

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

January 1, 2020 – December 31, 2021

## **Cortland County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Cortland 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 Cortland 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/ KM 1/31/2020

Kristen Monroe, Social Services Commissioner

1/31/2020, 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 DSS Employment Unit operates the employment programs for Cortland County. This Unit coordinates all employment activities with other Cortland County Department of Social Services units through the establishment of joint policies and procedures. The Employment Unit is comprised of: One Social Welfare Manager, five Senior Social Welfare Examiners (Sr. SWE), one Case Aide, and one Work Experience Supervisor. The Sr. SWE's complete and monitor all comprehensive assessments and employment plans, and make referrals to other program units as needed. The Work Experience Supervisor assists with employment plan development and activity monitoring in addition to providing work experience activities. One Disability Analyst, who performs under contract through J.M. Murray Inc. but is physically stationed at DSS, completes all disability assessment work for the unit by working with doctors to determine employability and any limitations that exist. The Disability Analyst also helps people pursue Supplemental Security Income when appropriate. The Social Welfare Manager supervises all of the positions that comprise the employment unit and that are outlined above.

The Department's Temporary Assistance and SNAP SWEs are responsible to determine initial employability. These SWEs refer all individuals to either employment or a disability evaluation process. They address issues of compliance for exempt individuals who are not considered employable. The Employment Unit staff addresses conciliation and sanction issues for non-exempt individuals.

In addition to the services of a Disability Analyst, the Department contracts directly with J.M. Murray Inc. for additional services as well. J.M. Murray Inc. provides a weeklong job search workshop service for all Temporary Assistance applicants who are considered potentially employable, Temporary Assistance or SNAP recipients who express a desire to attend. Specifically, they provide orientation, assessment and job search services in coordination with Department staff. The contract services with J.M. Murray Inc. are intended to be in place for the duration of this plan, but will be terminated should funds become unavailable.

### **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>
J.M. Murray, Inc.	\$60,698	<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%	Job search and assessment workshop
J.M. Murray, Inc.	\$63,113	<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%	Disability assessments and self-sufficiency planning recommendations
Industrial Medicine Associates, PC.	\$2,500	<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%	consultative medical examinations
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$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%	

**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>
J.M. Murray, Inc.		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Access VR
OCM BOCES		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	ESL Classes, Vocational Education
CAPCO		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	High School Equivalency (HSE)
Cortland Works Career Center, Employment and Training		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	WIOA 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%	
		<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%	
		<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)

### 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.
 

Cortland DSS contracts with JM Murray, Inc. to provide a weeklong Job Search Workshop for all potentially employable Temporary Assistance applicants, or Temporary Assistance or SNAP recipients who wish to attend. This Workshop is held at the Cortland Works Career Center, providing staff and clients with access to Career Center services.

Career Center staff have been made aware of the MyBenefits website and have access to the Cortland DSS website, which has updated information on how to apply for all DSS

programs. Career Center staff also have a DSS agency phone list, and have phone access to all DSS staff.

The Common Application has been provided to Career Center staff, so that they can provide the application to any individual within the community who request one.

As part of the WIOA partnership workgroups in 2017, an Interagency Referral Form was created, providing a generic referral that the Cortland Works Career Center and other community agencies, including DSS, can use to refer any client for needed services within the community.

## **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:

“Engaged in work” is defined as actively participating in any local district approved activity including, but not limited to, services that will assist the individual to become self-sufficient. The Cortland County Department of Social Services reserves the right to assign recipients to up to 40 hours of work activities (defined in Section 3.4), in any combination that will increase the recipients’ employability.

The activities that the Cortland County Department of Social Services will approve to assist participants in becoming self-sufficient include, but are not limited to, physical therapy, mental health counseling, drug and alcohol counseling, psychological testing, rehabilitation treatment, and supported work. These activities may be used to assist individuals in work activities to overcome their barriers.

### **Section 3.2 Orientation (Reference 18 NYCRR 385.5)**

Check one of the following:

- The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.
- In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

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

Temporary Assistance staff provide a face to face orientation to all applicants and recipients individually at application and at recertification.

### **Section 3.3 Assessment and Employment Planning**

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

- a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):
  - The district enters assessments directly into WTCMS
  - The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.
  - The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.
  - The local equivalent does not contain additional elements other than what is required.
  - The local equivalent does contain additional elements beyond what is required, listed below:
  
- b. Describe the district procedure for the completion of an employment assessment:

The one-page Employment Assessment is used at all initial eligibility appointments. The Social Welfare Examiner completes this form individually with the client at the face to face eligibility interview, to ensure that all questions are answered fully and to determine initial employability. Completion of this mini-assessment allows the worker to make a determination as to the next direction the case needs to go: the Job Search Workshop, Disability Analyst, or for an Alcohol/Drug Assessment. This assessment is reviewed and updated, if necessary, at every subsequent recertification. If there are any adult household members who are not present at the eligibility interview, a separate appointment will be made with them for purposes of completing the assessment. At case opening, the TA Intake Worker sends an email to the Employment Unit. The Employment Senior SWE then schedules the case with an appointment for a full employment assessment/completion of the employment plan. All adults, including 16 and 17 year olds not in school, adults with dependent children, and adults without dependent children, receive an employment assessment within 90 days of eligibility determination.
  
- c. The district administrative unit or contractor responsible for conducting assessments is:

The local district Temporary Assistance/Employment Unit
  
- 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)]

All staff will receive training in assessment and employability development to prepare assessments and plans. Staff will be trained in the agency by experienced supervisory staff and will be required to attend state training specifically for Temporary Assistance and SNAP employment programs, as it is available. All Social Welfare Examiners completing assessments must meet the following qualifications: Graduation from a regionally accredited or NYS recognized college or university with an Associate's Degree; or Graduation from high school or possession of a high school equivalency diploma and two years full time paid experience or it's part-time equivalent in examining, investigating or evaluation claims for assistance, veterans, or unemployment benefits insurance or a similar program operating under established criteria for eligibility; or An equivalent combination of training and experience as described previously.
  
- 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?  
Every 6 months or when there is a change in employment status.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):

The district enters employment plans directly into WTCMS.

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

The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent.

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

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

b. Check one of the following:

The same administrative unit or contractor that conducts employment assessments also develops employment plans.

A different district administrative unit or contractor develops employment plans, and their qualifications include

c. Describe the district procedure for the completion of an individual's employment plan. At case opening, the TA Intake Worker sends an email to the Employment Unit. The Employment Senior SWE then schedules the case with an appointment for a full employment assessment/completion of the employment plan. All adults, including 16 and 17 year olds not in school, adults with dependent children, and adults without dependent children, receive an employment assessment. While this is typically completed within 1 month of case opening, all assessments and plans are completed within 90 days of

eligibility determination. A copy of the completed plan is provided to the client.

- d. How often and under what circumstances is the employment plan updated?  
Every 6 months or whenever there is a change in employment status.

**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 Employment Unit Manager reviews the participation management reports through the COGNOS system monthly with staff to identify individuals that are not enrolled in activities or are not meeting required participation rate hours. The WTWCMS system is also used to identify enrollment of individuals and participation in activities. Non-exempt individuals are engaged in Job Search activities within two weeks of applying for assistance and they are engaged with other employment activities within two weeks of opening a case. The Disability Analyst tracks all exempt individuals. The Disability Analyst receives all verification to document the individual’s exempt or non-exempt status. When documentation is received that states a change in status from exempt to non-exempt, individuals are referred immediately to the Temporary Assistance/ Employment worker to schedule an assessment appointment within two weeks. The Temporary Assistance/Employment worker completes the Notice of Temporary Assistance Work Requirements Determination - Non-Exempt (LDSS-4005a). The Employment Case Aide tracks individuals who are exempt due to alcohol/substance abuse issues. Monthly reports are sent to the treatment agencies to report the individuals’ participation hours, progress with treatment, and any change from exempt to non-exempt status. When a change from exempt to non-exempt status is reported, the individual is immediately referred to the Temporary Assistance/Employment worker to schedule an assessment appointment within two weeks. The Temporary Assistance/Employment worker completes the Notice of Temporary Assistance Work Requirements Determination - Non-Exempt (LDSS-4005a). If individuals are exempt because they are needed in the home to care for an incapacitated household member, medical documentation is required to determine the continued need for the individual to remain in the home to provide care. The participation standard for households with no children under the age of six is 35 hrs/week, and for single caretakers of a child under the age of six it is a minimum of 20 hrs/week.
- b. Estimate the number of individuals expected to receive employment services:

	<b>Households with Dependent Children</b>	<b>Households without Dependent Children</b>
--	---	--

	Average Monthly	Average Monthly
Individuals	200	250

- 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:

On a monthly basis a number of COGNOS reports are pulled by the Unit Director and forwarded to the Employment Manager and Senior Social Welfare Examiners. The Examiners use these reports to address individuals who are not participating in work activities, those who are participating but who are lacking the number of hours to meet full engagement, sanctioned individuals who can be assessed for work barriers, and exempt individuals who may need to pursue an SSI application. The monthly reports pulled include: Activity Status of Adults, Employability Code Duration Report, Adults with Earned Income and No Employment Schedule, Sanctioned Adults, and Nonparticipating Adults.

- 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):

Our district does not mandate SNAP E&T work activities.

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):

All SNAP work registrants are notified, by mail, that job search assistance is available to them and are provided contact information for our department if they want assistance with job search. Job search is available to all SNAP applicants and recipients who express the need.

- 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 TA applicants are assigned to a week-long job search workshop for 35 hours at the Cortland Works Career Center (One-Stop Center) within 2 weeks of the TA application. All individuals receive instruction on how to complete applications, resumes, conduct job

interviews and use resources to assist them with their job search. During this week-long job search, individuals are given job referrals to any job openings that are consistent with their work abilities and interests. TA applicants are given a job search log to record the job contacts and are required to make 5 job contacts per week. The job contacts are reviewed by a DSS Case Aide to ensure compliance.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	5	10	
SNA Individuals	5	10	

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

If yes, the process for engaging TA **recipients** is: Once the recipient completes the Job Search Workshop, the Employment Senior SWE meets with the recipient weekly to verify their job searches and receive referrals for any job openings. Individuals are required to make 5 job contacts per week and spend a minimum of 5 hours per week on job search efforts.

- 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.  
Cortland DSS always approves self-employment as part of an individual's work activities, provided that the individual can provide documentation that proves their income from this employment. Income and expenses need to be proven for Temporary Assistance eligibility. The client can self-attest to the number of hours they participate in self-employment. If hours other than the net income divided by the federal minimum wage are reported as hours of work, then alternate documentation other than self-attestation must be maintained to verify the hours of work reported. Alternate documentation may include statements from individuals for whom the self-employed individual provides services, and time records used to document child care payments to those serving as child care providers (OTDA 08-ADM-07)
- 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.

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

	<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>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>
<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>

<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>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>
<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.

The following was provided by the Cortland Works Career Center Employment and Training Director: The Career Center has a staff of two Employment and Training Specialists. For the Summer Youth Program they solicit summer employment slots from around 70 local businesses and not-for-profits. For the adult population they post positions with the NYS Department of Labor. They have computers available for the public to use for job search and they also print and provide job seekers a weekly list of available jobs. Staff are available to help customers on a daily basis at the center. They provide ongoing service to those who want and need additional assistance. Cortland County DSS has established very successful partnerships with the agencies at the Cortland Works Career Center, Cayuga-Cortland Workforce Investment Area's Workforce One-Stop. The center in general serves as a resource for TA and SNAP recipients. The Computer and Resource Room lab and library provide computer based tutorials for skills building, internet access for job searching, copy machines, phones, fax machines and quality resume paper and stamps for job seeking purposes. Effective partnerships are established with Workforce Investment Act staff which facilitates and funds training for many of these participants so that they can get the skills they need to become employed and self sufficient. Participants are also registered in the One Stop Operating System (OSOS) "talent bank" for matching to job opportunities. DSS staff are emailed the Center calendar and workshop opportunities so that all work ready participants can benefit from these skill building opportunities. Partnering with the Center helps the participant workforce mainstream and creates a positive professional attitude that assists with being economically successful in the community. The Center also offers onsite Adult Literacy classes through BOCES. Cortland County Employment and Training also coordinates the TANF summer youth work experience program.

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:  
Cortland DSS refers individuals to OCM BOCES to enroll in Adult Basic Education, as they provide TASC (Test Assessing Secondary Education) classroom instruction. OCM BOCES is accredited through the Council on Occupational Education. The Community Action Program of Cortland County (CAPCO), has limited funding to provide HSE preparation for individuals under 21 years of age. Individuals needing this service are referred to CAPCO currently, although in the event of loss of funding those students would need to be referred back to their school districts. There is a local group who holds ESL classes at our local community center, we refer and track individuals sent to this. CAPCO is a New York State Community Action Agency (NYSCAA) and is a member of the national Community Action Partnership.
  
- 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:  
In addition to the basic educational programming described above, BOCES also offers Vocational Education and Job Skills programs. Job Search staff assess each applicant and recipient for strengths and skills, and how those strengths and skills relate to job searches and goal planning. Job Search classes are held at our local Cortland Works Career Center One-Stop, where clients have access to DOL staff as well. Job Search staff, DOL staff, and local DSS staff refer individuals appropriate for such services to BOCES programming, including such programs and classes as Certified Clinical Health Aide, Medical Assistant, HVAC, Electrical Maintenance Technician, Office Technology, Cosmetology, Licensed Practical Nurse, Mechanical Maintenance Technician, Automotive Technology, and Pharmacy Technician. Many computer, medical, and trade classes are held during evening hours to accommodate working participants. All Vocational Education program participants are able to apply for financial aid such as Federal Pell Grants and Federal Stafford Loans. BOCES provides Financial Aid Counselors to work with students on financing options. BOCES also holds a weekly open house for all interested participants. OCM BOCES is accredited through the Council on Occupational Education.
  
- 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:  
All non-exempt Temporary Assistance applicants attend a weeklong Job Search Workshop, and recipients maintain weekly contact with Job Search staff. This programming is provided through a contract with the J.M. Murray Center, who provides orientation, assessment, reading and math level testing (T.A.B.E.) and job search services. All clients identified as being in need of education programming or language instruction are offered the opportunity to attend BOCES programming, only those who are non-exempt are required to attend. BOCES offers adult HSE preparation and testing at various locations and times to accommodate individual schedules. Individuals under 21 years of age are referred to CAPCO for HSE instruction.

- 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:  
All individuals who have not obtained a high school diploma and who are interested in participating in an educational activity are encouraged and supported in their efforts to participate in available educational activities. This information would be gathered through the one-page Employment Assessment at the eligibility interview, at the Job Search Workshop, or at subsequent reassessment and recertification appointments.
- 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:  
Requirements include but are not limited to:  
Recipients are approved by Cortland County Department of Social Services for job skills or vocational education programs only when Cortland County Department of Social Services deems it necessary to enable such recipients to obtain employment or who are currently employed and require training to upgrade their position and earning capacity. Unemployed recipients are not approved if they already possess the skills and knowledge that enable them to obtain entry-level employment in the local job market. Additional requirements are:  
1. Recipients must achieve high school or equivalency diplomas before assignment to other job skills or vocational education activities; however, if such programs are available, recipients may be enrolled in job skills or vocational education programs that enable recipients to learn specific skills while achieving an equivalency diploma at the same time;  
2. Recipients must possess the prerequisite skills for a job skills or vocational education program or attend an approved program to achieve such skills;  
3. Recipients must demonstrate the aptitudes and abilities to benefit from job skills or vocational education as determined through evaluation of prior work/ training performance, counseling and/or testing;  
4. Those recipients who have previously engaged in approved work activities with DSS must have maintained 100% attendance\* and satisfactory performance in those activities;  
5. Recipients enrolled in job skills or vocational education programs must maintain 100% attendance\* and satisfactory performance according to the program's standards.  
\*100% attendance includes program excused absences
- 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:  
Cortland will approve post-secondary level education, up to a Bachelor's Degree, as a work activity up to two years, provided that:  
1. Recipients must demonstrate the aptitudes and abilities to benefit from education;  
2. Recipients must maintain 100% attendance, including excused absences;  
3. Recipients must maintain, at minimum, a 2.0 GPA;

- 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:  
Our Employment Case Aides track all employment activities assigned. After the 12 month lifetime education limit is reached, an Employment Assessment will be scheduled with the recipient to determine appropriate employment activities. Once assigned, the Employment Case Aide will track ongoing activities and hours of participation to ensure compliance.
- h. Education and training providers are evaluated by the following standards:  
Providers must demonstrate effectiveness in their programs; Providers must offer programs that enhance clients' abilities to secure unsubsidized employment; Providers must meet contractual goals and milestones; Providers must be willing to adjust their programs to meet the needs of the current client population; Providers' programs must reflect local labor market needs; Providers must be licensed or certified by the appropriate state regulatory agency; Providers' programs must be cost-effective and fiscally accountable.  
Before contracting with a new provider, the Cortland County Department of Social Services will receive documentation from the provider that will satisfy the above standards. Providers will be evaluated through performance measures established through each contract or agreement with the provider.
- i. The district procedure for advising participants of approved training providers is:  
The Cortland County Department of Social Services notifies recipients of approved training providers during orientations and at individual face-to-face interviews when completing assessments and developing recipient employment plans.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
Recipients are notified verbally and in writing. When an individual employment plan is being completed with the recipient, notification is accomplished verbally during the interview and in writing through the plan. Changes and updates in an employment plan are made verbally and in writing to the recipient.
- 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:

- I. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:  
The Temporary Assistance/Employment Unit verifies attendance with schools in writing at every case recertification. If a 16-18 year old is no longer attending high school, the TA/Employment worker schedules an employment assessment for the individual within two weeks.
- 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:  
Work limited individuals are assigned to activities that meet the limitations of the individual and which will not compromise their health issues. The limitations of individuals are provided in writing to all work activity site supervisors and work experience site supervisors.

### **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 WTCMS, excused absences and holiday time are documented in the case file and correctly reported on WTCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

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

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

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

### Use of Outside Providers/Vendors

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

Yes       No

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

Yes       No

If No, please describe the process used below:

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

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

The Department uses Language Line resources available through our phone service for translation as necessary. We refer participants to English as a Second Language courses

offered through OCM BOCES. Work sites that can accommodate non-English speaking individuals are also utilized as necessary.

### **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:

Examiners will be timely in sending out conciliation notices when participants are non-compliant, and sanctioning if the client continues to fail to participate. If there is good cause, the Examiner will make every effort to assist the client to overcome the barrier and allow them to participate.

### **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:

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

Sanctioned individuals are called in to the Department on a monthly basis to discuss past non-compliance and ways they can re-engage with employment activities. The Temporary Assistance/Employment worker discusses the effects such engagement would have on their individual benefit situation depending on the type of sanction.

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

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

The Department provides local employment resources during orientation. Additionally, all non-exempt individuals are required to attend a five-day job search workshop. This workshop is held at the Cortland Works Career One Stop Center where individuals are exposed to all local employment opportunities.

Applicants that are working or obtain employment can receive assistance for transportation with gas cards or bus passes if needed. The agency also provides additional assistance for any work related costs such as licenses, uniforms and tools.

The Department is applying the child care in lieu of temporary assistance guarantee rules to applicants, and is providing applicants with information regarding this option.

## **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:

To the extent that federal and state resources are available, the Cortland County Department of Social Services provides transportation and work-related expenses essential to obtain employment, case management and medical assistance to applicants and recipients in work activities. Whenever an expense listed below is cited as being once per year, it shall mean one time in any twelve (12) month period of time.

TANF funded supportive services will be provided to those families now receiving Safety Net assistance whenever such services are countable as TANF non-assistance with the exception of transportation services that will only be provided to such families who are employed.

All work-related expenses must be prior approved by the Cortland County Department of Social Services. Expenses must be essential so that the individual would not be able to engage in the work activity without the expense and the individual has no other resources to obtain payment for the expense.

Clothing purchases are approved when the individual does not have the items of clothing that are essential to perform the work activity and has no other resource to obtain the clothing items. The maximum for each item is \$100.00 and the maximum reimbursement per individual per year is \$200.00.

Vehicle expenses may be prior approved when the vehicle is essential to transport the individual to the work activity, when no other resource is available to transport the individual. The cost of any repairs must not exceed the book value of the vehicle and the individual must present two estimates from a NYS licensed automobile repair shop. Vehicle insurance may be reimbursed for one month at a time up to three months. Maximum reimbursement for all vehicle expenses, including insurance, is capped at \$800.00 per year.

Transportation needs for families who have exhausted their TANF lifetime benefits and who are in receipt of Federally Participating Safety Net assistance will be met with TANF funds whenever individuals in such families are employed and to the extent that TANF funds are available. For those Safety Net families who are unemployed, non-TANF funds will be used to meet transportation needs when necessary.

Work related expenses may also include licenses and fees essential to obtain subsidized or unsubsidized employment. A statement from the prospective employer is required. The maximum reimbursement for such work related expenses is \$200.00 per year; fees cannot be alcohol, drug or child support related.

To the extent federal and state resources are available, case management is provided to applicants and recipients with limited English proficiency and those whose employment plans indicate the need for two or more concurrent work activities. In addition, to the extent federal and state resources are available, case management is provided to families with multiple barriers to employment and case management is provided to potentially employable and work limited individuals.

When appropriate, a child care subsidy is guaranteed to applicants and recipients whose children are eligible for child care under 18 NYCRR Section 415 and who need such care to participate in approved activities. Applicants and recipients are responsible, with DSS assistance if needed, for locating appropriate day care.

- 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):

- 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:

Individuals are primarily responsible for their own transportation planning. Individuals are responsible for their own transportation if they are within two (2) miles of their work assignments or the nearest public transportation bus stop. Individuals presenting extenuating circumstances such as physical issues may be exempt from the 2-mile limit policy. When the assignment is over two (2) miles, individuals are pre-approved by the Employment Unit to receive bus vouchers or are pre-approved to receive reimbursement for transportation expenses at the current IRS medical/moving rate per mile up \$30.00 per month. If the actual transportation costs for an individual to travel to an assigned site exceed this amount, the actual cost of transportation will be reimbursed or the individual will be assigned to another site at the Department's discretion. A reimbursement amount up to \$45 was selected as this amount covers an unlimited travel bus pass within Cortland County.

- 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:

### **Section 4.2 Transitional Support Services**

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

Applicants that are working or obtain employment can receive assistance for transportation with gas cards, bus passes, and car repairs if needed. The agency also provides additional assistance for any work related costs such as licenses, uniforms and tools.

Individuals who are open Temporary Assistance are eligible for child care. Our Department provides assistance in locating appropriate, accessible providers and covers child care expenses.

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:

In addition to the mandated transitional programs, the Cortland County Department of Social Services will provide case management and work-related expenses when the Department deems such services necessary for the individual to retain employment, and to the extent federal and state resources are available. In some instances, referrals will be made to case management programs provided within the community. Work-related expenses are deemed necessary when the individual would lose employment without the expense, when the individual has no other resource to pay for the expense, and when the individual presents an estimate to the Department for prior approval. Reimbursement for the expense must be necessary for the individual to maintain unsubsidized employment. Reimbursement for transitional supportive services will be limited to the services and monetary amounts outlined in 4.1a

### **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:

The Department will make referrals for individuals to community programs offering services to individuals eligible under the 200% of poverty eligibility guidelines when available. Our local Job Center/One Stop does operate a summer youth employment program utilizing these guidelines, we coordinate with them to facilitate referrals from our current TA caseload and to help verify eligibility.

## **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

Conciliation notices are mailed or hand delivered to recipients. The notice states specific reasons for the notice and advises the recipient they must respond within the required timeframe for the case type. If the recipient fails to respond to the notice, then all available information is used to determine good cause. If they are found to have willfully not complied and no good cause is found, a ten (10) day notice of intent to reduce or discontinue benefits is sent to the recipient.

When a recipient responds to a conciliation notice, an Employment Unit worker discusses the issue and the recipient's explanation of failure to comply with the request with the recipient. The Employment Unit worker will make a determination based on the discussion with the recipient whether the noncompliance was willful and if there was good cause for failure to comply. The Employment Unit worker may, when possible, have an immediate discussion with a recipient upon hand delivery of a conciliation notice and make a determination whether or not the compliance was willful and if the individual had good cause for failure to comply.

If, after discussion with the Employment Unit worker, the recipient's issue is resolved, the recipient is advised verbally or in writing. If the issue is not resolved and it is determined by the Employment Unit worker that the individual's failure or refusal to comply was willful and without good cause, the recipient is sent a ten (10) day notice of intent to discontinue or reduce benefits. All notices contain advice to the recipient concerning the right to a fair hearing.

The conciliation process for Family Assistance cases shall be completed within thirty days (30) from the date the conciliation notice was issued and the process for Safety Net cases shall be completed within fourteen (14) days from the date on which an individual requested conciliation unless the individual and Department agree to an extension of time frames pursuant to regulatory guidelines.

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

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

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

Individuals will be provided with conciliation notices and the process outlined in section 5.1 above will be followed. The Employment Unit worker will make a determination of good cause/willfulness based on the discussion with the recipient and determine whether the recipient had good cause for failure to comply and if the noncompliance was willful. Good cause is defined to include circumstances beyond the individual's control, such as, but not limited to, illness of the individual, illness of another household member requiring the presence of the

individual, a household emergency, or the lack of adequate child care for children who are between 6 and 13 years old, or other extenuating circumstances approved on a case by case basis.

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

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

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

If a SNAP recipient wishes to engage in a work activity to demonstrate compliance, the Employment worker assigned to their case would assign the recipient to 10 hours over a 10 day period of job searching or applicable employment activities (such as the appropriate number of work experience hours or employment) to enable them to avoid a sanction.

## **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:  
If an individual who is sanctioned expresses a willingness to comply, specifically by telling us verbally or in writing that they are willing to participate in assigned activities, the assigned worker will schedule a face to face interview with them to complete a current employment assessment. This is all which is required to demonstrate compliance. We discuss with the sanctioned individual the reason why the noncompliance occurred and make adjustments to the employment plan as deemed necessary to try and avoid future noncompliance.

At the end of the sanction duration period, sanctioned individuals will be contacted by their Temporary Assistance/Employment Worker regarding their willingness to comply with the necessary requirements to be added back on to the case. An appointment will be made for the sanctioned individual for a reassessment to be completed and to modify the employment plan. The individual will be added back to the case if they are willing to be compliant and keep a scheduled face to face interview with the worker within 10 days. TA benefits will be restored retroactive to the date when the individual expressed a willingness to comply, 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:  
If a SNAP individual wishes to comply, the individual will be added back to the case if they are willing to be compliant and keep a scheduled face to face interview with the worker within 10 days. At that time appropriate work activities can be assigned. The individual may be eligible for SNAP benefits before the end of the durational period if the individual documents their exemption from SNAP work requirements and are 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):

The Examiner will set all clients claiming disability with our contracted Disability Analyst. The Disability Analyst will meet with the client and assist them in obtaining proper medical documentation. If the client does not have a medical provider the Disability Analyst will recommend that the client obtain one, or will refer for an independent medical evaluation. The client's physician's statement will be accepted unless information exists which conflicts with this statement, in which case an independent evaluation will be set up.

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 Disability Analyst reviews all medical documentation received by the agency. The medical documentation and recommendations are then forwarded to the TA eligibility worker or employment worker for appropriate action to be taken.

## 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 Disability Analyst works with individuals to determine the extent of their disability. Based on documentation received from medical professionals, the Analyst determines whether or not the individual is permanently disabled and could benefit from a SSI application. The recommendations of the Analyst assist Temporary Assistance/Employment workers in determining if an individual should be enrolled in a program to assist them in achieving self-sufficiency. Such recommendations include the expected duration of disabilities.

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

Whenever the Disability Analyst determines an individual is work limited, activities that meet the limitations of the person and which will not compromise health issues are selected. This is done on an individualized basis. We continue to work with medical professionals to engage these individuals in recommended treatment and other employment related activities.

J.M. Murray Inc. also coordinates the ACE program which has assisted DSS with the opportunity to place individuals with mental illness in a volunteer role in the community. Participants meet on a weekly basis to assess their skills and discuss their previous week's volunteer experiences. Individual and group counseling is also provided, as well as skills development training. When participants become employment ready, they are referred for ACCESS VR services

- 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:

For those individuals working with our on-site Disability Analyst, referrals are provided to the Employment and Temporary Assistance Units whenever someone fails to show for a scheduled appointment or fails to provide required documentation within timeframes provided. Individuals are also referred to the Disability Analyst for updated disability determinations when exemption time periods run out. We currently communicate with our local counseling agencies on a monthly basis to obtain updates and progress in treatment. Our plans for these individuals are updated as their case situations and employment status changes.

Appendix A: Organizational Chart

Appendix B: Initial Employment Assessment Chart