

Oneida 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 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 9
 - 3.3 Strategies/Procedures for Increasing Program Attendance 9
 - 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants10
 - 3.5 Strategies for Reducing the Need for TA.....10
- 4. Work Activities11
 - 4.1 Allowable Work Activities11
 - 4.2 Job Development14
 - 4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)15
 - 4.4 Post-Secondary Education Approval and Enrollment Policies17
- 5. Work Requirements18
 - 5.1 Meeting TA Work Requirements18
 - 5.2 Informing SNAP Applicants and Recipients of Work Requirements.....21
 - 5.3 Meeting SNAP Work Requirements22
 - 5.4 Advising Households of Employment and Training Services23
 - 5.5 Provider Determinations.....23
- 6. Quality Assurance/Work Verification24
 - 6.1 Quality Assurance Process - Random Case Sampling.....24
 - 6.2 Use of Outside Providers/Vendors26
- 7. Supportive Services27
 - 7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District.....27
 - 7.2 Post-Employment/Transitional Supportive Services29
 - 7.3 Extended Support Services.....29
- 8. Conciliation, Sanction and Dispute Resolution Procedures29

8.1 Conciliation	29
8.2 Sanction.....	32
8.3 Dispute Resolution	33
9. Disability Determinations, Documentation and Requirements of Exempt Individuals.....	33
9.1 Disability Determination Process and Tools	33
9.2 Mental Health Screening and Assessment.....	35
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	36
10. District Certification	37
10.1 Certification.....	37

1. Administration

1.1 Administrative Structure

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

See attached.

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

Oneida County Department of Family and Community Services' Director of Employment serves directly under the Oneida County Commissioner of Family and Community Services and is responsible for administering Oneida County's Employment programs. The Employment Division's organizational chart is attached. Oneida County Department of Family and Community Services staff utilize their expertise and resources to provide an integrated network of comprehensive, individualized employment services and activities for Temporary Assistance applicants, recipients, and SNAP recipients.

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
N/A	N/A	N/A	N/A	N/A

- 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
Workforce Investment Board of Herkimer, Madison and Oneida Counties	Others: OTDA	FA SNA Family SNA Individual SNAP TANF 200%	Wage Subsidy - Training reimbursement for TA recipients in employment settings. Training monies and programs designed to teach and enhance job skills in a variety of different occupations in a vocational educational setting.
Madison-Oneida County BOCES	Others: US Department of Education NY State Department of Education	FA SNA Family SNA Individual SNAP	English as a Second Language classes High School Equivalency classes Adult Basic Education Distance Learning External Diploma Program Work Experience A variety of vocational education programs
Women's Employment and Resource Center	Others: NY State Department of Labor OTDA	FA SNA Family SNA Individual SNAP TANF 200%	Employment Readiness Vocational Education Exploration Computer training Life Skills Work Experience
The Center	Others: US Refugee Resettlement US Department of Health and Human Services	FA SNA Family SNA Individual SNAP TANF 200%	Refugee services which include resettlement, interpretation, referrals for health and safety issues, English as a Second Language instruction, work experience, employment services, naturalization, and cultural events.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Oneida County Workforce Development	Others: OTDA	FA SNA Family SNA Individual SNAP TANF 200%	Summer Youth Employment Program - provides employment opportunities for school aged youth at community sites. Provides a direct connection and works in conjunction with the local Workforce Investment board to provide funding for training programs and job development services.
Working Solutions	Others: NY State DOL OTDA US DOL	FA SNA Family SNA Individual SNAP TANF 200%	Weekly job leads from NY State DOL Business Services Representatives. Resume workshops Job referrals Connection to Workforce Development and Workforce Investment Board representatives for their services. Job fairs, both virtual and in person. Virtual Reality, Learning and Career Exploration through virtual reality headsets.
ACCES VR	Others: US Department of Education NY State Department of Education.	FA SNA Family SNA Individual SNAP TANF 200%	Employment and Training Services for individuals with Disabilities.
Central New York Healthy Homes Network	Others: NYS Department of Mental Health NYS OCFS	FA SNA Family SNA Individual SNAP TANF 200%	Home visiting, case management.
Integrated Community Alternatives Network (ICAN)	Others: NYS Dept. of Mental Health NYS Medicaid	FA SNA Family SNA Individual SNAP TANF 200%	Home visiting, case management.

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:

N/A

1.3 OTDA Jobs Staff Agreement

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

Services Provided by Jobs Staff

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

Jobs Staff Target Groups

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

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

N/A

1.4 Access to Services at New York State Career Centers

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

Programs and Services Provided at Career Centers

Yes or No:	Programs and Services Provided:
No	The district has employee(s) physically present at a Career Center

Yes or No:	Programs and Services Provided:
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
Yes	Other (described here): Individuals are encouraged to go to the Career Centers to utilize all of their services.

- 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 Business Services team sends us individual job postings and notices of Job Fairs via email from the center as they come available. This happens daily. We also get weekly recruitment flyers emailed every week. These flyers have listings of local employers who are recruiting with information on requirements and how to apply. The emails are sent to the Director who in turn forwards the emails to all of the Employment Counselors to utilize when seeing their clientele. The flyers are also placed at the front desk of our reception area for our clientele to take. The Career Center sends representatives to our Job Fairs that our Employment Unit holds at our Utica location bi-monthly.

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:

Applicants and recipients of Temporary Assistance receive all the required information regarding employment expectations and other requirements by the eligibility worker at first point of contact. Books I, II, and III are given individually at the time of application, which

include time limits and requirements to engage in work, school attendance for teen parents, finding daycare if necessary. A complete explanation is given on additional supportive services available in our district that help applicants/recipients attain their goals and become self sufficient. Recipients are given books I, II, and III at every recertification. Orientation for applicants/recipients may be done as a group, individually, in person, or over the phone to accommodate the need of the applicant/recipient. Special accommodations are utilized to meet any language barrier or disability need for the applicant/recipient.

2.2 Temporary Assistance (TA) Employment Assessment

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

District Assessment Procedures

Yes or No:	How the district conducts assessments
No	The district enters assessments directly into WTWCMS.
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
Yes	The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. If applicable, the local equivalent contains additional elements beyond what is required: The local equivalent does not contain additional elements other than 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:

All English-speaking TA applicants (SN, SNF, and FA) are assessed by an Oneida County DSS Employment case manager, known as Workforce Development Employment Counselor, immediately upon TA application using a State approved local district mini assessment form containing all the required elements of an assessment. A more comprehensive assessment is done once the case is opened. Non-English speakers are assessed with an appropriate interpreter upon case opening. Assessments may be conducted in person, or over the phone to accommodate the needs of both the agency and the recipient. These assessments are completed within the 90 days of opening for adults with dependent children and for 16- and 17-year-olds not in school. Assessments are also completed within 1 year of opening for recipients without dependent children.

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

The Oneida County Department of Family and Community Services (DSS) Employment Division.

- 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)):

Oneida County DSS Workforce Development Employment Counselors and a DSS Senior Workforce Development Counselor conduct assessments and Employability plans under the supervision of a DSS Senior Workforce Development Employment Coordinator who has several years of experience, and has demonstrated effectiveness and knowledge of participation requirements and possesses a Bachelor's degree.

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

Yes

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

Yes

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

Yes

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

Employment assessments are updated whenever necessary depending on medical status, programming changes and/or treatment status, but at no more than 6-month intervals.

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

- 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:

Oneida County DSS workforce Development Employment Counselors complete an individual's employment plan immediately following the employment assessment. During the assessment, the client's needs and preferences as well as programming options are discussed. The employment plan is developed as a result of this discussion and a copy is provided to the client.

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

The employment plan is updated when the goals of the plan are attained, such as the completion of a program or whenever necessary taking in consideration, the needs of the individual as well as the needs of the agency to maintain participation rates. A copy of the updated employment plan is provided to the client.

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:

Oneida County has a diverse population, particularly refugees sponsored by the Mohawk Valley Refugee Center (The Center). Applicants and recipients of TA and SNAP that are sponsored by The Center have case management provided through The Center at no cost to local DSS - this includes acculturation, resettlement, medical needs, ESL classes in concert with Mohawk Valley Community College, and employment referral and assistance. Those non-English speakers not served under the resettlement provision may still attend ESL class at The Center.

Interpreting for non-English speakers is accomplished through County contracted LLE phone interpreters, MAMI, and The Center.

Oneida County strives to hire staff that is bilingual in an attempt to work more effectively with all needy applicants and recipients.

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:

Oneida County believes that attendance is directly related to the interest of the participant in the assignment. This begins with developing an employment plan with the full participation and in partnership with the participant right up front, the more participation in the development of the plan, the more desire the participant will have to follow it. An Employment Supervisor makes routine visits to work sites to discuss any issues both programmatically and individual client-based ones with the site supervisor. Work sites call the Employment Counselors if problems arise so hours can be rescheduled within the month and problems can be resolved in a timely fashion.

Some sites have evenings and weekend Work Experience hours available.

All programs have a DSS employee as liaison, usually an Employment Supervisor - their duty is to maintain a positive relationship and communication with program providers, so that attendance issues can be addressed immediately.

The Oneida County Daycare unit is under the supervision of the Director of Employment and Daycare. Daycare staff can meet a parent or provider and share information with TA and Employment staff during one visit. The use of Child Care Time and Attendance software to communicate the needs and approvals of daycare among staff means less time missed by clients to meet with staff. Childcare timesheets, paystubs and other agency needed information can be sent to the respective workers in the agency electronically and most issues can be resolved over the phone with both Daycare and Employment. Employment Counselors facilitate communication with a referral specialist from The Childcare Council of Cornell Cooperative Extension to help the individual find suitable childcare at the time of the appointment, thus assuring that the individual has reliable care set up and is able to attend their job and/or programming.

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:
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Oneida County engages sanctioned participants when the durational period of the sanction is completed through the use of our Sanctioned Engagement Project. This program is a collaboration between Employment, TA, and Resource/Investigations Units. At the completion of the durational period of the sanction, participants are sent a letter that they may end their sanction by contacting the agency and agreeing to participate as required. Participants who choose not to do this are referred to Resource/Investigations unit, who send the participant an appointment to discuss how they are meeting their family needs on a reduced budget. An Employment Supervisor is at this interview and allows the participant the opportunity to comply, to end the sanction. Participants who do not agree to comply are required to meet with a Resource Investigator monthly to discuss meeting the family needs on a reduced budget.
No	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

3.5 Strategies for Reducing the Need for TA

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

Oneida County attempts to meet the immediate need of TA applicants in the following manner, so they do not require an open case for cash assistance.

Safety Net applicants who are found to be non-exempt either attend a mandatory full-time Job Readiness program designed to help them find employment, which includes registering with the One Stop Centers for job leads or are placed into a supervised job search until their case opens, depending on program availability.

Non-exempt TANF and Safety net applicants are assigned to conduct a supervised job search monitored by an Employment Counselor with job leads provided and information on potential Grant Diversion payments to employers as an option to increase the likelihood of getting hired. Daycare applications for employed applicants can be expedited if the provider can be approved. Those who are employed at the time of application and found to still be eligible for Temporary Assistance are given the option of just receiving childcare subsidies in lieu of full TA benefits. This does not affect their eligibility for SNAP and Medicaid.

OCDSS can make diversion payments for a non-recurring payment to help meet a need that will prevent a TA applicant from needing cash assistance, such as a car repair to get to a job that will be self-supporting. The criteria for authorizing such payment is: the one-time

payment will result in not needing TA due to current employment or the verified promise of employment.

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</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</p>
<p>Community Service – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>Provision of Childcare for Individual Participating in Community Service – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>FA SNAFAM SNA SNAP</p>
<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.: Oneida County holds a Job Fair bimonthly at the Oneida County Office Building. This is spearheaded by Our Grade B Supervisor and Senior Workforce Development Employment Worker. The both of them along with our Senior Workforce Development Coordinator reach out to local employers to invite them to participate in the job fair. Both our Employment and Daycare staff participate in the job fair, assisting attendees with navigating the job fair and filling out job applications. Our Workforce Development Employment Counselors inform their clientele of the job fairs, we include a flyer in all the letters that go out to our SNAP work registrants, and our Daycare staff sends flyers to their childcare subsidy recipients with any correspondence that is sent to them.
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.: Oneida County Employment Unit gets job referrals and updates on upcoming job fairs daily from the local Career Center. These are distributed to the Employment Counselors to discuss and give to their individuals. The Career Center also sends a weekly recruitment flyer to Oneida County DSS Employment Unit. Along with the information we receive from the Career Center, we also receive weekly job listings from a local Staffing agency. This information is given to all the Employment Counselors and copies are also placed in publicly accessible bins in our waiting room.

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.

In Oneida County, most of the non-English speakers are part of a refugee resettlement program and are sponsored by The Mohawk Valley Resource Center for Refugees (The Center) who offers English language instruction in collaboration with Mohawk Valley Community College.

Adult Basic Education and GED preparation are handled by Madison-Oneida BOCES through their adult educational programs. Madison-Oneida BOCES also offers English Language instruction. Madison-Oneida BOCES is accredited through New York State Department of Education.

- 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.

Traditional sources for Vocational Education such as BOCES, who is accredited through New York State Department of Education, and Mohawk Valley Community College, who is accredited through Middle States Commission on Higher Education, are usually the first resort for training. Individuals are also referred to our local One Stop Career Centers for prerequisites, testing, interest inventory, etc. Guidance toward appropriate training is provided. Training funds through various sources such as The Workforce Investment Board are arranged for those eligible as a scholarship to allow TA individuals to attend approved training. The Women's Employment and Resource Center also identifies appropriate work-related training and funding streams for women served through their programs.

- 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.

At assessment all non-exempt adults are made aware of educational opportunities. Adults without a high school diploma/HSE or without basic literacy may be assigned to educational programming at Madison-Oneida BOCES. This would be coupled with a work experience in order to meet participation requirements. Employment Counselors make every attempt to engage individuals in appropriate educational activities in addition to their core activities. BOCES offers GED instruction at different times during the day as well as the evenings to give individuals choices and enable to work classes into their schedules. Distance learning and External Degree programs are also available and are encouraged when appropriate.

- 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.

Oneida County Employment Counselors will approve, in a manner consistent with the approval of training policy, educational programs which are determined to be appropriate for GED/Adult Basic Education/ESL or high school participation. In addition, in recognition of participation rate requirements, participants may also be assigned to core work activities such, as work experience for an appropriate number of hours based upon category of assistance and family circumstances. The agency would deny approval of education GED/ESL in instances where the individual is requesting to take the programming at a Community College for a fee. The agency does not believe anyone should have to pay for these services or use grants (Pell/TAP) when there are plenty of opportunities to receive these services free of charge within our county.

- 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.

All participants must have an in depth assessment and provide all background information on training preferences, eligibility for financial aid, and past training/work experience. In order to be approved for training, the participant must meet the following requirements:

- a. Lack a marketable job skill
- b. Demonstrate ability to complete program
- c. Possess pre-requisite skills to enter training – must possess high school diploma or high school equivalency diploma to attend college degree programs
- d. Training program must lead to immediate employment
- e. Training program must meet the needs of the local job market.
- f. Hours of training must satisfy the work requirement hours or support additional work activities
- g. Training requiring fees or tuition will not be approved if training is available at no cost at another approved site

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

- a. Are they accredited educational institutions or state recognized training sites?
- b. Do they offer training which leads to marketable skills, high school diploma or high school equivalency diploma?
- c. Successfulness of participants in reaching designated outcomes

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

At assessment by an Employment Counselor, and at any subsequent contacts, participants can receive information on all local training providers including booklets on courses/programs and certificates offered.

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

At face to face or phone interview, approval of training or enrollment in a work activity is reflected in writing in the Employment Plan developed with the participant.

- 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.

Temporary Assistance Examiners monitor at application and recertification.

- j. Described below is the district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity.

Client confidentiality is maintained. As an individual is sent to an activity, the Employment Counselor discusses the site and strategies for participation and acknowledgement of any health related concerns. The referral form for Work Experience and other assigned activities has a section for written comments is provided to the site supervisor where limitations can be listed. No diagnosis or disclosure of medical condition is mentioned.

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):

2 year Associates Degree program

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

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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

Yes or No:	Conditions for disapproval of work activity
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).

Each morning, the Senior Workforce Development Coordinator checks CMS for newly open and reopened cases. Additionally, the Director of Employment receives daily COGNOS generated lists of openings, closings and denials which are distributed to all the Employment Counselors and a check is done for cases whose category has changed from a work exempt status to a TA non-exempt one. A paper case is established for each open recipient found and is assigned on CMS to one of our Oneida County DSS Workforce Development Counselors to call in for face to face or phone assessment or assessment update and placement into appropriate work activities. They are seen assessed and referred for activities usually within 2 weeks. Work exempt adult cases are assigned to the appropriate Oneida County DSS Workforce Development Counselor for assessment and self-sufficiency plan.

Oneida County Employment Counselors monitor their individuals within their existing caseloads who are expecting the birth of a child and parents who are exempt due to the recent birth of a child for changes in status and authorize changes in employment codes as appropriate. When a child in a single parent household is 3 months of age, the parent is called in for reassessment. In a 2 parent household, the parent is called in for reassessment when the child is 6 weeks old.

Oneida County has a locally developed medical determination process. All adult TA recipients, regardless of category or exempt status, have a worker in the Employment Division monitoring his/her case. When a medical is returned to the agency on a previously exempt TA adult, it is faxed to the Employment Division and given to the worker responsible for the case to make the employment determination and process all the necessary paperwork. The worker assigned to the case makes the employment determination. They track all the exempt cases and call them in for medical updates. Those individuals with long term disabilities who's medical suggest that an SSI referral would be appropriate are called in by their assigned Employment Counselor and the SSI application is done together and immediately faxed to the Social Security Administration for processing. When a client is found to be non-exempt, including work limited, a 4005(a) is issued, an appointment is immediately sent to him/her for a face to face or phone assessment and appropriate work

activities are assigned. At 6 month recertification appointments, most adults are referred for reassessment in person.

All Safety Net applicants are oriented and assessed either in person or over the phone, after which the non-exempt SN applicants are assigned to Job Search until their case opens. Upon case opening, they are assigned immediately to Work Experience and/or other appropriate programming.

Oneida County DSS Workforce Development Employment Counselors make direct referrals to all programs. They have all been trained and are periodically updated as needed on the available programs and how they relate to work activities. Conflicts, problems and or adjustments pertaining to any of the provider agencies and or programming including Work Experience sites are handled by the Director of Employment who oversees operations of the Employment Division. Meetings and site visits are routinely done to ensure successful collaborations.

Oneida County supports Work Experience as a primary Work Activity. All clients assigned are expected to participate for the maximum number of hours their TA and SNAP benefits combined allow. If there are not enough hours supported by the grants to meet participation rates, then they are assigned to additional activities to meet the rate.

Oneida County requires each nonexempt TA recipient to participate in approved Work Activities. All clients are required to participate in at least 20hrs./wk. of a core activity. Additional activities are assigned according to case requirements as they pertain to participation rates. Each case is handled on an individual basis, and programming, as well as hours are determined as such. Single parents with children under 6 years of age are required to participate at least 20hrs/wk. and single parents with children over 6 years old are required to participate at least 30hrs/wk. Employment Counselors are instructed to have clients participate above the minimum required number of hours up to 40 whenever possible taking into consideration their individual case circumstances. The standard weekly hour participation requirement for Safety Net non-MOE individuals is 35 hours.

- 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	275
Households without Dependent Children Average Monthly	275

- 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:

Each month, the Director of Employment pulls up COGNOS reports by Employment Counselor and gives them to the respective Counselors so the Counselors can make appointments with individuals in order to engage in employment activities for enough hours

to meet participation requirements. The Counselors are also given reports of their employed population to make sure the schedules are projected out for the month and are matched with the budgets to ensure accuracy and consistency. The workers direct supervisor also gets the report to monitor the workers progress in their efforts to meet participation rates.

- 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	5	5	Outcomes are to be reported every 2 weeks until the case is open.
SNA Individuals	15	15	Outcomes are to be reported every 2 weeks until the case is open.

- 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	1	1	The actual number of hours varies depending on how many hours are needed to meet participation. This would usually be coupled with another work activity. Outcomes are to be reported every 2 weeks either in person or by mail depending on the plan developed with the individual for a maximum of 12 weeks per Federal Fiscal Year.
SNA Individuals	1	1	The actual number of hours varies depending on how many hours are needed to meet participation. This would usually be coupled with another work activity. Outcomes are to be reported every 2 weeks either in person or by mail depending on the plan developed with the individual for a maximum of 12 weeks per Federal Fiscal Year.

- 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:

Oneida County does approve self-employment as part of an individual's required work activities. The employment hours and wages are monitored by the Employment Counselor. If the individual's earnings are below the lower of Federal or State minimum wage, he/she will be given 4 weeks to increase earnings to above the lower of Federal or State minimum wage and if not, will be assigned to work activities to meet the participation requirements.

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.

Oneida County utilizes the State provided script to verbally explain to SNAP households the work requirements at certification, recertification and when there is a change of employability (someone becomes employable) of a member of the household.

- 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):

Oneida County does not require NTA SNAP applicants or recipients to participate in 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):

All NTA SNAP work registrants are sent a letter informing them that they can call the Employment Unit for information on how to obtain job search assistance. The letter also informs them that our local One Stop Career Center is available to them as a resource.

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.

Assignments to programming are done only after an assessment or reassessment is done with the individual. The employment plan spelling out what the assigned program is and what the attendance expectations are is prepared in conjunction with the individual. Doing assignments in this manner reduces the chances of an improper referral. Some providers

require an interview with the individual before acceptance into their program. In spite of these precautions, Oneida County realizes that an assignment sometimes just doesn't work out and is not a good fit. In the event of this happening, the provider notifies the district of the provider determination within 10 days and the district notifies the SNAP E&T participant of the provider determination within 10 calendar days of receiving the notification from the provider and the individual will be called in to meet with the Employment Counselor to come up with a new plan and a different work assignment.

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

Most assignments involve a discussion between the Employment Counselor and the provider. During this discussion it is explained that if there are any issues to please contact the Employment Counselor to discuss them and to discuss if the assignment should continue or not.

- 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.

Oneida County sends and receives monthly timesheets to and from the providers. These timesheets document time and have a section on them for the provider to document progress/problems/concerns as they arise. It is explained to the individual at time of assignment that he/she should notify the Employment Counselor of any issues and or concerns that may arise so that the agency can try to resolve them. If an issue were to arise, the agency would catch it by either the individual informing us or we would get an indication from the timesheets and would call the individual in to discuss the situation.

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.

12

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

12

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

6

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

6

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

6.2 Use of Outside Providers/Vendors

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

No

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

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:
1. OCDSS will provide housing relocation financial assistance for applicants and recipients who are not able to participate in assigned Work Activities due to the lack of private or public transportation.
 2. OCDSS will pay for clothing that is required to participate in approved Work Activities, including employment, up to \$200. A statement from the site supervisor or employer and two estimates of the cost from a retail store are required.
 3. OCDSS will pay a maximum of \$500 for tools which an applicant or recipient required to begin or retain a permanent job. A statement from the prospective employer and two estimates of cost for the tools will be required.
 4. OCDSS will pay for testing and licenses that are required in order for an individual to begin or retain a permanent job. A statement from the prospective employer is required.
 5. OCDSS will pay a maximum of \$2500 to repair an automobile owned by the recipient or other household member that is necessary for a Temporary Assistance recipient to travel to and from a permanent job he/she has or has been offered. Two estimates of the cost of repair are required.
 6. OCDSS will pay a maximum \$600 to cover three months of car insurance that is necessary for the recipient to have transportation to and from a permanent job he has or has been offered. Two estimates of costs are required from the recipient.
- 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
No	Bus pass/token

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

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

If transportation cannot be arranged, the maximum distance a participant would be required to walk would be 1 mile each way. Other factors such as weather and client's health are taken into consideration when assigning an individual to a program and attendance at the program or appointment.

- 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:

1. OCDSS will provide financial assistance for housing relocation for Temporary Assistance applicants who are not able to accept employment that would eliminate their need for cash assistance due to lack of transportation.

2. OCDSS will pay for clothing that is required to maintain employment and eliminate the need for cash assistance, up to a maximum of \$200. A statement from the employer and two written estimates of the cost from a retail store are required.

3. If the job will eliminate the need for cash assistance, OCDSS will pay a maximum \$600 to cover three months of car insurance that is necessary for the applicant to have transportation to and from a permanent job he has or has been offered. Two estimates of costs are required from the applicant.

4. If the job will eliminate the need for cash assistance, an applicant may receive a maximum of \$2500 to repair an automobile owned by the applicant or other household member that is necessary for a Temporary Assistance applicant to travel to and from a permanent job he/she has or has been offered.

5. If the job will eliminate the need for cash assistance, OCDSS will pay a maximum of \$500 for tools, which Temporary Assistance applicants require to begin or retain a permanent job. A statement from the prospective employer and two estimates of cost of tools will be required.

6. OCDSS will pay for testing and licenses that are required in order for an individual to begin or retain a permanent job. A statement from the prospective employer is required.

7.2 Post-Employment/Transitional Supportive Services

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

Transitional Childcare, Medicaid, and SNAP are explained to all employed recipients, as well as Child Support and referral for help with Earned Income Tax Credit filing.

- 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:

N/A

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.):

OCDSS will provide referrals to our local One Stop Career Centers, Workforce Development and Workforce Investment Board offices for supportive services to those who are eligible under the TANF 200% of poverty eligibility guidelines.

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
No	By mail

The districts process for conduction TA conciliations is described below:

A letter of conciliation is sent to the individual as soon as the Employment Counselor identifies a potential non-compliance issue. The notice states specific non-compliance issue and advises the individual that he/she must respond within the required timeframe.

If the individual does not respond to the letter of conciliation within the prescribed time limit, the district must make a determination of good cause without the individual's input.

If the individual responds to the letter of conciliation within the required number of days and

good cause can be determined over the phone, the issue is dismissed. The individual is sent a written notice of the decision by the Employment Counselor and if necessary, an appointment to develop a new employment plan.

If the individual responds to the letter of conciliation in the required number of days and good cause/willfulness determination cannot be determined over the phone, the individual is given an appointment for an agreed upon time to come in and further discuss the issue. The individual is given the opportunity to bring in any supporting documentation that may be necessary.

Following the meeting with the Employment Counselor, the individual is advised in writing whether or not good cause/willfulness determination was determined. If good cause was determined, the issue is dismissed and if necessary, a new employment plan will be developed at that time.

If it is determined the individual did not have good cause and the individual willfully did not comply with assigned work requirements, a request is sent from the Employment Counselor to the Eligibility Worker to impose an employment sanction consistent with NYCRR 385.12.

- 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
No	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
No	By mail

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

A letter of conciliation is sent to the individual as soon as the Employment Counselor identifies a potential non-compliance issue. The notice states specific non-compliance issue and advises the individual that he/she must respond within the required timeframe. If the individual does not respond to the letter of conciliation within the prescribed time limit,

the district must make a determination of good cause without the individual's input. If the individual responds to the letter of conciliation within the required number of days and good cause can be determined over the phone, the issue is dismissed. The individual is sent a written notice of the decision by the Employment Counselor and if necessary, an appointment to develop a new employment plan.

If the individual responds to the letter of conciliation in the required number of days and good cause/willfulness determination cannot be determined over the phone, the individual is given an appointment for an agreed upon time to come in and further discuss the issue. The individual is given the opportunity to bring in any supporting documentation that may be necessary. If the individual fails to report for the conciliation appointment, a request is sent by the Employment Counselor to the Eligibility Worker to impose a SNAP sanction consistent with NYCRR 385.12.

Following the meeting with the Employment Counselor, the individual is advised in person and in writing whether or not good cause/willfulness determination was determined. If good cause was determined, the issue is dismissed and if necessary, a new employment plan will be developed at that time.

If it is determined the individual did not have good cause and the individual willfully did not comply with assigned work requirements, a request is sent from the Employment Counselor to the Eligibility Worker to impose an employment sanction consistent with NYCRR 385.12.

- 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
No	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:

A letter of conciliation is sent to the individual as soon as the Employment Counselor identifies a potential non-compliance issue. The notice states specific non-compliance issue and advises the individual that he/she must respond within the required timeframe. If the individual does not respond to the letter of conciliation within the number of days required, a request is sent by the Employment Counselor to the eligibility worker to impose a SNAP sanction consistent with NYCRR 385.12.

If the individual responds to the letter of conciliation within the required number of days and good cause can be determined over the phone, the issue is dismissed. The individual is sent a written notice of the decision by the Employment Counselor and if necessary, an appointment to develop a new employment plan.

If the individual responds to the letter of conciliation in the required number of days and good cause/willfulness determination cannot be determined over the phone, the individual is given an appointment for an agreed upon time to come in and further discuss the issue. The individual is given the opportunity to bring in any supporting documentation that may be necessary.

Following the meeting with the Employment Counselor, the individual is advised in writing whether or not good cause/willfulness determination was determined. If good cause was determined, the issue is dismissed and if necessary, a new employment plan will be developed at that time.

If it is determined the individual did not have good cause and the individual willfully did not comply with assigned work requirements, he/she will be afforded the opportunity to avoid SNAP sanction by completing a work activity as assigned. A typical work activity will require the individual to make 5 job contacts in 5 days, log them into a job search worksheet which is provided to the individual, and return the worksheet with the required 5 contacts to the worker within the 5 days. If the individual successfully completes the work activity as assigned, a SNAP sanction will not be imposed. If not, a request is sent from the Employment Counselor to the Eligibility Worker to impose the SNAP sanction consistent with NYCRR 385.12.

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:

Sanctioned individuals who wish to end their employment sanction must contact their TA eligibility worker to inquire what they need to do specifically to have their sanction lifted. Demonstrating compliance in Oneida County is as follows :

The individual needs to contact his/her TA eligibility worker and request to have the sanction lifted. The eligibility worker will then let the employment unit know by sending a work registration for the individual to them. They will in turn contact the client by phone within 3 business days to complete the work registration including doing a mini assessment and will notify the eligibility worker that the individual is now in compliance and to lift the sanction. For those individuals who come into the office to speak to their eligibility worker to have a sanction lifted, the employment unit will be called, and an employment counselor will complete the work registration process with the Individual immediately.

- 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:

Sanctioned individuals who wish to end their SNAP employment sanction must contact their eligibility worker to inquire what they need to do specifically to have their sanction lifted. Demonstrating compliance in Oneida County is as follows :

The individual needs to contact his/her eligibility worker and request to have the sanction

lifted. The eligibility worker will then let the employment unit know by sending a work registration for the individual to them. They will in turn contact the client by phone within 3 business days to complete the work registration including doing a mini assessment and will notify the eligibility worker that the individual is now in compliance and to lift the sanction. For those individuals who come into the office to speak to their eligibility worker to have a sanction lifted, the employment unit will be called, and an employment counselor will complete the work registration process with the Individual immediately. An individual who was previously sanctioned for noncompliance with SNAP employment requirements may resume participation in the SNAP program before the end of the durational sanction period, if they document that they have become exempt from SNAP employment requirements consistent with 18NYCRR 385.3 and are otherwise eligible.

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 or No:	How the district determines an individual's disabilities and/or work limitation
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: Once an individual claims medical issues, an LDSS 4562 is given to the individual to have his/her health care practitioner fill out and return within the required timeframe. Once the form is returned, the agency will review it and make the determination of work limitations.

- 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:

Oneida County utilizes the LDSS-4005/LDSS4005(a) forms to notify individuals of the determination. Once the determination is made, based on the information provided to us by the individual, the corresponding notice based on the determination is sent to the individual.

- 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.
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: Employment Counselors located in the Employment Unit are responsible for determining the validity of an individual's claim of exemptions from work requirements or work limitations due to medical problems based on the medical information received from the individual's physician. In the event that an Employment Counselor has questions regarding the medical form, he/she reaches

Yes or No:	District's process for reviewing medical documentation
	out to the physician's office who filled out the medical for clarification. Upon getting more clarification from the physician, a case conference with Supervisor will be done if necessary to make the determination on employability. Once the determination is made, the Employment Counselor will send a 4005/4005(a) to the individual informing them of the decision.

9.2 Mental Health Screening and Assessment

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

No

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

N/A

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

Screening Tools the District Uses

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

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

N/A

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

N/A

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

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

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

The Employment Counselor reviews all medical documentation provided by the individual. The Employment Counselor utilizes the information obtained through the usage of the LDSS 4562 to determine if an individual can restore or improve employability through treatment or other rehabilitative activities. In the event that an Employment Counselor has questions regarding the medical form, he/she reaches out to the physician's office who filled out the medical for clarification. Upon getting more clarification from the physician, a case conference with Supervisor will be done, if necessary, to make the determination on the individual's ability to restore or improve employability through treatment or other rehabilitative services.

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

The treatment plan for individuals determined to be in need of treatment, i.e. mental health counseling, physical therapy is based on the physician's recommendations as stated on the completed LDSS 4526 in which the employability determination was made from.

- 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 Counselors are responsible for monitoring compliance with treatment plans with individuals in their caseloads. They will send timesheets to and collect from the individual's treatment facility on a monthly basis to confirm attendance and compliance. The individual's treatment plan will be updated each time an updated medical is received. New medicals are reviewed at recertifications or when the duration of the limitations expire.

10. District Certification

10.1 Certification

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

1/10/2024
Colleen Fahy-Box
Commissioner