

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

January 1, 2020 – December 31, 2021

## **Delaware County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Delaware 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 Delaware 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/ SEA            12/17/2019

Sylvia Armano, Social Services Commissioner

12/17/2019, 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.

Since we are a generic County, all Program Specialists are responsible for employment functions. The Delaware County Department of Social Services Temporary Assistance employees are responsible to provide the Welfare-To-Work services. These Department employees are responsible for: orientation/job search, assessment, employability determinations, employability planning, assignment to work activities, monitoring of participation, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, conciliation, sanction, dispute resolution and coordination of supportive services provided to individuals to enable them to participate in WTW activities including employment and retention services. Coordination and consultation with other partner units/agencies including: the Child Support Coordinator, the Delaware County Attorney's Office, the Resource Coordinator, Fraud Unit, the Director of Services, Delaware Opportunities, the Office of Temporary and Disability Assistance, the Office of Employment and Training, BOCES, Afton Consortium of Schools, and SUNY Delhi.

Delaware Opportunities (a Not-for-Profit Community Service Agency) is responsible for the following: 1) Develop work sites and secure work experience at not-for-profit organizations and/or municipalities. In addition, provide two work experience crew supervisors and operate two work experience crews. 2) Child care referral and assuring the availability of child care services and providing payment toward such expenses to eligible clients. 3) Post employment services 4) Job Development/Job Retention.

The CDO Workforce assists with job placement and participates in job readiness training, and case management.

The OTDA Jobs Program Specialist assists with employment referrals, job placement orientation/job search and job readiness training.

### **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>
Delaware Opportunities	\$291,828.00	<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%	Work experience, job development, job search, job readiness training, job counseling & coaching, and Work In Progress
	\$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%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

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

**Table 2 – Other Service Providers**

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

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Afton Consortium of Schools	State Education	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Adults Basic Education and HSE
BOCES	State Education	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	HSE, Vocational Training
Oneonta Community Education Center	State Education	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Adult Basic Education, HSE, English as a Second Language
SUNY Delhi	State Education	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational Training
		<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)

Jobs staff person participates in Work In Progress Program, weekly orientation/job search class and job referrals. In order to assist a greater number of job seekers, the job staff works out of two locations, Sidney (WIOA Satellite office) and Delhi (DSS).

### 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.

Applications for Temporary Assistance and SNAP are located at the Career Center in Delhi and Sidney. The Department refers clients on Application and Recertification to the Career Centers with a turn around document. Career Center staff would contact a Principal Program Specialist if they have an individual that needs District Services.

## **Section 3 Engagement and Work Preparation**

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

For purposes of satisfying the federal requirement which states that parents or caretakers must be engaged in work as soon as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance, district’s definition of “Engaged in Work” is:

Compliance with assessment, employment planning, all activities included in the individual’s Employment/Self-Sufficiency plan including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 3.4. Also included is pursuit of other forms of income such as SSI and SSDI.

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

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

Check one of the following:

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

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

Delaware County combines Orientation and Job Search Class. We, in conjunction with Delaware Opportunities employment staff and OTDA JOBS staff, provide the following information: diversion payments, Temporary Assistance budgeting, subsidized child care and transitional Medicaid benefits, alternatives to temporary assistance, other resources (CDO Workforce, OTDA Jobs Program, Delaware Opportunities), barriers to employment and potential solutions, sanction information, where to look for work, application completion, resume development, requirement to engage in work, attend school if a teen parent, explanation of rights and responsibilities of applicants and recipients and of the benefits and obligations of participation in employment activities, time limits, supportive services, vocational training options, availability of HSE, ABE and English as a second language classes. Emphasis is placed on the temporary nature of assistance.

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:

The Temporary Assistance staff (we are a generic county) conduct the orientation/job search. Delaware Opportunities conducts the job application completion and interviewing skills portion of the class. OTDA JOBS, Programs Staff provides job referrals and resume development. Applicant Orientation/Job Search is conducted in a group setting every Thursday from 9:00 to 1:00pm. Applicants are advised to attend one of the next two orientation/job search groups following the eligibility employment assessment interview. On a case by case basis, we will conduct one on one orientation/job search information. At recertification, the program specialist

assigned to the case would advise the recipient to attend one of the next two orientation/job search groups following the recertification interview.

### **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:

In addition to the LDSS 4930, the District conducts a reading assessment and work history form. Individualized assessments can be provided to those with special needs. If an individual is enrolled in the Work In Progress program, input from the Program is incorporated into the assessment including the TABE Test. Other agency assessments may be accepted by Delaware County which provide the same information.

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

All applicants are provided an employment assessment at the interview for Temporary Assistance Benefits. At the eligibility interview, the households with dependent children age 16 and 17 and not in school are advised the 16 and 17 year old will be called in for an assessment within 30 days. Applicant households with a 16 or 17 year old will also be advised of the requirement to verify school attendance. Applicant and recipients assessments are reviewed to determine the strengths and barriers of each client. Recipient assessments are reevaluated at Recertification and updated on an as needed basis or when case or individual's circumstances change including participants work status and activity assignment.

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

The District's Temporary Assistance Program Specialists conduct the assessments for applicant households with children and households without children with the Senior Program Specialists reviewing the completed assessment. If a Senior has any questions regarding the assessments, a Principal Program Specialist would provide input.

- 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)]

Program Specialists are required to have a two year Degree or, if promotional, 1 year agency related experience, or 3 years of college credits

- 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?

Programs Specialists review and update individual assessments at Recert and if a client has a substantial change in circumstances.

### 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.

Program Specialists complete the Employment Plan with the client at the interview for Temporary Assistance.

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

Our Program Specialists and Principal Program Specialists in conjunction with the client's and partner agencies routinely update plans on an as needed basis when case or individual circumstances change.

### **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 Program Specialists are required to enroll clients in activities immediately after case opening. At the beginning of each month, a Principal Program Specialist reviews each temporary assistance recipient to ensure he/she is engaged in activities.

Non-exempt applicants are referred to the OTDA Jobs Program Specialist for job referrals immediately after the eligibility interview. Applicants are referred to Delaware Opportunities for worksite placement immediately after the eligibility interview. Delaware Opportunities conducts the worksite placement assessment at the Orientation/Job Search class. At case opening, the client is assigned to participate in an activity. Program specialists are required to monitor worksite participation via time sheets.

If an individual's status changes from exempt to nonexempt, the program specialist would refer the client to engage in activities upon determining the client is no longer exempt.

The district's participation standard is 40 hours per week for households without children under age six in a countable work activity. Single parent caretakers of a child under 6 may be required to participate up to 40 hours weekly as long as all necessary supportive services are authorized.

A recipient who provides unlicensed child care and who receives less than the hourly minimum wage in payment will be required to participate in 35 hours of activity each

week, not including the hours of provision of child care. However, two weeks will be allowed to the recipient to give notice to the parents of the child(ren) receiving the care: additional time may be permitted as determined by the district based on case circumstances.

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	20	20

- 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:

A Principal Program Specialist monitors the activity status of non-exempt and exempt individuals no less than bimonthly to monitor progress toward meeting the work participation requirements and to ensure full engagement by recipients in work and/or work preparation activities. The TANF Adult Cases Receiving Assistance in the Current Month is also monitored bimonthly. Other COGNOS reports are reviewed bi-monthly. WTW/CMS is also utilized.

- 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):

The District will require Non-Temporary Assistance Supplemental Nutrition Assistance (NTA SNAP) applicants and recipients to participate in SNAP E&T work activities. Non-exempt NTA SNAP individuals will be called in for assessment, and assigned to supervised Job Search. If an individual is not successful at finding a job, then an assignment to another work activity, such as work experience may be made. Program Specialists assign NTA SNAP non-exempt individuals to supervised job search. They monitor the client's progress weekly usually 5 contacts per week for two weeks.

NTA SNAP work registrants are informed at application and recertification of services available. If the client has any questions regarding job search services, the Program Specialist will address them. The worker will also assist with other activities including case management, referrals to the CDO One Stop, the OTDA Jobs Specialist, Work In Progress, and may participate in work experience if slots are available.

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):

- 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:

Households with dependent children are assigned to complete a minimum number of 5 verifiable job search contacts and a minimum number of 5 hours per week. Households without dependent children are assigned to a minimum number of 5 verifiable job search contacts and minimum number of 5 hours per week. Applicants are required to submit the Job Search Handbook to the program specialist that has the application/recertificaton. The program specialist will review the job search handbook to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply, and interview for a job as well as time spent preparing and sending follow-up materials to an employer. We are using a modified Job Search Booklet LDSS-3696 (11/17). All participation in job search is documented, reviewed, monitored and tracked on a weekly basis by the program specialist.

During the application period, applicants are expected to meet with the OTDA Jobs Program Specialist for job referrals. The Jobs Program Specialist has weekly contact with the applicants to follow up on their job referrals. Applicants are also expected to meet with Delaware Opportunities for their worksite interview and job referrals.

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

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

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

When we issue a job search, we use the same process. In addition, Delaware Opportunities take recipients to employers to apply for job openings within his or her work abilities and interests.

- 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.

A recipient that is self employed and who receives less than the hourly minimum wage in earnings will be required to participate in 35 hours of activity each week, not including the hours of self employment. Delaware Social Services will allow 2 months to all self-employed individuals to increase business income. Additional time may be permitted based on case circumstance.

- 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>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Work Experience</b> - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student’s education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Community Service</b> - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Search</b> - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> <li>— SNAP</li> </ul>	<p><b>SNAP E&amp;T Supervised Job Search</b>- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Readiness Training (JRT) Activities</b> - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Vocational Education</b> - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Job Skills Training</b> - Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>

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

### Section 3.5 Job Development

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

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

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

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

District Program Specialist staff have the capability to contact employers to solicit jobs for applicants and participants.

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.

Delaware Opportunities has 2 crew chiefs on staff that also perform job development/job retention for our recipients. They meet with our participants and contact employers on their behalf. The crew chiefs participate in the Work In Progress (job readiness training program) and provide transportation to job interviews.

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:

Based on the applicant/recipient reading scores, the individual would be assigned to participate in ABE/HSE/English language instruction. The providers of these services are limited to Afton Consortium of School, Oneonta Community Education Center, Literacy volunteers and BOCES. We have a long standing cooperative relationship with each of these education providers. We would assign the client to the class closest to their home. Delaware County DSS Program Specialist would discuss at assessment and recertification the availability of classes.

- 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:

Our Vocational Education and Job Skills Training Programs are provided by SUNY Delhi and BOCES. They provide a range of training and have training resources to meet our needs.

We have frequent contact with both and would inform clients of the vocational programs offered (both training providers participate in our Work In Progress Program). As we are aware of Job Skills programs, we refer our clients.

- 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:

As part of our assessment, we offer applicants information on the availability of educational activities in their area.

- 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:

We would discuss the educational opportunities for all individuals without a high school diploma or HSE and would approve as appropriate. It is unlikely that the Agency would deny participation in educational activities since we encourage/mandate attendance in ABE/HSE

- 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:

Participants must meet the following requirements: Training must be for a specific skill or occupation relevant to the local labor market and must be sufficient to enhance the recipient's opportunity to secure unsubsidized employment. Education designed to provide high school diplomas or their equivalent, basic education, English as a second language and Literacy training. Education/work activities are approved based on the Delaware County training policy. Training is approved if it can be determined that the individual's current skills are obsolete or the individual lacks sufficient skills to find gainful employment.

At the interview for Temporary Assistance/SNAP, the Program Specialists discuss vocational, educational and job skills training opportunities as part of the Employment Assessment. In addition, The Department discusses at Orientation/ Job Search, the Vocational, Educational and Job Skills Training opportunities in Delaware County and the contact information for these. At recertification, the Program Specialists, again discuss the benefits of Vocational Education, ABE/HSE, and Job Skills Training to increase and maintain enrollments.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:

The Department approves up to a one-year vocational program.

- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20

hours in paid employment activities which may include work study, work experience or community service:

The Department only approves up to one year of post secondary education.

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

Progress reports are required on a monthly basis. Outcomes will be reviewed on a semi-annual basis to be evaluated for contributions to job readiness and job placement of a participant. Approved training providers will prepare customers to qualify for local job opportunities.

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

Training approval is determined by an assessment of the clients' current job skills and employment goals as they relate to the local labor market conditions. Each recipient, on request, will receive a list of approved training providers.

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

Clients are enrolled in training or assigned to work activities after completing an assessment with a Program Specialist. Each client is given a letter via WTCMS providing the following information: the enrollment date of the specific activity, the number of hours available per month, and the interview date, if appropriate. If work experience, the participant will be given an assignment letter via WTCMS that includes enrollment date, hours available, worksite and address of worksite, information regarding daycare and transportation is discussed at employment assessment.

- 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:

School attendance policy for 16 – 18 year old students is the same as the local school district policy. Attendance is monitored by the school district with notification of attendance issues and copies of report cards to the local district. Program Specialists track attendance at Application and Recertification.

- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:

Following the initial interview and at recertification, both applicants and recipients who identify as incapable of participating in employment or job preparation services will be given form LDSS-4526, "Medical Examination for Employability Assessment, Disability, Screening, and Alcoholism/Drug Addition Determinations" and asked to make a medical appointment with their physician to complete the form. If there are medical records that the applicant wishes to submit the eligibility worker will assist, if asked, in gathering more information. If an applicant does not identify as incapable of participating in employment or job preparation services in any capacity the examiner will review the "Waiver of New York State Welfare-to-Work Medical Review Procedure" (from Chapter 15, Model Documents, NYS TA and SNAP Employment Policy Manual) with the client.

The participant medical form is reviewed by a program specialist prior to the participant being assigned to a work activity. The medical can be reviewed by a principal and, if necessary, our A.D. person if the program specialist has a question regarding the medical information. The agency also refers clients to the County Physician for a second opinion. The worksites are informed in writing of any/all work limitations.

### **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 WTCMS and documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

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

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

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

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

### Use of Outside Providers/Vendors

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

Yes       No

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

Yes       No

If No, please describe the process used below:

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

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

We have 3 Bi-lingual employees. Each employee is proficient in Spanish. Language identification signs are posted at Reception as well as available to workers to assist clients in identifying their first language. In addition, we can utilize the language line services and they will provide an interpreter via phone conference.

### **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:

During our application, orientation/job search, DSS, and Delaware Opportunities stress the importance of attendance in work activities. When individuals attend Work In Progress, the facilitator and employers stress the importance of attendance. While on a work crew, the crew chiefs encourage attendance and assist with problem solving skills to facilitate increased attendance in work activities. All Agencies counsel clients on the importance of having backup childcare and transportation arrangements.

### **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:

Delaware County's sanctioned individuals are limited in number. When we do process a sanction, we contact the agencies involved with the person (Services, OTDA, Mental Health, Delaware Opportunities, etc.) to determine what we can facilitate to have the person comply. We also assign sanctioned clients to a Pathways group for an ongoing eligibility review; during the Pathways meeting we try to encourage sanctioned individuals to comply with work activities.

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

Program Specialist would make an appointment with the sanctioned participant to discuss compliance and reinstatement. Sanctioned participants are also required to attend monthly Pathways meetings. At the conclusion of the monthly Pathways meeting, the Principal Program Specialist would meet with the sanctioned participant to discuss compliance and reinstatement.

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

Same as above.

### **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 information regarding subsidized housing, subsidized daycare, income disregards, child support, earned income tax credits, WIC, and supportive services are discussed at Orientation/Job Search, Pathways meetings and Recertification.

## 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:

Support services, based on need, include the following: 1) Clothing allowance for training, work experience, unsubsidized and subsidized employment, 2) Professional license fees and other work related fees necessary for participation in training and to accept/retain employment, 3) Moving expenses to another community if it deems such service is appropriate. 4) Jobs related safety equipment – protective gloves, boots, and etc. needed to accept/maintain employment. 5) Tools and equipment necessary to participate in training and to accept/retain employment. 6) Transportation for activities, including the cost of transporting children of TANF participants to/from daycare, car registration fees, car insurance, 5 hour course, car repairs, permit/driver's license, gasoline vouchers, mileage reimbursement rate of .505 cents (same rate for mileage reimbursement for County Employees). The district reserves the right to consider other needs for supportive services necessary to enable an applicant/recipient to participate in an employment activity or retain employment. The need must be documented and approved by a Principal Program Specialist based on the availability of funds. Support Services in excess of \$500.00 needs to be approved by the Deputy Commissioner.

- 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): Delaware County attempts to provide whatever is necessary for the client to participate in activities. The Department develops with the applicant/recipient a transportation plan. The Department may contract with Delaware Opportunities to

transport a recipient to and from full-time work for a limited time in order for the recipient to complete a transportation plan. The recipient may be eligible for a vehicle donated to the County. The Department has two work crew vans that provide transportation to work activity sites. Clients can be assigned to the mobile work crews that provide transportation or assigned to work sites that provide transportation. Also, the Department provides: gasoline vouchers and mileage reimbursement rate of .505 cents (the same rate for mileage reimbursement for County employees). In addition, the Department makes a reasonable effort to assign participants to appropriate work activities at a site as close as possible to a participant's home.

- c. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below each way to a work activity or to access public transportation:

The Department's policy is to require a participant to walk to a work activity assignment if the distance is no greater than 1.5 miles. There are several factors determining if an individual would be required to walk. For instance, a client's general health, if there are children that need day care, weather conditions, etc. The distance is the same as our local school districts require of middle school children.

- 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:

Supported services, based on need, will be issued to assist individuals at risk of needing temporary assistance to improve their opportunities for employment or to maintain their employment as outlined in Section 4.1.

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

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

In addition to case management, the district will make any supportive services (as outlined in Section 4.1) needed available to an individual whose case has closed due to employment, provided the supportive services is necessary for the individual to retain employment. The need for the supportive services must be documented. The supportive services will be provided pending the available funds. Supportive child care and transitional Medicaid will be provided, if eligible.

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

Same as 4.1

#### **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:

Same as 4.1

## **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

Delaware's process is as follows: Program Specialists will mail Conciliation Notification DSS 4230 to the recipient. Recipients must respond within the required timeframe. If the client fails to respond to the conciliation notice within the respective time frame or if the department determined from the conciliation that the individual's refusal to comply or failure to comply was willful and without good cause, the district will issue a ten day notice to impose an employment sanction consistent with 385.12.

If client responds, the client will be given an opportunity to explain why he/she did not comply. Client will be requested to provide, in writing, the reason for refusal or failure to comply. If client does not wish to state reasons, worker will record case notes on CMS. The client will receive written notification of the conciliation whether the determination was with or without good cause regardless of whether format is telephone or face-to-face. Conciliation is conducted by agency staff trained in the process to be followed.

If there is no response to the conciliation, the worker reviews the information available and if it is determined that the individual willfully and without good cause, refused or failed to comply with employment requirements a timely notice will be sent regarding the appropriate sanction. If there is a response, a conference is held with the client and employment worker. The employment worker and if necessary the supervisor, will make the determination that noncompliance was or was not willful and without good cause.

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

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

Conference is offered to the client by the Program Specialist, via mail, by phone or in person indicating that a failure or refusal to participate has occurred and indicates that the individual has a right to provide reasons for such failure or refusal to participate. If there is no response to the good cause conference, the worker reviews the information available and if it is determined that the individual willfully and without good cause, refused or failed to comply with employment

requirements a timely notice will be sent to post the appropriate sanction. If there is a response to an offer, a conference is held with the client and Programs Specialist. The Program Specialist and if necessary the supervisor, will make the determination that noncompliance was or was not willful and without good cause.

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

Delaware's process is as follows: Program Specialists will mail Conciliation Notification DSS 4230 to the recipient. Recipients must respond within the required timeframe. If the client fails to respond to the conciliation notice within the respective time frame or if the department determined from the conciliation that the individual's refusal to comply or failure to comply was willful and without good cause, the district will issue a ten day notice to impose an employment sanction consistent with 385.12.

If client responds, the client will be given an opportunity to explain why he/she did not comply. Client will be requested to provide, in writing, the reason for refusal or failure to comply. If client does not wish to state reasons, worker will record case notes on CMS. The client will receive written notification of the conciliation whether the determination was with or without good cause regardless of whether format is telephone or face-to-face. Conciliation is conducted by agency staff trained in the process to be followed.

If there is no response to the conciliation, the worker reviews the information available and if it is determined that the individual willfully and without good cause, refused or failed to comply with employment requirements a timely notice will be sent regarding the appropriate sanction. If there is a response, a conference is held with the client and employment worker. The employment worker and if necessary the supervisor, will make the determination that noncompliance was or was not willful and without good cause.

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

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

Conference is offered to the client by the Program Specialist, via mail, by phone or in person indicating that a failure or refusal to participate has occurred and indicates that the individual has a right to provide reasons for such failure or refusal to participate. If there is no response to the good cause conference, the worker reviews the information available and if it is determined that the individual willfully and without good cause, refused or failed to comply with employment requirements a timely notice will be sent to post the appropriate sanction. If there is a response to an offer, a conference is held with the client and Program Specialist. The Program Specialist and if necessary the supervisor, will make the determination that noncompliance was or was not willful and without good cause.

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

The SNAP recipient would contact Program Specialist for assignment to demonstrate compliance. SNAP recipient would need to complete 5 job search contacts. Individuals who demonstrate compliance with SNAP work requirements as assigned by the District will not be sanctioned for SNAP.

### **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:

The client would request reinstatement. As part of this request, the client would agree to comply and demonstrate compliance in an employment activity for a minimum of 5 days. The department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended and the client has demonstrated compliance for 5 days.

For TA individuals who have become exempt after the noncompliance, and, who have provided documentation of the exemption the department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended.

- 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:

The client would request reinstatement. As part of this request, the client would agree to comply and demonstrate compliance in an employment activity for a minimum of 5 days. The department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended and the client has demonstrated compliance for 5 days.

For SNAP individuals who have become exempt after the noncompliance, and, who have provided documentation of the exemption the department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended

### **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):

When an applicant or recipient declares a medical impairment, the local district issues a medical form DSS-4526. This form also states that the following information is required:

1. A specific diagnosis
2. Any specific work limitations caused by this diagnosis
3. The expected duration of these work limitations/prognosis
4. The duration of the disability

The local district has sole discretion in determining if the documentation provided is sufficient to make a determination of medical impairment. Submitting the required documentation is described above to determine the initial claim of impairment by an applicant, or in evaluating the continuing claim of a recipient who has been previously determined exempt from participation in work activities, shall be a condition of initial or ongoing eligibility for Temporary Assistance. For SNAP, failure to document a disability causes the individual to lose exempt status.

Additional documentation may be required of the individual's health care practitioner to evaluate an individual's ongoing claim of a mental or physical impairment, if such individual has been found not to be exempt from work activities by the local district. Such individual remains non-exempt unless and until a different determination is made by the local district.

If an individual has demonstrated an inability to successfully participate in work activities or employment and the local district has reason to believe this is due to a disability or work limitation, the local district shall require the individual to participate in a disability related screening and/or evaluation. Additionally, if an individual has demonstrated an inability to successfully function in a work setting and is determined through an evaluation or assessment to be exempt and in need of treatment, the individual shall be required to participate in necessary treatment as a condition of eligibility for temporary assistance.

If an individual does not have a health care practitioner, a referral is made to our County physician.

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 local district shall deem an individual work limited if the verification received shows medical impairment that would limit the individual's ability to engage in work activities in accordance with Department Regulation.

Each applicant and/or recipient for Temporary Assistance that states a medical issue/limitation is requested to have a medical form DSS-4526 completed by his/her physician. If the Program Specialist has any questions or concerns regarding the returned medical, the client may be required to have a physical with the Delaware County physician. When this medical is received the Program Specialist and/or the Senior Program Specialist and/or a Principal Program Specialist will review the available medical information. The district will notify the individual of this determination in writing with the LDSS- 4005/a Notification of Temporary Assistance Work Requirements Determination (Exempt/Non-Exempt).

The local district assigns individuals through close and recurring verbal and written collaboration with work experience sites. Any work offered at a site is developed in accordance with each individual's documented abilities. The individual's limitations are provided to the worksite supervisor in writing.

For each individual where employment limitations are cited, the Program Specialist coordinates work activities to accommodate the limitations and involvement in a rehabilitation plan to return the individual to self-sufficiency. The treatment plan and progress are/may be monitored. In addition, if program specialists have any questions, our agency Director and/or A.D. Program coordinator will review the information and provide input. Our procedure follows the process of the regulation 18 NYCRR 385.2(d).

## 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 Program Specialist and Senior Program Specialist would review the provided medical information to determine if the individual has the potential to be restored (or improved employability) through treatment or other rehabilitative activities to self-sufficiency. If they have any questions or concerns regarding their determination, they review the information with the principal program specialist and Director of Temporary Assistance/Deputy Commissioner, our A.D. person, or request a second opinion from our County Physician.

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

All individuals with an indicated need for treatment are referred to the appropriate provider. The indicated need can be determined via medical information provided by the client, assessment, employability plan and case management. The treatment provider is required to provide a copy of the treatment plan.

- 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:

Providers are required to notify the Department if an individual is not complying with his/her treatment plan. We require monthly attendance verification. Some treatment providers need to be reminded to notify us timely of noncompliance and the monthly attendance verification. The Director of Programs currently monitors all in-house rehabilitation clients utilizing progress reports and direct communication. Treatment plans are to be updated every 3 months.