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Local Commissioners Memorandum

Section 1

Transmittal:	21-LCM-14
To:	Social Services District Commissioners
Issuing Division/Office:	Employment and Income Support Programs
Date:	September 22, 2021
Subject:	2022-2023 Biennial Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan
Contact Person(s):	Emily Maher, Emily.Maher@otda.ny.gov
Attachments:	Attachment A – TA and SNAP Employment Plan Template Attachment B – Guide to Completion of the 2022-2023 Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan Attachment C – Biennial Employment Plan System (BEPS) District User Manual Attachment D – Section Change Chart Attachment E – Biennial Employment Plan System (BEPS) District System Administrator User Manual

Section 2

I. Purpose

The purpose of this Local Commissioners Memorandum (LCM) is to instruct social services districts (districts) to develop and submit for review and approval their 2022-2023 Biennial Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the Office of Temporary and Disability Assistance (OTDA) no later than November 5, 2021. The TA and SNAP Employment Plan Template is included as Attachment A, the Guide to Completion of the 2022-2023 TA and SNAP Employment Plan is included as Attachment B, the Biennial Employment Plan System (BEPS) District User Manual is included as Attachment C, the Section Change Chart is included as Attachment D, and the Biennial Employment Plan System (BEPS) District System Administrator User Manual as Attachment E. The LCM and all five attachments will be stored in the new Biennial Employment Plan System (BEPS) for district access.

II. Background

Section 333 of the New York State Social Services Law requires that every two years each district submit to OTDA for approval a plan that describes the district's employment services program. The Plan must include a description of the provision of education, work, training, and support services for all TA and SNAP applicants and recipients along with other information required by OTDA.

State regulations at 18 NYCRR 385 set forth the requirements of TA and SNAP employment programs, including the administration of local employment plans.

III. Program Implications

The Plan outlines local policy governing programs operated to provide employment services for TA and SNAP applicants and recipients as well as optional non-assistance services for individuals eligible for Temporary Assistance for Needy Families (TANF) services with incomes up to 200% of the federal poverty level. The Plan covers many aspects of district employment services such as the district's policy and/or procedure for participant assessments and employment plans, approval of training programs, disability determinations and work accommodation procedures, available support services, work activities offered, program partners, work verification procedures, and conciliation procedures. The activity definitions and other sections are consistent with the requirements included in 08 ADM-07.

Updates for the 2022-2023 Plan Year

For the 2022-2023 Plan submission, districts will access their Plan template through a new web-based application called the Biennial Employment Plan System (BEPS). BEPS allows district users who have been provisioned access and roles specific to BEPS to enter information and submit the Plans directly to OTDA for review all within the application. OTDA staff will then review and approve each district's plan within the application. District staff will be able to upload required documentation into a district specific document repository and all team members (Employment Coordinator, the OTDA Employment Services Advisor (ESA), and other staff, as needed) will have access. Additionally, staff will be able to create and print a copy of the Plan directly from BEPS while they are drafting it and after it has been completed. Please see Attachments B and C for information regarding answering specific questions and district user information for the system. The Biennial Employment Plan SharePoint site will continue to store the 2020-2021 district Plans and other prior years' approved Plans and related documentation, per OTDA retention policies. The SharePoint site is available for district staff, granted systems access and a role, to access should the need arise to review a prior year Plan.

With the BEPS implementation, sections of the Plan have been rearranged and do not correlate with the previous years' Plans. Please see Attachment D for a full listing of section and subsection changes. Along with renumbering the sections and subsections from the 2021-2022 TA and SNAP Biennial Employment Plans and the minor language changes for readability, the following sections and subsections have been added to the Plan. Below is a list of the major changes for the 2022-2023 Plan:

- Subsection 1.2(c) – TA and SNAP Employment and Training (SNAP E&T) Provider Agencies. A new question was added asking districts to describe the process they use to monitor district held contracts or agreements with providers that receive TANF and/or SNAP E&T funds for employment services.
- Section 2 – Orientation, Assessment, and Employment Plan (New) – Added a standalone section for orientation, assessment, and employment plan. The subsections within this section are not new and were taken from the former Section 3 – Engagement and Work Preparation in the 2020-2021 Biennial Employment Plan.
- Section 5 – Work requirements. This section was part of Section 3 – Engagement and Work preparation in the 2020-2021 Biennial Employment Plan. It is now a standalone section. This is a new section and brings Meeting TA Work Requirements and Meeting SNAP Work Requirements into their own standalone section.
- Subsection 6.2 – Use of Outside Providers/Vendors. This is a new section to the Biennial Employment Plan. This subsection asks districts if they use an outside provider/vendor to collect documentation and enter directly into the Welfare to Work Case Management System (WTWCMS). If so, OTDA would like to know if the providers/vendors follow the same process that is used by the district worker. If not, the district is asked to describe the process.
- Subsection 7.2 – Post-Employment/Transitional Supportive Services. This subsection's title was changed. It was formerly subsection 4.2 – Transitional Support Services.

- Section 10 – Certification. This is a new section. The district Commissioner, or designee, must certify the district's Biennial Employment Plan and electronically sign it before submitting to OTDA via BEPS.

Within BEPS, there are certain character limitations. District users should make special note of the following:

- The following questions have a text box limit of 4,000 characters and all other sections with a text box, have limit of 2,500 characters:

  - 2 – Orientation, Assessment, and Employment Plan
    - 2.1a
    - 2.2a
    - 2.2b
  - 3 – Engagement
    - 3.1a
    - 3.2a
  - 4 – Work Activities
    - 4.2a
    - 4.3a
    - 4.3b
  - 5 – Work Requirements
    - 5.1a
    - 5.1c
    - 5.1d
    - 5.1e
    - 5.1f
  - 7 – Supportive Services
    - 7.1a
  - 9 – Disability Determinations
    - 9.1a
    - 9.3a

  - Within the text boxes, regardless of character limit, users will not be notified they have exceeded the character limit in any boxes in the system until they click the "save" button for that section. The system will not stop users from typing once they have reached the character limit and any text within a box that has exceeded the character limit will not be saved. This includes the text within the character limit.
  - A best practice for the 2022-2023 Plan will be for users to complete a character count of each section before entering the information into the text box.
  - Any necessary information that exceeds the character limit for a question can be saved separately and uploaded in the district specific document repository.

- Additionally, district users may copy and paste responses from prior MS Word versions of the biennial TA and SNAP Employment Plans directly into corresponding questions in BEPS. Users should ensure that when doing so, non-alphanumeric characters are not turned into erroneous symbols during the copying/pasting process. Given that the template has changed, districts should also ensure that the information copied from prior MS Word versions are pasted in the appropriate section and adequately addresses the information requested.

District Access to BEPS

District staff must be assigned a role to access BEPS. District roles and their associated permissions are as follows:

- District Viewer – can view, but cannot make any changes to the Plan;
- District User – can view and make changes to the Plan, but cannot submit;
- District Submitter – can view, make changes, and submit the Plan; and,
- District System Administrator – can give district staff access to the system as one of the three previously mentioned roles (direction on how to grant access to BEPS is outlined in Attachment E).

Prior to the release of this LCM, OTDA reached out to districts to submit designees for the above-mentioned user roles. Users and roles indicated by each district are now active in BEPS. Districts may add new users or update user roles at any time. Only the BEPS District System Administrator or OTDA Plan Managers can add or remove users or change roles. If users do not know who their District System Administrator is, they should contact their ESA for assistance.

Plan Submission Process

Districts must concurrently submit their draft Plan to OTDA via BEPS for review and comment and release for a 30-day public comment period. This must occur no later than November 5, 2021. District users can upload required attachments (and additional information that exceeds the text box limit as described above) into the district specific document repository in BEPS.

Districts will receive a comment letter indicating any changes identified by OTDA that must be made prior to Plan approval. Districts must incorporate any OTDA required changes along with any changes necessary, as a result of the public comment process and resubmit the final Plan for approval by the due date included in the comment letter. Districts should not resubmit their revised Plans to OTDA until after the 30-day public comment period had ended. The Commissioner or their designee, must certify the district's Plan with their electronic signature and submit it, along with any applicable attachments, in BEPS for approval. Once the final Plan has been submitted, districts must contact Emily Maher at: Emily.Maher@otda.ny.gov to inform her that the final Plan has been submitted.

Each district will receive written notification of Plan approval. Copies of all approved Plans will be provided to the Office of Administrative Fair Hearings to support hearing decisions and will also be made available for public review on the OTDA website.

Amendments

Districts that wish to make amendments to their approved Plans may do so at any time. In order to make an amendment, the district must notify their ESA to let them know they will be making a change and which sections are being modified. Districts must submit any amended attachments with their Plans at this time as well. Districts should also work with their ESA to make these changes. OTDA will fill out the Amendments tab in BEPS, which lists the sections amended. District staff granted the District User or District Submitter role may access BEPS to make updates, and the District Submitter(s) may resubmit the Plan. Districts must also remember to put their amended Plans out for a 30-day public comment period after the change has been made. Districts must notify their ESA if any changes from the public comment period have been added to the Plan. Once OTDA has reviewed and approved the amended Plan, the district will receive written notification of its approval.

Issued By:
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Division/Office: Office of Temporary and Disability Assistance