

Columbia 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..... 3
 - 1.4 Access to Services at New York State Career Centers 4
- 2. Orientation, Assessment and Employment Plan 5
 - 2.1 Orientation (Reference 18 NYCRR 385.5) 5
 - 2.2 Temporary Assistance (TA) Employment Assessment..... 6
 - 2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7) 7
- 3. Engagement 8
 - 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))..... 8
 - 3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency 8
 - 3.3 Strategies/Procedures for Increasing Program Attendance 9
 - 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants 9
 - 3.5 Strategies for Reducing the Need for TA..... 9
- 4. Work Activities10
 - 4.1 Allowable Work Activities10
 - 4.2 Job Development13
 - 4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)13
 - 4.4 Post-Secondary Education Approval and Enrollment Policies15
- 5. Work Requirements16
 - 5.1 Meeting TA Work Requirements16
 - 5.2 Informing SNAP Applicants and Recipients of Work Requirements.....19
 - 5.3 Meeting SNAP Work Requirements20
 - 5.4 Advising Households of Employment and Training Services21
 - 5.5 Provider Determinations.....22
- 6. Quality Assurance/Work Verification22
 - 6.1 Quality Assurance Process - Random Case Sampling.....22
 - 6.2 Use of Outside Providers/Vendors24
- 7. Supportive Services24
 - 7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District.....24
 - 7.2 Post-Employment/Transitional Supportive Services26
 - 7.3 Extended Support Services.....26
- 8. Conciliation, Sanction and Dispute Resolution Procedures27

8.1 Conciliation	27
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)).....	32
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.)

Please 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 Employment unit consists of one Principal Social Welfare Examiner, one Senior Social Welfare Examiner, two Social Welfare Examiners and one OASAS CASAC, as well as one Community Services Aid. This unit is responsible for the operation of Columbia County Department of Social Services Employment program.

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

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

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

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

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

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Columbia Greene Medical Center	\$0	Others: Admin	SNA Family SNA Individual TANF 200%	Physicals are done prior to a CWEP assignment to determine eligibility and/or limitations. This is an open contract and no dollar amount has been established.
Twin Counties	\$79,553	Local Others: Safety Net	FA SNA Family SNA Individual	D/A CASAC to do D/A assessments and tracking
Workforce Investment Board	\$112,518	Others: OTDA NYS Summer Youth program monies given to LDSS and allocated to the Workforce Investment Board	FA	Summer youth employment program and educational experience

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

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

Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Questar III	Local	FA SNA Family SNA Individual SNAP	HSE
Adult Education Programs	Others: unknown	FA SNA Family SNA Individual SNAP	HSE for those over 18, Local libraries

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Mental Health Association	Others: Bill for services	FA SNA Family SNA Individual SNAP TANF 200%	A consumer of Mental Health that is 18 years of age or older. Life skills, job training, and mental health services
Access-VR Counselor Services	Others: unknown	FA SNA Family SNA Individual SNAP	Conduct interviews and help clients complete an application for the program. Refer them to a counselor to determine what the training needs are.
CGCC Career Center	Local	FA SNA Family SNA Individual SNAP	Referrals to Vocational Education and Job Skills Training programs; Career Resource Room: Resumes, job leads, assistance with job interviews, career development workshops
Healthy Families Columbia/Greene-HFNY	Local	FA SNA Family	Home Visiting Services

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, Columbia County does not have any TANF or SNAP E&T Funded contracts/agreements for employment services.

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)

Yes or No:	Services Provided:
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
N/A	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 local district refers appropriate clients to the services provided at the Career Center. The clients are always given an appointment time at the time of assessment and notified via paper of this, either directly, by mail, or by email. The district sends a list of the clients that have appointments set to the Career Center via email or fax. We then email the Career Center on the verified days to confirm attendance. After the initial confirmation, follow up is done via phone or email if additional participation is referred. The worker maintains communication to make sure attendance is satisfactory.

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:

At the time of application and recertification, the TA worker signs the applicant/recipient up for an appointment with the Employment unit. At this time, the district has individual orientations, but we will be implementing group orientations within the next twelve months. At the time of the appointment, the Employment worker will review the activities and supportive services that can be provided. The services they are informed of include but are not limited to education, employment and training opportunities, availability of child care and transportation and work activities through the social services. Assessments are done at this time as well. Orientations are offered to all clients. If a client is exempt and chooses to participate with orientation, the district may offer to conduct over the phone to alleviate transportation issues. If the orientation is not conducted in person, this will be noted in the case record. A complete list of all available resources is also available on our website.

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:

At the time of the application or recertification, the client is given an appointment to meet with an employment worker to do an assessment. The appointment is by phone as a default, unless otherwise requested by the client. If the client is in the agency for an application or recertification, the Employment worker will meet with them while they are here. If it was a phone interview, the client will be mailed an appointment letter with a date and time to contact the agency.

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

The Employment unit.

- 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)):

Assessments are conducted by Social Welfare Examiners. The minimum qualifications for a Social Welfare Examiner are:

A) Completion of 60 semester credit hours from a regionally accredited or New York State registered college or university; OR

B) Graduation from a regionally accredited or New York State registered two year college with an Associate's Degree; OR

C) Graduation from high school or the possession of a high school equivalency diploma and two years (2) experience in examining, investigating or evaluating claims for assistance, veterans or unemployment benefits, insurance or a similar program operating under established criteria for eligibility; OR

D) An equivalent combination of education and experience as stated in (A), (B) or (C) above.

- 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 at any new application and recertification unless the individual has a permanent exemption (ie code 32 or 54), or if there is a change in the individual's status.

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

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

District Employment Plan Procedures

Yes or No:	How the district develops employment plans
No	The district enters employment plans directly into WTWCMS.
Yes	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTWCMS.
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:

The Employment plan is done with the individual after each assessment appointment. When the Employment plan is created or updated, the individual is provided with a copy.

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

The Employment plan is updated at every new application, recertification or when an individual's status changes from exempt to non-exempt. The plan is also updated when the individual's activity assignments change. Whenever there is a change or update to the plan, the individual is provided with a copy.

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:

There is no additional information at this time.

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

- a. Described below is how the district accommodates non-English speaking participants' access to employment activities and services:

The district utilizes the Language Line to communicate with the client if needed. The Language Line desk guides are available to all workers and posters are hung in the agency in accordance with 06-ADM-05. All non-English speaking clients are given the option to utilize the Language Line. Our non-English speaking clients will often have a translation spokesperson from the community with them.

3.3 Strategies/Procedures for Increasing Program Attendance

- a. Described below are the district policies and/or procedures used to reduce the number of times participants fail to participate in work activities. This includes absences with good cause:

The Employment unit provides the case management for program attendance. The Employment worker will meet with the clients to review any barriers and how to work through them. Examples would be backup day care, transportation issues, how to handle workplace conflicts, and offer them any training that would assist them. The Employment workers will review the importance of being on time to employment, how to present or any other issues that a client may be having on a case-by-case basis. In addition, the Employment workers keep open communication via phone and email.

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 the next client contact or recertification, the sanctioned participant is encouraged to engage in the necessary activity and may request to be added back on to the case after the durational period has ended and the client is in compliance. The Employment workers utilize quarterly reports and make contact with the sanctioned individuals.

3.5 Strategies for Reducing the Need for TA

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

The district will provide applicants/recipients a list of resources with contact information about the services available that will assist them in reducing the need for Temporary Assistance. This list is given to the client at initial Assessment / Orientation. This includes information about diversion payments and other supportive services.

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>Unsubsidized Employment – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Work Experience – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Job Search – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Vocational Education – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p>Secondary School – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Job Skills Training – Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Education Training – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Job Readiness Training (JRT) Activities – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p>Subsidized Private Sector Employment – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Subsidized Public Sector Employment – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Community Service – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Provision of Childcare for Individual Participating in Community Service – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>FA SNAFAM SNA</p>
<p>SNAP E&T Supervised Job Search – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>	<p>N/A</p>
<p>On-the-Job-Training (OJT) – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
Other – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.	FA SNAFAM SNA SNAP

4.2 Job Development

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

Yes

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

How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
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.: Employment workers communicate with employers on a daily basis via email and phone calls. The workers also attend local job fairs and hiring events.
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.:

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.

We have several local, not for profit agencies that are available to provide these services such as Columbia Greene Community College, Questar and the local libraries. They have shown a high success rate working with our clients.

- 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.

The district works closely with Columbia Greene Community College in which our local Workforce is located. We refer all applicable clients to the local Workforce office for assignment to the appropriate training program.

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

The Employment worker completes the assessment with the client and discusses what educational opportunities are available. The Employment worker will refer them to the appropriate activity and may mandate them to comply. Anyone aged 17-44 that does not wish to obtain HSE diploma will be given ninety days to find adequate employment. If they fail to do so, they will be mandated to enroll in and attend education activities including basic literacy, high school equivalency or other educational programs designed to lead to the attainment of a diploma or equivalent. If they fail to comply with the educational activity assignment, willfully and without good cause at this time, they would be sanctioned. Individuals aged 44-59 may be mandated to obtain HSE. This will be determined on a case-by-case basis. The process outlined above does not apply to individuals who have been deemed exempt pursuant to 18 NYCRR 385.2.

- 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.

CCDSS supports the attainment of HSE for any applicant/recipient that does not have a high school diploma. The attainment of the HSE is almost always essential in attaining employment. We do not deny participation in the attainment of HSE, ABE or ESL. We may deny participation in other educational activities if the individual has the ability to become employed without that activity. Other educational activities will be reviewed to determine if they will result in employment and be approved on that basis.

- 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.

They must meet the standards and procedures of the specific education/training for which they will be enrolled.

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

Past performance, successful outcomes, diploma, degree and certification attainment

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

Applicant/recipients will be notified during orientation of all approved training providers. If a client presents us with another training provider, we will review the information to make sure it complies with approved training and inform the client of the outcome in person or in writing.

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

Participants are notified in writing of enrollment in a work activity. The letter includes all pertinent information including location, time, and date of work activity.

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

The LDSS-3708 will be utilized to monitor the student's successful enrollment in school. It will be sent with all recertifications and applications as needed. Verification in writing from the school may be requested as well. Monthly COGNOS reports are utilized to identify these individuals.

- 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.

Work site supervisors are informed in writing of the client's limitations so accommodations can be made.

4.4 Post-Secondary Education Approval and Enrollment Policies

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

The district will approve post-secondary education as an approved work activity for up to 48 months.

- 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 or No:	Conditions for disapproval of work activity
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.
N/A	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).

Our district's weekly standard for client participation varies slightly based on the case type and household composition. For TA, 1 adult HH with a child under 6 is required to participate 30 hours weekly with at least 20 of those 30 hours in one or more core activities. For TA, 1 adult HH with dependents, but no child under 6, is required to participate at least 35 hours weekly of which at least 30 are in one or more core activities. If a single adult HH with no dependents, we schedule 40 hours weekly in one or more core activities in order to make the 35 hour weekly participation rate. For two adult HH with dependents, each adult is scheduled for up to 40 hours according to their abilities and available childcare. Time spent in job search may include travel time but does not include travel time from residence to the first job search site or from the last job search site back to the residence. The required number of contacts and hours may be adjusted for individuals participating in additional work activities to ensure that no more than a total of 40 hours per week of participation is assigned. The same day that an individual applies for assistance they are given an appointment to attend Job Search Orientation/Assessment. Non-exempt applicants/recipients are given a job search form. They attend weekly individual job search appointments until they obtain employment, their status changes, or they are no longer open for assistance. Non-exempt individuals are given an appointment for an assessment, an employment plan is completed, and they are enrolled in an appropriate employment related activities upon the case opening. Those clients that are going from exempt to non-exempt will be engaged in a work activity within 30 days, usually less.

- 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	8
Households without Dependent Children Average Monthly	25

- 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:

We utilize COGNOS for many different current and monthly reports. The report we utilize the most would be the employability code duration report which helps us track the length a client has been under a specific employment code. This helps primarily with clients coded 70, 31, 24 and 43. We use COGNOS reports to complete the work verification report. The work verification report helps us check for accuracy of the work completed by the employment and TA workers and make sure the information in both files matches. We look at the participation and engagement status report. Looking at this report helps us re-engage clients and make sure they are participating and that the participation counts.

- 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	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply for and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individuals search for work.
SNA Individuals	10	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply for and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
			traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individuals search for work.

- e. Does the district assign TA recipients to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected using the “Additional Information” column.

Yes

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply for and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individuals search for work. If employment is not secured within 12 weeks, there will be a second enrollment, and the individual will be referred to additional activities such as additional workshops or community service. The individual is assigned no more than 40 hours per week. The worker maintains weekly contact with the individual throughout job search.
SNA Individuals	10	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply for and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individuals search for work. If employment is not secured within 12 weeks, there will be a second enrollment, and the individual will be referred to additional activities such as additional workshops or community service. The individual is assigned no more than 40 hours per week. The worker maintains weekly contact with the individual throughout 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:

The policy and process that the workers follow when determining participation in self-employment as an approved part of the individual's required work activities as follows: The individual will complete the self-employment worksheet and divide the amount of income from self-employment by the minimum wage. If it does not meet the minimum of 30 hours at minimum wage, we will enroll the individual into work activities.

5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

Written Information Provided to SNAP Applicants and Recipients

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

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

During initial interview, at recertification and when an individual's status changes from exempt to non-exempt, the eligibility worker verbally explains the applicable work rules to each TA/SNAP and NTA/SNAP household that includes a member subject to work requirements.

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

How the District Documents the Written Requirement in the Case Record

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

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

How the District Documents the Oral Requirement in the Case Record

Yes or No:	How oral information is provided to SNAP applicants and recipients
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):

Columbia County does not require its NTA SNAP recipients to participate in SNAP E&T work activities.

- 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):

At application and recert, the eligibility workers provide a list of available services to NTA SNAP applicants and recipients. The individuals are able to request additional information about any of these services if they wish.

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:
No	Required population only
Yes	Other groups described here: We have resources available in our lobby for anyone that walks through the door. Also, at application and recert, the eligibility workers provide a list of available services to non-exempt SNAP applicants and recipients. The individuals are able to request additional information about any of these services if they wish.

- 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:
Yes	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.

The Employment worker completes the assessment, reviews work history and education, and refers to a provider. The provider notifies the district of the provider determination within 10 days and the district notifies a SNAP E&T participant of a provider determination within 10 calendar days of receiving notification from the provider

- 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 workers communicate with the providers weekly, primarily through email, fax or telephone. If the provider determines that an individual is not a good fit, they will inform the district within 10 days. The district will then notify the individual within 10 calendar days of receiving notification from the provider and document the case record.

- 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.

When the district receives a referral from a provider indicating that an individual is not a good fit, the staff in the Employment unit will review the referral to determine if the reason for the provider determination is appropriate and not unfair or discriminatory.

6. Quality Assurance/Work Verification

6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

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

6

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

3

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

3

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

6.2 Use of Outside Providers/Vendors

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

No

- 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?

N/A

- 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:

-Car repairs needed to keep the vehicle operating in a safe manner will be considered. Car repairs will be up to \$750.00 or the value of the car, whichever is less.

-Car insurance payments will be paid one month at a time, with a maximum of six months to

be paid.

-Car payments will be paid one month at a time, with a maximum of three months to be paid.

In order to receive assistance for any of the above, the client must submit the following:

-Car title and registration in their name or spouses name (if on the case)

-Proof of insurance

-Two repair estimates

-A copy of the car payment booklet / statement and a plan on how the next payment will be made

Each of these will be evaluated on a case-by-case basis to determine eligibility for payment.

-Uniforms needed to complete approved training/coursework, for example scrubs

-Work clothing (including clothing items needed for an interview)

-Safety items needed to complete an approved training or job placement/retention, for example steel toe boots

-Licensing/testing fees associated with a training approved by the district or required to obtain or retain employment

- 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)
Yes	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 LDSS authorizes transportation for approved employment activities. LDSS uses the IRS Medical / Moving rate as stated above for the current year. If the individuals actual cost exceeds this rate, the individual will be compensated for the additional costs based on reasonable documentation.

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

The LDSS authorizes transportation for approved employment activities. The maximum that an individual may be expected to walk is two miles as long as there is no disability that would make it difficult or impossible to walk and the route is safe. In the event of inclement weather, the individual may contact the LDSS to see if transportation is available. If transportation is not available, the LDSS would excuse or reschedule the work activity assignment. This will be reviewed on a case by case basis.

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

CCDSS will provide temporary transportation, gas monies, vehicle repair, vehicle insurance, work clothing, money for some license/permits, child care referrals.

7.2 Post-Employment/Transitional Supportive Services

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

The district provides referrals for daycare assistance, temporary transportation services as listed previously as well as Medicaid and SNAP for those who are eligible.

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

For a period of 90 days after closing, the CCDSS will provide the same supportive services as listed previously to the extent permitted by local resources.

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.):

All supportive services previously listed consistent with statute and regulations and to the extent funding is available.

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:

A conciliation letter is sent to the individual asking them to respond within the required timeframe. When the individual contacts us by any of the above methods, as well as by email of applicable, the information is reviewed by the worker and/or supervisor to determine if the individual's actions were willful and without good cause. We may require proof of a doctor visit or whatever was claimed as good cause.

- 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 or No:	How conciliation is conducted
Yes	By mail

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

A conciliation letter is sent to the individual asking them to respond within the required timeframe. When the individual contacts us by any of the above methods, the information is reviewed by the worker and/or supervisor to determine if the individual's actions were willful and without good cause. We may require proof of a doctor visit or whatever was claimed as good cause.

- 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
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 district will conciliate and meet with the recipient to re-engage them in job search activities at 5 job searches. The district will complete an employment assessment if the act of noncompliance for SNAP purposes is non-compliance with employment assessment.

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:

Upon completion of the minimum sanction duration, individuals who wish to end their employment sanction must now show compliance. They are assigned to a work assignment and must attend and/or participate for 10 business days. Once the individual has demonstrated compliance, TA benefits are restored retroactive to the date the individual indicated willingness to comply, but not earlier than the expiration of the minimum duration period. Individuals who are medically unable to participate will be provided a medical. TA benefits are restored retroactive to the date the individual claimed to be unable to participate (but no earlier than the expiration of the minimum duration period) provided the individual has cooperated with efforts to document the exemption.

- 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:

Upon completion of the minimum sanction duration, individuals who wish to end their employment sanction must now show compliance for all combination TA/SNAP recipients whose SNAP employment sanction duration has expired. They are assigned to a work assignment and must attend and/or participate for 10 business days. Each of the above categories can come into the agency or contact the agency via mail or phone and request to demonstrate compliance prior to their sanction duration being up so that they are in compliance at the time of sanction duration ending. An individual may be eligible for SNAP benefits before the end of a durational period if the individual documents that he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefits. For the NTA SNAP recipients, we do not mandate SNAP E&T activities, so all they would need to do is reapply once the duration has expired.

8.3 Dispute Resolution

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

Grievance Mediation

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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

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

Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual's disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
No	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: The Employment worker reviews available documentation and individual's disabilities and/or work limitations. The supervisor reviews the decision. In some cases, the Principal, Senior and Worker have a conference to make the determination. The decision is based upon review of all available documentation. The client is then notified in writing of the LDSS decision via the LDSS-4005/4005(a).

- 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:

The district utilizes the LDSS-4005/4005(a) to notify individuals of the district's determination of exempt or non-exempt status.

- 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

Yes or No:	District's process for reviewing medical documentation
No	District directs the contracted physician or individual's physician to determine status.

Yes or No:	District's process for reviewing medical documentation
No	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: The Employment worker determines whether the individual is exempt, non-exempt, or work-limited. The decision is reviewed by the Supervisor. In some instances, a conference is held with the Principal, Supervisor, and worker to make a final determination.

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.).

If an applicant/recipient claims a disability they are given the LDSS-4526 to be completed by the appropriate medical professional. The returned LDSS-4526 is reviewed by both the Employment worker and supervisor and a plan for self-sufficiency is formulated based on the client's diagnosis, treatment recommendations, and limitations. Referrals to treatment or other rehabilitative activities are processed by the worker. Documentation is collected in a timely fashion to monitor the status and compliance with the treatment plan. Updated medical documentation is requested from the client as needed. Other forms of documentation are also accepted such as a Dr note, prescriptions, and past history of the client. If any barriers, mental or physical are suspected, the client will be referred to the appropriate provider for an ongoing determination to be made.

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

Based on the information received from the medical examination and the Employment assessment, the applicant/recipient and the Employment worker develop an appropriate plan of action.

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

The Employment unit communicates with providers via phone, email, or fax, requesting verification of the ongoing treatment compliance.

10. District Certification

10.1 Certification

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

3/4/2024
Robert Gibson
Commissioner