

# **Livingston County**

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

January 01, 2024 - December 31, 2025

# Table of Contents

- 1. Administration ..... 1
  - 1.1 Administrative Structure..... 1
  - 1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies..... 1
  - 1.3 OTDA Jobs Staff Agreement .....4
  - 1.4 Access to Services at New York State Career Centers .....5
- 2. Orientation, Assessment and Employment Plan ..... 6
  - 2.1 Orientation (Reference 18 NYCRR 385.5) ..... 6
  - 2.2 Temporary Assistance (TA) Employment Assessment ..... 6
  - 2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7) ..... 8
- 3. Engagement ..... 9
  - 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))..... 9
  - 3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency 9
  - 3.3 Strategies/Procedures for Increasing Program Attendance ..... 9
  - 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants ..... 10
  - 3.5 Strategies for Reducing the Need for TA..... 10
- 4. Work Activities ..... 10
  - 4.1 Allowable Work Activities ..... 10
  - 4.2 Job Development..... 14
  - 4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) ..... 14
  - 4.4 Post-Secondary Education Approval and Enrollment Policies..... 16
- 5. Work Requirements ..... 17
  - 5.1 Meeting TA Work Requirements..... 17
  - 5.2 Informing SNAP Applicants and Recipients of Work Requirements ..... 19
  - 5.3 Meeting SNAP Work Requirements ..... 20
  - 5.4 Advising Households of Employment and Training Services ..... 21
  - 5.5 Provider Determinations ..... 22
- 6. Quality Assurance/Work Verification ..... 22
  - 6.1 Quality Assurance Process - Random Case Sampling ..... 22
  - 6.2 Use of Outside Providers/Vendors ..... 24
- 7. Supportive Services..... 25
  - 7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District..... 25
  - 7.2 Post-Employment/Transitional Supportive Services..... 26
  - 7.3 Extended Support Services ..... 26
- 8. Conciliation, Sanction and Dispute Resolution Procedures..... 26

8.1 Conciliation .....	26
8.2 Sanction.....	28
8.3 Dispute Resolution.....	29
9. Disability Determinations, Documentation and Requirements of Exempt Individuals .....	29
9.1 Disability Determination Process and Tools .....	29
9.2 Mental Health Screening and Assessment.....	31
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)) .....	31
10. District Certification.....	33
10.1 Certification.....	33

# 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 org chart documents

- 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.

Employability of clients is determined at application, recertification, and at interim changes by Social Welfare Examiners in the Temporary Assistance/SNAP/Day Care Unit. Employment Counselors from the Office of Workforce Development and Catholic Charities of Livingston County are responsible to complete Employment Assessments and develop individual Employment Plans (within the regulatory timeframes) with each client. Employment Counselors are responsible for assigning clients to appropriate employment activities, monitoring client's compliance, following conciliation procedures if necessary, and notifying the Department of Social Services assigned Social Welfare Examiner of the results of the conciliation.

## 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>
Livingston County Office of Workforce Development	\$250,750	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP TANF 200%	Employment assessments, employability plans, and support for compliance with employment plan, activities, job development, job search, job placement, job club, oversight of WEP
Catholic Charities of Steuben Livingston	\$129,720	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP TANF 200%	Employment assessments, employability plans, and support for compliance with employment plan, activities, job development, job search, job placement, oversight of WEP.
CASA Trinity	\$54,996	FFFS Local	FA SNA Family SNA Individual TANF 200%	Medical/psychological assessment for employability determination, second opinions of employability determinations, suggested referrals to SSI/SSD.
Industrial Medicine Associates	\$5,000	FFFS Local	FA SNA Family SNA Individual TANF 200%	Medical/psychological assessment for employability determination, second opinions of employability determinations, suggested referrals to SSI/SSD.

- 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>
Genesee Valley BOCES	Others: public access	FA SNA Family SNA Individual TANF 200%	Vocational/educational training, TABE testing, TASC instruction

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
CORE	Others: public access	FA SNA Family SNA Individual SNAP TANF 200%	ESL instruction, literacy and educational support to remove barriers to employment
Perinatal & Infant Community Health Collaborative( PICHC)	Others: Department of Health Sponsored	FA SNA Family SNAP TANF 200%	-Community health workers -Assessment of needs and barriers to accessing services -Connections to community resources and parent support groups - Promote prenatal, postpartum and interconception health
Healthy Families NY (HFNY)	Others: Sponsored by Catholic Charities Steuben Livingston	FA SNA Family SNAP TANF 200%	Healthy Families works with many families, from first-time parents to families who already have children. In-home support is based on a family' specific circumstances and needs. Healthy Families NY goal is to identify strengths and challenges prenatally or at birth and provide appropriate information and referrals to help babies get off to a healthy start.
Children & Family Treatment & Support Services	Others: Medicaid Sponsored Service	FA SNA Family SNAP TANF 200%	Children and Youth (under age 21) who are covered by Medicaid and have mental health and/or substance use needs can get Children and Family Treatment and Support Services at no additional cost. These services are covered by regular Medicaid or, if enrolled in a Medicaid Managed Care plan*, these services are available through the health plan.
Children's Health Home Care Management	Others: Medicaid Sponsored offered by Catholic Charities Steuben Livingston	FA SNA Family SNAP TANF 200%	Care Managers link and refer children to any needed services to coordinate health care goals. Care Managers coordinate community supports and provide advocacy child services through assistance with linking and referring to the following: - Medical Health, Dental Health, and Behavioral Health - Clinical Services, Social Services, and Legal Services - Home & Community-Based Services (HCBS), including teaching skills both in-home and in the community. Skills include, how to budget, shop, access public transportation, clean, cook, medication management, family supports and nutrition as identified and needed. - Religious Services - Pharmacy Services - Substance Abuse

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
			- Transportation - Employment Services - Promote natural supports, including supports in the environment, i.e., friends, neighbors, colleagues.
Genesee Community College	Others: Local Community College	FA SNA Family SNAP TANF 200%	Offers Certificate Programs, and 2-year associate degree programs
SUNY Geneseo	Others: Local State University	FA SNA Family SNAP TANF 200%	Offers 4-year undergrad and master's level degree 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:

Bimonthly meetings are held with the Directors of OWD and Catholic Charities of Steuben Livingston, CASA Trinity and with district staff consisting of the Division Director, Principal Social Welfare Examiner and Senior Social Welfare Examiner that monitor the TA Employment caseload. Topics are related to new policy directives, service provision, areas identified for improvement and community collaboration. CORE Director and management staff attend as needed. Monitoring of contract outcomes for CASA, OWD, and CCSL are also reviewed.

### 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**

<b>Yes or No:</b>	<b>Services Provided:</b>
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**

<b>Yes or No:</b>	<b>Target Groups:</b>
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**

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

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

The district contracts with the Career Center to provide employment services to TANF customers. The career center conducts assessments, case manages non-exempt clients, and co-enrolls clients in any of the other career center partner programs that may benefit the client. Several of the Career Center staff are cost allocated between TANF and WIOA, enabling them to provide services from both programs to TANF clients.



## 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: Information regarding home visiting services is also covered during Employment Orientation

- 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:

Orientations by Social Welfare Examiners are conducted individually with applicants/recipients at their face-to-face eligibility appointments, and at any time the individual's employability status changes. Orientations are conducted individually with applicants/recipients face-to-face at initial application. Orientation is completed over the telephone for recipients at recertification.

### 2.2 Temporary Assistance (TA) Employment Assessment

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

#### District Assessment Procedures

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

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

Information is gathered from the client and entered into CMS. If a client notes and concerns or inability to meet face to face despite other accommodations, contract staff will conduct a field visit to the clients home to complete the employment assessment.

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

Contract staff - Employment Counselors at Liv Co. Office of Workforce Development and Catholic Charities of Steuben / Livingston.

- d. Described below are the minimum qualifications of the employees conducting the assessment (refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)):

Employment Counselors at OWD: MINIMUM QUALIFICATIONS: Either:

1. Graduation from a regionally accredited or New York State registered college or university with a bachelor's degree; or

2. Satisfactory completion of a minimum of 60 semester credit hours at a regionally accredited or New York State registered college or university and two years of full-time experience as a Counselor, Employment Interviewer, or other related position with similar duties and responsibilities; or

3. Graduation from high school or possession of a high school equivalency diploma and four years of full-time experience as defined in 2; or

4. An equivalent combination of training and experience as defined by the limits of 1 through NOTE: Verifiable part time and/or volunteer experience will be pro-rated toward meeting full time experience requirements.

Employment Counselors at Catholic Charities: Education: bachelor's and 1-2 in Human Services related field or Associates with related experience and 1-2 years in Human Services field.

- 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 no less than annually for all TA recipients and applicants; at recertification; during regular face to face meetings with recipients when they have removed / or added a prior barrier; or, when they have information to add that would improve their employability in a specific sector due to training or experience.

### 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 Counselors meet face to face with recipients to discuss their employment history, any training they have had, their likes and dislikes in employment areas as well as their employment goals. Plans are developed together to set realistic expectations to progress toward self-sufficiency. If client raises concerns or identifies barriers, occasionally Employment plan interviews are conducted telephonically or by staff conducting a field visit to the client's residence.

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

Employment Plans are updated during regular face to face meetings with recipients when they have removed a prior barrier, or if a new barrier is noted, and when they have information to add that would improve their employability in a specific sector due to training or experience.

### **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:

Clients are referred to CORE/Literacy West to assist with ESL services. DSS staff use Language Service Line/Interpretalk services during interviews to communicate with individuals with Limited English Proficiency. Temporary Assistance Examiners identify individuals with Limited English Proficiency and refer them to CORE Learning Center which is the grant recipient for these services in Livingston County. This tutoring program improves the clients' ability to understand and communicate in English to increase their opportunities for employment, as well as improving their ability to communicate with schools, day care providers, and other community resources. Individuals with Limited English Proficiency may also be assigned to the ESL program.

#### **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:

Applicants and recipients are interviewed to explore any barriers they may have. Staff works with the clients to plan for removing these barriers long term to assist them in achieving self-sufficiency. When assigning clients to activities, Employment Counselors explain the requirement and importance of attending activities. The clients are advised to schedule personal appointments for minimum impact on their work activity schedule. Employment Counselors closely monitor attendance of their clients. When notified of an absence, the Employment Counselor contacts the client to determine the reason for the absence and decides if the absence is with good cause. During discussion with the client, they may

identify problems or barriers, and adjust the employability plan/make referrals as appropriate.

### 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:
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: Temporary Assistance Examiners discuss options with sanctioned clients when the client has contact with the agency (recertifications, reporting of changes).

### 3.5 Strategies for Reducing the Need for TA

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

Fully exploring with the client their needs and barriers, assisting them in gaining further skills to increase job opportunities, and referring to other potential long term financial resources (SSI/SSD) if needed.

## 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

Activity and Definition	Case Type
<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>
<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>

Activity and Definition	Case Type
<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</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>
<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>N/A</p>

Activity and Definition	Case Type
<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>	N/A
<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>	FA SNAFAM SNA SNAP
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	FA SNAFAM SNA
<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>	N/A
<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>	FA SNAFAM SNA SNAP
<p><b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>	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.:
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.: OWD invites local employers to recruitment days at their office. Local employers meet with participants to identify qualified candidates for job opportunities. Identified candidates are referred to employers for interviews for job openings. OWD and CCSL also monitor and develop WEP sites for placements that have often led to full time employment. There are 4 line staff and 2 Admin Supervisory Staff that over see this.

## 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.

OWD identifies service agencies that are certified through Department of Education or are credentialed to provide education services. OWD also works with WIOA partner Literacy West to coordinate and refer clients for educational services.

- 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.

OWD identifies service agencies that are certified through Department of Education or are credentialed to provide these services. Referrals and coordination are done with local BOCES for adult education/skill trade training for appropriate clients.

- 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.

During Assessment, contract staff of OWD or Catholic Charities of Steuben Livingston determine if there is a literacy need and referrals are made to WIOA partner Literacy West.

- 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.

Clients must meet the minimum requirements to qualify for the programs. The agency would deny participation in the education activity if the client had already completed a comparable activity, or the activity was not consistent with the client's employability plan goals.

- 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.

Consideration is given to client interests, literacy levels, aptitudes, skills, medical limitations, availability of programs and funding resources, and where job skills/vocational education seem to fit best in the over-all employability plan.

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

All education and training providers must be certified through SED or have other formally recognized certification.

The following standards are criteria providers may be evaluated on:

1. State approval or licensing
  2. Past performance
  3. Range of training/education activities available
  4. Qualifications of staff
  5. Documentation of fiscal responsibility
  6. Cost per enrollment/completion/entry to employment
  7. Achievement of goals at delivering agreed upon outcomes
- OWD accesses the list of in-demand occupations from the State Labor Department.

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

Employment Counselors from OWD and Catholic Charities provide to participants a list of approved in-demand occupations and trainings. Clients may be referred to OWD staff for one-on-one appointment to provide more individual search/application for trainings.

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

Training programs notify clients of their approval to the program. Employment Counselors send referrals / notices to clients that have been accepted.

- 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 initial eligibility and at 6 month recertifications, Temporary Assistance Examiners send school verification form DSS 3708 to verify attendance.

- 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.

Temporary Assistance Examiners share the 4005a with Employment Counselors. The Employment Counselors assure that they assign clients to activities that can accommodate the client's limitations. When assigning to WEP, the Employment Counselor shares (in writing) the 4005a limitations with the WEP site to accommodate the limitation.

#### 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):

Approval for:

- short-term (6 months or less) certification programs for in-demand occupations,
- on a case-by-case evaluation, completion of last year of 4 year degree that will assure graduation, accommodations will be made in the employability plan for study time/classes; or a 2 year post-secondary education programs for those who wish to pursue a career / employment opportunity in an in-demand occupation.

- 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.

<b>Yes or No:</b>	<b>Conditions for disapproval of work activity</b>
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).

Recipients are engaged within 4 weeks of their case opening or their employability code changing from exempt to non-exempt. Individual plans are developed to assign sufficient hours necessary to meet the participation rate for the individuals case type and employability code, while considering the interests of the client and any individual skills/barriers, and circumstances. When State ABAWD waivers are not in place, DSS schedules ABAWD recipients with an appointment to an ABAWD qualifying activity at opening, recertification or when ABAWD status changes.

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

#### Number of Individuals Who Receive Employment Services

<b>Household Type</b>	<b>Number Served</b>
Households with Dependent Children Average Monthly	100
Households without Dependent Children Average Monthly	100

- 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:

LDSS and Contract staff use monthly and current COGNOS reports to monitor participation/engagement, and to identify clients that may need to increase their hours of participation.

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

The district assigns TA applicants to Job Search.

Yes

**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	Bi-weekly, the Office of Workforce Development conducts a 3-day Assessment/Job Readiness, Job Search training workshop. At the TA eligibility interview, all non-exempt TA applicants are assigned to a workshop. At the conclusion of the 3rd day of the workshop, the non-exempt applicants are entered into an ongoing Job Search until their case opens. Employment recruitments are held regularly at the Office of Workforce Development. All non-exempt applicants are required to attend the recruitments sessions.
SNA Individuals	10	20	Bi-weekly, the Office of Workforce Development conducts a 3-day Assessment/Job Readiness, Job Search training workshop. At the TA eligibility interview, all non-exempt TA applicants are assigned to a workshop. At the conclusion of the 3rd day of the workshop, the non-exempt applicants are entered into an ongoing Job Search until their case opens. Employment recruitments are held regularly at the Office of Workforce Development. All non-exempt applicants are required to attend the recruitments sessions.

- 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.

The district assigns TA recipients to Job Search.

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	Recipients are contacted by their employment counselor (OWD or Catholic Charities), and assigned to job search
SNA Individuals	10	20	Recipients are contacted by their employment counselor (OWD or Catholic Charities), and assigned to job search

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

Self-employment is reviewed on a case-by-case basis. In most situations, the self-employment will be approved as work participation if it meets the federal minimum wage standards.

**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**

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

Information in the 5193(A) is read verbatim to the client during interview. Client is provided a hard copy of notice via mail.

- 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.
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):

Livingston County does not mandate Non-Temporary Assistance SNAP applicants and recipients to participate in work activities. SNAP applicants/recipients are informed of job clubs, recruitment events and host employer activities offered at OWD. Livingston County DSS will make a qualifying ABAWD activity available, if requested.

- 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):

NTA SNAP applicants/recipients are informed of job clubs, recruitment events and host employer activities offered at OWD. Livingston County DSS will make a qualifying ABAWD activity available, if requested. NTA SNAP recipients are informed of the available services of the Office Of Workforce Development by the DSS examiner at case opening and at recertification both verbally and with written notice. When these clients present at OWD, they are assisted by staff to help facilitate their next steps.

### 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.

At application LDSS staff interview clients and discuss required work-related activities. Clients who offer concerns for this are provided with a medical form to have completed by their medical / mental health provider. If the information provided back is sufficient for the LDSS staff to make a determination, one is made regarding appropriate work activities. If there is not sufficient information returned, client is referred to IMA (Industrial Medicine Associates)

- 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.

Bimonthly staff meetings are held between LDSS and contract staff. Here regulations and process to meet regulations are discussed, as well as best practice in working with clients to assist them in achieving self-sufficiency.

- 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.

All contract staff refer any concerns for a client / case to the LDSS assigned worker. Client also refers their concerns to LDSS staff person. Case is reviewed by Supervisory staff and determination is made in conjunction with the LDSS staff person assigned to the case. Client is generally notified of outcome by LDSS Supervisory staff.

## 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.

- b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

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

3

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

3

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

## 6.2 Use of Outside Providers/Vendors

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

Yes.

- b. If Yes, does the district’s provider/vendor documentation collection, data entry and management of WTWCMS follow the same process that would be used by the district worker?

Yes.

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

N/A

## 7. Supportive Services

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

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

See attached listing of Supportive Services Provided

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

#### Transportation Services Provided to Clients

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
Yes	Gas card/voucher
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): See attached calculation chart

- 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 mile or less one way

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

Applicants are screened for eligibility for diversion payments, transportation monies to cover travel to/from employment until the client received their next paycheck, referrals to other agencies/organizations to ameliorate a short-term emergent need that would allow them to continue their employment. Clients are also screened for eligibility for other programs that may stretch their budget: SNAP, Day Care, HEAP. Clients without medical coverage are referred to Certified Application Counselors to apply for health care coverage.

## 7.2 Post-Employment/Transitional Supportive Services

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

See Supportive Services attachment.

- 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:

See Supportive Services attachment.

## 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.):

N/A

# 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:

Conciliation notices are sent to clients that do not satisfactorily complete the assignments in their employment plan. LDSS staff and Employment Counselors reinforce the importance of compliance, discuss possible changes to the Employment Plan, and encourage the client to comply.

- 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**

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

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

Conciliation notices are sent to clients that do not satisfactorily complete the assignments in their employment plan. LDSS staff and Employment Counselors reinforce the importance of compliance, discuss possible changes to the Employment Plan, and encourage the client to comply.

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

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

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

Yes or No:	Who makes the TA good cause/willfulness determination?
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:

Employment Counselor or TA Examiners make sure clients are aware of their option to demonstrate compliance to avoid the SNAP sanction. If the client responds stating they know they do not have good cause but would like to demonstrate compliance, the TA Examiner or Employment Counselor explains to them they would need complete job search for 3 verified jobs applications and submit their job search verification log within 10 days to demonstrate compliance to avoid the SNAP sanction. If clients submit their form listing 3 job applications, no SNAP sanction is imposed. If client does not submit completed verification form by the deadline date, the SNAP sanction is imposed. TA Examiner or Employment Counselor may contact the employers listed on the form to verify applications were submitted.

## 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:

Clients that have agreed to comply with employment to end their sanctions will be required to attend the appropriate work activity as assigned for one weekly activity cycle. The sanction is lifted immediately after the activity cycle is completed, and benefits are restored retroactive to the date the client 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:

If a SNAP sanctioned client reapplies for SNAP and their sanction duration is done, they may end their sanction by agreeing to comply with employment requirements and are provided information regarding services offered through OWD.

### 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
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: Clients are asked to have their medical provider complete form related to barriers / medical / mental health, etc., to include diagnosis, expected duration and if there were activities that would assist the client in removing the identified barrier to employment.



- 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:

LDSS staff advise client of the outcome of determination based on eval or information provided by their medical provider. Client is also noticed with the LDSS 4005 via mail.

- 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**

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

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

**Process for Reviewing Medical Documentation**

<b>Yes or No:</b>	<b>District’s process for reviewing medical documentation</b>
Yes	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: When the requested medical assessment / documentation has been completed by the client’s provider and received by District staff, it is reviewed by District Staff for clarity of the limitations noted, probable duration of the condition, as well as any activities that would assist in removing the barrier to employment if any. The District Staff person then determines the appropriate employment code for that individual. Supervisory district staff review the determination of appropriate employment coding when case processing is reviewed. Contract staff are then alerted to the individuals employment code and case management activities commensurate with the employment code are begun.

## 9.2 Mental Health Screening and Assessment

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

No

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

N/A

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

### Screening Tools the District Uses

Yes or No:	Screening Tools
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.).

Medical form is sent to the provider and information is requested regarding type of barrier / projected duration of the barrier / and recommended treatment to remove the barrier. Client activities are then created in WTWCMS and the assigned contract staff monitor the compliance with the recommended treatment by having the client provide signed documentation of attendance at the activity identified to remove the barrier.

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

If the client does not have a provider but LDSS and contract staff have indication of a barrier, a referral is completed to IMA. Based on determination, client is referred to local services that could assist in removal of the barrier.

- 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.

Client activities are entered into CMS and reviewed monthly by contract staff assigned to provide case management. Client is required to provide signed calendars of attended activities. Treatment plans are updated when needed if prior to a recert period.

## **10. District Certification**

### **10.1 Certification**

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

12/04/2023  
Tracy McCaughey  
Commissioner