# **Chemung County**

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

January 01, 2024 - December 31, 2025

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### 1. Administration

#### 1.1 Administrative Structure

a. This agency's organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district's employment program. (Attachments must be uploaded to the system through the "Documents" screen prior to submitting the plan. Use the textbox below to provide any additional information.)

Please find attached organizational chart in the documents section.

b. Below is a description of the office(s) in and/or outside of the Department of Social Services that are involved in the operation of the district's employment program and include the responsibilities of each office.

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-Schuyler-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.

# 1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies

a. Table 1 lists the local contracts or agreements with agencies to provide employment services to TA and SNAP clients. These activities and services may include, but are not limited to: employability determinations; development of assessment and employment plans; conciliation and grievance activities; provision of work activities such as job readiness training; education and job skills training; monitoring and support for compliance with treatment plans for exempt individuals with the potential for restoration to self-sufficiency; job development; job placement and retention services; and other employment related activities.

Each contract listed in Table 1 contains an assurance that the activities are not otherwise available from that provider on a non-reimbursable basis, and, if not a performance-based contract, a statement regarding use of a cost allocation methodology that satisfies Generally Accepted Accounting Principles, as well as the requirements of U.S. Office of Management and Budget Circulars A-122 for nonprofit organizations, A-21 for educational institutions, or A-87 for State and local governments. Districts must maintain proper monitoring and oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

# Contracts or Agreements with Agencies Who Provide TA and SNAP Employment Services

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
CSS-WFNY Pathways to Employment	\$350,000	FFFS Local	FA SNA Family SNA Individual SNAP	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	Local	FA SNA Family SNA Individual	Conducts mandatory drug and alcohol assessments, provides case management to ensure engagement in treatment when appropriate, to assist individuals in restoration to self sufficiency.

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
OTDA/MA	\$1,817	Others: State Charge Back MA	FA SNA Family SNA Individual	Medical examination and diagnostic testing to determine individuals' employability status.
GST - BOCES	\$30,000	SNAP E & T	SNAP	BOCES conducts short term trainings for SNAP applicants & recipients.
Chemung County Youth Bureau	\$185,000	FFFS	FA SNA Family TANF 200%	The Chemung County Youth Bureau's Learn & Earn Program is a project designed to provide youth program participants with an opportunity to learn basic life and soft employment skills that will strengthen their ability to become self-sufficient adults of the future. The goal of the Learn & Earn Program is to enable youth to see themselves as respected, successful, contributing members of the community and workforce with strong goals for their future.  The program serves income eligible youth ages 14-18 who are currently enrolled in middle school or high school. The program operates on four cycles during the school year. Each cycle consists of 20 hours of workshops which are divided in two sessions that occur over a 5-6 week period. Income eligibility is based upon the NYS Office of Temporary and Disability Assistance Temporary Assistance Temporary Assistance for Needy Families (TANF) and TANF 200% standards. The workshops are designed to teach students basic life and soft employment skills. The skills learned in the program will better prepare the students in gaining meaningful employment, including referrals to the

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
				Summer Youth Employment Program. In addition to income guidelines, eligibility for this program is based on attendance, appropriate behaviors and attitude. Upon successful completion of 9 out of 10 hours of training during session 1 students will receive a milestone payment of \$80.00. Students must then successfully complete another 9 out of 10 hours of training during session 2 to receive a separate milestone payment of \$80.00. Students are not considered employees of the Youth Bureau for this program.

b. Table 2 includes agencies/providers that offer services to participants and to which the district expects to refer participants, but which have no direct financial agreement with the district.

Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and TANF 200%.

#### Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
DOL One Stop Center	Others: UNKNOWN	FA SNA Family SNA Individual	Workshops, OJT Certificates, and career counseling
ACCESS VR	Others: UNKNOWN	FA SNA Family SNA Individual SNAP	Vocational re-training services to individuals with disabilities
Cornell Cooperative Extension	Others: UNKNOWN	FA SNA Family SNA Individual SNAP	Educational classes on nutrition, budgeting, and parenting.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Corning Community College	Others: UNKNOWN	FA SNA Family SNA Individual SNAP	Testing, education, training and post secondary education.
Family Services of Chemung County	Others: OMH DOH	FA SNA Family	Mental Health Services.
CIDS	Others: UNKNOWN	SNA Family	Parenting Classes
OTDA JOBS STAFF	Others: UNKNOWN	FA SNA Family SNA Individual SNAP TANF 200%	Orientation, supervised job search, job readiness training, job club and preemployment services.
Head Start Program	Local Others: Unknown	FA SNA Family TANF 200%	Home Visiting Services and Nutritious meals, socialization skills, supervised play, physical activity, health and developmental seeing, researched based curriculum, expectant mother/father services.
Comprehensive Interdisciplinary Developmental Services Inc.	Others: Unknown	FA SNA Family TANF 200%	Nurse-Family Partnership NFP Eligibility - first time parent, under 28 weeks pregnant Services - Registered nurses monitor for complications during pregnancy and post- partum. Helps to boost a child's brain development. Can stay enrolled in this program for 2 years.
			Health Families New York (HFNY)-(CIDS)- Eligibility-first-time parents as well as parents with multiple children, who are pregnant and/or have at least one child less than three months of age. Services-educating families on parenting and child development; connecting families with medical providers for prenatal/well- baby visits and immunizations; assessing children for development delays; and helping families access community referral resources and services.

c. Monitoring and Oversight of TANF and SNAP E&T Funded Contracts/Agreements

Described below is the process used to monitor district held contracts/agreements with providers that use TANF and SNAP E&T funds for employment services:

The District's Quality Assurance Office & Providers collaborate with monthly reports. These reports are used to input data to measure for outcomes - percentages as stated in the contract. Quarterly reports are submitted by providers to LDSS Quality Assurance, the Director of Temporary Assistance and Commissioner. Audits are conducted bi-annually.

### 1.3 OTDA Jobs Staff Agreement

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

#### Services Provided by Jobs Staff

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

#### **Jobs Staff Target Groups**

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

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

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

#### 1.4 Access to Services at New York State Career Centers

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

#### **Programs and Services Provided at Career Centers**

Yes or No:	Programs and Services Provided:
Yes	The district has employee(s) physically present at a Career Center
Yes	The district has contract staff physically present at a Career Center
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
No	Other (described here):

b. Described below is how the district coordinates with Career Center partners to provide services to the district's clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

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.

# 2. Orientation, Assessment and Employment Plan

# 2.1 Orientation (Reference 18 NYCRR 385.5)

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

#### **District Orientation Procedures**

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:  1) Description of alternative programs to Temporary Assistance, including the Child

Yes or No:	District Orientation:
	Care Guarantee (in lieu of) program. 2) Description of transitional benefits when Temporary Assistance case closes due to new or increased earnings. 3) Domestic Violence Services. 4) Home Visiting Services.

b. Described below is how the district completes the required orientation for all applicants and recipients of TA at application and recertification. Orientation can be held in-person, either in a group setting, individually, or a combination of both. It can also be held virtually, over the phone, or by sending orientation material to the client by mail. Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

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 the Temporary Assistance interview.

## 2.2 Temporary Assistance (TA) Employment Assessment

a. How does the district conduct assessments as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

#### **District Assessment Procedures**

Yes or No:	How the district conducts assessments
Yes	The district enters assessments directly into WTWCMS.
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
No	The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. If applicable, the local equivalent contains additional elements beyond what is required:

b. Described below is the district procedure for the completion of an employment assessment, including when initial assessments are conducted and whether an assessment is conducted in-person, virtually by phone, or a combination of both:

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

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

Assessments are primarily completed by CSS-WFNY staff for Temporary Assistance Applicants or Recipients. LDSS examiner staff complete assessments in extenuating circumstances. Community Services worker completes annual re-assessment for exempt individuals.

- d. Described below are the minimum qualifications of the employees conducting the assessment (refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)):
  - 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. Are applicants in households with dependent children required to participate in completion of an employment assessment?

Yes

f. Are applicants in households without dependent children required to participate in completion of an employment assessment?

Yes

g. Are exempt adults in households without dependent children required to participate in completion of an employment assessment?

Yes

h. How often and under what circumstances is the employment assessment updated?

Assessments are updated as changes occur that could impact employability for the individual and "NO less than annually". Individuals that are engaged in work activities are often reassessed more frequently as changes occur.

# 2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)

a. How does the district develop individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

#### **District Employment Plan Procedures**

Yes or No:	How the district develops employment plans
Yes	The district enters employment plans directly into WTWCMS.

Yes or No:	How the district develops employment plans
No	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTWCMS.
No	The district develops individual employment plans using a local equivalent tool. If applicable, the local equivalent contains the following additional elements beyond what is required:

b. Who develops the employment plan (reply yes or no to the options as the apply)?

#### **District Employment Plan Development**

Yes or No:	Who develops the districts employment plans
Yes	The same administrative unit or contractor that conducts employment assessments also develops employment plans.
No	A different administrative unit or contractor develops employment plans and the contractor's qualifications include:

c. Described below is the district procedure for the completion of an individual's employment plan:

Employment plans are primarily completed by CSS-WFNY staff for employable Temporary Assistance Recipients. LDSS examiner staff complete Employment plans in extenuating circumstances. In either instance, clients are provided a copy.

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 and clients are provided a copy.

# 3. Engagement

# 3.1 Federal "Engaged in Work" Requirement (Reference 18 NYCRR 385.2 (f))

a. Federal requirements state that parents or caretakers must be engaged in work as soon as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance. The district's definition of "Engaged in Work" is:

Compliance with assessment, employment planning, all activities included in the individual's Employment/Self-Sufficiency plan, including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 4.1. Also included is pursuit of other forms of income such as SSI and SSDI.

b. Described below is additional information regarding the district's "Engaged in Work" requirements:

N/A

# 3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

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

# 3.3 Strategies/Procedures for Increasing Program Attendance

 Described below are the district policies and/or procedures used to reduce the number of times participants fail to participate in work activities. This includes absences with good cause:

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. The Pathways to Employment Program staff collaborate on site with the Jobs program staff, as well as Child Care Council staff in order to provide case management to any individual who has been identified as needing additional supports; such as one on one targeted job search assistance- resume building- childcare referrals, etc.

# 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

a. The following are strategies used to engage sanctioned participants. If a district uses one of the options, a description will be provided (reply yes or no to the options as the apply and provide a description for "yes" responses):

#### Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
No	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: 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.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: The benefits of

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
	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.

# 3.5 Strategies for Reducing the Need for TA

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

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.

### 4. Work Activities

#### 4.1 Allowable Work Activities

a. Below is a list of activities available to individuals receiving Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), and Supplemental Nutrition Assistance Program (SNAP) benefits. In the chart below, the case type is listed next to each activity available to it in the district.

#### Allowable Work Activities by Case Type

Activity and Definition	Case Type
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP

Activity and Definition	
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP
Education Training – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA
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.	FA SNAFAM SNA
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM

Activity and Definition	Case Type
<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.	N/A
On-the-Job-Training (OJT) — Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.	FA SNAFAM SNA
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.	FA SNAFAM SNA

# **4.2 Job Development**

a. Does the district conduct or access job development services to expand job opportunities for TA and SNAP participants?

Yes

How does the district participate in job development activities (reply yes or no to the options as they apply)?

### **How the District Participates in Job Development Activities**

Yes or No:	How the district participates in job development activities
No	District staff contacts employers to solicit jobs for TA and/or SNAP participants.  Describe how this is done, including number of staff, frequency of contact, etc.:  N/A
Yes	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: 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.

# 4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

- a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.
  - 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. Described below is how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.
  - CSS-WNFY 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. Described below are the district's process and guidelines workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.
  - 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. Described below are the district's process and policy, including the guidelines workers follow, when determining whether participation in educational activities is approved for individuals who have not attained a high school diploma who are interested in participating in an educational activity. Include in this section instances when the district would deny participation in educational activities.
  - Participation in an educational and/or vocational training program, that includes but is not limited to, a two-year post-secondary degree program, which is necessary for the participant to attain their individual employment goal and is likely to lead to a degree or certification and sustained employment, shall be approved consistent with such individual's assessment and employability plan to the extent that such approval does not jeopardize the State's ability to comply with federal work participation rates. As New York continues to meet our federal participation rate, districts currently have the flexibility to support clients' participation in

educational and/or vocational training programs, including but not limited to post-secondary education, that is likely to lead to sustained employment.

e. Described below is the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities.

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

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.

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

When completing the individual's 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.

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

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.

i. Described below is how the district will monitor the high school attendance for 16-18 yearolds in order for them to retain their TA exempt status.

The teen must be considered a student actively attending school. The LDSS Examiner Staff will obtain written documentation from the school district of the student's standing, at application and recertification.

j. Described below is the district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity.

The 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.

### 4.4 Post-Secondary Education Approval and Enrollment Policies

a. Described below is the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program (please ensure to include the current providers the districts partners with for the provision of post-secondary education programs in Table 1 or Table 2 under Section 1.2 of this plan):

The district will review cases on an individual basis and may approve up to a two-year degree program.

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

#### Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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

# 5. Work Requirements

# **5.1 Meeting TA Work Requirements**

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

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 for:

#### **Number of Individuals Who Receive Employment Services**

Household Type	Number Served
Households with Dependent Children Average Monthly	47
Households without Dependent Children Average Monthly	82

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

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. Does the district assign TA applicants to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Use the "Additional Information" column in the chart below to describe how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

Yes

### **Applicant Job Search**

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	20	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 dependent 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. In general, applicants are allowed two (2) hours for each Job Search contact to include travel time. If an actual Job Search takes longer than two (2) hours, it is allowable activity 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.
SNA Individuals	10	20	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 dependent 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. In general, applicants are allowed two (2) hours for each Job Search contact to include travel time. if an actual Job Search takes longer than two (2) hours, it is allowable activity 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.

e. Does the district assign TA recipients to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected using the "Additional Information" column.

Yes

#### **TA Recipient Job Search**

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	20	Job Search activities are assigned up to the maximum of time 6 weeks as allowed 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.
SNA Individuals	10	20	Job Search activities are assigned up to the maximum of 6 weeks as allowed 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. Described below is the district's process and policy used for determining whether participation in self-employment is approved as part of an individual's required work activities, including the guidelines workers follow. If the district always approves self-employment as part of an individual's required work activities, please note this policy below:

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

### 5.2 Informing SNAP Applicants and Recipients of Work Requirements

The district informs SNAP households where at least one member is subject to a work requirement of the applicable work rules at certification, recertification, and when a previously exempt household member or new household member becomes subject to work requirements. Notification is provided verbally and in writing.

a. Described below is how SNAP applicants and recipients are informed in writing of SNAP work requirements (reply yes or no to options as they apply).

#### Written Information Provided to SNAP Applicants and Recipients

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	Eligibility staff use the LDSS-5193 Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD) and the LDSS-5193A Important Information about SNAP Work Rules (General and Mandatory E&T) as appropriate.
No	Eligibility staff use a local equivalent consolidated work requirements notice to inform SNAP applicant and recipient households of their work requirements. Please attach a copy of the district's OTDA approved local equivalent.

b. Described below is the process eligibility staff follow to provide a comprehensive oral explanation to SNAP households of work requirements, including General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules which pertain to non-exempt individuals in the household.

An oral explanation of General Snap Work Rules and Snap Employment and Training requirements is provided at intake, recertification, and when an exempt member or new member becomes subject to the requirements. The LDSS-5193A is provided to the member and a copy of the form is placed into the case file. A note is then placed into the case record to confirm the oral explanation took place, as well as form provided.

c. Described below is how the district documents in the case record how the written information about SNAP work requirements was provided to the household (reply yes or no to options as they apply).

#### How the District Documents the Written Requirement in the Case Record

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	The district retains copies of all LDSS-5193/LDSS-5193A in the case record.
No	The district retains copies of local equivalent notices provided to the household in the case record.

d. Described below is the district's process for documenting in the case record how the oral explanation of SNAP work requirements was provided to the household (reply yes or no to options as they apply).

#### How the District Documents the Oral Requirement in the Case Record

Yes or No:	How oral information is provided to SNAP applicants and recipients
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
No	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
Yes	Eligibility staff document the case record through case notes/comments.

# **5.3 Meeting SNAP Work Requirements**

a. Described below is the extent to which the district requires NTA SNAP recipients to participate in SNAP E&T work activities. (Please note: Case management services must be provided to all participants enrolled in SNAP E&T activity):

SNAP E&T work activities are not mandated for NTA SNAP applicants and recipients.

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

N/A

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

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

# 5.4 Advising Households of Employment and Training Services

At the time of recertification, non-exempt SNAP recipients who are members of certain TA/SNAP and NTA/SNAP households must be advised of the availability of employment and training services within the district and/or region. This requirement applies non-exempt recipients in households containing at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report.

a. Described below is who the district provides information about employment and training services to (reply yes or no to the options as they apply):

#### Who the District Provides Employment and Training Services Information to

Yes or No:	Who the district provides employment and training services information to:
Yes	Required population only
No	Other groups described here:

b. Described below is the method the district uses to advise SNAP recipients of available employment and training services at recertification (reply yes or no to the options as they apply):

#### How the District Provides Employment and Training Services Information

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
No	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website:
No	Material and information provided via email.

#### 5.5 Provider Determinations

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

The contracted employment program, Pathways to Employment, matches individuals up with activities based on the information provided during case management and assessment, as well as in person interactions with individuals. If it is not a good fit, Pathways is notified by the provider within 10 days and the individual is given feedback as to why and reassigned within 10 calendar days. All conversations and actions taken are noted in WTW/CMS case notes.

 Described below is the district process for informing providers of their authority and responsibility to determine if an individual is not a good fit for a particular activity or program.

The contracted employment program, Pathways to Employment, has open communications with providers of activity assignments. When an individual is initially placed, contact is made to set up the referral, and it is advised at that time if there are any concerns with

someone not being a good fit, to reach out to the Pathways to Employment staff for intervention or reassignment.

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

The contracted employment program, Pathways to Employment, is advised to bring to the district's attention, if there is any provider that appears to be making a determination that is unfair or appears to be discriminatory. The district would then reach out to OTDA for guidance.

# 6. Quality Assurance/Work Verification

### 6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

 Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;

- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

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

6

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

3

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

3

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

#### 6.2 Use of Outside Providers/Vendors

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

No

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

N/A

c. If No, describe below the process used:

N/A

# 7. Supportive Services

# 7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District

- a. The district must provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide the following expenses, which the district deems necessary for the individual to participate in orientation, assessment, employment planning, approved work activities and activities to restore selfsufficiency:
  - 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. Indicated below are the services the district will use to assist those participants who need transportation to and from an approved work activity site, including any applicable mileage reimbursement rate, and the method used by the district to arrive at that reimbursement rate. OTDA policy establishes a mileage reimbursement rate of no less than the IRS established rate for medical/moving purposes. In all instances, should the actual cost of transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, the district will reimburse for the actual costs based on reasonable documentation submitted by the work activity participant (reply yes or no to the options as they apply).

#### **Transportation Services Provided to Clients**

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
Yes	Gas card/voucher
Yes	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
No	Other mileage rate (the methodology used to establish reimbursement rate is described here):

c. OTDA policy establishes a distance not to exceed two miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. Describe below the distance an individual may be required to walk, each way, to a work activity or to access public transportation:

Due to weather conditions is 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 when a worker determines it would not be appropriate when the weather conditions are bad, the terrain or route is a safety concern or the client has a physical or health limitation.

- d. Described below are the services the district will provide to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:
  - 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.

### 7.2 Post-Employment/Transitional Supportive Services

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

Transportation for up to 90 days for TANF200% employed or SN-MOE employed individuals, not to exceed available funding. In addition, the district will provide Transitional Childcare, 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.

- b. Described below are the support services (for up to 90 days after case closing) the district will provide to individuals whose TA cases have closed due to employment:
  - 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.

### 7.3 Extended Support Services

a. Described below are the support services the district will provide for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines. These services can be provided as long as funding is available (FFFS, etc.):

The district offers extended support services to individuals who are eligible under TANF 200% of poverty eligibility guidelines with FFFS funding. Transportation for up to 90 days for TANF200% employed or SN-MOE employed individuals, not to exceed available funding. In addition, the district will provide Transitional Childcare, 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.

# 8. Conciliation, Sanction and Dispute Resolution Procedures

#### 8.1 Conciliation

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

#### How the District Conducts Conciliation for TA Applicants and Recipients

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

The districts process for conduction TA conciliations is described below:

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 the client was not willful and had good cause, the LDSS Examiner staff will re-engage the client in continued employment activities. If the client was found to be willful and without good cause, the LDSS Examiner staff will proceed with implementing the sanction.

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

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

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

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

#### How the District Conducts Conciliation for SNAP Applicants and Recipients

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

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

Recipients who fail or refuse to comply with work requirements are sent written notification of their right to conciliation and 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 the recipient was not willful and had good cause, the LDSS Examiner staff will re-engage the client in continued employment activities. If the client was found to be willful and without good cause and the client has not demonstrated compliance to avoid their SNAP sanction, the LDSS Examiner will proceed with implementing the sanction.

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

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

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

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

The individual must demonstrate compliance by submitting three verifiable, in person or online, job applications and provide this information to the district within 10 calendar days of the conciliation determination; if the failure was for any activity other than employment assessment. If the failure was for not completing the employment assessment, the individual must complete the employment assessment within 10 calendar days of the conciliation determination.

#### 8.2 Sanction

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

When the sanction period has ended, and the individual states they are willing to comply, they are referred to an employment activity. When the individual complies with activities for 7 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. Describe below the district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 18 NYCRR 385.13), including the time period established for demonstrating compliance to the satisfaction of the district:

When the sanction period has ended, and the individual states they are willing to comply, they can demonstrate compliance by submitting three verifiable, in person or online, job applications if the failure was for any activity other than employment assessment. If the failure was for not completing the employment assessment, the individual must complete the employment assessment. 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. SNAP benefits are restored effective the first of the month following the month of compliance, but no earlier than the expiration of the minimum duration period. Demonstrated compliance period for SNAP is 7 business days.

# 8.3 Dispute Resolution

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

#### **Grievance Mediation**

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

# 9. Disability Determinations, Documentation and Requirements of Exempt Individuals

# 9.1 Disability Determination Process and Tools

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

#### **Process for Determining Disabilities and/or Work Limitations**

Yes or No:	How the district determines an individual's disabilities and/or work limitation
Yes	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: 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.

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

The agency's Disability Analyst meets with individual's and reviews medical paperwork they have and or assists them in obtaining medical paperwork. Once paperwork has been received the disability analysts makes an employability determination and then creates a LDSS 4005 or LDSS 4005A. The LDSS-4005/LDSS4005 (a) is provided to the individual through the CNS System. The Disability Analyst takes extra steps when individuals are presenting with complex case. Examples are referring to Social Security or Industrial Medical Associates, IMA. The client is notified within 10 days of receipt of determination.

c. Described below is how the district notifies an individual of their exempt or non-exempt determination (reply yes or not to the options as they apply):

#### Process for Notifying an Individual of Their Exempt or Non-Exempt Status

Yes or No:	District's process for reviewing medical documentation
Yes	The district sends the LDSS-4005 or LDSS-4005a and a retains a copy in the case record.
No	The district sends a local equivalent and retains a copy in the case record.

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

#### **Process for Reviewing Medical Documentation**

Yes or No:	District's process for reviewing medical documentation
No	District directs the contracted physician or individual's physician to determine status.
No	District review team reviews and determines status (described here):
Yes	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: 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.

# 9.2 Mental Health Screening and Assessment

a. In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?

No

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

N/A

c. What screening tools does the district use (reply yes or no to the options as they apply)?

#### **Screening Tools the District Uses**

Yes or No:	Screening Tools
N/A	LDSS 5009 - Mental Health Screening Tool
N/A	The computer assisted version of the Modified Mini Screening tool (MMS)
N/A	Other Screening tool (described here):

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

N/A

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

N/A

# 9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))

a. An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist them in recovering from a mental or physical impairment, accept referral to and enrollment in a program of vocational rehabilitation, training, and/or other essential rehabilitation, and provide requested evidence that the individual is participating in the assigned program.

Described below is the district's procedure for determining if an individual, who is unable to work due to mental or physical impairment, has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 9.1 of this Plan. Indicate who makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities (e.g., medical practitioner, employment worker, TA worker, local review team, etc.). Also indicate the source and type of information used to make the determination (e.g., information from individual's medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.).

The district does not have a process in place to determine whether or not an applicant/recipient who is unable to work can be restored to self-sufficiency.

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

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

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

The district is not tracking an individual's compliance with a treatment plan.

# 10. District Certification

#### 10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of 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, 2024 through December 31, 2025. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations, and provisions of this Plan.

1/23/2024 Brian Hart Commissioner