

# **Otsego County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

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

*See attached*

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

The Otsego County Department of Social Services Employment Unit works with Temporary Assistance, (TA) and Supplemental Nutritional Assistance Program (SNAP) applicants and recipients. The unit assists in determining employability, completes assessments and employment plans, makes referrals for activities and monitors compliance. While monitoring compliance of the applicant or recipient, conciliations and good cause determinations are also completed. Cases are recommended to the Income Maintenance worker for application denials or for posting sanctions as appropriate based on the regulations. Supervisory staff reviews all case actions to include, but not limited, to determining employability and any difference of decisions that may arise on case actions or with the client. Coordination of the Work Experience program (WEP), making referrals to program sites, monitoring compliance and worksite development are also the responsibility of the Unit.

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

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

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

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

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

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
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**

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Del/Chen/Mad / Otsego BOCES; Norwich and Milford, NY	Others: Unknown	FA SNA Family SNA Individual SNAP	Educational resources Program, Vocation Education
Oneonta Adult Education; Oneonta, NY	Others: Unknown	FA SNA Family SNA Individual SNAP	Test Assessing Secondary Completion (TASC) Preparation, Adult Basic Education (ABE), English as a Second Language (ESOL), Literacy Testing
Afton Consortium of Schools; Afton, NY	Others: Unknown	FA SNA Family SNA Individual SNAP	Test Assessing Secondary Completion (TASC), Literacy Testing. (locations in Otsego County)
WIOA One Stop Services; Oneonta, NY	Others: WIOA Funds	FA SNA Family SNA Individual SNAP	Interest and Aptitude Testing, Resume services, Employment resources, Job readiness training, Job search assistance, One Stop Registration
Otsego County Behavioral Health	Others: Unknown	FA SNA Family SNA Individual SNAP	Drug and Alcohol Assessment, Mental Health evaluations, treatment and Counseling.

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Services; Oneonta, NY			
Opportunities for Otsego	Others: Unknown	FA SNA Family TANF 200%	Opportunities for Otsego provides Early HeadStart-Home Visits in multiple locations throughout Otsego County.

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**

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

**Jobs Staff Target Groups**

<b>Yes or No:</b>	<b>Target Groups:</b>
N/A	Applicants
N/A	FA & SNA with children
N/A	SNA without children
N/A	SNAP

Yes or No:	Target Groups:
N/A	TANF 200%

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

N/A

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

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

### Programs and Services Provided at Career Centers

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

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

The district and the Career Center maintain a single point of contact to allow for open communication. Referrals are made weekly for A/R of Temporary Assistance to register at the Career Center and access resources such as Workshops, Career Counseling and assistance with job searching available as well as other agencies located at the Center.

## 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:

Otsego County DSS will begin their orientation process by providing the exempt and non-exempt applicants with the TA application (LDSS-2921), client information books (LDSS-4184 A, B, and C), and the district created orientation brochure. The exempt and non-exempt recipients will receive the client information books (LDSS-4184 A, B, and C), and the district created orientation brochure at recertification. The orientation brochure is reviewed with the client individually or over the phone at intake and recert. Additionally, the new orientation process will no longer include TA eligibility as this will be separate.

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



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

Otsego County DSS will ensure that all adults in households with dependent children and 16-17-year-old individuals not in school, receive an assessment within 90 days of eligibility. All adult households without dependent children will receive an assessment within one year of the date of application. Employment and Training or the district designee, provides in-person and over the phone assessments which are conducted and completed individually with the client via phone. The district understands that it is not a requirement of the recipient to sign the employment assessment or plan. If client chooses to sign, this is an acknowledgement, not an agreement. See 385.6 for more details. The individual should be provided a copy of the employment plan.

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

Local Department of Social Services Employment Unit or designee.

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

Employment and Training Assistants (ETA's) and Case Managers that are designated to conduct employment assessments meet the civil service requirements of that position. The designated staff has been deemed to have demonstrated effectiveness in assessment and employability development. Orientation has been provided through our staff development coordinator. Staff training is provided by Supervisors.

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

No

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

No

- 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?

Assessment is an ongoing process and updated biannual. If changes are reported that create, inflate or remove any barriers, the Employment Worker will review and update the assessment appropriately.

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

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

### District Employment Plan Procedures

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

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

### District Employment Plan Development

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

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

All TA individuals complete an Employment Plan with an Employment and Training Assistant using the LDSS 4978 NYS Employment Plan based upon their assessment. An employability plan shall be developed in writing and in consultation with the recipient.

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

The Employment Plan is updated when changes are reported in the household that may create, inflate or remove any barriers and when activities assignments change. The Employment Worker will review and update the Plan accordingly with the client and provide a copy 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:

Bilingual staff may be available but if not, the Department will obtain bilingual services to ensure the client's needs are addressed. Some worksites can accommodate non-English speaking participants in their work experience as well as classroom training to provide ESL instruction on site. In the event these resources are not available, Language Line Telephone Interpretation Services will be utilized.

#### **3.3 Strategies/Procedures for Increasing Program Attendance**

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

The Employment Unit maintains contact with the Housing Unit and the LDSS Service Units to engage, provide support and continuity to the client to aid in becoming successful in completing their Employment Plan activities. All clients are instructed by the LDSS to arrange for back-up childcare and schedule all personal appointments, whether it is school or medical related, around their required work assignments. If outside appointments occur during their assigned hours, clients are instructed to either come late or leave early and make up their missed hours within the month. The client is educated on the local bus systems; provided with schedules and phone numbers as well as monthly calendars to assist with organizing the client's schedule.

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

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

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

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: In house staff meet with the client to discuss household income and expenses and determine how the household needs are being met. District will help create a plan of action including but not limited to: *Job searching *Job coaching while developing employment opportunities *Explaining budgeting and how wages can benefit the household *Assist in accessing available resources to enhance their self-sufficiency. The client is also afforded the opportunity to reengage in work activities to end the sanction.
No	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
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:

Employment worker and/or eligibility examiners educate all TA applicants of the employment requirements, TA eligibility, resource standards, and potential resources available to the individual.

Other diversion options are to apply for SNAP, Medical Assistance, Unemployment Insurance, Childcare assistance, child support and one time (emergency) cash assistance for such things as rent arrears, heating fuel, car insurance and car repairs to avoid ongoing assistance. Individuals can enroll and complete an active job search, and participate in job search workshops when available. Available funding may be used to assist with transportation if employment is secured.

## 4. Work Activities

### 4.1 Allowable Work Activities

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

#### Allowable Work Activities by Case Type

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

Activity and Definition	Case Type
<p>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><b>Job Skills Training</b> – Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Readiness Training (JRT) Activities</b> – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Subsidized Private Sector Employment</b> – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of</p>	<p>FA SNAFAM SNA SNAP</p>

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

## 4.2 Job Development

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

Yes

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

### How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: Job development is initiated by district staff, Employment Clerk, weekly when contacting Employers to verify job search contacts. Employment and Training Staff (2) will also contact Employers on occasion. Staff will discuss possible openings or any future availability.
No	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.:

## 4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

- a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.

Oneonta Adult Education, (OAE) is the district's provider for ABE/HSE and ESL programs. OAE's central location is accessible to our local bus service; the offsite locations can accommodate many rural areas of the county as well. OAE offers HSE/ABE/ESL classes at the local OAE office or other OAE sites. Afton Consortium is also available as needed and appropriate and located at the local Career Center-One Stop Office and off site in various locations. Clients under twenty-one years of age, who do not have a high school diploma or HSE, are referred to their local school district for directions on returning to school or attending HSE classes.

- b. Described below is how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

The district uses educational program providers who offer programs, such as but not limited to, Vocational and Job Skills training that are certified and promoted by our WIOA program



partners. Vocational trainings will also be approved by the State of New York Department of Education.

- 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.

All applicants for Temporary Assistance are referred for literacy/math testing. Reading and math levels are determined by the local Oneonta Adult Education Center (OAE). When reading or math or both are less than a 9th grade level, regardless of the individual's educational level and employability, the individual is referred to HSE/ABE classes provided by OAE at the local OAE office or other available sites as appropriate for the client. Educational activities, to include HSE and ABE are part of the individual's employment plan as indicated by the testing results. Clients under twenty-one, who do not have a high school diploma, a HSE or their reading or math or both are evaluated at less than a 9th grade level, are referred to their local school district for directions on returning to school or attending HSE classes. Monthly attendance forms are provided to the client to have completed and signed by the instructor and returned to the Employment Unit for monitoring.

- d. Described below are the district's process and policy, including the guidelines workers follow, when determining whether participation in educational activities is approved for individuals who have not attained a high school diploma who are interested in participating in an educational activity. Include in this section instances when the district would deny participation in educational activities.

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

- e. Described below is the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities.

Approval is based on the completed assessment and literacy/math testing. The Employment Development Plan will include the approved activities. If the individual has not obtained their high school diploma or HSE, the client is encouraged and may be required to enroll in an educational program, such as HSE classes, in addition to a job skills or vocational education activity.

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

The district uses educational program providers who offer programs that are certified and approved by the State of New York Department of Education. The LDSS will contact the local WIOA/CDO office to determine which in-demand occupations are located in the LDSS region. The LDSS will refer interested participants who are interested in pursuing education to <https://www.bls.gov/ooh/>.

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

The client is advised of approved training providers by staff during their assessment and with on-going case management.

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

Recipients will receive written notice of approval or denial of their request for training. Recipients who are enrolled in other work activities will be notified by a letter via WTCMS providing the following information: the enrollment date of the specific activity, the number of hours available per month, and the interview date, if appropriate. If work experience, the participant will be given an assignment letter via WTCMS that includes enrollment date, hours available, worksite and address of worksite, information regarding daycare and transportation is discussed at employment assessment.

- 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.

Teens enrolled and participating in school on a full-time basis will be monitored through the use of the DSS-3708, School Attendance Verification, at application and recertification by an eligibility worker (Welfare Examiner). Monitoring is achieved via the results of the completed DSS 3708. If verification is not received a referral is sent by the eligibility worker to the employment worker and a call-in notice is sent to the client to review their status.

- 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.

The district will share necessary information, regarding the individuals' limitations with the activity site supervisor, in writing prior to the activity start date to ensure that the individuals' limitations are accommodated. If the site supervisor has further questions, they can contact the Employment Unit worker.

#### **4.4 Post-Secondary Education Approval and Enrollment Policies**

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

The highest level of post-secondary level of education must be of no more than two years in duration and result in an associate's degree, certificate or credential.

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

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

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

**5. Work Requirements**

**5.1 Meeting TA Work Requirements**

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

Otsego County DSS will refer non-exempt TA applicants to Job Search Enrollment at intake. At the Job Search Enrollment appointment, the district will explain what resources are available, how to complete the job search form, what is a verifiable contact, how to notify the agency and what to provide if employment is obtained. Supportive services such as transportation and child care needs are also discussed. The district will be requiring TA applicants to provide 15 contacts over a 10-day period. A return appointment, face to face or by phone, is scheduled after the 10-day job search period. The job search form can be emailed, faxed or dropped off to the agency prior to the appointment for review. Once the TA case opens and if employment is not found, recipients may be referred again to Job Search enrollment. They will be required to submit 15 contacts over a 10-day period. The

district understands weekly contact must be made and the weekly contact can be done face to face or by phone. Additionally, per 385.9 participants must be supervised on an ongoing basis no less frequently than daily. For job search, daily supervision may include access by phone to a case manager or district worker for the participant to report on progress or seek additional guidance as needed before the next regularly scheduled contact. Contact between the district worker (or program provider) and the participant must be no less frequent than weekly and can be by phone, in person, or electronically.

- 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	35
Households without Dependent Children Average Monthly	110

- 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:

The local district monitors performance by utilizing data available in WMS and COGNOS. The local district has on site staff that can create additional reports in COGNOS, as needed. These reports allow the LDSS to monitor activities and performance of the worker, unit and agency level. Supervisors have access to this information on their desktops and employment staff will be given monthly reports. The WTWCMS system will also be utilized for continuous quality review.

- 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	15	10	The district will be requiring TA applicants to provide 15 contacts over a 10 -day period. A return appointment, face to face or by phone, is scheduled after the 10-day job search period. The job search form can be emailed, faxed or dropped off to the agency prior to the appointment for review.
SNA Individuals	15	10	The district will be requiring TA applicants to provide 15 contacts over a 10 -day period. A return appointment,

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
			face to face or by phone, is scheduled after the 10-day job search period. The job search form can be emailed, faxed or dropped off to the agency prior to the appointment for review.

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

Yes

**TA Recipient Job Search**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	15	10	Once the TA case opens and if employment is not found, recipients may be referred again to Job Search enrollment. They will be required to submit 15 contacts over a 10-day period. The district understands weekly contact must be made and the weekly contact can be done face to face or by phone. Additionally, per 385.9 participants must be supervised on an ongoing basis no less frequently than daily. For job search, daily supervision may include access by phone to a case manager or district worker for the participant to report on progress or seek additional guidance as needed before the next regularly scheduled contact. Contact between the district worker (or program provider) and the participant must be no less frequent than weekly and can be by phone, in person, or electronically.
SNA Individuals	15	10	Once the TA case opens and if employment is not found, recipients may be referred again to Job Search enrollment. They will be required to submit 15 contacts over a 10-day period. The district understands weekly contact must be made and the weekly contact can be done face to face or by phone. Additionally, per 385.9 participants must be supervised on an ongoing basis no less frequently than daily. For job search, daily supervision may include access by phone to a case manager or district worker for the participant to report on progress or seek additional guidance as needed before the next regularly scheduled contact. Contact between the district worker (or program provider) and the participant must be no less frequent than weekly and can be by phone, in person, or electronically.

- 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:

An individual that is self-employed and who receives less than the state hourly minimum wage in payment will be required to participate in 35 hours of activity each week, to include the hours of provision of self-employment. Otsego County DSS will allow two months to all self-employed individuals to increase their business income, additional time may be permitted as determined by the district based on case circumstances.

## 5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

### Written Information Provided to SNAP Applicants and Recipients

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

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

Eligibility Staff read a locally developed comprehensive oral explanation of the SNAP household work requirements(F31B) to the client and complete the LDSS 4826B Interview/Verification Guide for new and recertification applications. The Eligibility Worker will initial and date the LDSS4626B confirming the oral explanation was completed. Once completed and signed the LDSS4826B is scanned into the case folder.

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

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

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

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

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

<b>Yes or No:</b>	<b>How oral information is provided to SNAP applicants and recipients</b>
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
No	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
Yes	Eligibility staff document the case record through case notes/comments.

**5.3 Meeting SNAP Work Requirements**

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

Department of Social Services does not mandate SNAP E & T work assignments.

- 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):

Eligibility workers mail the LDSS5193A Important information about SNAP Work Rules to all households containing at least one member subject to SNAP work rules and the LDSS also includes a local information letter (E109) providing contact information, services available and phone numbers for the Local DSS and CDO/WIOA office.

## 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.

Based on documentation provided to the district on behalf of the client, the district notifies the client of any work limitations via the LDSS 4005(a). Based on those limitations an appropriate referral will be made. If the district receives documentation, phone call or other means of reporting from a site supervisor within 10 days of determining the participant is



not fit or the client is not appropriate for the position, the district will document on IEDR, speak with the site supervisor and then arrange a meeting with the client within 10 days. The district will meet with the client discuss the situation, reassess any limitations, with supporting documentation or information provided by the site's supervisor and arrange for a new site if the client is still nonexempt. A new referral will be generated and provided to the client.

- 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.

Site supervisors are made aware of their authority to determine if the referred client is not appropriate. Prior to the referral, the district will discuss with the site supervisor who will be referred. The supervisors are told to contact the district with any questions or concerns they may have. The district will provide case management to ensure the site supervisor is aware and supported when issues or concerns arise.

- 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.

Worksites are provided with information that is clear, understandable, and useful in every paper or electronic letter, publication, form, notice, or instruction the district provides when referrals for work activities are made. The district will review with the site specifics on why the client is not appropriate for the assigned activity to ensure they are not being unfair or discriminating against a protected class.

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

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

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

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

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

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

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

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

3

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

3

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

## **6.2 Use of Outside Providers/Vendors**

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

No

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

N/A

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

N/A

## **7. Supportive Services**

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

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

The district will provide case management and payments for transportation (as described below up to a maximum of \$75.00), work related clothing up to \$75.00, licensing fees, required safety equipment, tools and equipment. On site computer/internet and phone access is provided.

- b. Indicated below are the services the district will use to assist those participants who need transportation to and from an approved work activity site, including any applicable mileage reimbursement rate, and the method used by the district to arrive at that reimbursement rate. OTDA policy establishes a mileage reimbursement rate of no less than the IRS established rate for medical/moving purposes. In all instances, should the actual cost of

transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, the district will reimburse for the actual costs based on reasonable documentation submitted by the work activity participant (reply yes or no to the options as they apply).

**Transportation Services Provided to Clients**

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
No	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
Yes	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
Yes	Other mileage rate (the methodology used to establish reimbursement rate is described here): The Employment worker will work with the applicants/recipients who do not live where public transportation is available to identify alternate means such as carpools, friends, neighbors or family and assist them to develop a transportation plan. When an individual is placed in a work experience assignment, the district will make a reasonable effort to assign the individual as close as possible to the individual's home. Should the actual cost of transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, Otsego County will reimburse for the actual costs, based on documentation submitted by the work activity participant.

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

The maximum distance that is required for a participant to walk to work or a work activity or to access public transportation will not exceed 2 miles each way. In all instances, individuals with limitations will be accommodated. Agency will take into consideration route being traveled (in a rural area versus within city or village) and adverse weather conditions.

- 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:

Clothing allowance, as necessary for participation in assigned activities, up to \$150.00 per year. Car insurance payment up to \$500.00 per year. The insurance policy must meet minimum State requirements. Increased policy costs related to violations, convictions or other reasons for inflated costs, will not be paid by the LDSS. Any premium balance the A/R must pay in order to activate or keep the policy in force, must be made prior to the LDSS issuance of payment. Driver's license/permits, up to \$100.00 for each item per year. Vehicle registration/title and fees up to \$200.00 per year. Car repairs, up to a maximum of \$500.00 or the retail value of the automobile, whichever is less per year. Professional license fees, up to \$100.00 for each license, necessary for participation in assigned employment activities or employment per year. Tuition, books and supplies associated with an approved training

program, up to \$2,000.00 for one year of programming. A/R cooperation with WIOA to seek other funding to meet unmet costs will be a prerequisite to LDSS payment. Other expenses as deemed necessary by the LDSS to maintain participation in a work activity or to maintain or secure employment, up to \$500.00 per year.

## **7.2 Post-Employment/Transitional Supportive Services**

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

The Employment Staff will complete an exit interview with the client, by phone or in person, whichever is convenient. Support Services will be explained and the LDSS worker will inform the client on how to contact the agency when they have any questions and to provide case management services. The agency will also send a congratulation letter to the employed individual which will include information regarding support services, transitional supports and other local agency and community-based organizations phone numbers that may be a viable resource to the employed individual.

- 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:

Clothing and personal needs, public transportation or other means of transportation, car insurance and repairs, driver's license/permit and or vehicle registration/title and fees, professional license, drivers' education, tuition, employment counseling; any other allowable expenses as deemed necessary and reasonable by the LDSS to maintain employment. Approval of any and all requests is subject to availability of Federal, State, and local funds.

## **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.):

As long as funding is available (through FFFS, Transportation Initiative, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines: Bus passes, gas cards and other such programs as available at the time of need.

## 8. Conciliation, Sanction and Dispute Resolution Procedures

### 8.1 Conciliation

- a. The district's conciliation process for TA applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(a). Indicate below how conciliations are conducted (reply yes or no to the options as they apply).

#### How the District Conducts Conciliation for TA Applicants and Recipients

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

The districts process for conduction TA conciliations is described below:

A notice of conciliation is issued. The notice shall indicate that a failure or refusal to participate has occurred; indicate that the individual has a right to provide reasons for such failure or refusal to participate; Recipients must respond within the required timeframe. If there is a response, a conference is held with the client and employment worker. A supervisor will be available to mediate a client dispute if the need arises.

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

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

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

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

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

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

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

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

A notice of conciliation is issued. The notice shall indicate that a failure or refusal to participate has occurred. The notice also indicates that the individual must either contact the indicated worker within the required timeframe and provide either documented good cause for failure to participate or documentation exempting them from participating in the assigned work activity or demonstrate compliance as indicated in the notice.

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

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

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

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

The districts procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is when non-compliance is determined to be willful and without good cause and an exemption is not evident, the client is given the opportunity to demonstrate compliance. The LDSS will refer an individual to an assigned activity; the client must report as assigned on time and prepared to engage in the assigned activity. The client must successfully complete, at least one scheduled day on site to be in compliance. If the conciliation process was initiated due to non-compliance with job search compliance will be to provide a complete, verified weekly job search of five contacts within the indicated times issued in the Conciliation notice.

**8.2 Sanction**

- a. Described below is the district’s procedure for determining compliance for those TA recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district:

The LDSS will refer an individual to an assigned activity; the client must report as assigned on time and prepared to engage in the assigned activity. The client must successfully complete, at least one scheduled day on site to be in compliance. If the sanction was imposed for non-compliance with job search, compliance will be to provide a complete, verified weekly job search.

- 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:

When a TA/SNAP recipient is willing to end a TA/SNAP sanction and demonstrate compliance the LDSS will refer the individual to an assigned activity; the client must report as assigned on time and prepared to engage in the assigned activity. The client must successfully complete, at least one scheduled day on site to be in compliance. If the sanction was taken on a job search that was not provided, not complete or could not be verified, compliance will be to provide a complete, verified weekly job search.

In cases where a TA/SNAP sanction was imposed, and the SNAP sanction duration ends prior to the TA sanction duration a recipient who is part of a multi-person case must request to be added back to the SNAP case after the minimum duration has ended. In these instances compliance will be demonstrated within ten (10) days by meeting with the Employment worker and completing the assessment process. Once the assessment process is completed, SNAP benefits will be restored for the month following the month when the individual demonstrated compliance but no earlier than the expiration date of the minimum duration period. Those who document an exemption may have their SNAP sanction lifted before the end of the durational sanction period.

### 8.3 Dispute Resolution

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

#### Grievance Mediation

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



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

### 9.1 Disability Determination Process and Tools

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

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

Yes or No:	How the district determines an individual's disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: Medical documents are provided to the LDSS from the client or via a medical professional.

- 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:

Employment worker and Supervisor, when necessary, reviews and determines status to include the process for issuing the notice to the individual informing them of their exempt/nonexempt status (LDSS 4005/LDSS 4005a).

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

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

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

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

**Process for Reviewing Medical Documentation**

<b>Yes or No:</b>	<b>District’s process for reviewing medical documentation</b>
No	District directs the contracted physician or individual’s physician to determine status.
Yes	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: Employment worker and Supervisor, when necessary, reviews and determines work status. If necessary, the provider may be contacted for further assistance and their input.

**9.2 Mental Health Screening and Assessment**

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

No

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

N/A

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

**Screening Tools the District Uses**

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

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

N/A

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

N/A

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

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

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

The Employment worker and Supervisor, when necessary, will review the case file and any documentation provided by the client. Case management meetings with the treatment providers to determine the client's degree of impairment, and how treatment can improve the client's ability to become self-sufficient are scheduled.

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

When the client requires a temporary medical exemption from employment requirements a self-sufficiency plan is created with the Employment worker. The plan consists of the treatment requirements indicated on the medical documentation provided. The plan is monitored and updated as needed depending on the treatment recommendations.

- 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 worker monitors and tracks all treatment attendance and progress. Monthly attendance calendars are provided to the client to give to the treatment professional to complete and verify attendance in treatment as well as any missed or rescheduled appointments. The calendar also allows for any comments. The client is required to provide the attendance calendar monthly. The Employment Worker will contact the treatment professional on an ongoing basis to monitor compliance and employability changes as well as meeting with the client to assess their rehabilitation.

## **10. District Certification**

### **10.1 Certification**

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

1/28/2025

Lisa Winne

Commissioner

## 11. Amendments

Date	Sections Amended
1/28/2025	Section 2, 2.1 (a) & (b); 2.2 (b) (c) (e) & (f) Section 5, 5.1 (a) Section 9, 9.1 (d)