been determined to be both willful and without good cause, the case is referred for sanction. Employment Assessments and development of the Individual Employment Plan are currently conducted prior to case openings. Reassessments and updating of the Individual Employment Plan are scheduled in the recipient's home, worksite, or at HHS. W.I.B. staff has been trained by District staff to complete conciliations. The W.I.B. completes conciliations for individuals who have failed to attend/comply with WEP assignment.

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

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

#### Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: The Case Manager will attempt to contact a client who has been sanctioned and discuss options to lift sanction and make referrals as appropriate based on sanction timeline.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Individuals who are sanctioned beyond duration will be scheduled for an office meeting with the case manager at least bi-annually but no more frequently than once per month. Meetings will include discussion to explore changes in case circumstances, household composition, medical condition, income, and the availability of resources. When an individual who is sanctioned beyond duration expresses an interest in complying with the employment activity so that the sanction can be lifted, the case manager, in coordination with the W.I.B., will assign the individual to an employment activity and monitor the progress toward compliance. Once the individual demonstrates compliance and completes satisfactorily with no unexcused absences, the sanction will be lifted, and benefits restored retroactive to the date that the individual expressed a willingness to comply with employment requirements. Compliance is defined as a completion of the activity which caused the sanction and may be up to 10 business days in length.
No	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

### 3.5 Strategies for Reducing the Need for TA

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

Diversion payments may be made to meet a short-term need in order to assist an individual to obtain or retain employment rather than opening an on-going Temporary Assistance case. All applications for diversion services will be interviewed and processed by the Eligibility Team. A request must be initiated by the individual indicating what services are needed. The eligibility worker investigates the availability of resources in the household (checking, savings, etc.) or if any outside resources are available (funding from another agency, family than can lend a hand, etc.). If any resources are available, the client will be



responsible to access those resources first. If resources are available and the application is denied, a notice (LDSS 4002) "Action Taken on Your Request for Assistance to Meet an Immediate Need or a Special Allowance" is sent. If there are no available resources to meet the need, the client is advised to obtain documentation which may include estimates. When all required information is received, the worker evaluates the most cost-effective means that will meet the client's needs. If a diversion payment is being made, the client may be required to write out a plan on how they will pay for future needs. The client is informed of the decision using client notice LDSS 4002.

## 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
<b>Unsubsidized Employment</b> – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.	FA SNAFAM SNA SNAP
<b>Work Experience</b> – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.	FA SNAFAM SNA
<b>Job Search</b> – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
<p><b>Vocational Education</b> – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Secondary School</b> – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Skills Training</b> – Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (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><b>Job Readiness Training (JRT) Activities</b> – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Subsidized Private Sector Employment</b> – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA</p>
<p><b>Subsidized Public Sector Employment</b> – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA</p>
<p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>FA SNAFAM</p>

Activity and Definition	Case Type
<b>SNAP E&amp;T Supervised Job Search</b> – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.	N/A
<b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.	FA SNAFAM SNA SNAP
<b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.	N/A

## 4.2 Job Development

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

Yes.

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

### How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: This falls under our contract with W.I.B and is handled by their staff.
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.: All staff members employed by our Contract Agency participate in job development, job placement and job retention activities. The Self-Sufficiency Center staff actively recruits employers who will hire Temporary Assistance recipients, either directly or through the use of grant diversion or other subsidy programs. Staff identifies employers who are geographically and occupationally appropriate for the population to be served. The Contract Agency looks for jobs that could match the client's skill base, strengths, and barriers. After reviewing the assessment, a "cold" call may be made to employers to determine if the employer has any positions for which the participant may be qualified. At times, the match can be done in reverse. After learning about the employer's job openings and the skills necessary to perform the jobs, the contractor may attempt to find a participant who may have the skills needed to perform the job. Frequency of contact varies depending on the current positions in need of placement and the current employment opportunities in the community. Contacts may be as frequent as several times a day with employers that are currently looking for staff, to monthly or bi-monthly for others.

### **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.

Training providers must be Workforce Investment Board (W.I.B) and/or State Education Department (SED) certified. The W.I.B. approves training providers for the Eligible Training Provider List. This list is updated annually and the training provider must be on this list prior to utilization. Chautauqua County uses already existing programs operated by Erie2-Chautauqua-Cattaraugus Board of Cooperational Education Services (E2CCB) also establishes programs at additional sites when and where necessary due to demand.

- 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.

Our Targeted Training Contract has been granted to the W.I.B. who with the case managers will be assessing the needs of each recipient relative to training opportunities. In most cases, referral will be made by the case manager to the W.I.B. utilizing the Request for Education/Training form (Attachment F). The need for training of the recipient will also be identified in the Individual Employment Plan (Attachment D). The W.I.B. will assist in matching recipients to available training and will arrange to cover the costs of such training. Priorities for training will be those associated with jobs on the local Demand Occupation List which is established by the W.I.B. Training providers must be W.I.B. and/or SED certified. The W.I.B. approves training providers for the Eligible Training Provider List. This list is updated annually, and the training provider must be on this list prior to utilization. DSS contracts with the W.I.B. to provide this type of training. E2CCB correlates TABE, Best Plus, and Best Literacy scores with appropriate education and/or training opportunities. Pre and post tests are given to monitor gain or remediation requirements. Curricula will be evaluated based on documented DOL Western New York labor market demand for the skill being taught. The W.I.B. establishes the local Demand Occupation List. For skills developed for local labor and southern tier markets, demand will be established based on regional labor market data developed by the NYSDOL and/or demand validated by the W.I.B. and W.I.B. One-Stop Operator, as well as evidence that the skill can be mastered to the demand level within the time frame allotted for training. For skills developed for regional or national demand, the above criteria will be considered as well as the ability of the trainee to attain wage rates which will offset the extraordinary expenses related to relocation to another labor market. If there is a disagreement between DSS, the participant, and other service providers involved, about whether or not the district should approve the education or training, any of the parties involved can request a case review of the participant's situation. At the case review, all involved parties meet to discuss points of view and review additional information and/or documentation prior to the final decision which is made by DSS.

- 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.

Recipients who have not already attained a high school diploma or High School Equivalency will be offered the opportunity to participate in educational activities and may be referred for ABE, High School Equivalency preparation, or ESL classes when appropriate. E2CCB correlates TABE, Best Plus, and Best Literacy scores with appropriate education and/or training opportunities. Pre and post tests are given to monitor gain or remediation requirements.

- 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.

Our Targeted Training Contract has been granted to the W.I.B. who with the case managers will be assessing the needs of each recipient relative to training opportunities. The W.I.B. will assist in matching recipients to available training and will arrange to cover the costs of such training. Priorities for training will be those associated with jobs on the Demand List.

Recipients who are assigned to work experience in addition to ABE, GED preparation or ESL classes may be counted for additional participation hours.

Curricula will be evaluated based on documented DOL WNY labor market demand for the skill being taught. For skills developed for local labor and southern tier markets, demand will be established based on regional labor market data developed by the NYSDOL and/or demand validated by the W.I.B. and W.I.B. One-Stop Operator, as well as evidence that the skill can be mastered to the demand level within the time frame allotted for training. For skills developed for regional or national demand, the above criteria will be considered as well as the ability of the trainee to attain wage rates which will offset the extraordinary expenses related to relocation to another labor market.

Recipients that have not yet attained a high school diploma or equivalent and are requesting to participate in an educational activity as part of their work activities would first be required to complete the TABE or Best Plus testing to determine their current level of education proficiency. The CM would then review the minimum education requirements (TABE/Best Plus scores) as well as the current goals of the recipient as outlined in his/her Individual Employment Plan.

The educational activity will be approved if the recipient meets the minimum education requirements, and the educational activity is in line with the individual's goals (must be realistic for the client). If the educational activity is approved and the individual does not have good cause for not attending the activity on a regular basis, the educational activity will no longer be an approved work activity and the individual may be referred to other work activities as appropriate.

The educational activity would be denied if the individual does not meet the minimum education requirements, the educational activity is not in line with the goals of the individual, the educational activity is not expected to increase the ability of the individual to secure self-sustaining employment, or if the educational activity would only aid the individual in securing employment that would also require a high school diploma or equivalent. When an educational activity is denied solely for the reason that it would only lead to employment that would also require a high school diploma or its equivalent, the CM will work jointly with the individual to determine if high equivalency classes are needed or if the recipient can take the next GED test. When the recipient obtains his/her high school diploma or its equivalent, the educational activity may be approved assuming that all other requirements have been met.

If there is a disagreement between DSS, the participant, and other service providers involved, about whether or not the district should approve the education or training, any of the parties involved can request a case review of the participant's situation. At the case review, all involved parties meet to discuss points of view and review additional information and/or documentation prior to a final decision which is made by DSS.

- 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.

The participant must meet the minimum achievement/aptitude levels, which are prerequisites for the program requested.

The participant must have an approved individual employment plan which demonstrates the capacity of the individual to meet the scheduled class hours of the training/education selected as well as the scheduled hours of work required by the District.

The participant must demonstrate and continue to demonstrate satisfactory attendance (75% attendance), grades/performance (at least a C average) and progress commensurate with other students in good standing.

A client requesting approval of a specific training will be required to complete and submit a written justification (in the participants own words) of how the training will help him/her in becoming self-sufficient. It will also explain how the participant expects to overcome any obstacles in completing the training while continuing to meet the number of required participation hours (Attachment F). Students who are attending school are required to submit monthly instructor signed attendance verification.

Up to four years of post-secondary education as a Temporary Assistance work activity may be approved beyond a twelve-month period when combined with no less than 20 hours of participation averaged weekly in paid employment, or other core work activities or community service.

When determining whether or not an individual is approved/assigned to participate in job skills training or vocational educational activities, including up to four years of post-secondary education, the District will consider such factors as, but not limited to, the individual's ability to successfully complete the program, the extent to which the individual is able to secure employment without the additional education or training, and the extent to which the education or training will prepare the individual for jobs in an occupation with favorable job opening predictions.

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

Education and training providers must be SED and/or W.I.B. approved instructors. The W.I.B. approves training providers for the Eligible Training Provider List. This list is updated annually and the training provider must be on this list prior to utilization.

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

Education and training opportunities will be discussed with the recipient during assessment, reassessment, and the development of the Individual Employment Plan. Desired education and training will be identified in the Individual Employment Plan as it relates to the achievement of the goals developed by the recipient. The recipient will complete the Request for Education/Training form jointly with the case manager to identify goals of the individual and relevant training that will help them to achieve their goals.

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

Notification will be by phone from the DSS case manager and/or the W.I.B. and may be followed by or preceded by a letter.

- 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.

At recertification, examiners are reviewing the cases for school attendance and if not in school and non-exempt, they are referring the youth to a case manager to be scheduled for an assessment.

- 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.

When assigning an individual with limitations to an employment activity, the DSS case manager and/or W.I.B. provides a written notification of such limitations to the service 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 highest level of post-secondary education that will be approved is a 4 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).

The social services district will enroll TA clients in employment activities that will lead clients to employment and financial independence. Assignment of employment activities will meet or exceed the State and Federal requirements for participation rate purposes but will not exceed 40 hours per week for each recipient. The hours needed to be assigned to WE is limited to the hours derived by dividing the household's TA grant, including SNAP allotment, by the higher of the Federal or State minimum wage.

Whenever possible, applicants are assessed prior to case opening and are typically referred for enrollment in an activity within 2-3 weeks of the determination of non-exempt status. Recipients whose status changes from exempt to non-exempt are typically referred for

enrollment in an activity as soon as possible after the determination of non-exempt status. All non-exempt applicants are immediately assigned to Job Search at the time of the employment interview by the case manager. Some are referred upon receipt of application and others at the employment interview. On-going job search may be required of all non-exempt recipients in addition to other work activities to which they are assigned. We plan to increase the use of TEAP and subsidized employment contracts. The W.I.B. will be recruiting employers who are willing to hire recipients and participate in the TEAP and/or subsidized employment programs. The district monitors participation and engagement rates by:

- Conducting monthly contractor contacts to assure coordination.
- Providing staff with individual participation rate information. This information is reviewed and discussed at the case manager's one-on-one supervision session with the supervisor.
- COGNOS reports, including the detail list, are generated and reviewed monthly by the Employment Principal, the Employment supervisors, and by the case managers. The W.I.B. will provide continuous outreach to local employers to increase our numbers of Work Experience slots and to develop employment opportunities for our work-limited and our non-English speaking populations.

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	351
Households without Dependent Children Average Monthly	287

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:

Tracking of compliance begins at the front door. SN applicants and some FA applicants who are non-exempt are referred to the OTDA Jobs Program for Supervised Job Search. The remaining SN and FA applicants who are non-exempt are referred to the HHS job search. For job search, non-compliance is tracked for no shows, incomplete job search and falsification of job search logs. All adult applicants may be referred for TABE testing. Other referrals may include Career Exploration, Best Plus, Alcohol and Substance Abuse Assessment, and FEDS. All of the above referrals for eligibility activities are tracked by the case managers/examiners to ensure that denials have been processed for applicants who do not comply with applicant job search and assessment activities. The Employment supervisors use COGNOS reports in their daily work activities. The detail lists are printed each month and the cases reviewed with the individual workers. Wages reported in the budget and wages reported to the case manager are compared on a monthly basis with the use of two COGNOS reports: "Adults with No Budgeted Earned Income and Current Employment Schedule" and "Adults with Budgeted Earned Income and No Current Employment Schedule".

The Possible Miscoded Non-legal Union Families with Children in Common Report are reviewed as well as the Employability Code Duration Report. The Employment supervisors meet bi-weekly with each case manager individually to review timely scheduling of assessments and reassessments as well as non-compliance and need for conciliation. They also review compliance with employment activities including Job Search (attendance, completeness of logs and falsification of logs), JRT, WEP, and other employment activities to determine if conciliations have been started in all cases where appropriate.

- 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**

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	10	20	Non-exempt applicants may be assigned to the OTDA Jobs Program for supervised job search upon submission of their application. The Jobs Program staff works closely with the DSS staff to coordinate any diversion/supportive service funds that may be needed to get the applicant employed and to keep them employed. Jobs staff provides a weekly Jobs Program orientation for one hour. At that time, each applicant is assigned to complete 10 job search contacts. Each applicant is scheduled for a weekly one on one session to review their job search logs. After the first week, applicants are assigned to complete 5 new and 5 follow-up job search contacts each week. Jobs staff continues to meet with each applicant until their case is determined and then makes a follow-up contact at 90 days and again at 180 days. Non-exempt applicants who have not been referred to the OTDA Jobs Program are assigned to job search at the employment interview and are expected to make a minimum of 10 contacts per week. The job search logs are reviewed at the job search appointment which takes place weekly. Random contacts with employers are made to verify that contacts are actually being made. This review is conducted by the case managers.
SNA Individuals	10	20	Non-exempt applicants may be assigned to the OTDA Jobs Program for supervised job search upon submission of their application. The Jobs Program staff works closely with the HHS staff to coordinate any diversion/supportive service funds that may be needed to get the applicant employed and to keep them employed. Jobs staff provides a weekly Jobs Program orientation for one hour. At that time, each applicant is assigned to complete 10 job search contacts. Each

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
			applicant is scheduled for a weekly one on one session to review their job search logs. After the first week, applicants are assigned to complete 5 new and 5 follow-up job search contacts each week. Jobs staff continues to meet with each applicant until their case is determined and then makes a follow-up contact at 90 days and again at 180 days. Non-exempt applicants who have not been referred to the OTDA Jobs Program are assigned to job search at the employment interview and are expected to make a minimum of 10 contacts per week. The job search logs are reviewed at the job search appointment which takes place weekly. Random contacts with employers are made to verify that contacts are actually being made. This review is conducted by the case managers.

- 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**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	10	10	All non-exempt recipients are required to conduct an on-going job search for up to 12 weeks a year when enrolled in other employment activities. Required job search hours and required employer contacts per week will vary and are based on the number of hours a recipient is required to participate. Recipients are required to report weekly with their completed job search logs which will be reviewed by DSS staff. Random contacts with employers are made to verify that contacts are actually being made. This review is conducted by the Employment Clerks.
SNA Individuals	10	10	All non-exempt recipients are required to conduct an on-going job search for up to 12 weeks a year when enrolled in other employment activities. Required job search hours and required employer contacts per week will vary and are based on the number of hours a recipient is required to participate. Recipients are required to report weekly with their completed job search logs which will be reviewed by DSS staff. Random contacts with employers are made to verify that

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			contacts are actually being made. This review is conducted by the Employment Clerks.

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

The district will approve self-employment if the individual is making at least minimum wage. For all other self-employment, the district may determine if the activity is approved on a case by case basis, taking into account the individual's capabilities and future earning potential.

## 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&amp;T, and ABAWD)</i> and the LDSS-5193A <i>Important Information about SNAP Work Rules (General and Mandatory E&amp;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.

During initial interview, at recertification and when an individual's status changes from exempt to non-exempt, the eligibility staff use an eligibility checklist, which includes a review of the 5193/5193a to verbally explain the applicable work rules to each TA/SNAP and NTA SNAP household that includes a member subject to work requirements.

- 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**

<b>Yes or No:</b>	<b>How written information is provided to SNAP applicants and recipients</b>
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**

<b>Yes or No:</b>	<b>How oral information is provided to SNAP applicants and recipients</b>
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
Yes	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):

Chautauqua County does not mandate SNAP E&T.

- 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):

Information for Chautauqua Works/DOL is included in the SNAP application packet.

## 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 individuals complete an employment assessment with a case manager prior to their case opening in which they discuss any interests, goals, education and possible medical and/or physical limitations, drug and alcohol issues and other barriers such as criminal record. Individuals who state that they have limitations in regard to physical or mental

health are given a LDSS-4526 form to take to their Doctor. If they are not linked with a doctor, then DSS refers them to IMA for the evaluation as our contract agency for these services. If a client reports that they are needed in the home to care for someone then a needed in the home statement would be given. If they report D&A issues, they are referred to IMA for an evaluation. Once received, documentation is reviewed by CM and/or supervisor to determine if exempt from activities, or non-exempt. Once a determination has been made if a client is deemed non-exempt the individual is then referred to our contracted agency, Career Systems Development (CSD) for an appropriate activity placement. When DSS refers a client over to be linked with work activities a coversheet is given that states any limitations and/or barriers they may have, as well as any interests. Based on the information CSD receives they place the client at a worksite that best fits the interests, needs and limitations for the client. The client completes an interview with the worksite and is either accepted or declined for placement. If the providing agency determines the individual is not a good fit, they report back to CSD as our contracted agency within 10 days, CSD then reports back to the assigned CM. The individual is notified within 10 days of the case managers notification and discussions are held to see if there is a more appropriate activity or provider available. CSD staff work closely with the client, providing agency, and CM to ensure a seamless transition to a different providing agency and/or activity. All information is documented in WTWCMS and via email with CMs.

- 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.

CSD locates and secures all participating providers as an agent of the county, using the DSS worksite agreement template. During the contract/worksite development, the need for worksites and provider responsibilities are reviewed in great detail and importance. CSD staff maintain ongoing relationships with all participating providers. CSD completes worksite agreement renewals as needed. The renewal process includes a review of the worksite agreement, program expectations, and a review orientation. When a worksite agreement is being completed for the first time, the worksite agreement is reviewed in detail, a comprehensive orientation is conducted, and contact information is highlighted. Consistent and timely feedback is requested and encouraged with a coordinated goal of positive experiences and outcomes. During the orientation, the following topics are covered: program goals, provider expectations, CSD expectations, DSS expectations, required paperwork review including time sheet completion and submittal, conflict resolution process, and program contacts. Additionally, CSD develops and provides a Worksite Newsletter monthly. The Worksite Newsletter provides important dates for required actions during the upcoming month such as time sheet due dates and observed holidays. The Worksite Newsletter also provides work readiness development topics and tips as well as CSD staff contact information. For non-contracted providers we follow a similar process making sure that providers are informed of their authority and responsibility to determine if an individual is a good fit for their program.



- 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.

Contracted providers must have procedures in place to prevent discriminatory practices and ensure provider determinations are fair. They report to CSD any issues with DSS individuals placed with them. CSD gathers the information, shares with the assigned DSS Employment worker. Consistent and timely feedback is stressed with every participating provider throughout their participation. CSD confirms the need for such feedback to ensure that CSD staff and/or DSS staff can assist with any conflict resolution needs and or issues sooner rather than later. It is explained that the goal is to set clients up for success and the only way that this can occur is if CSD and DSS knows about situations and can then provide assistance as appropriate. Developing work readiness skills is a process and takes time. CSD staff stress that clients may struggle at times during this process, but that CSD staff is there to assist the participating provider to ultimately result in a successful experience for clients and participating providers. Further, CSD documents all information is WTWCMS and via email with CMs. For non-contracted providers a similar oversight process is in place to ensure determinations are fair and do not discriminate against protected classes.

## **6. Quality Assurance/Work Verification**

### **6.1 Quality Assurance Process - Random Case Sampling**

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

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

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

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at [AQI.WV.SelfAudits@otda.ny.gov](mailto:AQI.WV.SelfAudits@otda.ny.gov) for State review including specific information on each of

the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
  - Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
  - Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
  - Assess that the data entered into either WTWCMS, 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.
- 12
- 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.
- 12
- 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.

6

- 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.

6

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 WTCMS?

Yes.

- b. If Yes, does the district’s provider/vendor documentation collection, data entry and management of WTCMS 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:

Supportive services (Attachment H) include, but are not limited to: entrepreneurship/business start-up; motor vehicle repair; vehicle insurance; vehicle registration; transportation; professional licenses and fees; tuition, books and fees; tools and equipment; job related safety equipment/clothing; and driver’s license and permits. The District may also provide any other supportive services, within regulation, which are deemed necessary to allow individuals to participate in work activities, assist individuals at risk of needing Temporary Assistance to improve their opportunities for employment or to maintain their employment, or to assist employed Temporary Assistance recipients to improve their opportunities for employment which will move them to self-sufficiency.

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

**Transportation Services Provided to Clients**

<b>Yes or No:</b>	<b>Transportation Assistance Provided</b>
Yes	Bus pass/token
No	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:

Two Miles is the maximum distance we would require anyone to walk to an activity. Transportation and supportive services needs are reviewed at initial assessment and reassessment. When looking at walking verses providing transportation Case Managers take into consideration any physical limitations, parents with small children that need to get to the childcare provider, and inclement weather during the activity period. Transportation is provided on a case-by-case basis.

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

Individuals at risk of needing Temporary Assistance may be referred to Chautauqua Works for employment services.

Referrals may be made to local Temporary Employment Agencies.

Referrals may be made to Assurance Wireless or SafeLink for a free cell phone.

Diversion payments or supportive service payments may be made on a short-term basis to assist an individual to obtain or retain employment rather than opening an on-going Temporary Assistance case.

## 7.2 Post-Employment/Transitional Supportive Services

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

The District will provide Child Care Subsidy, Supportive Services, and Diversion Payments to support job retention. Please see the Supportive Services Plan (Attachment H).

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

The following supportive services will continue to be available for 90 days after case closings: child care subsidy; motor vehicle repair; insurance, and registration; transportation; tools and equipment; job related safety equipment/clothing; and driver's license and permits. The district may also provide any other supportive services, within regulation, which are deemed necessary to allow individuals to participate in work activities, assist individuals at risk of needing Temporary Assistance to improve their opportunities for employment or to maintain their employment, or to assist employed Temporary Assistance recipients to improve their opportunities for employment which will move them to self-sufficiency. Please see the Supportive Services Plan (Attachment H).

## 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.):

For 90 days after case is closed, we will assist as needed with car repairs, car insurance, license renewals for those clients that are now employed a minimum of 20 hours per week. See Attachment H.

## 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:

Once notice has been received of non-compliance, the case manager/employment clerk, or W.I.B. staff mails a conciliation notice to the recipient. All recipients are given 10 days from the date notice is sent to respond for TA and/or SNAP conciliation. For FA cases, it is expected that the case manager or W.I.B. staff member attempt to contact the recipient by phone to expedite the conciliation process. At the time of the conciliation, a case manager or W.I.B. staff member will conduct the conciliation either by phone or face to face. W.I.B. staff has been trained by District staff to complete conciliations. W.I.B. staff is completing conciliations for failure to attend/comply with WEP assignment.

- 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**

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
Yes	The client's employment worker
Yes	A supervisor in the district
Yes	A separate entity (described here): Case managers and W.I.B. staff will take into account when deciding good cause if the non-compliance was both willful and without good cause before processing with negative action.

- 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**

<b>Yes or No:</b>	<b>How conciliation is conducted</b>
Yes	In person
Yes	By phone
Yes	By mail

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

Once notice has been received of non-compliance, the case manager/employment clerk mails a conciliation notice to the recipient. For FA cases, it is expected that the case manager attempt to contact the recipient by phone to expedite the conciliation process. At the time of the conciliation, a case manager will conduct the conciliation either by phone or face to face. When a conciliation takes place, the recipient has an opportunity to document good cause or an exemption from participation in SNAP work activities. The district will then inform the individual in writing of the results (i.e., whether or not the district determined that the non-compliance was both willful and without good cause). This notice may be done separately or as a 10-day notice for recipients.

- 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**

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
Yes	The client's employment worker
Yes	A supervisor in the district
Yes	A separate entity (described here): When the conciliation is conducted, the DSS worker explains to the individual that they may continue to receive SNAP benefits by attending job search as assigned.

- 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:

When a recipient fails to comply with SNAP E & T Work Requirements, the worker will send LDSS 4230A notifying the recipient of non-compliance and requiring that they contact the Agency within 10 days to document good cause or an exemption from participation in SNAP work activities or to demonstrate compliance to avoid the SNAP E & T sanction. The recipient will be required to demonstrate compliance by conducting a job search activity consisting of 5 contacts to be submitted by the date agreed upon in conciliation in order to continue to receive SNAP benefits. The client will have 5 business days to complete the required 5 Job Search contacts.

**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:

The individual has a conversation with the case manager regarding their desire to end the sanction. A plan is developed jointly with the individual and the case manager for the individual to demonstrate his/her willingness by reporting to an assigned work activity site or other activity on time and prepared to engage in the work assignment. To demonstrate compliance, the individual must report to the assigned worksite or activity as scheduled for 10 business days and complete satisfactorily with no unexcused absences. 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.

- 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:

The individual has a conversation with the case manager regarding their desire to end the sanction. A plan is developed jointly with the individual and the case manager for the individual to demonstrate his/her willingness by reporting to an assigned work activity site or other activity on time and prepared to engage in the work assignment. To demonstrate compliance, the individual must report to the assigned worksite or activity as scheduled for 10 business days and complete satisfactorily with no unexcused absences. SNAP benefits are restored once satisfactory compliance is attained. An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that he/she is exempt from SNAP E & T requirements and is otherwise eligible for SNAP benefits.

### 8.3 Dispute Resolution

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

#### Grievance Mediation

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



## 9. Disability Determinations, Documentation and Requirements of Exempt Individuals

### 9.1 Disability Determination Process and Tools

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

#### Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual's disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
Yes	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: The client informs the worker they are unable to work. If a relationship is already established with a medical doctor a medical statement (LDSS-4526) and a document requirement form is given to the client to have completed and returned for review within a minimum of 10 days. If a medical doctor is needed, client is referred to the district's medical practitioner (IMA). IMA relays the outcome of the evaluation to the CM.

- 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:

Once medical documentation is received, the appropriate notice, either LDSS-4005 or LDSS-4005a is sent to the individual notifying them of the determination of employability. Each time the disability is reviewed a new 4005/4005a is sent updating their status. If determination changes from exempt to non-exempt, the case manager attempts to call the individual to notify of the decision and discuss and also sends a LDSS-5193.

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

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

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

<b>Yes or No:</b>	<b>District's process for reviewing medical documentation</b>
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**

<b>Yes or No:</b>	<b>District's process for reviewing medical documentation</b>
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: The Employment Case Manager, TA Examiner and/or Supervisor(s) review the medical documentation and determine status. When the documentation, diagnosis, prognosis or limitations are unclear, the worker may contact the physician for further clarification, and/or the worker may make a referral to IMA for an Employability Determination (second opinion).

**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**

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

Case Managers review all medical documentation submitted by an individual (normally the LDSS 4526). If the medical documentation indicates that the treating physician is recommending non-invasive treatment or rehabilitation, the Case Manager will mail the individual a request to document attendance in recommended rehabilitation treatment regardless of expected duration of the medical exemption. Attendance documentation will be completed by the treating provider and submitted by the individual no less frequently than monthly. Non-invasive treatment or rehabilitation shall include but not be limited to mental health counseling, physical therapy, occupational therapy, and cardiac therapy. When an individual has been determined to be exempt due to a mental or physical impairment based on medical information received from the medical professional, and when the professional has recommended rehabilitation to assist in restoring the individual to self-sufficiency, the individual will be required to submit documentation of their participation in the recommended treatment. The timeframe for submitting documentation will be based on the recommended need for treatment and will be required to be submitted at a minimum on a monthly basis. The medical status for each individual will also be reviewed at the end of the expected duration of the diagnosis and/or recertification. When an individual has been sanctioned for failure to comply with recommended rehabilitation treatment, the individual will be scheduled for an office meeting with a case manager no more frequently than once per month. Chautauqua County contracts with the Chautauqua W.I.B. to provide services for the work-limited population at both the Jamestown and Dunkirk Self-Sufficiency Center locations. The purpose of the program is to develop, establish, and sustain effective linkages that will

benefit the work limited population. These benefits include both direct services and access to additional services and funds from the New York State Office of Adult Career and Continuing Education Services - Vocational Rehabilitation (ACCESS-VR). For those individuals who are determined to be totally and severely disabled, program staff provides assistance accessing Social Security or Supplemental Security benefits. These individuals are assisted with the SSI/SSDI application process, including the collection of documentation and the completion of paperwork. When appropriate, Self-Sufficiency Center staff also links individuals to Legal Assistance of Western New York (LAW NY). Self-Sufficiency Center staff will assess each TANF and Safety Net recipient referred by DSS for the Income Security Program for Work Limited Individuals from a holistic standpoint. They will develop an individualized plan of action that will include an array of services that will address their needs. This assessment will determine the services and activities that are offered to the participant and will lead to a return to full-time employment, optimal employment (with accommodations for individual barriers) or an exit from the labor market as a result of approval for SSI or SSDI. Referred individuals are expected to be work limited but non-exempt. The Self-Sufficiency Center staff will work together with each participant to determine the appropriate steps to employment or to secure Social Security or Supplemental Security Income benefits.

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

Case Managers review all medical documentation submitted by an individual (normally the LDSS 4526). If the medical documentation indicates that the treating physician is recommending non-invasive treatment or rehabilitation, the Case Manager will mail the individual a request to document attendance in recommended rehabilitation treatment regardless of expected duration of the medical exemption. Attendance documentation will be completed by the treating provider and submitted by the individual no less frequently than monthly. Non-invasive treatment or rehabilitation shall include but not be limited to mental health counseling, physical therapy, occupational therapy, and cardiac therapy. When an individual has been determined to be exempt due to a mental or physical impairment based on medical information received from the medical professional, and when the professional as recommended rehabilitation to assist in restoring the individual to self-sufficiency, the individual will be required to submit documentation of their participation in the recommended treatment. The timeframe for submitting documentation will be based on the recommended need for treatment and will be required to be submitted at a minimum on a monthly basis. The medical status for each individual will also be reviewed at the end of the expected duration of the diagnosis and/or recertification.

When an individual has been sanctioned for failure to comply with recommended rehabilitation treatment, the individual will be scheduled for an office meeting with a case manager no more frequently than once per month.

- 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.

Self-Sufficiency Center staff will continue to monitor these individuals and report progress and compliance directly to DSS case managers, and, when appropriate, enters compliance/non-compliance information into WTWCMS. Staff provide a monthly report of all participants and what activities they are in.

## **10. District Certification**

### **10.1 Certification**

As a condition of the receipt of federal and State funds the Local District Commissioner of Chautauqua 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.

2/8/2024

Carmelo Hernandez  
Commissioner