



Office of Temporary and Disability Assistance

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Governor

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Local Commissioners Memorandum

Section 1

Transmittal:	23-LCM-15
To:	Social Services District Commissioners
Issuing Division/Office:	Employment and Income Supports Programs
Date:	September 13, 2023
Subject:	2024-2025 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 – 2024-2025 TA and SNAP Employment Plan Template Attachment B – Guide to Completion of the 2024-2025 Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan Attachment C – Biennial Employment Plan System (BEPS) District User Manual Attachment D – Biennial Employment Plan System (BEPS) District System Administrator User Manual

Section 2

I. Purpose

The purpose of this Local Commissioners Memorandum (LCM) is to provide instructions to social services districts (districts) regarding the development and submission of their 2024-2025 Biennial Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the Office of Temporary and Disability Assistance (OTDA) for review and approval. Plans are due to OTDA no later than October 27, 2023. The TA and SNAP Employment Plan Template is included as Attachment A, the Guide to Completion of the 2024-2025 TA and SNAP Employment Plan is included as Attachment B, the Biennial Employment Plan System (BEPS) District User Manual is included as Attachment C, and the Biennial Employment Plan System (BEPS) District System Administrator User Manual as Attachment D. The LCM and all four attachments will be stored in the Biennial Employment Plan System ([BEPS](#)) for district access.

II. Background

In accordance with § 333 of the New York State Social Services Law and department regulation 18 NYCRR 325.10, every two years each district must submit a plan for OTDA approval that describes the district’s employment services program. The Plan must include a description of how the district provides education, work, training, and support services for all TA and SNAP applicants and recipients along with other information required by OTDA.

III. Program Implications

The Plan outlines local policy governing programs that 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](#).

For the 2024-2025 Plan submission, districts will access their Plan template through the web-based [BEPS](#) application. BEPS allows district users who have been provisioned specific access and roles 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 (the district 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. OTDA continues to maintain the [Biennial Employment Plan SharePoint](#) and will use it to store districts' prior approved Plans and related documentation, per OTDA retention policies. Anyone who requires access to review a prior year Plan should reach out to their ESA.

Updates for the 2024-2025 Plan Year

Below is a list of the major changes for the 2024-2025 Plan:

- Subsection 4.1(a) – Allowable Work Activities. Family Assistance, Safety Net Assistance Families, and Safety Net Assistance Individuals have been removed as case types eligible to participate in SNAP E&T Supervised Job Search.
- Subsection 4.4(b) – This question was 4.4(c) in the 2022-2023 Plan. The previous question 4.4(b) has been removed from the 2024-2025 Plan as it is no longer needed.
- Subsection 5.2 – Informing SNAP Applicants and Recipients of Work Requirements. This new subsection was added with four questions to address how districts inform SNAP applicants and recipients of work requirements.
- Subsection 5.3 – Meeting SNAP Work Requirements. This was subsection 5.2 in the 2022-2023 Plan.
- Subsection 5.4 – Advising Households of Employment and Training Services. This new subsection was added with two questions to address how districts are advising households of employment and training services.
- Subsection 5.5 – Provider Determinations. This new subsection was added with three new questions to address how districts are providing information to providers and clients about work activities that may not suit certain clients.
- Subsection 9.1 – Disability Determinations Process and Tools. Two new questions were added about the district's procedure for determining disabilities.

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.:
 - 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
- All other sections with a text box have a limit of 2,500 characters.
- Within all the text boxes, regardless of character limit, users will not be notified if they have exceeded the character limit until they click the “save” button for that section. The system will not stop users from typing once they have reached the character limit. Any text within a box that has exceeded the character limit will not be saved, including the text that is within the character limit.
- A best practice for the 2024-2025 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 in BEPS.
- Additionally, district users may copy and paste responses from prior 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. District users should also ensure that the response copied from prior versions is pasted in the appropriate section and adequately addresses the information requested.

District Access to BEPS

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

- District Viewer – can view, but cannot make any changes to the Plan or submit;

- 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 D).

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 release it for a 30-day public comment period. This must occur no later than October 27, 2023. District users can upload required attachments (and any 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 necessary changes resulting from the public comment process, and resubmit the final revised 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 has 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 and 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. If required, districts must put their Plan out for a 30-day public comment period after it has been amended. 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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Title: Deputy Commissioner

Division/Office: Employment and Income Support Programs/Office of Temporary and Disability Assistance