

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

January 1, 2020 – December 31, 2021

Allegany County

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Section 1- Assurances

As a condition of the receipt of federal and State funds the Allegany 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, 2020 through December 31, 2021. As Commissioner of Allegany County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

/s/ EBK 01/28/2020

Edna B. Kayes , Social Services Commissioner

01/28/2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

Section 2 Administration

Section 2.1 Administrative Structure

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.

Following 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. The responsibilities of each office are described below.

The Allegany County Department of Social Services Employment Unit is part of the Temporary Assistance Division. It is comprised of a Principal Social Welfare Examiner (PSWE) who is responsible to oversee the program. In addition this unit employs one (1) Sr. Social Welfare Examiner who supervises the day to day operations, four (4) Employment Specialists, one (1) mobile JOBTRAK crew Supervisor who transports and supervises a team of individuals assigned to work experience activities. This agency has added one (1) contracted Agency Counselor who handles CASAC duties as well as Mental Health evaluations, and one (1) Case Manager who handles sanctioned individuals as well as individuals requiring intensive case management to become employable.

Attached please find the Employment & Training Center organizational chart as the majority of our employment services are provided by this agency.

Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies

Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services

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 assessments 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 oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Allegany Co ET&C	\$423,774.	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Employment assessments, related skills & aptitude test, career counseling, employment plans; job skill, readiness, development & placement; referrals for supportive services; enroll in vocational/educational programs
STTT(Sout hern Tier Traveling Teachers)	\$136,046.	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Identify and reduce barriers to self-sufficiency and job placement; job retention services; statistics and summary analysis of same. Evaluate for success in obtaining HSE and for job retention; provide materials and in-home tutoring for HSE, case management services; assess strengths and needs in both general functional areas and in employment specific areas, and assist person with improving areas of need.
ACASA	\$45,683.	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Agency Counselor
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Table 2 – Other Service Providers

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.

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
BOCES		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Adult Education, Career Counseling
ACCESS-VR		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Career Counseling, Education, Training
ACCORD	TANF	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Community Solutions for Transportation/WHEELS FOR WORK, ASSET program
Literacy West		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Education, Training and HSE
LAWNY		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assistance in Appealing SSI/SSD denials
AIM		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assistance in the SSI/SSD application process
Clarity Wellness		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	PROS (Day Treatment Program) and Mental Health
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Section 2.3 OTDA Jobs Staff Agreement

OTDA Jobs Program Services – Target Groups

(“X” signifies those that apply in this district)

Services	=	Target Groups	=
Assessment/Employment Plan	=	Applicants	=
Supervised Job Search	=	FA & SNA with children	=
Job Readiness Training	=	SNA without Children	=
Job Club	=	SNAP	=
Job Placement Services	=	TANF 200%	=
Grant Diversion	=		=
Job Development (employer outreach)	=		=
WOTC pre-certifications	=		=

Other Services Requested

Described below are additional services/duties which will be requested of Jobs staff (e.g. WTWCMS data entry, case conferencing, job fairs)

Section 2.4 Access to Services at New York State Career Centers

In New York State, TANF is a required WIOA partner and must coordinate access to TANF services with the comprehensive Career Centers.

a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:

- The district has employee(s) physically present at a Career Center
- The district has contract staff physically present at a Career Center
- The district makes available direct access to its program staff via phone or technology at a Career Center
- The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
- Other:

b. Please provide a description of how the district coordinates with Career Center partners with providing services to the district’s clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

The district contracts with the Allegany County Employment and Training Center for various services. Information is shared with the E&TC staff through WTWCMS as well as by paper referrals. ACDSS also contracts with Souther Tier Traveling Teachers, which is located in Wellsville, NY. The Southern Tier Traveling Teachers meet with individuals at various locations. Information is shared by referral and case conferencing. Monthly and quarterly reports are submitted to the district by both entities as per contract. These reports include Quantitative reports, Narrative reports and Financial reports.

Section 3 Engagement and Work Preparation

Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))

For purposes of satisfying the federal requirement which states 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, 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 3.4. Also included is pursuit of other forms of income such as SSI and SSDI.

Include any additional information regarding the district’s local “engaged in work” requirements:

Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Check one of the following:

The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.

In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

Described below is the manner in which the district completes the required orientation for all applicants and recipients of TA (e.g. in a group setting, individually, or a combination of both), including the orientation procedure for exempt individuals and non-exempt individuals, if different:

Specifically, ACDSS employment staff and Allegany County Employment and Training Center staff conduct orientations on a one-to-one basis for applicants starting at the time of their initial interview for assistance. Recipients receive additional individualized orientation from the TA Employment Unit before starting a work experience program and at recertification, and/or as indicated on their individualized employment plan. Information is given to clients both orally and written. Included in the orientation is:

- education, employment and training opportunities available, including those which are available at no cost to the individual and those which are available in the local district according to its employment plan. Emphasis on non-exempt recipients who have not attained a basic literacy level to strongly encourage that population to enroll in basic literacy. Equally so, non-exempt recipients who have attained a basic literacy level to strongly encourage them to enroll in activities that will allow them to obtain their high school diploma or equivalent
- the participant's responsibilities associated with the repayment of student financial aid as applicable

- supportive services available through the district and the obligations of the district to provide them;
- work activities available through the local district and the local district's obligation, if any, regarding those activities;
- the types and settings of reasonable accessible child care services for individuals assigned to work activities, and how such services will be provided and financed;
- the assistance available upon request to help individuals assigned to work activities select and obtain child care services; and,
- the individual's responsibility to cooperate in establishing paternity and enforcing child support obligations.
- information provided on time limits.
- the individual's opportunity to receive child care assistance in lieu of Temporary Assistance

Section 3.3 Assessment and Employment Planning

TA Assessment

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):

The district enters assessments directly into WTCMS

The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.

The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.

The local equivalent does not contain additional elements other than what is required.

The local equivalent does contain additional elements beyond what is required, listed below:

b. Describe the district procedure for the completion of an employment assessment:

Employment Assessments are completed after the initial application for benefits. Assessments are done on a one-to-one basis and we do not allow for individual self-assessments. In instances where there are individuals on the case that are not in the office on the date of application, i.e. 16/17 year old individuals living in the home, and not in school, an appointment is scheduled within 10 days for completion of the assessment. The depth and variety of questions enables the worker to gain relevant information about the client's strengths and barriers in order to form a strategy to assist the individual in

obtaining employment or self-sufficiency. We have a case manager who specifically works with TA recipients when referred by their worker for case management services due to multiple barriers. In addition to the WTCMS assessment, the agency uses TABE test, recert assessments, and Self-Sufficiency plans including goal setting activity for cases with a time limit of 42 months or more. After reaching 58 months a Self-sufficiency Assessment and a Transition Plan to Self-sufficiency is completed with them.

- c. The district administrative unit or contractor responsible for conducting assessments is:
DSS Employment Unit and E&TC staff
- d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]
Employment Specialist with an Associates Degree or equivalent ACDSS experience or higher title.
- e. Applicants in households **with** dependent children are required to participate in completion of an assessment:
 Yes No
- f. Applicants in households **without** dependent children are required to participate in completion of an assessment:
 Yes No
- g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:
 Yes No
- h. How often and under what circumstances is the assessment updated?
At minimum, once yearly for exempt and non-exempt

Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:
 - The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
 - The district enters employment plans directly into WTCMS.
 - The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTCMS.
 - The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent.
 - The local equivalent **does not** contain additional elements other than what is required.

The local equivalent **does** contain additional elements beyond what is required, listed below:

- b. Check one of the following:
 - The same administrative unit or contractor that conducts employment assessments also develops employment plans.
 - A different district administrative unit or contractor develops employment plans, and their qualifications include
- c. Describe the district procedure for the completion of an individual's employment plan.
Employment Unit staff completes plan with individual as part of the assessment process.
- d. How often and under what circumstances is the employment plan updated?
Monthly for non-exempt and yearly for exempt.

Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)

- a. Describe below how the district plans to meet federal and State TA participation rate requirements. Included is the weekly hours standard participation requirement 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 who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

Applicants are engaged in job search from the date of application and have to meet with and provide the DSS Employment Unit or E & TC staff their job search verification weekly after case opening. Non-exempt TANF & SN households may be required to complete up to 35 hours of work-related activities with WEP hours being limited to the monthly PA grant plus the Supplemental Nutrition Assistance Program (SNAP) allotment divided by the State or Federal minimum wage, whichever is higher. However, hours of participation are determined on a case by case basis as appropriate due to work limitations, child under 6 in the household or other case circumstances.

We meet with recipients monthly to review employment goals and update their Employment Plan as needed to accomplish new goals. These monthly appointments continue until the case closes, the recipient obtains employment or becomes unemployable.

Exempt clients are tracked and monitored by the Employment Unit and are engaged in countable activities once they become non-exempt. The District tracks participants through use of the various reports available (e.g. COGNOS), and plans to continue to maintain timely WTCMS entries, and engage non-exempt clients in a timely manner to maximize countable participation.

- b. Estimate the number of individuals expected to receive employment services:

	Households with	Households without
--	-----------------	--------------------

	Dependent Children Average Monthly	Dependent Children Average Monthly
Individuals	75	110

- c. Describe below how the district uses work participation management reports available through COGNOS or other reports and activities to monitor district progress toward meeting work participation requirements and ensuring full engagement by adults in work or work preparation activities:

The Employment Unit staff receives the COGNOS reports on a regular basis They review the lists to determine if an individual is meeting the necessary requirements. They then would call any individuals that appear on the list that may not be fully engaged in an activity to their ability.

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) recipients to participate in SNAP E&T work activities. If the district is offering Supervised Job Search as an E&T activity component, the district must describe how the job search activity will be supervised and tracked, including the frequency of monitoring the participant’s job search efforts. (Please note: Case management services must be provided to all participants enrolled in an E&T activity):

Allegany County does not mandate work activities for NTA-SNAP applicants or recipients.

If the district is not mandating SNAP E&T work activity assignments, please describe 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 make available job search as a SNAP E&T activity to NTA SNAP applicants and recipients):

Referrals are made to the Employment and Training center where they are educated regarding services available and for assistance with job search activities.

- e. Describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also 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:

1. The district assigns TA **applicants** to Job Search. Yes No

If yes, the process for engaging TA **applicants** is:

Non-exempt applicants for Temporary Assistance are required to do 20 job search contacts within a 30 day period. The applicants are given a job search log in which it is documented the time spent on the contact. Applicants for Temporary Assistance will be seen after the 30-day period so that they may report their job search outcomes. This follow-up will be done by an Employment and Training Counselor. After successful completion of their job search, the recipient is given a return date of 90 days from completion date. This on-going self-directed job search effort is monitored by a DSS Employment Specialist. Also, during the initial application

period, an applicant is required to initiate their work experience physical and be scheduled for their TABE test.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	15	20	unless otherwise indicated in the individualized employment plan
SNA Individuals	15	20	same as above

2. The district assigns TA **recipients** to Job Search. Yes No

If yes, the process for engaging TA **recipients** is:

Non-exempt recipients of Public Assistance continue to be required to do job search. The requirement is 5 contacts per week. These outcomes are reported on the job search log and followed up at individual meetings with their Sr. Employment Counselors weekly. The minimum required weekly hours will be determined by a coordinated effort with Employment and Training staff and DSS staff. The outcomes as stated previously are reported on a job search log and reported to their counselor. The E & TC monitors the job search log for SNAP recipients on a regular basis for individuals enrolled in Job Search as an activity in WTWCMS.

f. Describe the district’s process and policy, including the guidelines workers follow, when determining whether participation in self-employment is approved as part of an individual’s required work activities. If the district always approves self-employment as part of an individual’s required work activities, please note this policy below. When an individual identifies to the Agency they are participating in self-employment, the Agency will accept all self-employment as an eligible work activity. The hours of eligible participation are determined by the reported self-employment income divided by the higher of the federal or state minimum wage. If the eligible hours are not sufficient to meet the individuals hourly participation requirements as described in Section 3.4, the individual must participate in additional activities. The Agency will re-evaluate the income being generated by the self-employment on a quarterly basis and re-determine if the self-employment will be approved as a work activity.

g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>On-the-Job Training (OJT) - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> • Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance. • Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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, 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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<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>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>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.</p>

Section 3.5 Job Development

The district conducts or accesses job development services to expand job opportunities for TA and SNAP participants. Yes No

If yes, the district participates in job development activities in the following manner:

District staff contacts employers to solicit jobs for TA and SNAP participants.

Below is the description of how this is done, including number of staff, frequency of contacts, etc.:

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Below is the description of how this is done, including number of staff, frequency of contacts.

Our contract with the Allegany County Employment and Training Center provides for 10% of their Job Developer employee's salary. This individual provides job development services as needed to assist referred individuals to obtain employment leading to financial self-sufficiency, including TEAP (Temporary Employment Assistance Program) contracts.

OTDA Jobs Program staff are charged with job development as indicated in section 2.3. Additional information, if any, is described below:

Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

- a. Describe how the district identifies appropriate education program providers for services of Adult Basic Education, 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:

The assessment done by our agency identifies individuals who need educational services. The intake process at the E&TC is also an indicator of the need for educational services. It is possible for the client to be referred to an education program by either ACDSS or the E&TC. Providers of educational services are identified by the Employment and Training Center who has a long working relationship with these entities

- b. Describe 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:

Similar to educational activities, the assessment is the primary source for identification for either vocational education or job skills programs. The E&TC also identifies potential clients, as well as our Department, based on their evaluation. Potential clients may be referred by ACDSS or E&TC, to a contracted staff person at the E&TC who does the school approvals for vocational rehabilitation. Either E&TC staff or ACDSS staff will do referrals for Job Skills. Employment and Training staff have a roster of area providers

that specialize in vocational education and job skills programs geared to our clients. This list is the result of a long established relationship with these providers.

- c. Describe the process and guideline 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 department refers non-exempt recipients who have not attained the HSE to Southern Tier Traveling Teachers for assistance in completing their HSE. This is a requirement that is incorporated into their employment plan.

Non-exempt recipients who have not attained a basic literacy level are also referred to Southern Tier Traveling Teachers and Literacy West for an evaluation. Our county utilizes a TABE score of 9 or below for determining if someone has obtained a basic literacy level. These agencies will evaluate individuals to determine if they will work with them to increase their literacy level to hopefully attain a HSE or if referrals need to be made to ACCES-VR or Allegany ARC to take advantage of their services. These activities are a requirement and incorporated into their employment plan.

- d. Describe the district's process and policy, including the guideline 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 agency would deny participation in educational activities:

Through the assessment process the determination is made whether an individual has attained a basic literacy level or has not received their high school diploma. The employment worker will advise the individual that the improvement of basic literacy skills as well as job skills training can expand their employment opportunities. If the applicant is interested in attaining basic literacy levels or their high school diploma we refer them to STTT or BOCES. The Literacy West in Allegany County was awarded a federal grant to provide educational and support services to individuals and families seeking pathways out of poverty. We have a close working relationship with them and utilize them as a resource for individuals who need additional assistance in securing their high school diploma or HSE. This educational activity is incorporated into their employment plan, as they have agreed to do this. For individuals who are not interested, we would provide the individual with the employment opportunity mentioned above and advise if they become interested they should contact their employment worker. However, this activity would not be incorporated into their employment plan.

The circumstances when individuals may be denied participation in educational activities would include situations such as: individuals starting but not completing training(s) in the past with no reasonable explanation as to why they quit, individuals already having three or four trainings making them currently employment ready and requests for unsuitable training (training would not increase the employability of the individual).

- e. Describe the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities:
To determine an individual's participation in this program, the counselor will look at their current education, conduct a TABE test if necessary and inquire as to how the individual intends to pay for it. The major factor into whether this schooling is approved will be if it

is a "high demand occupation." Dependent on the number of hours a week an individual will participate in a vocational education program, the department may assign an individual to a work experience slot.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:
The district will approve up to 12 months of post-secondary level education as a work activity for a college program of up to a four-year college program.
- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:
Individuals must verify their educational attendance schedules on a monthly basis. These are tracked in WTWCMS. Those that are not participating in a countable activity are reviewed for additional activities or work assignment.
- h. Education and training providers are evaluated by the following standards:
Providers who must possess a license or certification of the State Department of Education will hold a current license or certification
- All providers, regardless of licensure or certification, must submit each curriculum to the Allegany County Employment and Training Center and it must meet the approval process of the local Work Investment Board's training policies and procedures.
- As set by program or contract, providers must meet performance standards, including but not limited to maximum costs per participant and required entries to employment.
- i. The district procedure for advising participants of approved training providers is:
In accordance with the WIOA requirements regarding approval of training providers, recipients will be informed of approved training providers by the E&TC. This information will be provided following assessment, during career counseling and/or development of individual employment plans.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:
- Educational/Training work experience or supervised job search, written notification by ACDSS
 - Job readiness of other directly provided training - written notification by ACDSS or E&TC
 - Education/training services provided by an approved provider - written notification by E&TC
 - For self-initiated training, the recipient will be provided written notification regarding whether or not the training has been approved.
 - Enrollment will be reflected in the individual's employability plan, a copy of which is provided to the enrollee

k. 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 checked below:

— It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.

— 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.

— 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.

— The institution or student fails to monitor and report information regarding the student's attendance and performance as required.

— The student fails to progress toward the completion of a course of study without good cause, as determined by the district.

— 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.

— Additional reasons as stated below:

l. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:
The DSS eligibility worker (SWE) assigned to the case is required to verify the student's attendance at initial application and subsequent recertification.

m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:
The district will inform work activity providers of an individual's work limitations identified as part of the disability review process, in writing. The following is a description of how the district will ensure that work sites are responding to notification of work limitation:

- Individuals determined to have work limitations will be requested to report to ACDSS any demand of a work activity provider which they consider not to be accommodating their medical limitations.

- Work activity providers will be contacted by ACDSS and be provided with information about ADA requirements, insurance and compensation considerations, and ACDSS requirements that the medical limitations be accommodated. A specific corrective action response will be required, verbally or in writing.

- If a work activity provider subsequently fails to accommodate the individual's medical limitation, the individual will be allowed to disenroll from the activity and will be

reassigned. Any work activity provider who, after advisement by ACDSS, continues to fail to accommodate medical limitations will be discontinued as a provider.

Section 3.7 Work Verification

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 WTCMS, NYCWAY 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 (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

The District's Quality Assurance Process is as follows:

The district will perform a random sample of (6) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTCMS and documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

The district will perform a random sample of (6) cases semi-annually for participation in **unpaid work activities** to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTCMS, excused absences and holiday time are documented in the case file and correctly reported on WTCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability code **38-needed in the home fulltime or employability code 48-time limit exemption** to care for a disabled household member to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability **code 31-caretaker of a child under the age of 12 months** to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. TA records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12-month lifetime limit.

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.

Use of Outside Providers/Vendors

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

Yes No

If Yes, does the district's provider/vendor collected documentation, data entry and management of WTCMS follow the same process that would be used by the district worker?

Yes No

If No, please describe the process used below:

Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

Following is a description of how the district accommodates the needs of Non-English-speaking participants in accessing employment activities and services:

The district does not generally find the need to provide services to individuals who do not speak English (never or rarely have occasion to serve such individuals). In the unlikely event we do have individuals who require translation services, we have contracts with interpreters who can provide qualified interpreter services. As described in our ADA policy; the Interpreter Services Poster is posted in all client areas. The Interpreter Services desk guides are made available to all workers and qualified interpreter services can be provided.

Section 3.9 Strategies/Procedures for Increasing Program Attendance

Describe district policies and/or procedures in place to reduce the amount of time participants fail to participate in work activities, including absences that are with good cause:

Our orientation process strongly enforces the requirement of applicants/recipients to be engaged in work activities. The Case Manager for the TANF population also reinforces the need for applicants/recipients to comply with activities they are assigned to. Case managers as well as Employment Specialists provide information to clients on an ongoing basis which include the need to be engaged in work activities.

Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants

District attempts to engage sanctioned participants as soon as they are sanctioned using the following strategies:

ACDSS utilizes the Intensive Case Management Services for non-compliant families

Strategies utilized are:

- An intensive assessment to determine barriers to self-sufficiency
- Enhanced case management to ensure individuals fully understand the work requirements and the impact of non-cooperation on their ability to become self-sufficient. Emphasis will be given to their need to remain compliant on an on-going basis.

- Home visits to identify needed services that will assist clients to comply.
 - Information will be provided to explain the reason for the sanction, the impact of the sanction on their grant, and their ability to cure the sanction.
 - On-going involvement with the family to bring them into compliance
 - Provide services to the individual/family that allow them to participate in work or work activities. There will be a variety of methods used to initiate this activity, such as intensive job search, employer outreach, a medical evaluation, if appropriate, etc.
 - For individuals/families that secure employment, job retention will also be an ongoing activity
- District attempts to engage sanctioned participants when the durational period of the sanction is completed using the following strategies:
- District attempts to engage sanctioned participants during different times in the sanction period using the following strategies.

Section 3.11 Strategies for reducing the need for TA

District's strategies for reducing the need for TA are described below:

We provide applicants with specific items (i.e. car insurance payments, car repairs, security guarantee or other help with shelter costs, etc.) to enable them to remain self-sufficient, and not to have to follow through with their public assistance application. These payments are made when our agency has documentation of employment or verification of anticipated employment when a need is verified. We also provide information about other emergency assistance and the child care program.

Section 4 Support Services

(Reference 18 NYCRR 385.4)

Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants 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:
Based on individual assessment and as approved by ACDSS: One time related allowance, such as payment of permit/driver's license fee, 5-hour course, car registration, car insurance, essential clothing (not to exceed \$150.00), safety equipment (not to exceed \$150.00) and car repair which is necessary to accept employment (not to exceed \$1000 depending on the fair market value of the vehicle owned by the client).

- b. The district will use the following approach 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.

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/19 is 58 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/19 is 20 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):
 - Vouchers for gas, reimbursement for mileage is at the rate of \$.35 per mile, or tokens for public transportation for activities other than subsidized or unsubsidized employment. The mileage rate was derived from the IRS rate for medical and moving.
 - Vehicle repairs, not to exceed \$500.00 may be authorized if the repairs will result in a viable means of transportation
 - Initial cost of car insurance (for the minimum period required by the insurer) may be authorized as a one-time-only payment.
 - Vehicle registration fees may be authorized as a one-time-only payment

Method of payment for any supportive services is at the discretion of ACDSS. No authorization for supportive services will be made unless the request is for services that will directly and immediately address the individual's employability plan goals.

No supportive service expense will be authorized unless directly related to the individual's employability plan and no other means are available for the individual to access service.

- c. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below each way to a work activity or to access public transportation:
The maximum distance a client would be expected to walk to a work assignment is 2 miles. However, a special consideration would be given to recipients with young children that need to go to daycare and recipients with physical limitations.
- d. The district will provide the following services to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:
Our department can provide emergency assistance if the client is otherwise eligible. Also, employment counseling is available at the Allegany County Employment and Training Center to assist clients in securing full-time/part-time employment.

Section 4.2 Transitional Support Services

The district will provide the following supports and strategies to support job retention:

Any supportive service listed in 4.1, with the exception of gas vouchers or mileage reimbursement and costs of employer-specific prerequisite training expenses. For individuals with vehicles we can provide a gas card to assist with gasoline expenses for the TANF and SN-MOE population. In addition to the supportive services previously described, the department will assist persons with transitional SNAP benefits, transitional Medicaid, transitional child care and emergency assistance as eligible.

The district will provide the following support services, for up to 90 days after case closing, to individuals whose TA cases have closed due to employment:

Agency will provide transitional Medicaid and transitional SNAP benefits, the same as noted above

Section 4.3 Extended Support Services

As long as funding is available (through FFFS, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines:

Transportation and child care assistance is available for individuals that meet the program eligibility requirements. These supportive services are provided through the Wheels to Work/Transportation Initiative Program (which is still active in Allegany County) and the Child Care Program.

Section 5 Conciliation, Sanction and Dispute Resolution Procedures

(Reference 18 NYCRR 385.11 and 385.12)

Section 5.1 Conciliation

The district's conciliation process for TA applicants and recipients is in accordance with 18 NYCRR 385.11(a). Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

Allegany County DSS will use the conciliation process as outlined in 385.11. Employment Unit staff will issue a notice to an applicant/recipient who fails to comply with employment requirements. The notice will indicate that a failure has occurred and indicate that the individual has a right to provide an explanation for failure to participate. All recipients will have ten (10) days to contact their worker. The individual will provide verbally or in a written statement form describing the good cause claim with the appropriate documentation attached.

The Temporary Assistance good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

Allegany County DSS will use the conciliation process as outlined in 385.11. Employment Unit staff will issue a notice to an applicant/recipient who fails to comply with employment requirements. The notice will indicate that a failure has occurred and indicate the individual has a right to provide an explanation for failure to participate. All recipients will have ten (10) days to contact their worker. The individual will provide verbally or in a written statement form describing the good cause claim with the appropriate documentation attached.

The district's conciliation process for SNAP recipients is in accordance with 18 NYCRR 385.11. Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

Conciliation notices are sent based on a non-exempt individual's failure to comply with an assigned activity. When the agency becomes aware of the individual's potential failure to comply, the conciliation notice is sent. These notices are sent by the Department of Social Services and the Employment and Training Center. The person is given 10 days to respond to the conciliation notice. If the client does not contact this Department within the time frame outlined, Temporary Assistance staff is notified to send the sanction notice. The worker who initiated the conciliation will interact with the client to obtain information so a decision can be made. The worker will also seek information from other sources that may impact the determination. After information is gathered, a determination would be made if there was good cause/willfulness and a decision on whether or not to proceed with the sanction

The SNAP E&T good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

Please see description below of the district's SNAP good cause/willfulness process

The district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is:

If a recipient claims to have good cause or claims to be exempt from SNAP work requirements, but the district subsequently determines that the recipient did not have or failed to document good cause/willfulness or an exemption, the recipient may then have up to an additional five days to demonstrate compliance in a SNAP work activity to avoid the SNAP sanction. When SNAP recipients are sent a conciliation notice, a directed job search log is also sent. This is done so that the individual has the opportunity to demonstrate compliance by doing a job search. If the individual responds to the conciliation within the 10 days allowed, they can demonstrate compliance by completing at least five job applications, which they document on the Job Search Log, and then send to their employment worker.

Section 5.2 Sanctions

- a. 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 is:
Individuals are informed at the time of the sanction as to when and how they can "end their sanction" and become compliant. An individual whose TA case has been closed must serve the durational period, if any, reapply and then must comply with all program requirements to establish TA eligibility. Benefits for recipients who demonstrate compliance with assigned work requirements consistent with this section will be restored retroactive to the date the individual indicates a willingness to comply, but not before the end of the durational sanction. In all instances, the time period established for demonstrating compliance to the satisfaction of the district cannot exceed 10 business days.

- b. The district's procedure for determining compliance for those SNAP 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 is:
Individuals are informed at the time of the sanction as to when and how they can "end their sanction" and become compliant. An individual whose SNAP case has been closed must serve the durational period, if any, reapply and then must comply with all program requirements to establish SNAP eligibility, including applicant employment requirements. Benefits for recipients who demonstrate compliance with assigned work requirements consistent with this section will be restored retroactive to the date the individual indicates a willingness to comply, but not before the end of the durational sanction. An individual may be eligible for SNAP benefits before the end of the durational sanction period if the individual documents the he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefits. In all instances, the time period established for demonstrating compliance to the satisfaction of the district cannot exceed 10 business days.

Section 5.3 Dispute Resolution

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 is conducted in accordance with 18 NYCRR 385.11.

The grievance is mediated by:

- An agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
- Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals

(Reference 18 NYCRR 385.2)

Section 6.1 Disability Determination Process and Tools

The district's process for determining an individual's disabilities and/or work limitations is in accordance with 18 NYCRR 385.2(d). Check **all** that apply, and describe the process:

- District participates in the OTDA managed contract for independent medical evaluations.
- District contracts directly with a physician to provide independent medical evaluations.
- District accepts physician's statement provided by participant.
- District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
- Other process (please describe):

- A physical examination is required prior to any JOBTRAK assignment. Physicals are conducted by the Jones Memorial Walk-In Clinic unless the client chooses to go to their primary care provider.

- Any individual who claims to have a limitation or disability must provide the agency with the name(s) of his or her medical provider(s) and sign a release of information.

- A participant claiming a limitation or disability may be required by ACDSS to make an appointment with his/her health care provider(s) to obtain current information about the person's health. It is the client's responsibility to provide documentation of this to the agency.

-If it is determined by the health care provider that the individual has no limitations, or can work with limitations, the individual will be assigned to appropriate work activities regardless of whether the individual has applied for SSI

- If it is determined by the health care provider that the individual is unable to work, the district may refer the individual to a health care provider for a second opinion, and/or may require that the individual apply for SSI.

- Each time that a determination or redetermination is made of an exempt or non-exempt status the appropriate LDSS-4005 or LDSS-4005(a) notice is sent to the individual

- If there are no work activities that can safely accommodate the individual's limitations and/or plan of treatment, a person with medical limitations may be offered the option of proposing a community service plan as his/her work activity. However, if the individual is unable to arrange for community service, no negative action will be taken.

- An individual with documentation of permanent and/or total disability will be referred to AIM and Legal Services, to pursue SSI. Such an individual will also be provided information regarding ACCES-VR services and the ADA, and will be encouraged to seek assistance for becoming self-supporting.

The local process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited is as follows:

- District directs the contracted physician or individual's physician to determine status.
- District review team reviews and determines status (described below).
- Specialized disability/medical staff or unit reviews and determines status (described below)
- Other:

A member of the DSS Employment Unit reviews the medical documentation for employability and then will track the individual and request new documentation as needed

Section 6.2 Mental Health Screening and Assessment

The district is administering a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted, in addition to screening for a disability that occurs as part of the application or disability determination process

Yes No (*If No, section 6.2 is complete*)

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

Program participants will be offered a mental health screening at case opening and recertification

If yes: Does the district use the LDSS 5009 - Mental Health Screening Tool and/or the computer assisted version of the Modified Mini Screening tool (MMS)?

Yes No

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

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If using a screening tool other than the MMS, indicate the screening tool used:

Describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result:

The individual will contact a mental health provider of their choice to set up an initial appointment. If the individual requires assistance with this task a member of the DSS Employment Unit will facilitate by helping to set up the initial appointment.

Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))

An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist the individual 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 he/she is participating in the assigned program.

- a. Following 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 6.1 of this plan. Included here is who (e.g., medical practitioner, employment worker, TA worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also included is 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.):

Agency staff, including Agency Counselor and Case Manager, and other providers involved review with the client: their medical, mental health and appropriate information to determine likelihood of restoration to self-sufficiency.

- b. Following is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc. Please be specific:

If an individual has the potential to be restored to self-sufficiency a treatment plan is developed based on the physician's recommendations and assessments completed by employment unit staff and other provider agencies. Participants are mandated to follow the recommended treatment plan and are monitored for compliance by the employment unit. If appropriate, participants may be referred to ACASA, ACCES-VR, ARC, Clarity Wellness or other providers as appropriate or indicated.

- c. Following is the district's procedure for tracking the participant's compliance with the treatment plan, including who in the district is responsible for monitoring compliance. Include elements such as monthly confirmation of attendance at rehabilitation or other factors to judge participation and progress, along with how often the treatment plan is updated:

The determination that an individual, who is unable to work, has the potential through treatment or other rehabilitative activities to improve the ability to work is determined by the Employment Specialists, Agency Counselor and Employment Unit Case Manager who carefully review the medical form completed by a medical provider. The district adheres to the recommendation of the medical provider regarding the need for treatment or rehabilitation activities.

Client is required to provide proof of monthly attendance of both drug & alcohol and mental treatment. They are provided with monthly tracking sheets that must be returned to the agency by the 5th of the month following treatment.