

Seneca 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.)

The attached organizational chart is for the Temporary Assistance/SNAP and Workforce Development Youth Bureau units that operate the districts employment programs.

- 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.

Seneca County reorganized in 1999 and created a Seneca County Division of Human Services. (Encl 1: Seneca County Division of Human Services Organizational Chart) Under the Division of Human Services exists the Department of Temporary Assistance, the Department of Children and Family Services, the Department of Workforce Development and Youth Bureau (WFDYB), Support Collection Unit, Personal Care Aides Unit, Fraud Investigation Unit and Accounting Unit. In 2018, a countywide Finance Department was created and the DSS Accounting Unit is housed in the Finance Department on a contractual basis. The Department of Workforce Development and Youth Bureau (WFDYB) acts as the primary employment unit for social services programming. It aligns with the plans, goals and funding of the Workforce Innovation and Opportunity Act, Temporary Assistance/ SNAP Employment, Intensive Case Management, TANF Summer Youth Employment Program (SYEP), as well as other potential funding sources. WFDYB employment services include, but are not limited to, employability determinations, orientations, assessment, employment planning, assignments to work activities, monitoring of participation, developing, and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, coordination and provision of supportive services, and employment placement and retention services. All departments report directly to the Commissioner of Deputy Commissioners of Human Services.

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
Literacy Volunteers of Seneca County	Others: United Way, NYS Education Department	FA SNA Family SNA Individual SNAP TANF 200%	Assist individuals to overcome literacy hurdles to employment. ESL, HSE and tutoring
Finger Lakes Community College	FFFS Others: State & Federal Education funds	FA SNA Family SNA Individual SNAP TANF 200%	Job Readiness Training, Job Skills Training, Life Skills, Parenting Skills, Customer Service Training and Customized Training as necessary based on industry demands ESL and Spanish HSE. FFFS funds are used to provide individual or group training if other funding sources are not available
Cayuga Community College	FFFS Others: State and Federal Education funds	FA SNA Family SNA Individual SNAP TANF 200%	Job Skills Training, Job Readiness Training

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Tompkins Cortland Community College	FFFS Others: State and Federal Education funds	FA SNA Family SNA Individual SNAP TANF 200%	Job Skills Training, Job Readiness Training
ACCES-VR	Others: NYS Education Department	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Rehabilitation Services
Commission for the Blind	Others: New York State	FA SNA Family SNA Individual SNAP TANF 200%	Enhance employability, to maximize independence and to assist in the development of the capacities/strengths of people who are legally blind
Child & Family Resources, Inc.: Healthy Families	Others: New York State budget and private and public foundation such as: United Way.	FA SNA Family SNAP TANF 200%	Home visiting service to assist with pregnant women and families with children under 3 months referred by TA. They can also assist with families working with services with a child up to age 2
Onondaga Community College	FFFS Others: State and Federal Education funds	FA SNA Family SNA Individual SNAP TANF 200%	Job skills training, job readiness training

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:

Workforce Development Youth Bureau is under the Division of Human Services. Monitoring and Oversight of TANF and SNAP Employment and Training programs is performed directly by the Commissioner of the Division of Human Services.

1.3 OTDA Jobs Staff Agreement

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

Services Provided by Jobs Staff

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

Jobs Staff Target Groups

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

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

N/A

1.4 Access to Services at New York State Career Centers

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

Programs and Services Provided at Career Centers

Yes or No:	Programs and Services Provided:
No	The district has employee(s) physically present at a Career Center
No	The district has contract staff physically present at a Career Center
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
Yes	Other (described here): Customers that may be eligible for Career Center and WIOA funded services are referred to WIOA staff. WIOA staff are provided office space within the Division of Human Services to meet with referred individuals or walk in customers to access these 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 Seneca County Workforce Development Youth Bureau staff provides access and referral services to WIOA Career Center Partners that include: A4TD (Associates for Training & Development) -Title V of the Older Americans Act, Jobs for Veterans, Local Office for the Aging, Seneca Housing INC, Job Corps, Migrant/ Seasonal Farmworkers Program, Cayuga Seneca Community Action Agency, NYSDOL/Trade Adjustment Assistance/Trade Act (TAA), NYSDOL/Wagner-Peyser and Unemployment Insurance (UI). Clients are referred to WIOA services through a universal referral form and that individuals eligible for Public Assistance and SNAP are referred using the same universal referral form.

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

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

District Orientation Procedures

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

Yes or No:	District Orientation:
	activities and responsibilities - Services available through Seneca County The Department of Workforce Development and Youth Bureau (WFDYB) and partners - Availability of Support Services - Childcare in lieu of Temporary Assistance, and - Review of the consequences of applicant/recipients not fulfilling obligation to participate in any required activity.

- 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:

Temporary Assistance orientations are done on an individual basis. The orientation process is reviewed during the application process and is completed before the case opening. The Department of Workforce Development and Youth Bureau (WFDYB) staff conducts orientation separately and individually Recertification interviews are done separately by TA and WFDYB staff and on an individual basis. Same day appointments with Workforce Development staff are available and scheduled for any individual that presents in person for a Temporary Assistance application interview. The interview can be done in person or by phone for their initial orientation/intake with Workforce. If the customer is unable to complete the orientation/intake on the same day an appointment will be scheduled within 5 business days to complete this.

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 tool does not contain any 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:

During orientation/intake staff meets one-on-one with the client to complete a preliminary assessment. (Att. 2: Employment Assessment Information, EF24). At case opening staff meets with recipient and a more comprehensive assessment is done using WTWCMS assessment.

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

Seneca County Workforce Development Department and Youth Bureau (WFDYB)

- 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)):

Per New York State Civil Service Employment & Training Assistant- Minimum Qualifications:
(a) Completion of a minimum of 60 semester credit hours in a regionally accredited or NYS registered college or university; or (b) graduation from high school or possession of a high school equivalency diploma and two years of experience in job development, personnel counseling, or placement in an Employment and Training, community action, or similar agency dealing with the employment and training of economically disadvantaged minority, handicapped, or low income persons; or (c) an equivalent combination of training and experience as defined by the limits of (a) and (b).

Employment & Training Counselor - Minimum Qualifications:

(a) Graduation from a regionally accredited or NYS registered college or university with a Bachelor's Degree; or (b) completion of a minimum of 60 credit hours in a regionally accredited or NYS registered college or university and two years of full-time paid experience as a counselor, caseworker, employment interviewer or similar title in a community action or similar agency dealing with the employment or training of economically disadvantaged, minority or low income persons; or (c) graduation from high school or possession of a high school equivalency diploma and four years of full-time experience as defined in (b); or (d) an equivalent combination of training and experience as defined by the limits of (a) through (c).

- 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 at least annually, and any time there is a change that affects the client's employability status. For example, Employability from Exempt to Employable, Work Limited etc.

Temporary Assistance staff submits referral form to Workforce Development to inform them of case changes. If the case has not had a code change that affects employability status a 6-month assessment will be updated.

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.
No	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTCMS.
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: During orientation staff meets 1 on 1 with the client to complete a short-term employability plan. (Attached Short-Term Employability Development Plan, EF23). The initial Employment Plan is developed using the EF# 23 Short Term Employability Development Plan questionnaire as well as additional information provided by the client. Employment related workshops, assessments, basic skills classes, or unpaid work experience may be assigned as well. The counselor assists the client in identifying any potential barriers such as medical, childcare or transportation issues that need to be addressed.

- 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:

At case opening staff meets with the individual recipient and a more comprehensive employment plan is done using the WTWCMS employment plan. The Department of Workforce Development and Youth Bureau (WFDYB) also incorporates into the Employability Development Plan the requirement for clients to comply with and participate in any and all treatment recommendations from service providers including Addictions, Mental Health, ACCES-VR, medical providers, or other identified agencies. The customer's employment plan includes any barriers such as childcare, transportation or medical limitations that need to be addressed for the customer to become self-sufficient.

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

Employment plans are updated at least annually, and any time there is a change that affects the client's employability status or supportive service needs. At any time, there is a code change that affects the client's Employability from Exempt to Employable, Work Limited etc. Temporary Assistance staff submits a referral form to Workforce Development to inform them of case changes (Form attached).

When an employment plan is updated a copy of the 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:

- a. Activities and programs to which the client may be referred during the assessment process for determining specific exempt status or disability limitations.
- b. Any activity that may be tailored to the requirements of special-needs or at-risk individuals, particularly as applicable to persons evaluated under Section 385.2 having to do with physical and mental disabilities and work limitations.
- c. Any activity not mentioned herein that may be deemed suitable within the scope, purpose, and philosophy of the Plan, Seneca County and the laws and regulations pertaining thereto. Exempt individuals, although not required to actively participate in work activities, are offered the same range of services/activities as non-exempt individuals. This may include selected work activities on a limited basis as well as referrals for therapy, counseling, rehabilitation, training, etc. Additionally, participants are expected to follow recommended

treatment plans, e.g., physical therapy, mental health treatment, monthly drug and alcohol treatment plans, and/or medical treatment and to timely document treatment.

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

The local state certified providers are Finger Lakes Community College (FLCC), Cayuga Community College (CCC), Tompkins Cortland Community College (TC3) FLCC provides ESL and Spanish HSE classes in Geneva (accessible by bus). Literacy Volunteers of Seneca County provides basic literacy, basic computer training and English as a Second Language programs for adults. Tutoring is one-to-one at locations and times mutually acceptable to both student and tutor. Literacy Volunteers partners with FLCC instructors to provide services.

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:

Each customer is assigned an Employment and Training Counselor and meets on a scheduled on a weekly or bi-weekly basis to work through any problems or barriers that may be impacting their ability to participate in assigned work activities. The customer can be scheduled in person or by phone.

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 the 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: When the sanctioned individual is within two weeks of the end of the durational period the Employment and Training staff person contacts via phone/mail to offer services and assistance to help the person have all the necessary supportive services in place so they can get back into compliance.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Periodically during and until compliance sanction, the Employment and Training staff sends a letter to offer services and assistance to help the person have all the necessary supportive services in place so they can end the sanction.

3.5 Strategies for Reducing the Need for TA

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

The district may utilize diversion payments as appropriate to assist applicants in starting or retaining employment and diverting them from the need to receive temporary assistance. The district may provide childcare payment, or refer them to the Childcare Assistance Program, Employment related clothing, boots, uniform etc. Transportation - Bus passes and gas cards, License, and other work-related fees, fingerprinting for employment opportunities, Employment related safety equipment, Automobile repairs/towing, Automobile Insurance, Other payments are considered on a case-by-case basis. Diversion payments are discussed with Workforce Development Youth Bureau Supervisors and or Temporary Assistance Principal Welfare Examiners to determine if these options are available.

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>

Activity and Definition	Case Type
<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>
<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>

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

Activity and Definition	Case Type
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.	FA SNAFAM SNA SNAP
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.	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	<p>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.: The Deputy Director of Workforce Development and Youth Bureau serves as our Business Service Representative that serves as a liaison and contact for businesses and not-for-profit employers. The Business Services Representative contacts employers of available programs and solicit jobs and work experience sites. The BSR also makes referrals to WIOA staff for possible funding for OJT contracts or customized training and collaborates with ACCES-VR. The BSR creates weekly job leads for the 4 county region. Weekly job leads are shared with our Workforce Development staff to inform them of potential employment opportunities. These are posted weekly on the County website and go to all users on the network. Our partner agencies who also serve our population receive the job leads electronically as requested.</p> <p>The Seneca County Industrial Development Agency has a Job Placement and Business Retention Services Representative that provides information and what services are available to employers that help support The Department of Workforce Development and Youth Bureau (WFDYB) efforts.</p>
No	<p>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.:</p>

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.

The local state certified providers are Finger Lakes Community College (FLCC), Cayuga Community College (CCC), Tompkins Cortland Community College (TC3) and Finger Lakes Community College provides ABE and HSE on-site services 2 days per week.

FLCC provides ESL and Spanish HSE classes in Geneva (accessible by bus). Literacy Volunteers of Seneca County provides basic literacy, basic computer training and English as a Second Language programs for adults. Tutoring is one-to-one at locations and times mutually acceptable to both student and tutor. Literacy Volunteers partners with FLCC.

- 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.

If the assessment indicates that vocational education and/or job skills training would be appropriate the following procedure is followed: Clients are matched to appropriate programs with the understanding that the successful completion of the training would produce a skill that is reasonably marketable within the local economy. The funding streams used to pay for training are primarily WIOA and TAP/Pell grants, as well as grants secured by the training facilities. The WIOA system, through the Finger Lakes Workforce Investment Board (FLWIB), established partnerships with representatives that include providers of Adult Education/ Literacy, Vocational Rehabilitation and Higher Education. Some FFFS & SNAP E&T funding is used as needed to supplement. WFDYB also works with local colleges (FLCC, CCC and TC3).

- 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 individuals are assigned to take a TABE as soon as possible, usually within seven days of intake. This program is provided by Finger Lakes Community College. If the individual does not have their HSE they are assigned to class to work on obtaining it. If they have a high school diploma or HSE but their basic skills are low, then they are assigned to work on improving basic skills in ABE/HSE/ESL class, Literacy Volunteers can assist. Supportive services are offered so the individual can take advantage of these programs. See Section 3.2 for Strategies/Procedures for Accommodating Individuals with Limited English Proficiency.

- 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.
1. Individual is a recipient of TANF/SNA (indicating SNA households without children) or SNF (indicating SNA households with children, i.e., Safety Net families, SN-MOE), or SNAP and training is allowable under SNAP student rules.
 2. The recipient demonstrates based on his/her individual assessment and Employment Plan, that he/she possesses the necessary skills, abilities, and aptitude to successfully complete the proposed training and get a job in the field with the existing credentials.
 3. Previous training history does not contain elements that would indicate a pattern of failure, without sufficient cause, to successfully pursue or complete programs, or a legal bar to employment in the desired field. More and more employers in this area are requiring high school completion for a new entrant to the field, even if the school does not make secondary completion an entrance requirement. Because of this trend, we strongly encourage continuation with HSE. In addition, a review and analysis will be completed regarding an individual's day care, other supportive service needs and family circumstances including any special needs of a child.
 4. Individual is able to meet the qualifications for entrance to training or training facility. Participation in education activities may be denied to individuals who engage in conduct that is disorderly, conduct that is insubordinate, conduct that is violent or conduct that endangers the safety, health, or welfare of others. Disciplinary action, when necessary, will be firm and fair and will be handled on a case by case basis. If necessary, services would be referred to an alternate partner or another site/partner in our area.
- 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.
1. Individual is a recipient of TANF SNA (indicating SNA households without children) or SNF (indicating SNA households with children, i.e., Safety Net families, SN-MOE), or SNAP and training is allowable under SNAP student rules.
 2. The recipient demonstrates based on his/her individual assessment and Employment Plan, that he/she possesses the necessary skills, abilities, and aptitude to successfully complete the proposed training and get a job in the field with the existing credentials. In addition, a review and analysis will be completed regarding an individual's day care, other supportive service needs and family circumstances including any special needs of a child.
 3. Previous training history does not contain elements that would indicate a pattern of failure, without sufficient cause, to successfully pursue or complete programs, or a legal bar to employment in the desired field.
 4. Individual is able to meet the qualifications for entrance to training or training facility.

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

The Finger Lakes Workforce Investment Board has an approved providers list for education and training programs. For training providers to receive WIOA funding the providers must be approved with meeting certain program criteria Seneca County uses the same list of approved training providers as the Finger Lakes Workforce Investment Board (WIB). These providers are approved by the local WIB which consists of 51% business representation

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

The case manager or training counselor refers and guides participants to the Finger Lakes WIB approved training provider list.

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

Recipients are notified through their case manager/counselor of approved training. WFDYB staff both assess and develop employment plans with clients. Notification in person or via phone or mail of approval and/or requirements of a work activity is the responsibility of the staff. Notification is also provided to the individual of the support services and resources to assist them in complying with the selected work activity(ies). This update is reflected in the employment plan.

- 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.

Attendance is monitored by TA staff. At the initial orientation the school is called to verify that the individual is enrolled as a full time student. TA sends an attendance verification to the school district to complete. The student then provides the social welfare examiner with a copy of their report card when issued.

- 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 Employment and Training Counselor discusses with the client any health-related documentation that has been received that indicates any work activity limitations. These may include physical health limitations such as heavy lifting, extended walking or standing, limited hours per week, mental health or substance use disorders. These are shared with the work experience sites in writing, Only the limitation of the activity is shared with the worksite, no specific health information is shared.

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):

A participant who was very close to achieving an educational credential in a demand occupation in this area might be approved for the post-secondary training needed to complete up to a baccalaureate. In general, we are more likely to see participants needing to complete an associate degree in a demand occupation and have approved the completion of the program of study. We have no public 4-year colleges within commuting distance but have approved for online classes. The district would approve up to a 4 year college program if in a demand occupation.

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

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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

5. Work Requirements

5.1 Meeting TA Work Requirements

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

Typically, 14 days elapse after an individual's case opening or status changes before they are engaged in a countable employment activity. The main strategy used to meet participation rates is ongoing monitoring of recipients by case managers and supervisor. When SNAP plus TA grant amount allows, the district's standard participation requirement for households with no children under age six is to assign 30 hours. For those households with a single caretaker of a child under age six the assignment is 20 hours. The district assigns all other case types up to 40 hours of work activities. An effort is made to assign enough hours to allow for cases of illness or other absences. Participation rates are monitored using Cognos and local reports.

- 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	150
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:

Staff assigned to TANF, SN-MOE and SN NON-MOE clients are responsible for checking on a monthly basis the Cognos Reports under OTDA, Employment Programs the TANF/SN MOE and the SN NON-MOE detail reports. Assigned staff check the reports to make sure that the reports reflect accurate information. Any errors found or changes are acted upon immediately to ensure accurate reporting. Communication between the DSS TA staff and WFDYB staff is crucial because some of the corrections can only be done on WMS by (DSS Temporary Assistance staff) and some can only be done on the WTWCMS system (WFDYB staff). The Deputy Director and the Deputy Commissioner review Cognos OTDA reports (Earned Income/Employment Report, Participation and Engagement Status Report, Preliminary Federal Countable Not Countable Report, Monthly Employability Code Summary Report and Worker Participation Engagement Summary Report, etc.) to assist staff in targeting areas for improving participation rates.

d. Does the district assign TA applicants to Job Search?

Yes

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:

Applicant Job Search

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	3	Job searches can be completed online, in person and utilize the job search booklet to verify searches in person. Job searches can also be conducted in the career center and completing online applications. Job searches are required weekly. The Employment and Training Counselor assigned to the client meets weekly, biweekly, or monthly as necessary to provide case management services support for job searches and identifying barriers to employment. Resource Room staff and Employment and Training Counselors are available to assist customers with their search, and complete online applications.
SNA Individuals	5	3	Job searches can be completed online, in person and utilize the job search booklet to verify searches in person. Job searches can also be conducted in the career center and completing online applications. Job searches are required weekly. The Employment and Training Counselor assigned to the client meets weekly, biweekly, or monthly as necessary to provide case management services support for job searches and identifying barriers to employment. Resource Room staff and Employment and Training Counselors are available to assist customers with their search, and complete online applications.

e. Does the district assign TA recipients to Job Search?

Yes

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.

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	3	Job searches can be completed online, in person and utilize the job search booklet to verify searches in person. Job searches can also be conducted in the career center and completing online applications. Job searches are required weekly up to 12 weeks at most. The Employment and Training Counselor assigned to the client meets weekly, biweekly, or monthly as necessary to provide case management services support for job searches and identifying barriers to employment. Resource Room staff and Employment and Training Counselors are available to assist customers with their search, and complete online applications.
SNA Individuals	5	3	SNA recipients are required to have 5 job search contacts per week up to 12 weeks at most, with a minimum of 3 hours per week required for job search efforts. The recipients are required to report to WFDYB on at least a monthly basis, depending upon the engagement in other work activities. Job searches can be completed online, in person and utilize the job search booklet to verify searches in person. Job searches can also be conducted in the Resource Room and completing online applications Job searches are required weekly. The Employment and Training Counselor assigned to the client meets weekly, biweekly, or monthly as necessary to provide case management services support for job searches and identifying barriers to employment. Resource Room staff and Employment and Training Counselors are available to assist customers with their search, and complete online applications.

- 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:

WFDYB staff are aware of the DSS 3-month income reporting form (streamlined profit & loss statement) for the rare applicants/recipients already earning through self-employment. Self-employed people can be scheduled to meet a business advisor from Onondaga Community College Small Business Development Center on the monthly appointment day in our office, and/or remotely at other times. We try to distinguish between hobbies and viable business ventures, with client self-sufficiency in mind, on a case-by-case basis. As for many entrepreneurs, often business development is only feasible as a supplement to employment for our clients. We encourage unlicensed, informal childcare providers making less than minimum wage either to expand by formalizing or to transition to work activities. Consideration is given to the parent's access to childcare for his/her own children, ability to develop or use in-demand skills, job-keeping history, transportation resources, and so on, in deciding if this arrangement is the best for now. If unlicensed childcare is not the best option, the recipient will be required to participate in the usual hours of activity weekly, not including the hours of provision of childcare. However, two weeks (or more if District permits

on a case-by-case basis) will be allowed for the recipient to give notice to the parents of the children in care and to secure replacement care for his/her own children.

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.

SNAP interviews both at intake and recertification are completed in person and over the phone. During the interview, the SNAP interview guide is used to explain SNAP households of work requirements. During the TA intake interview, an orientation packet is read to the client to explain eligibility requirements for TA, SNAP, and Workforce for compliance with the ongoing program. Once an employment determination has been made, the supervisor reviewing the case would issue the LDSS-5193/LDSS-5193A to the client either in person or by mail. At recertification, employability is reassessed for TA households.

- 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
Yes	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):

Seneca County does not mandate NTA SNAP recipients to participate in SNAP E & T work activities.

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

N/A

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

NTA SNAP applicants and recipients are informed of Job Search availability at intake and recertification either through face-to-face or telephone interview through the SNAP interview guide verbally. Applicants can contact Workforce Development Youth Bureau at any time for assistance or access the county's resource room for self-guided job search requests with an E&T counselor present.

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
Yes	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website: SNAP recipients are informed and encouraged to meet with the Department of Workforce Development Youth Bureau to assist with employment and training services that may be available to them. The weekly job leads are available online or can be printed in the resource room and Workforce Development staff is available to assist. Full time and Part time employment opportunities are listed as well as training programs in the 4-county region. If requested by a client, job lead information can be emailed to them. Additional copies are made available in the lobby area for clients to pick up when in the agency at their leisure.
Yes	Material and information provided via email.

5.5 Provider Determinations

- a. Not every activity assignment/referral to training might be the right fit for every participant. As such, districts are required per federal regulations at 7 CFR 273.7(c)(18) to have procedures in place for when a provider/contractor determines an individual is not a good fit for a particular activity or program they are referred or assigned to. This is called the provider determination process. Described below is the district's process for provider determination, including the process for screening individuals prior to referral to a provider, how to communicate information related to provider determinations with the district, how workers communicate information related to provider determinations with the client, and documenting provider determinations.

The Workforce Development Employment Counselor reviews the Job Matching Skills sheet that is completed by the client that provides a baseline for clients' interest in employment or training programs. The Counselor tries to match this interest and determine if there are additional skills or educational requirements to meet. There is open communication between the employer, work experience site or training provider. In compliance with 21-ADM-05, the provider has 10 days from the date of a provider determination to notify the district that a participant is not a good fit for a program. Districts are required to notify a mandatory or voluntary E&T participant with a provider determination within 10 days of receiving the notification from the E&T provider. Depending on the reason for the provider not feeling the participant is a good fit, the E&T counselor will meet with the client and discuss what caused them to lose the position.

- 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.

A program site is provided information verbally and in writing when necessary, informing them of their responsibility to provide supervision to the client and to report any issues to the Workforce Development Employment and Training Counselor so that it may be addressed. If the issues continue and is deemed to not be an appropriate placement, the client is removed from the program site and other potential sites are identified.

In accordance with 21 ADM 05, the providers are notified verbally that they have 10 days from the date of a provider determination to notify the district that a participant is not a good fit for a program. The notification must include the reason for the provider determination and may include input to the district on the most appropriate next step. If the provider is unable to provide the reason for the provider determination, the district should process the provider determination without the reason.

- c. Described below is the district process for provider oversight to ensure that provider determinations are not unfair or used to discriminate against protected classes.

The Department of Labor and Finger Lakes Workforce Investment Board provides oversight of the Equal Opportunity is the Law. The Finger Lakes Workforce Investment Board designated staff person is the local contact for filing an alleged allegation, grievance, or an affirmative action complaint. A copy of the steps involved in filing a grievance/complaint has been given to each participant. The staff person goes to the worksites, meets with participants, and worksite providers to ensure fair treatment for all participants.

6. Quality Assurance/Work Verification

6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences, and holidays; and is based on documentation in the case record; and

- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6
 - b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6
 - c. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA Employability Code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3
 - d. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 31 – “Parent or caretaker relative of a child under 12 months of age”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

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

6.2 Use of Outside Providers/Vendors

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

Childcare not to exceed the state allowed rates.

Employment related clothing - up to \$200

License and other work-related fees up to \$300

Job related safety equipment up to \$200.

Automobile repairs/towing up to \$1,000.

Automobile insurance up to \$600

Learners Permit/Driver's license and registration fees (Driving lessons as necessary, 5-hour course)

Transportation gas card or bus passes or the mileage reimbursement rate at the IRS established rate for medical/moving purposes.

Cabs or taxis on a very limited basis -case by case basis

Bicycles may be purchased on a case-by-case basis.

Other payments and limits on a case-by-case basis (i.e. - Fingerprinting for background checks)

The Workforce Development staff may refer customers to their local libraries for access to computers and internet access, and if necessary, bus passes or gas cards to get to the library.

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

Transportation Services Provided to Clients

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

Yes or No:	Transportation Assistance Provided
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)
N/A	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:

The maximum distance a client would be expected to walk is 1.5 miles to either a work site or public transportation. Weather conditions, physical and health limitations, safety of the route traveled would all be taken into consideration when making this determination. Medical limitations would also be documented when able from a medical provider to ensure safety of the client.

Public transportation has limited dial a ride available for those individuals not on the main transportation line. The maximum distance a client would be expected to walk is 1.5 miles. This is approximately a 30 minute walk to access other transportation or directly to work. The WFDYB will provide accommodations on a case by case basis for any individuals with limitations who walk to work activities.

- 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:

The district provides bus passes for transportation for people within the dial a ride availability or regular bus route. If a client is starting a job, and outside the bus route or hours of operation, a taxi service can be paid for to accommodate the client's work schedule, until the first pay is received, and the client is able to afford the transportation on their own income. The agency has also provided transportation for orientation or onboarding employment opportunities that are not able to be scheduled in the future or accommodations are not able to be met by any other means. The district also provides clothing for job interviews, hygiene products, or required clothing for a client to gain employment when required to start employment.

7.2 Post-Employment/Transitional Supportive Services

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

Employment related clothing

License and other work related fees

Job related safety equipment

Automobile repairs/towing

Transportation gas card or bus passes or the mileage reimbursement rate at the IRS established rate for medical/moving purposes. The agency on rare occasions, will reimburse for the actual cost based on reasonable documentation submitted by the work activity participant. Customers can call their Employment and Training Assistants or Counselors for any follow up needs such as supports listed above.

- 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:

The district will provide the services described in Section 7.1 to individuals to maintain employment for up to 90 days after case closing due to employment. Such services will be provided on a case-by-case basis, requiring verification as necessary to establish need.

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.):

Employment related clothing

License and other work related fees

Job related safety equipment

Automobile repairs/towing

Automobile insurance

Transportation gas card or bus passes

If the individual has transportation, and gas cards are not the best mechanism, the mileage reimbursement rate is the IRS established rate for medical/moving purposes. The agency, on rare occasions, will reimburse for the actual cost based on reasonable documentation submitted by the work activity.

8. Conciliation, Sanction and Dispute Resolution Procedures

8.1 Conciliation

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

How the District Conducts Conciliation for TA Applicants and Recipients

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

The districts process for conduction TA conciliations is described below:

A conciliation notice is issued when it is determined that an individual has refused or failed to comply with employment requirements. The Social Welfare Examiner and the Employment and Training Assistant/Counselor will consult and review all conciliations and assess for positive resolution. If it is determined that the individual was not willful, and/or had good cause for the failure to comply with employment requirements, no negative action will be taken. If there is a disagreement supervision from both departments will provide guidance.

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

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

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

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

How the District Conducts Conciliation for SNAP Applicants and Recipients

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

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

A conciliation notice is issued when it is determined that an individual has refused or failed to comply with employment requirements. If it is determined that the individual was not willful, and/or had good cause for the failure to comply with employment requirements, no negative action will be taken. The district will offer recipients the opportunity to demonstrate compliance to avoid a SNAP sanction during the conciliation process, unless the individual documents good cause or they provide documentation they are exempt from SNAP work requirements.

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

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

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

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

The district will offer recipients the opportunity to demonstrate compliance to avoid a SNAP sanction during the conciliation process, unless the individual documents good cause or that they provide documentation they are exempt from SNAP work requirements. The SNAP client could come in and complete the required task, such as completing 3 hours of job search or engaging in an employment related workshop or work experience. to prevent a sanction from being imposed.

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:

If an individual wishes to end their employment sanction they must contact their Workforce Development Youth Bureau Employment worker. They must verbally indicate a willingness to comply and complete the assigned activity such as Job search, or Work Experience. If the individual complies for 10 days, they will be deemed in compliance and the sanction will be lifted. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply.

- b. Describe below the district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 18 NYCRR 385.13), including the time period established for demonstrating compliance to the satisfaction of the district:

If an individual wishes to end their employment sanction they must contact their Workforce Development Youth Bureau Employment worker. They must verbally agree and demonstrate compliance by completing the assigned employment activity such as job searches or work experience. If the individual complies for the 10 days, they will be deemed in compliance and the sanction will be lifted. SNAP benefits are restored when the duration of sanction has expired, and client demonstrates compliance to the satisfaction of the district. An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefit.

8.3 Dispute Resolution

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

Grievance Mediation

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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

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

Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual's disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
No	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: The DSS Social Welfare Examiner requests the LDSS-4526 form(s) be completed by the applicant's physician/health care provider/mental health counselor, addiction counselor, etc. and returned within 10 days of the intake date.

- b. Described below is the district's procedure for notifying an individual of their exempt or non-exempt determination whenever an individual alleges to be unable to participate, or the individual otherwise participates in the employability disability review, including when an individual is notified that their status changes from exempt to non-exempt:

The District Utilizes the LDSS-4526 form and accepts this statement from the client's physician(s).

At the application stage, if an applicant states a disability, either physical, mental health, or both, the Social Welfare Examiner requests the LDSS-4526 form(s) be completed by the applicant's physician and returned within 10 days of the intake date. Once the form is returned, the DSS Social Welfare Examiner makes their determination of work limitations and the appropriate employment code.

WFDYB and TA staff regularly share medical reports, regardless of who requested them for our mutual clients. TA requests medicals at application and recertification appointments for anyone who discloses a disability or medical/psychiatric limitation. WFDYB requests the medical when the client has disclosed additional information or when a known limitation of 1-3 months duration needs to be rechecked, or when additional medical information is needed to assist a client whose conditions are managed by multiple doctors' offices. The 4005 A

form is used to notify the client of their determination. The LDSS-4005 and the 4005A forms are used to notify the client of their determination.

- 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 a retains a copy in the case record.
No	The district sends a local equivalent and retains a copy in the case record.

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

Process for Reviewing Medical Documentation

Yes or No:	District’s process for reviewing medical documentation
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: The medical documentation is reviewed and discussed by the Social Welfare Examiner and Principal Social Welfare Examiner to determine if the documentation supports an exempt, nonexempt or work limited status. If the information does not clearly support the recommendation or there is disagreement with the determination, the Deputy Commissioner/s will discuss with the Social Welfare Examiner and Principal Social Welfare Examiner the information and decide on the appropriate status and employment code.

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?

Yes

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

We currently do not use the Mental Health Screening and Assessment Tool but will be implementing this tool for the 2024-2025 plan. Our Temporary Assistance Social Welfare Examiner staff will be completing the required training this year. An applicant or recipient that is in our lobby waiting to apply for assistance or an interview that may be exhibiting physical or emotional behaviors that may indicate the need for a mental health screening. This may also occur during the interview for assistance as additional information is received from the applicant or recipient.

- 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
Yes	LDSS 5009 - Mental Health Screening Tool
Yes	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.

The district has decided to use 7 as the cutoff score for referral for a mental health evaluation.

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

If the screening tool is 7 or above, the Social Welfare Examiner will make a referral to our contracted Mental Health professional for further evaluation to determine appropriate referral for services and/or treatment. The mental health professional will make the referral and track attendance and progress on a monthly basis and report this to the Social Welfare Examiner for compliance. The Mental Health professional is located in a separate private provider area within the Division of Human Services area.

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.).

We capture from medical reports (LDSS-4526 and facility-specific forms) the treatment or additional assessment recommendations made by medical practitioners and other health care practitioners. Their recommendations become the foundation of the person's self-sufficiency plan. We rely heavily on the answers in the LDSS-4526, all medical diagnoses and specify medical/clinical findings, including prognoses and how long each condition is expected to last, recommendations for additional treatment, and the SSI referral section to help distinguish between the SSI/SSDI-only path, and the path to return to employment. Much of this also depends on the ability of the person with limitations to be either accommodated at work or retrained in another field.

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

The treatment plans components are harvested from the various medical reports. When we suspect additional factors, as yet undiagnosed, we add referrals to other sources of assessment. Professional assessment using Medicaid can be difficult to find. We make facilitated referrals to Mozaic- formerly known as ARC of Seneca County when we suspect an undiagnosed developmental cognitive disability. When a neuropsychological exam is warranted for a person suspected of other mental disabilities to assess a wide range of mental functions, we make a facilitated referral to ACCES-VR for the diagnostic tests, but only for those whose goal is vocational rehabilitation.

- 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.

WFDYB requires monthly documentation from most exempt clients of their attendance at the treatment or rehabilitative providers mentioned in their self-sufficiency plan. Workforce Development Youth Bureau Employment staff will track the compliance with the treatment plan. New medical reports (requested by the TA unit at recertification) or when new

limitations are updated then a TA Referral to Workforce change form is sent over. (See Attached Form)

10. District Certification

10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Seneca County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2024 through December 31, 2025. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations, and provisions of this Plan.

2/2/2024

Michael Whirtley
Interim Commissioner