

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

January 1, 2020 – December 31, 2021

## **Chemung County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Chemung 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 Chemung 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/ BH 1/31/2020

Brian Hart, Social Services Commissioner

January 31, 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 Welfare To Work Program is operated by the local district's Division of Temporary Assistance. All local district Social Welfare Examiner staff either conduct intakes and/or carry a caseload. Unit codes are used to identify households exempt or non-exempt status as follows:

- 1) TA - TANF and SN cases who are non-exempt from employment requirements and who are not employed or those who have a medical exemption expected to last for less than 4 months
- 2) TEMP - TANF & SN cases with an individual with a medical exemption for 4-11 months, caretaker/relative exemption, or Drug/Alcohol exemption.
- 3) TOP - TANF & SN individuals with subsidized and unsubsidized employment.
- 4) DCAP - TANF & SN cases with an individual with a medical exemption expecting to last 12 months or more.
- 5) GRNT - Child only cases with caretaker relatives or SSI parents.

All local district Social Welfare Examiner staff are responsible for monitoring participation in work activities, conciliation, imposing sanctions and referring to other appropriate supportive services. The Disability Analyst reviews all client medicals and determines the clients' employability status and assists clients in actively pursuing Social Security benefits when appropriate. Chemung-Schuylers-Steuben Work Force New York (CSS-WFNY) conducts orientation, applicant diversion, employment assessment, assignment and monitoring of work activities by contract with the Local District.

### **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.

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
CSS-WFNY	\$328,125	<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%	Orientation, applicant diversion, assessment, job readiness training, job search, job development, case management, enrollment and monitoring of applicant and recipient work activities
Trinity of Chemung	\$85,000	<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%	Conducts mandatory drug and alcohol assessments, provides case management to ensure engagement in treatment when appropriate, to assist individuals in restoration to self sufficiency
OTDA/MA	\$1,817	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other <b>State Chargeback- IMA</b>	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Medical examination and diagnostic testing to determine individuals' employability status
BOCES	\$30,000	<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%	Conduct short term trainings for SNAP applicants and recipients
	\$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%	

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
	\$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.

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
DOL- One Stop		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Workshops, OJT certification, career counselling
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%	Vocational re-training services to individuals with disabilities
Cooperative Extension		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Educational classes on nutrition, budgeting and parenting
Corning Community College		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Testing, education, training and Post Secondary Education
Family Services of Chemung County	OMH, DOH	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Mental Health Services
CIDS		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Parenting Classes
OTDA-Jobs Staff		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Orientation, Supervised Job Search, Job Readiness Training, Job Club, Pre-employment services
		<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)

<b>Services</b>	=	<b>Target Groups</b>	=
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)

Assist CSS-WFNY staff with Orientation for applicants and recipients of Temporary Assistance.

### 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.

District coordinates with the Career Center Partners with providing services to the districts clients by collaborating to ensure that district clients are provided orientation, assessment, pre-employment services, Intensive Case Management, referral to work activities, Job Fairs, Job Search, Job Club, employment planning, and monitor participation including: job readiness training, job development, job shadowing, networking and job placement services, job skills testing, education, training,

TABE/LOCATOR testing, High School Equivalency (HSE) instruction, Work Experience assignment and other allowable employment activities as defined by the Office of Temporary and Disability Assistance (OTDA). Career Center Partners meet regularly to discuss any areas of concern. District Career Center Partners work together collectively to resolve any issues in a timely manner to ensure district clients receive all available employment related assistance without delay.

## 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:

1) Description of alternative programs to temporary assistance, including the Child Care Guarantee (in lieu of) program.

2) Description of transitional benefits when case closes due to new or increased earnings.

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:

Group orientation is held 3 times a week by CSS-WFNY, for exempt and non-exempt applicants and recipients. In special circumstances where an individual is not able to attend their scheduled orientation, an alternate date is provided. During these sessions all program requirements in 385.5 of the regulations are explained. Childcare and transportation are also explained. Orientation is expected to occur within 3 business days of the filing of an application for cash 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 WTWCMS

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 done on all exempt and non-exempt adults and 16 & 17 year olds not in school, within 90 days of eligibility. No employment self assessment is done by the applicant/recipient.

c. The district administrative unit or contractor responsible for conducting assessments is:

Assessments are primarily completed by CSS-WFNY staff for Temporary Assistance Applicants or Recipients. LDSS examiner staff complete assessments in extenuating circumstances.

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)]

LDSS Examiner staff that are designated to conduct assessments meet the civil service requirements of that position which include the following minimum qualifications: Either:

A) Graduation from a regionally accredited college or university or one accredited by the New York State Board of Regents to grant an Associate's Degree; OR

B) Graduation from high school or possession of a general equivalency diploma and two (2) years of clerical experience in an office setting which shall have required the use of a database to process work.

Contracted providers are also expected to have similar experience/education requirements as district staff. These providers are also required to have demonstrated proven effectiveness in assessment and employability plan development to prepare assessments and plans in accordance with applicable regulations.

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?

Assessments are updated as changes occur that could impact employability for the individual.

### 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 WTWCMS.

The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTWCMS.

The district develops individual employment plans using a local equivalent tool and later enters information into WTWCMS. 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 plans are primarily completed by CSS-WFNY staff for employable Temporary Assistance Recipients. LDSS examiner staff complete Employment plans in extenuating circumstances.

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

Employment plans are updated when there is change in employment status, goals, supportive services and/or assigned activities. If there are no changes, Employment plans are updated annually.

**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:

The LDSS plans to meet Federal and State Temporary Assistance participation requirements by continuous training and monitoring of LDSS and CSS-WFNY staff, including meeting at a minimum on a quarterly basis. All non-exempt recipients will be engaged in work activities within 14 calendar days of case opening or change in status from exempt to non-exempt. The district will require that participation will be at a minimum, those set forth in 385.8 and 385.9, but reserves the right to assign any recipient in up to 40 hours of work activity when deemed appropriate and necessary.

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	175	100

- 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 local district monitors performance by utilizing data available in WMS and COGNOS that is integrated with local software, allowing us to monitor activities & performance at the worker, unit and agency level, as well as by specific provider. Workers and Supervisors have access to this information on their desktops. The WTWCMS system is also utilized for continuous quality review.

- 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):

SNAP E&T work activities are not mandated for NTA SNAP applicants and 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):

Work registrants are informed of job search services by an informational letter at Intake, Recertification or upon request.

- 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:

All non-exempt applicants are assigned to Job Search by contracted CSS-WFNY staff. All non-exempt applicants or applicants employed less than 20 hours per week are expected to Job Search and hours are dependant on individual assessments.

The applicant must report weekly and submit a Job Search log that contains employer contact information and the amount of time spent to complete each job application/contact including travel time between employers. It is expected that the logs will contain at least 10 contacts weekly and will be used to determine completeness and reasonableness of the activity. Applicants are allowed two (2) hours for each Job Search contact to include travel time. Job Searches to supplement other hourly activities that count toward the weekly required amount of participation can be assigned to applicants in hourly increments, such as those employed more than 20 hours per week or work limited applicants.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	10	20	
SNA Individuals	10	20	

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

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

Job Search activities are assigned on a continual basis per the Temporary Assistance Activities Schedule. The CSS-WFNY Job Developer will notify the appropriate CSS-WFNY Employment Staff of job openings and clients are assigned targeted job search. The client reports outcomes on a weekly basis. The required

number of job searches will vary weekly depending on the other activities that a recipient may be assigned to, such as vocational training, job clubs, etc.

- 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.

The district always approves self-employment as part of an individual's required work activities.

- 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
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Unsubsidized Employment</b> - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Subsidized Private Sector Employment</b> - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of 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.
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Subsidized Public Sector Employment</b> - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Work Experience</b> - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>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"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Community Service</b> - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</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"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Search</b> - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> <li>— SNAP</li> </ul>	<p><b>SNAP E&amp;T Supervised Job Search</b>- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Readiness Training (JRT) Activities</b> - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>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"> <li>• 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.</li> <li>• 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.</li> </ul>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Vocational Education</b> - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Skills Training</b> - Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Education Training</b> - Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, 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"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Secondary School</b> - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a 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"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Provision of Childcare for Individual Participating in Community Service</b> - Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Other</b> - Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</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.

Chemung County contracts with CSS-WFNY for job development. There is one Job Developer that makes contacts on a regular basis with employers in the district and notifies the employment staff of job openings. The Job Developer also meets with the CSS-WFNY Employment Home Staff regularly to identify individuals with the required skill set to match appropriate potential employees with employers.

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:

CSS-WFNY is charged with outreaching throughout the community to identify educational programs that are available for our clients which consist of occupations in demand. When a new program is identified, CSS-WFNY staff will meet with the provider and gather the information about the program and their target population. The information will be provided to and options discussed, when meeting with their clients at assessment and reassessment.

- 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:

CSS-WFNY is charged with outreaching throughout the community to identify Vocational Educational programs and Job Skills training programs that are available for our clients. When a new program is identified, CSS-WFNY staff will meet with the provider and gather the information about the program and their target population. The information will

be provided to and options discussed, when meeting with their clients at assessment and reassessment.

- 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:

Those without a HSE/HS diploma or those that score below a 9th grade level on the TABE/LOCATOR are offered to attend either HSE or basic skill building classes.

- 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:

Participation in Educational activities may be denied if the Vocational Program exceeds 12 months from start to completion, or if the individual has exceeded the 12 month Vocational Education limit or the individual has failed to make satisfactory progress in their current program or past approved program.

- 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:

CSS-WFNY Employment Staff identify the Vocational Education and Job Skills trainings that would assist the client with meeting both their long and short term goals and refer the identified clients to the trainings as they occur. A variety of career assessment tools are utilized to determine appropriateness of training for the individual.

- 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 may approve the last 12 months of a 2 year degree program. The district does not approve any time towards a 4 year college program. The district will review cases on an individual basis and may approve up to 12 months post- secondary level education of a 2 year degree program for those individuals who have not previously exceeded the 12 month lifetime limit and who have successfully completed one year of a specific educational course which has a history of demonstrated effectiveness (defined as the rate of placement of program graduates in employment directly related to their field of study or a closely related field). The individual must maintain the equivalent of a B average or higher while in the program.

The district will review cases on an individual basis and may approve up to 12 months postsecondary level education for those individuals who have exceeded their 12 month lifetime limit when the individual is meeting 20 hours per week in core activities on a consistent basis when the specific educational course has a history of demonstrated effectiveness (defined as the rate of placement of program graduates in employment directly related to their field of study or a closely related field). The individual must maintain the equivalent of a B average or higher while in the program.

All assigned/ approved employment activities will be included in the individual's Temporary Assistance Activity Schedule.

- 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:  
CSS-WFNY staff will meet with each individual on a weekly basis to determine if the individual has expended their 12 month lifetime limit and, if so, will ensure that such individual has at least 20 hours per week in core activities (paid employment, work experience or community service).

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All approved/assigned employment activities will be included in the individual's Temporary Assistance Activity Schedule.

- h. Education and training providers are evaluated by the following standards:

Providers of education/training must be licensed or supported by the State Department of Education or Labor or by the Adult Career and continuing Education Services - Vocational Rehabilitation (ACCESS-VR). The provider must possess a history of demonstrated effectiveness in the delivery of training or educational programs. The specific educational courses or training programs offered must also be ones with histories of demonstrated effectiveness. Demonstrated effectiveness is defined as the rate of placement of program graduates in employment directly related to their field of study or a closely related field. The current or projected local labor market conditions or demands must indicate a strong likelihood that participants upon completion of, or graduation from, a specific program will secure unsubsidized employment as entry level workers in either their field of study or a closely related field. This will be determined by projections from the Department of Labor or placement statistics provided by the training/education providers.

- i. The district procedure for advising participants of approved training providers is:

When completing the individuals assessment with them, development of the individuals Employment Plan and Temporary Assistance Activity Schedule, at weekly scheduled meetings with the CSS-WFNY Employment Staff and as requested by the applicant/recipient.

- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

Applicants and Recipients will be notified of approval for enrollment in a work activity via a written employment plan. The employment plan will detail the obligations for the agency and the participant alike, and will specify the steps to be taken and services to be provided as a series of actions to be followed leading to the full time unsubsidized employment of the participant. This information is also provided to the applicant and recipient on their Temporary Assistance Activity Schedule.

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 teen must be considered a student in good standing by the school. The LDSS-Examiner Staff will obtain written documentation from the school district of the student's standing, at application and 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 CSS-WFNY Employment Staff referring an applicant or recipient to a work activity will inform the worksite and/or training provider in writing at the time of the activity assignment of any health related limitations and special accommodations that must be made, providing these have been made known by the applicant/recipient and confirmed by a healthcare provider and supported by appropriate documentation.

### **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](mailto:AQI.WV.SelfAudits@otda.ny.gov) for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, 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 WTWCMS and documentation is in the file to support hours reported on WTWCMS and that the scheduled hours on WTWCMS 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 WTWCMS, excused absences and holiday time are documented in the case file and correctly reported on WTWCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTWCMS 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 WTWCMS?

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 Agency uses an interpreter and/or refers them to the Language Line Solutions (<http://www.language.com/>) for anyone that does not speak English. We also refer to 'English as a Second Language' classes which are offered in our community.

### **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:

Applicants/Recipients are scheduled up to 40 hours of activity per week to allow flexibility in hours missed to limit the amount of excused and unexcused absences. Clients are also informed of additional agencies that are available to assist with any barriers to potential employment. Clients are offered to work with other community agencies who also inform SNAP applicants/recipients of employment supports and local employment events or job fairs taking place in the area.

### **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:

District attempts to engage sanctioned participants when the durational period of the sanction is completed using the following strategies:

The client is required to come into the agency monthly and meet with a worker from our Special Investigations Unit. Household income and expenses are reviewed with the client to determine how the household needs are being met. The client is afforded the opportunity to reengage in work activities to end the sanction.

District attempts to engage sanctioned participants during different times in the sanction period using the following strategies.

The benefits of complying with work rules are discussed at each client contact and clients are offered the opportunity to engage in work related activities. When the durational sanction period

has ended, and/or the individual expresses a willingness to comply, contact is made by the LDSS-Examiner to encourage compliance.

### **Section 3.11 Strategies for reducing the need for TA**

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

As a condition of eligibility, Temporary Assistance applicants are required to participate in an Employability Assessment, Job Search and Job Readiness training. The applicant also meets with the WFNY Job Developer to find appropriate job matches and referrals. Temporary Assistance diversion payments are discussed with the applicant during the Intake process, as well as at Orientation and when meeting with the individual one on one. The district offers diversion payments as described in Section 4.1d of this plan.

## **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:
  - 1) Clothing necessary to obtain or retain employment, not to exceed \$250, unless approved by the Director of Temporary Assistance and/or his/her designee.
  - 2) Clothing required for approved training programs when no other option is available, ie nursing uniforms, steel toe work boots, not to exceed \$250, unless approved by the Director of Temporary Assistance and/or his/her designee.
  - 3) Fees for licenses necessary for employment, not to exceed \$250, unless approved by the Director of Temporary Assistance and/or his/her designee.
  - 4) Tools and equipment necessary for employment when no other option is available, not to exceed \$500 unless approved by the Director of Temporary Assistance and/or his/her designee.
  - 5) Reasonable costs of necessary repairs to a recipient's automobile, and payment of automobile insurance premiums to enable a recipient to obtain or retain employment. Such expenditures may not exceed the Kelly Blue Book trade in value of the vehicle, unless approved by the Director of Temporary Assistance and/or his/her designee.
  - 6) Any other supportive needs deemed appropriate by the agency, which will not include fines or penalties.
  
- 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):

Transportation will be provided via public transportation or mileage reimbursement for individuals enrolled in work activities or newly employed individuals, prior to receiving their first pay. Mileage reimbursement for mileage over 1 mile, 1 way, at a rate equivalent to the current IRS mileage reimbursement rate. The District reserves the right to reimburse the least expensive form of transportation available to the participant. Exceptions will be made in instances where it may be necessary to transport children to and from a daycare provider when participating in a work activity or employment and where an individual has physical limitations that would prohibit the standard.

- 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:  
Due to weather conditions in this area, an individual would be required to walk up to one mile, one way, to participate in a work activity assignment. Exceptions would be made as stated in 4.1(b). Individuals are encouraged to seek housing in areas where public transportation is readily available.
- 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:
  - 1) Diversion payments for non-recurring employment related expenses such as uniforms, tools, fees, short-term employment-focused trainings or other items needed to enable the applicant to maintain or obtain employment.
  - 2) Diversion transportation expenses that are non-recurring, such as car insurance or car repair payments.
  - 3) Diversion payments for non-recurring expenses directly related to resolving a housing crisis, such as moving expenses, storage fees, rental arrears, etc.
  - 4) Referral to food pantries or Catholic Charities for rental assistance or Security Deposits to prevent homelessness.

## **Section 4.2 Transitional Support Services**

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

Transportation for up to 30 days for TANF200% employed or SN-MOE employed individuals, not to exceed available funding. In addition, the District will provide Transitional Child Care, Transitional SNAP and Transitional Medicaid, based on eligibility requirements. Referral to MyBenefits for assistance in seeking out other benefit entitlements, and referral to VITA for free Income Tax assistance.

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:

Services as described in Section 4.1(d), not to exceed available funding.

### **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:

None

## **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

Clients who fail or refuse to comply with work requirements are sent written notification of their right to conciliation by the LDSS Examiner staff, via the Welfare-To-Work Caseload Management System. The LDSS Examiner staff will speak by telephone or in person to give the applicant/recipient an opportunity to provide an explanation for their failure to comply. If appropriate, the LDSS Examiner staff may request supporting documentation of claims made by the client and upon receipt determine if good cause/willfulness has been demonstrated for the failure to comply. If it is determined that good cause is established, the LDSS Examiner staff will re-engage the client in continued employment activities. If good cause/willfulness has not been established, and the client has not demonstrated compliance to avoid a SNAP sanction, the LDSS Examiner staff will proceed with negative action.

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

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

LDSS Examiner staff

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

Recipients who fail or refuse to comply with work requirements are sent written notification of their right to conciliation and/or how to demonstrate compliance by the LDSS Examiner staff. The LDSS Examiner staff will speak by telephone or in person to give the recipient an opportunity to provide an explanation for their failure to comply. If appropriate, the LDSS Examiner staff may request supporting documentation of claims made by the recipient and upon receipt determine if good cause/willfulness has been demonstrated for the failure to comply. If it is determined that good cause is established, the LDSS Examiner staff will re-engage the applicant/recipient in continued employment activities. If good cause/willfulness has not been established, the LDSS Examiner staff will proceed with negative action.

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

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

LDSS Examiner staff

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

The individual must demonstrate compliance by submitting 3 verifiable, in person or online, job applications and provide this information to the LDSS via the SNAP Option to avoid a SNAP sanction letter, within 10 calendar days.

## **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:  
When the sanction period has ended and the client states they are willing to comply, they are referred to an employment activity. When the client complies with activities for 7 consecutive business days, their Temporary Assistance benefits will be restored retroactive to the date the individual indicated a willingness to comply with employment requirements, but not before the end of the durational sanction period.
- 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:  
When the sanction period has ended, and the client states they are willing to comply, the individual can demonstrate compliance by submitting three verifiable in person or online job applications within seven consecutive business days. An individual may be eligible for SNAP benefits before the end of the durational period, if the individual documents he/she is exempt from SNAP Work Requirements, and is otherwise eligible for SNAP benefits.

### **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):

LDSS Examiner and CSS-WFNY Staff inquire whether the applicant/recipient has a physical or mental impairment that would limit his/her ability to participate in work activities. Such inquiry will be made at application, recertification or when there is reason to believe an applicant/recipient has an impairment. When an applicant/recipient claims to have a mental or physical impairment, he/she will be given written notification that he/she has ten calendar days, from the date of the written notice, to present medical documentation from his/her health care practitioner. The documentation must include a specific diagnosis, specify work limitations and the length of time the impairment will prevent the applicant/recipient from performing work activities. Acceptable documentation for making disability determinations include a completed LDSS-4526, treating physicians note on letterhead, CASAC determination, hospital newborn footprint/birth certificate.

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:

The LDSS Disability Analyst reviews the information submitted by the applicant/recipient's health care provider to determine work-limited, exempt or non-exempt status. Written notice of the results of the determination and the right to a Fair Hearing to contest the determination is also provided to the client via the LDSS 4005 or LDSS-4005(a) form as applicable.

In the event the medical documentation submitted by the applicant/recipient's health care provider is insufficient to make a determination, the applicant/recipient will be referred to IMA for further examination or the District may require additional documentation from the applicant/recipient's health care provider.

### **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.

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:

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:

### **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.):

The District's Disability Analyst will review the submitted medical documentation, interview the individual and if necessary consult with the individual's medical practitioner and/or service provider to determine if treatment and/or other rehabilitation activities would restore or improve the individual's employability status.

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

The District is not engaging exempt applicants/recipients in work activities or monitoring the treatment plans for exempt applicants/recipients.

- 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:

Not Applicable