

# **Broome 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.)*

See attached

- b. Below is a description of the office(s) in and/or outside of the Department of Social Services that are involved in the operation of the district's employment program and include the responsibilities of each office.

The Welfare to Work Unit with the Assistance Programs Division administers the WTW program and is overseen by the Director of Temporary Assistance and Employment. The Welfare to Work Unit is located at 36-42 Main Street Binghamton, NY 13905. The Employment Coordinator oversees the staff that work with the non-exempt population. They are responsible for assisting clients in finding employment, securing training and addressing barriers to employment with the goal of self-sufficiency. The Human Services Coordinator II oversees the staff that work with the medically exempt population. The purpose is to address physical and mental health issues so clients can return to work or training or determine and file for Social Security benefits. This person also oversees the Chemical Dependency Services Unit staff that work with the drug/alcohol exempt population. This unit evaluates the need for treatment, employability and tracks progress and treatment compliance.

STAR Group contracts with Broome County Department of Social Services to provide employability assessments, Social Security applications and case management services for Temporary Assistance to Needy Families (TANF), SNA Families and TANF 200% eligible clients.

## 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**

<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>
Industrial Medicine Associates - SAAM Program	\$375,000	Local Others: TANF	FA SNA Family SNA Individual	Provide substance abuse assessment, testing and treatment monitoring services for individuals applying for or in receipt of public assistance.
STAR Group	\$150,000	Others: TANF	FA SNA Family TANF 200%	Employability/Disability review - monitor medical cases, determine work limitations, ensure participation in treatment to return to work.
Industrial Medicine Associates (IMA)	\$35,000	Local Others: TANF	FA SNA Family SNA Individual TANF 200%	Independent medical and psychological exams to determine employability.

- 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>
Mother's & Babies Perinatal Network	Others: Unknown	FA SNA Family	Home Visiting Services

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Broome County Health Department	Others: Unknown	FA SNA Family	Home Visiting Services
Family Enrichment Network (FEN)	Others: Varies	FA SNA Family	Child Care Resource and Referral Agency.
ATTAIN	Others: HUD	FA SNA Family SNA Individual	Computer training
Binghamton City School District	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Alternative HS, TASC, ESL, Work Experience.
BC Transit	Others: DOT and CST	SNAP TANF 200%	Bus passes for TANF non-TA eligible for 4 months post employment
Cornell Cooperative Extension	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Nutritional education and also training for individuals between the ages of 18 to 24 years old.
Broome Tioga Workforce	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Workshops, Job Skills/Job Readiness Training, OITP training program and other Vocational Training Programs.

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:

Currently, Broome County DSS does not have any SNAP E & T contracts. Any new contract with SNAP E & T funding will be closely looked at as far as the scope of work and will follow federal and state regulations. Any scope of work that is submitted will be thoroughly reviewed by the Deputy Commissioner of Assistance Programs.

STAR - Each month a worker reviews the invoices to ensure that services were provided prior to any payment being made. On a monthly basis, 1-2 cases, per worker, will be randomly selected to be reviewed by the Supervisors or Sr. Caseworkers to ensure the assessments are being completed timely and accurately. Any cases missing assessments or information, will be returned to the worker for completion.

IMA - Once per month the agency receives an email from OTDA requesting verification that examinations were completed and reports were received for a specific list of individuals.

The Sr. Caseworker in the Employability/Medical Review Unit verifies that we have received the reports and responds back accordingly to OTDA.

IMA- SAAM - Each month IMA-SAAM provides the agency an Excel spreadsheet listing the Client Name, CIN, Case Number, case type (TANF or SN), itemized services and fees for each client seen during the month together with a completed voucher with the total amount due for the month. The Sr. Caseworker reviews the list to ensure that services have been provided prior to 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:
N/A	Assessment/Employment Plan
N/A	Supervised job search
N/A	Job readiness training
N/A	Job club
N/A	Job placement services
N/A	Grant diversion
N/A	Job development (employer outreach)
N/A	WOTC pre-certification

#### Jobs Staff Target Groups

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

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

N/A

## 1.4 Access to Services at New York State Career Centers

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

### Programs and Services Provided at Career Centers

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

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

BCDSS staff refer clients to the Resource Room and encourage them to take advantage of services available, i.e. computer access, workshops, funding for training, etc.

## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

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

#### District Orientation Procedures

Yes or No:	District Orientation:
Yes	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
No	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:

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

TANF, SNF and SN exempt and non-exempt participate in an individualized in-person or over the telephone orientation. Clients that are employed are given appointments that do not interfere with their work schedule.

## 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.
Yes	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
No	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:

- 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:

Applicants and/or recipients will be assigned to an individual appointment to complete the Employment Assessment. This will either be done in-person or over the telephone. The Temporary Assistance Unit sends referrals to the Employment Unit when a 16 or 17 year old is not in school. The recipient is assigned to a caseworker for completion of the Employment Assessment and Employment Plan development. The Employment Assessments for households with dependent children are completed within 90 days of the date on which eligibility is determined and for households without dependent children they are completed within 1 year of the application date. For assessment monitoring, on a weekly basis, the Assessment Date Report from COGNOS will be run by the Supervisors to track when assessments are due and to make sure that they are completed timely.

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

BCDSS Assistance area Caseworkers/Job Developer and the Star Group conduct assessments. The STAR Group only works with TANF, SN MOE or 200% populations.

- 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)):

Caseworkers in the WTW Unit must have a Bachelor's degree.

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

Yes

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

Yes

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

Yes

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

Assessments are updated anytime there is a case circumstance change, at a minimum, assessment are updated yearly.

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

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

### District Employment Plan Procedures

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

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

### District Employment Plan Development

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

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

Employment plans are completed as part of the initial assessment and anytime that there is a change. Employment plans are not done for exempt clients. The employment plan is developed with the clients input and lists short term and long term goals and a copy is provided.

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

The employment plan is updated whenever there is a change in activity assignment, or a goal is attained. At a minimum, all plans are updated yearly.

### **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:

N/A

#### **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:

Desk guides and posters are provided to staff and displayed in waiting areas to assist with the identification of the individual's primary language.

Broome County contracts with Language Line to provide translation services to assist with assessment process and plan development. Non-English speaking clients are referred to American Civic Association for ESL classes and other services. Once the recipient is at Level 4 for English, they are referred to other work activities in addition to ESL classes.

### 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:

Clients are assigned to a caseworker who works with them to develop their employment plan and assign them to work activities. During the development of the plan, the caseworker addresses barriers the client may have so that they are better prepared to start participating in an activity. The caseworkers have problem solving discussions to help lead the individual to self-sufficiency by being able to solve problems such as daycare and transportation so that they do not interfere with an assigned work activity or job. The frequency that a Caseworker meets with a client is dependent upon the client's needs and situation.

### 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
No	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
No	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: At this time, the agency is not attempting to engage sanctioned participants during different times in the sanction period. However, during the Temporary Assistance Recertification interview, it is discussed with the recipient how to get into compliance. If interested, the recipient is directed to the Employment Unit.

### 3.5 Strategies for Reducing the Need for TA

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

Broome County connects clients to job search activities and employment opportunities. Broome County emphasizes the importance of employment and the benefits that are associated with employment (transitional childcare, EITC, SNAP benefits, etc.). When appropriate, job search is mandated for employable clients. Nonrecurring diversion payments are issued based on following the TA Sourcebook Chapter 31, Section E. to reduce the need for Temporary Assistance.

## 4. Work Activities

### 4.1 Allowable Work Activities

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

#### Allowable Work Activities by Case Type

Activity and Definition	Case Type
<p><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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><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.</p>	<p>FA SNAFAM SNA SNAP</p>
<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>

Activity and Definition	Case Type
<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>
<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>

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

Activity and Definition	Case Type
<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.: Broome County Social Services employs one job developer who serves as a member of the Business Services Team in conjunction with DOL. Potential and current employers are contacted by email, telephone and in-person on an as-needed basis. Employers are contacted through job fairs and individual employer visits. On-the-job training contracts (OJT) are offered and Work Opportunity Tax Credit is discussed with the employer. WOTC certification is done by DOL staff at Work Force NY.
No	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.: N/A

## 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.

Services listed are provided through local school districts, BOCES, and the American Civic Association

- 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.

BCDSS works in conjunction with the local WIOA to refer clients to training facilities and courses that are approved for WIOA funding.

- 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.

Based on information as a result of the assessment and through observation by the Caseworker or disclosure from the client, the want or need for ABE, HSE or ESL is ascertained. The client is encouraged to engage in these activities and informed of available resources for ABE, HSE and ESL in the community. These classes are incorporated into the employment plan. All clients without a high school diploma are encouraged to participate in ABE and HSE.

- 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.

Approval is based on the completed assessment and literacy/math testing results. The Employment Plan will include the approved activities. If the individual has not obtained their high school diploma or HSE, the individual is encouraged and may be required to enroll in an educational program, such as HSE classes, to prepare them to attain a high school diploma or HSE. The education activity would be denied if the participant did not complete their assessment or the literacy testing.

- 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.

TANF and SN recipient's enrollment in job skills and vocational education must be approved by the department's designated staff. The criteria upon which decisions to approve or disapprove shall be consistently applied to each person's circumstances. Program approval will be dependent upon the extent to which the combined classroom activities, allowable study time and other structured activities total required participation mandates. Those factors to be included are:

**Current Abilities:** The individual's ability to reasonably compete for existing jobs, the current labor market, past work history and skill level in trades or occupations will be evaluated.  
**Training Record:** The amount and type of prior training the individual has had will be evaluated in conjunction with his/her performance. Whether there has been sufficient prior training to qualify the individual for existing local job opportunities. Training may not be re-approved after termination without good cause. The Employment unit shall be responsible

for determining good cause and re-approvals.

**Aptitude:** The individual's aptitude and ability to benefit from the program as determined in a consistence and reasonable manner, through an evaluation of past work/training performance, counseling, and testing.

**Academic Progress:** Continued approval will be based upon a minimum academic performance of "C" as determined by the academic provider. Academic performance and progress will be evaluated on a semester-to-semester basis.

Only programs of study that directly relate to the preparation of individuals for current or emerging occupations will be approved. The individual must be able to qualify for employment in their field of study.

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

Broome County will evaluate their education/training providers by approving programs on a case by case basis that are:

- a. Accredited or recognized by employers.
- b. Training that is in demand locally or regionally.

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

Broome County Employment Caseworkers receive information on different training programs being offered in the community. The available training programs are shared with clients. Educational approval is based on a number of factors including skills, education and prior work experience.

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

Participants who are approved for vocational education are notified through an approval letter clearly outlining the requirements that a student must meet in order to remain in their approved course of training. For Job Skill training programs, it would be listed on the Employment Plan.

Students who have not been approved also receive a disapproval letter that details the justification for the decision not to approve training.

- 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 TA recertification, BCDSS Temporary Assistance staff requests verification from the parent to provide attendance documentation. When necessary, staff will send a request for attendance verification directly to the school.

- 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 a client with limitations to a work activity, the referring worker notifies the work site in writing as to the limitations that need to be accommodated. The limitations are based on documentation that was provided by a certified health practitioner.

## 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):

Up to a four year degree may be allowed.

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

### Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

Non-exempt individuals, to the extent each is medically able, will be enrolled in 35 hours of activity/week, including, whenever possible, at minimum, the requisite number of hours of

countable activity as defined under federal and state legislation. Anyone who is employed less than 30 hours/week will be required to participate in additional activities to total 35 hours/week. Those with children under the age of six may be required to participate in less than 30 hours/week, but always, when possible, in a sufficient number of hours to be countable. The weekly standard of 35 hours is used. Individuals whose employability status changes from exempt to non - exempt are typically engaged in activities within 30 days of notification of status change.

- 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	185
Households without Dependent Children Average Monthly	205

- 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:

Workers receive a copy of the monthly detail listing to identify under-engaged and non-participating clients. Supervisors review unassigned cases.

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

Yes

**Applicant Job Search**

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	20	May be required to participate in supervised job search through weekly individual and group appointments with BCDSS staff by participating in active job search, submitting weekly job logs and attending workshops or Job Clubs.
SNA Individuals	10	20	May be required to participate in supervised job search through weekly individual and group appointments with BCDSS staff by participating in active job search, submitting weekly job logs and attending workshops or Job Clubs.

- 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	20	Non exempt SN, TA and SNF are required to participate in job search either as a standalone activity or as a non-core, sometimes not countable activity. They may be required to participate in supervised job search through weekly individual and group appointments with BCDSS staff by participating in active job search, submitting weekly job logs and attending workshops or Job Clubs. Job search is typically done 4 weeks at a time with a 12 week maximum.
SNA Individuals	10	20	Non exempt SN, TA and SNF are required to participate in job search either as a standalone activity or as a non-core, sometimes not countable activity. They may be required to participate in supervised job search through weekly individual and group appointments with BCDSS staff by participating in active job search, submitting weekly job logs and attending workshops or Job Clubs. job search is typically done 4 weeks at a time with a 12 week maximum.

- 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:

A recipient who provides unregistered child care is encouraged to register through the Child Care Council to become a legally exempt childcare provider in order to receive payment from the agency. BCDSS will budget this child care income as appropriate. An individual that is self-employed and who receives less than the hourly federal minimum wage in payment will be required to participate in 30 hours of additional work activities each week, not including the hours of provision of self-employment. BCDSS will allow two months for all self-employed individuals to increase their business income, additional time may be permitted as determined by the district based on case circumstance.

## 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.

Eligibility workers read the LDSS-5193A notice, after they have screened for exemptions to determine which requirements apply to which household members, at certification, recertification and after any previously exempt household member becomes newly subject to a work requirement during the certification period.

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

### How the District Documents the Written Requirement in the Case Record

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

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

**How the District Documents the Oral Requirement in the Case Record**

<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.
No	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
Yes	Eligibility staff document the case record through case notes/comments.

**5.3 Meeting SNAP Work Requirements**

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

Broome County Social Services currently does not mandate SNAP E & T assignments for NTA-SNAP applicants and recipients.

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

N/A

- c. If the district is not mandating SNAP E&T work activity assignments, please describe below how NTA SNAP work registrants are informed of the services available, upon request, for assistance with job search activities. (Please note: At a minimum, districts are required to offer job search assistance to NTA SNAP applicants and recipients):

Broome County Social Services will send all NTA-SNAP non-exempt work registrants the BCDSS Employment/Training Opportunities literature at case opening, recertification, or per client request.

**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**

<b>Yes or No:</b>	<b>Who the district provides employment and training services information to:</b>
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**

<b>Yes or No:</b>	<b>How the district provides employment and training services information</b>
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.

When referring a client to a work activity, the caseworkers and job developer take into consideration a person's skills, limitation and preferences. When a provider has concerns or does not think a client is appropriate the provider must notify the district of their determination within 10 days of making the determination and the client must be informed by the district of the determination within 10 days of the provider notifying the district of the determination. The worker will discuss the concerns with the site and write a detailed case note in WTWCMS. The worker will then reach out to the client to discuss the feedback from the site and determine the appropriate next step.

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

The Employment Unit has good working relationships with agencies that clients are referred to for activities. The agencies we work with have been verbally notified of their responsibility to determine if someone is not 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.

The district works closely with providers to make appropriate referrals. The Job Developer works closely with Work Experience site. If it was determined that a work site was treating clients unfairly or discriminating against them the site would no longer be used and appropriate measures would be taken.

## **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:

See attached Supportive Services Desk Guide

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

#### Transportation Services Provided to Clients

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
No	Gas card/voucher

Yes or No:	Transportation Assistance Provided
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
Yes	Other mileage rate (the methodology used to establish reimbursement rate is described here): The district will issue 44 cents/mile. The methodology that was used was to double the IRS Medical/Moving rate for 2023. The new rate takes into consideration the increase in the cost of gas.

- 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:

One (1) Mile while taking into consideration such things as weather conditions, terrain, safety of the route and physical abilities.

- 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:

To the extent Federal, State and local resources are available BCDSS will provide a nonrecurring diversion payment for services outlined in the attached Supportive Services Desk Guide.

## 7.2 Post-Employment/Transitional Supportive Services

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

OJT, job development and job coaching with the caseworker will provide early intervention to identify any problems on the job.

- 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:

To the extent Federal, State and Local resources are available, BCDSS will provide supportive services deemed necessary and reasonable to assist employed Temporary Assistance recipients improve their self - sufficiency opportunities. This will be accomplished by referral for separate determination of eligibility for transitional medical/childcare services. Supportive services as outlined in attached Supportive Services Desk Guide will be provided as requested.

### 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.):

Services listed in the attached Supportive Services Desk Guide are provided to TANF, SNAP and 200% eligible individuals.

## 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:

The Department will send the system generated "Conciliation Notification" to the applicant/recipient who failed to comply with a work requirement. The conciliation notice details the process by which they can respond and the required timeframe.

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

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

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

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

**How the District Conducts Conciliation for SNAP Applicants and Recipients**

<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:

SNAP recipients that failed to comply with a SNAP work activity that do not meet an exemption are sent a system generated conciliation notice. The notice indicates that a failure has occurred and the steps that need to be taken to show good cause or the steps that can be taken to avoid a reduction in SNAP benefits. Recipients must respond within the required timeframe.

- 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
No	A separate entity (described here):

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

The Department will send a written "Conciliation Notification" to the recipient which describes the process by which they may dispute a work assignment or explain their reason(s) for failing to comply. For SNAP E&T compliance, job logs are mailed with the conciliation and documentation of five (5) job applications is required and must be provided within 10 days as indicated on the conciliation notice.

## 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 Caseworker determines that the individual is in compliance with the assigned work activity. The standard criteria for any client to demonstrate compliance prior to ending a durational sanction is 5 days in an assigned work activity. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period).

- 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 standard criteria for any client to demonstrate compliance prior to ending a durational sanction is a minimum of 5 job applications or provide documentation to verify they are exempt. For active cases, the individual will need to comply with work requirements to be added back to the case after the minimum duration has ended. For inactive cases, the individual would need to reapply for benefits and will be eligible to have the sanction lifted when they comply, and the duration has ended. Those who document an exemption may have their SNAP sanction lifted before the end of the durational sanction period.

## 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

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
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
Yes	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: The district makes a determination of an individual's disabilities or limitations based on information provided by the individual or obtained by the agency. When documentation is unable to be obtained or is conflicting, the individual will be scheduled for an independent medical evaluation at IMA.

- 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:

When receiving information regarding a change in status exempt/non-exempt, the Caseworker will initiate a conversation with the client and follow up the conversation by sending the LDSS-4005/LDSS-4005(a) and keeps a copy of the form for the case record.

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

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

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

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

**Process for Reviewing Medical Documentation**

<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.
Yes	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: BCDSS Employability Medical Review Unit (EMRU) staff and subcontracted Star Group staff review collected/submitted medical documentation, consult with physicians' offices and determine employability status for recipients claiming a medical/mental health disability. They may also make referrals for Functional Capacity Exams, Mental Health evaluations, or any other follow up necessary to make a solid determination of employability. The goal is always to move the recipient to self-sufficiency, by returning them to employability or assisting them in obtaining Social Security benefits.  Once documentation is collected and reviewed, BCDSS staff determines appropriate employment code and issue the LDSS 4005/4005a to the client.

**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>
N/A	LDSS 5009 - Mental Health Screening Tool
N/A	The computer assisted version of the Modified Mini Screening tool (MMS)
N/A	Other Screening tool (described here):

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

N/A

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

N/A

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

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

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

When caseworkers in the Employability Medical Review Unit (EMRU) receive medical information from a provider that indicates treatment or rehabilitation is necessary to restore the client to self-sufficiency, the worker reviews the medical information and recommendations and develops the appropriate treatment plan and will refer to IMA for further assessment when needed.

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

The Caseworker will develop a treatment plan based on the recommendations they receive from IMA or a provider.

- 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.

BCDSS CDSU receives attendance on a monthly basis. Treatment plans are updated based on the duration specified in the medical information received from the provider.

## **10. District Certification**

### **10.1 Certification**

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

2/2/2024  
Nancy Williams  
Commissioner