

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

January 1, 2020 – December 31, 2021

JEFFERSON County

Contents

Section 1- Assurances	3
Section 2 Administration	5
Section 2.1 Administrative Structure	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies	5
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	5
Table 2 – Other Service Providers.....	8
Section 2.3 OTDA Jobs Staff Agreement.....	9
OTDA Jobs Program Services – Target Groups.....	9
Other Services Requested.....	9
Section 2.4 Access to Services at New York State Career Centers	9
Section 3 Engagement and Work Preparation.....	11
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))	11
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	11
Section 3.3 Assessment and Employment Planning.....	11
TA Assessment.....	11
TA Employment Plan	13
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9).....	14
Section 3.5 Job Development	20
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)	20
Section 3.7 Work Verification	23
The Quality Assurance (QA) plan include the following elements:	24
The District’s Quality Assurance Process is as follows:.....	24
Use of Outside Providers/Vendors.....	25
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency	25
Section 3.9 Strategies/Procedures for Increasing Program Attendance	25
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	25
Section 3.11 Strategies for reducing the need for TA	26
Section 4 Support Services	26
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District	26
Section 4.2 Transitional Support Services	28
Section 4.3 Extended Support Services.....	28
Section 5 Conciliation, Sanction and Dispute Resolution Procedures	29
Section 5.1 Conciliation.....	29
Section 5.2 Sanctions.....	31
Section 5.3 Dispute Resolution	31
Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....	32
Section 6.1 Disability Determination Process and Tools.....	32
Section 6.2 Mental Health Screening and Assessment	33
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	33

Section 1- Assurances

As a condition of the receipt of federal and State funds the Jefferson 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 Jefferson 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/ TWG 01/02/20

Teresa W Gaffney, Social Services Commissioner

1/2/20, 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 Employment program in Jefferson County operates collaboratively among the Temporary Assistance (TA) eligibility units of the Department of Social Services (DSS), the Department of Employment and Training (DET), local Substance Abuse providers, OTDA JOBS staff, and the medical community.

DSS and DET staff are fully integrated within the DSS office located at 250 Arsenal St. Watertown NY. All adult applicants and recipients of TA and SNAP work registrants are identified by the Social Welfare Examiners (SWE) in the TA and SNAP units and referred to the DET staff for employment assessment, employment plans or wellness plans, and enrollment in appropriate activities and job placement. DSS SWE's are responsible for case management services, authorizing supportive payments, administering the conciliation process, completing participation reports, reviewing proposed sanctions and providing post-employment services.

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

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

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

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

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Jefferson County Department of Employment and Training (DET)	\$886,756.64	<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%	Unsubsidized job placement, establishing and overseeing subsidized job placement, job development including employer visits, performing assessments, developing employment plans, supervising job search, developing and supervising CWEP placements, offering job readiness training and monitoring the progress of participants in employment and training activities, monitoring and support for compliance with treatment plans
Resolution Center of Jefferson And Lewis Counties INC	\$ per capita	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other Administrative TANF and SN	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Act as a mediator for the Agency's conciliation process when requested by the client.
Jefferson Lewis BOCES	\$12,120.000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	TASC instruction
Watertown Urban Mission	\$when funding available	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other OTDA CST grant	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Wheels to Work program provides cars, car repairs and inspections
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

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

Table 2 – Other Service Providers

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

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Community Action Planning Council	Child Care Block Grant	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Approves Legally Exempt Childcare Providers and provides Childcare billing services
Community Action Planning Council	OCFS	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Childcare Registration and Inspection Program
PIVOT	FFFS LAF	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Substance Abuse case management
Cornell Cooperative Extension	SNAP-ed	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Providing nutritional information, assistance in obtaining employment, assist in completing and filing employment applications, teach keeping and balancing a check book
Jefferson County Children's Home		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Care Manager
Literacy of Northern New York		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	English as a Second Language (ESL)
		<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)

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

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)

The additional duties and services that will be requested of the JOBS staff are case conferencing and 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: Jefferson County DSS KIOSK
- 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.

DET staff at the One Stop center conduct the District's Job Club/Job Search programs at their location. Job Club/Job Search individuals are required to register with NYS Department of Labor co-located at the One Stop.

The District contracts with the Jefferson County DET for employment services. This ensures the coordination of services, information sharing and referrals on a daily basis.

The District has placed a KIOSK at the One Stop that is available for individuals to submit documentation, access their account information as well as apply for assistance using the MYBENEFITS application on the KIOSK.
JCDSS Commissioner and Director of FAP participate in the local WIOA Business services team.

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:

Participating in any approved activity, work in the Private sector, work toward self-sufficiency.

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:

DSS, via DET staff, will provide a WTW orientation at application and to recipients of TA at the time of re-determination, both in writing and orally.

All orientation is completed on an individual basis for both the Exempt and Non-Exempt individuals. Within one month of the individual's participation in orientation, the individual will be notified in writing of the opportunity to participate in the District's work activities or this notification may be incorporated into the District's orientation.

Section 3.3 Assessment and Employment Planning

TA Assessment

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

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

The district enters assessments directly into WTWCMS

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

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:

Military history, drug and alcohol screening, medical assessment, transportation , and arrest record. (attachment 2)

The District will provide a wellness assessment to applicants and recipients who are exempt from assignment to work activities. (attachment 3)

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

An in-depth assessment interview is completed using the Employability Skills Assessment form and the WTCMS system Assessment Summary and Employability Plan. (attachment 2) The employment assessment is completed by a DET Employment Coordinator, DET Counselor, DET Assistant or a DSS SWE. TANF non-exempt individuals are interviewed at the time of the TA application. TANF exempt individuals are interviewed within thirty days of case opening. SN non-exempt individuals are interviewed after the 30th day of application date but prior to the 45th day from application date. Exempt SN individuals that reside in a household with children would be interviewed as a TANF individual at the time of application. All applicant or recipients that are age 18 will also be required to have an assessment. The time of the assessment would depend on the category of assistance as above. 16 and 17 year old individuals who are not attending secondary school residing in households with dependent children would either be assessed at the time the family applied for assistance or immediately upon the agency determining that they are no longer enrolled in a secondary school program.

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

Jefferson County Department of Employment and Training and Jefferson County Department of Social Services.

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)]

Completion of 60 semester credit hours in a regionally accredited New York State registered college or university: or 2 years of experience in job development, personnel counseling, or placement in an employment and training, community action or similar agency dealing with the employment and training of economically disadvantaged, minority, handicapped, or low income persons. The following titles will be responsible for conducting assessments: Employment and Training Coordinator, Employment and Training Counselor, Employment and Training Assistant and Social Welfare Examiners.

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?
The assessment is updated at application, recertification, or at any change in an individual's status that would prompt the need to update the assessment.

Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

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

The WTWCMS employment plan is used for non-exempt individuals and the participant is notified of their responsibilities in addition to activities and employment. The Wellness Plan (attachment 3) will serve as the plan to self-sufficiency for exempt individuals.
- 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.
An in-depth assessment interview is completed using the Employability Skills Assessment form (attachment 2) and the WTWCMS system Assessment Summary and

Employability Plan. The employment plan is completed in WTWCMS by a DET Employment Coordinator, DET Counselor, DET Assistant or a DSS SWE. TANF non-exempt individuals are interviewed at the time of the TA application. TANF exempt individuals are interviewed within thirty days of case opening. SN non-exempt individuals are interviewed after the 30th day of application date but prior to the 45th day from application date. Exempt SN individuals that reside in a household with children would be interviewed as a TANF individual at the time of application. All applicant or recipients that are age 18 will also be required to have an employment plan. The time of the employment plan would depend on the category of assistance as above. 16 and 17 year old individuals who are not attending secondary school residing in households with dependent children would complete the employment plan at the time the family applied for assistance or immediately upon the agency determining that they are no longer enrolled in a secondary school program.

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

The employment plan is updated at application, recertification, or at any change in an individual's status that would prompt the need to update the employment plan.

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 District plans to meet all participation requirements by aggressive program placement and engaging non-exempt individuals during the application process. Assessment is ongoing for non-exempt Family Assistance individuals and non exempt SN individuals beginning with the upfront Supervised Job Search/Job Club assignment. Employment plans are completed during the application process.

Clients whose status changes from exempt to non exempt will be reassessed by DET within 30 days of the change in their status for Employment Plan updates and subsequent engagement in work activities.

The maximum assigned hours of countable activities per week will be up to 40 hours for all Family Assistance cases and SN non-exempt individuals. Work limited individuals will not exceed the hours recommended on their medical evaluation.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	264	510

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

The District uses the following COGNOS reports to monitor progress toward meeting the participation requirements: SN Non-Moe and TANF and SN MOE detail report, SN Non-Moe and TANF and SN MOE worker participation/engagement summary report, Earned Income/Employment Report, Employability Code Duration Report, TANF All Families Participation Rates and SN Non Moe Participation Rates. These reports are reviewed by the DET Employment Coordinator, Financial Programs Director, Income Maintenance Supervisors, and Principal SWE's who have supervision of the public assistance caseloads on a monthly basis. The Supervisory staff identified work closely together to ensure that the District is continually monitoring the progression toward meeting participation rates.

- 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):

We do not require NTA SNAP applicants and recipients to participate in Job Search 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):

We do provide them with the opportunity for Job Search assistance. (attachment 4)

- 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:

TA applicants who are non-exempt are assigned to start Job Club/Job Search within a week of application. They attend an orientation session where rules and expectations are explained. They are then added to the already existing Job Club groups. Each individual is required to make a minimum of 10 weekly job contacts

and turn in their Job Seekers Log sheet on the last day of attendance each week. Actual hours in the activity will be logged on the Job Search Log sheet which include job contacts, time spent preparing for interviews, resume preparation and time spent traveling between prospective employers. Time spent in Job Club will count toward Job Search hours. All of this information will be logged in on the Job Seekers log sheet. (attachment 5)

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	10	20	4.5 hours of Job Club
SNA Individuals	10	20	2 hours of Job Club

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

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

Once the case opens, non-exempt SN recipients are required to continue with Job Search at 5 contacts weekly and report to the NYS OTDA JOBS program specialist for an in person contact every two weeks. Attendance will also be monitored using the Job Search log sheet. SN recipients will be given credit for time spent traveling between prospective employers. This information will be logged on the recipients Job Seekers Log Sheet. (attachment 5)

TANF and SN MOE non-exempt recipients are required to continue Job Search at 5 contacts weekly and attendance is monitored with the recipient Job Seekers log sheet at a weekly in person contact. Staff will collect weekly attendance verification so that supportive services can be provided.

- f. Describe the district’s process and policy, including the guidelines workers follow, when determining whether participation in self-employment is approved as part of an individual’s required work activities. If the district always approves self-employment as part of an individual’s required work activities, please note this policy below.

The District makes a determination on a case-by-case basis for self-employment as an approved work activity. Initially, the District will allow self-employment as a work activity and review at recertification (mail in or face to face) to determine if it is gainful employment. The District uses 30 hours at Federal minimum wage as a guideline for gainful employment.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for

households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

	Activity and Definition
<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP 	<p>Unsubsidized Employment - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>
<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP 	<p>Subsidized Private Sector Employment - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP 	<p>Subsidized Public Sector Employment - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP 	<p>Work Experience - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP 	<p>On-the-Job Training (OJT) - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Community Service - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Search - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> — SNAP 	<p>SNAP E&T Supervised Job Search- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Readiness Training (JRT) Activities - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> • Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance. • Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Vocational Education - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Skills Training - Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Education Training - Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Secondary School - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Provision of Childcare for Individual Participating in Community Service - Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Other - Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>

Section 3.5 Job Development

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

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

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

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

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

DET staff will refer clients to contacts using a variety of tools that report available employment, including but not limited to OSOS, America's Job Bank, WIA, Watertown Daily Times and the Newzjunky.com website. Our JOBS staff person will also be working with this population to provide Job Development.

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

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

- a. Describe how the district identifies appropriate education program providers for services of Adult Basic Education, High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:

The District has one State Certified Education Program provider at this time, BOCES. BOCES provides Adult Basic Education and TASC preparation. ESL instruction is made available through Literacy of Northern New York.

- 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:

Vocational Education and Job Skill programs are available at BOCES and Jefferson Community College such as CNA, LPN and computer classes.

- 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:

Educational activities for non-exempt recipients will be identified at the Employment Assessment/Plan interview. If the individual does not have a high school diploma and /or has not obtained a 9th grade reading level per SORT test, they will be referred to BOCES

preTASC/TASC program. If the TASC program is not appropriate for the individual, their interests and the Agency expectations will be reviewed and a training request assessment (attachment 6) will be completed to determine appropriate training opportunities. This could include training at BOCES, classes at JCC, truck driver training at NTTS or CSDA, OJT at their current employment, apprentice programs and coordination of in house training opportunities with local employers. Training must be a program that will result in skills appropriate for immediate entry into the workforce upon completion. If the training lasts for more than one year it must be approved by a DSS Income Maintenance Supervisor who is at a higher level than those who normally approve training.

Individuals can also be identified as in need of additional training to improve chances for self-sufficiency at one or more of the following : Job Club, WEP site, Employment Plan, intake appointment, Self-certifications to the worker, The WorkPlace (One Stop Center).

- 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:

Individuals who are interested in participating in an educational activity are reviewed to determine if they have the basic literacy level needed for the activity. The educational provider BOCES will administer pre-testing to determine if the individual scores in the necessary range to continue participation as an allowable educational activity.

- 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:

A training request assessment (attachment 6) is completed at employment assessment when the individual indicates interest in these activities. The district issues the participant an approval notice that advises what program they are approved for and the supportive services available to them.

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

The District will approve post-secondary education as a work activity up to 2 years for college or a 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 DET Supervisor and Counselors will track post secondary education that is beyond the 12 month lifetime limit to ensure that it is combined with the weekly average of 20 hours in paid employment activities.

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

Training providers will submit to the District a training program for review and approval. Each such submission must include a written description of the requirements for maintaining satisfactory progress in the training program. The District will evaluate both the rate of participation completion in the training program and the rate of subsequent entry to employment.

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

The District advises the participant of the approved training providers verbally during their employment assessment.

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

The District issues an enrollment letter that advises the participant of the location of the training/work activity and the number of hours assigned.

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 level of attendance necessary for a teen to continue to be exempt from employment requirements must meet the school's minimum attendance requirements unless the individual demonstrates good cause. For public High School, the District accepts the school's official records at initial application and recertification for verification of attendance.

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

The District takes into consideration the individual's health limitations when making an assignment to a site. The site manager is notified of any health-related limitations in writing when the participant is assigned to a work activity. All sites are educated on the importance of working within the boundaries of a participant's limitations. The participant is also informed at the time of assignment the importance of making sure the site is aware of their 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 for State review including specific information on each of

the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

The District’s Quality Assurance Process is as follows:

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

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

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

presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

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

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

Use of Outside Providers/Vendors

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

Yes No

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

Yes No

If No, please describe the process used below:

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

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

The District offers interpreters when needed who will assist the participant with assigned activities. ESL is also offered to these individuals and is typically their initial assigned activity so that they may expand their English speaking capabilities.

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:

Individuals are counseled on the responsibilities of meeting their participation requirement at orientation and the impact on their assistance if they do not. They are instructed to make appointments before and after their work site duties just as if they were employed. They are also instructed to find alternate child care that will take their child/children if they are ill so as not to miss time from their work activity.

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:

The District attempts to engage the sanctioned participants as soon as the sanction begins. The Supervisor begins at conciliation by explaining the benefits of participating and the effect it may have on their benefits. The participant is also informed of all the work related benefits that they may be eligible for if they became compliant.

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

The SWE responsible for the case where there is a sanctioned individual will make an appointment for that individual to come into the agency once a month to discuss the sanction and how they are making ends meet. The SWE also discusses the work related benefits available should the participant comply.

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

The SWE responsible for the case where there is a sanctioned individual will make an appointment for that individual to come into the agency once a month to discuss the sanction and how they are making ends meet. The SWE also discusses the work related benefits available should the participant comply.

Section 3.11 Strategies for reducing the need for TA

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

The SWE's and the JOBS staff provide front-end employment referrals and supportive services for Temporary Assistance applicants not currently employed. This includes a supervised job search component that provides direct linkages with employers.

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:

- Clothing - up to \$150.00 per activity or employment as determined by the District.
- Job Related Safety Equipment - \$400.00 maximum per job.
- License and Other Work Related Fees - the amount set by the State of New York for vocational or driver's licenses, and or registrations. Any other license would be up to \$100.00. In no event will the District pay fines to obtain said licenses.
- Tools and Equipment - up to \$600.00

-Tuition, Academic Fees, Books, Supplies - up to \$2100.00 for one year. Persons must apply for financial aid when available. The District will supplement but will not replace available financial aid. In no event will the tuition be approved for college when the person has previously defaulted on a student loan or been refused a student loan or grant due to poor academic standing.

-Automobile repairs - up to \$1000.00 for a vehicle that is owned by the participant or the participant's spouse who resides in the same household, allowing that the value of the vehicle exceeds the amount of the repairs.

-Automobile Insurance - up to 6 months or \$1000.00 whichever is less. The length authorized is at the discretion of the District.

-Transportation - Clients who are enrolled in employment programs that require reimbursement for transportation will be compensated for their expenses in the following way :

-If they live within the City of Watertown and have access to public transportation, the District will provide them with bus tickets.

-If they live within the City of Watertown and have their own vehicle, they will be reimbursed mileage at \$.30 per mile.

-If they live outside of the City of Watertown, and they do not have access to public transportation, they will be given gas cards and /or reimbursed mileage at \$.30 per mile depending on their needs.

-If they do not live in the City of Watertown and their WEP site is not in the City of Watertown, they will be reimbursed at the rate of \$.30 per mile.

-In situations where transportation is not available, the District will assist participants in moving to where public transportation is available at their request.

-At the discretion of the District, if funding is available, the District may on a case-by-case basis exceed the aforementioned amounts. Each situation would have to be approved by a DSS Income Maintenance Supervisor. The District's Transportation Policy that is distributed to individuals is attached (attachment 7) .

- 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): JCDSS has chosen to reimburse mileage at the rate of \$.30 per mile.

- 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:

A participant could be required to walk up to 1.5 miles to a work activity when public transportation is not available. The District determined this by using the average distance local School districts use when they determine what will be the cut off for bussing High School students.

- 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:

- Clothing-up to \$150.00 per activity or employment as determined by the Department.
- Job Related Safety Equipment - \$400.00 maximum per job.
- License and Other Work Related Fees - The amount set by the State of New York for vocational or driver's licenses. Any other license would be up to \$100.00. In no event will the department pay any fines to obtain above said licenses.
- Tools and Equipment - Up to \$600.00.

Section 4.2 Transitional Support Services

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

The DET worker that currently provides Post Employment services is located in our building and will work with the SWE to provide knowledge and support for the client. The DET worker will send a series of 3 flyers over 3 months to the individual to advise of the services that can be provided. The District has additionally set up a shared mailbox to attempt contact and notification of available services.

The SWE will make contact with the individual within one week of the new employment to provide support, referrals, and assist the individual with problem solving strategies and backup plans for emergencies. There will be a second contact made during the second week of employment to continue to monitor and assist with any problem areas prior to a crisis. The SWE will explore questions, make referrals, and assist with planning to be assured that the employed individual is prepared to continue to work toward self-sufficiency. The SWE will advise the families of the services that can be provided from the Community Agencies. For example, Wheels to Work, Cooperative Extension's nutritional program, CAPC Child Care, Urban Mission for clothing, and Consumer Credit Counseling Service of CNY. These services along with those offered by the District for emergencies will support the family.

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:

The District will provide the same supportive services as described above for the individuals who are transitioning from Temporary Assistance and the services are necessary to obtain or retain the employment. After the first two weeks of employment are completed the individual will then be transferred to the DET Post-Employment worker for further follow up.

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:

Supportive services incidental to training, counseling, etc. will be provided to those individuals who are employed and eligible under the 200% FPL guidelines. (ex. transportation, cab fare)

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

Conciliations will be conducted over the phone, in person, or if requested, in person contact with the Resolution Center of Jefferson and Lewis Counties, INC. acting as mediators with the individual and a representative of the district.

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

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

All non-compliance referrals (NCR) are sent to the designated Principal/Senior Social Welfare Examiner (PSWE,SSWE) from DET. Conciliation letters are sent to the individual by assigned clerical staff within 5 days of the receipt of the NCR. The individuals are instructed on the conciliation notice to contact the PSWE/SSWE at their phone number within 10 days. When the individual calls regarding the conciliation notice they are asked if they would like to have a mediation in the office scheduled with the mediation center present, a face to face meeting in the office with the PSWE/SSWE or they can discuss the non-compliance over the phone. During the mediation discussion a determination is made that the non compliance is willful and without good cause or there is a reason the individual failed to comply and supporting documentation is requested to be submitted within 10 days.

If they choose to have the mediation with the mediation center present, the appointment is scheduled and then the PSWE/SSWE contacts the center on the date of the scheduled mediation. It is followed up with a letter to the individual.

If they choose a face to face with the PSWE/SSWE, it is scheduled within 10 days and followed up with an appointment letter. Additionally, if a recipient refused to be screened for disabilities and is unable to comply with work activities, the PSWE/SSWE will offer the opportunity to be screened for disabilities again prior to taking an adverse action(see section 6.2 and attachments 10 and 11)

If the client responds within the time allotted and can demonstrate that the action was not willful or was with good cause then the sanction is not imposed. If the documentation and information presented indicate a willfull cause for non-compliance or if no response is received from the client the case is reviewed for appropriateness and sanction is recommended and sent to the assigned SWE for review and to impose the sanction.

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

The DET will send an email to the PSWE/SSWE assigned to mediations. Conciliation letters are sent to the individual by a clerk in the team within 5 days of the receipt of the email. The individual is instructed on the conciliation notice to contact the PSWE/SSWE at their phone number within 10 days as well as how to avoid a loss or reduction in SNAP benefits. The conciliation notice advises that they are able to demonstrate compliance by looking for work and they must complete and return the Job Seekers Log (attachment 8) that is included with the conciliation notice with 5 employer contacts within 10 days. If the individual calls regarding the conciliation notice they are asked if they would like to have a mediation in the office scheduled with the mediation center present, a face to face meeting in the office with the PSWE/SSWE, they can discuss the non-compliance over the phone, or they can comply by completing the Job Seekers Log included with their letter. If they choose to do it over the phone they discuss the situation right then. If there is a good cause reason they failed to comply, they may be asked to submit supporting documentation.

If they choose to have the mediation with the mediation center present the appointment is scheduled and then the PSWE/SSWE contacts the center on the day of the scheduled mediation. It is followed up with a letter to the client.

If they choose a face to face with the PSWE/SSWE, it is scheduled within 10 days and followed up with an appointment letter. Once the mediation is held and all factors have been reviewed such as supporting documentation, previous mediations and non-compliances, the PSWE/SSWE makes the decision as to whether or not the individual will be referred to the SWE for sanction. At that point the NCR is sent to the SWE to impose the sanction.

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

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

The PSWE/SSWE assigned to mediations will be the contact for the individual to discuss their reasons for not complying with the required work activity assignment. The individual is offered the opportunity to supply documentation if necessary to support their good cause claim. The PSWE/SSWE will notify the SWE that the individual has demonstrated good cause and benefits will continue.

The district's procedure for engaging SNAP recipients in a work activity to demonstrate

compliance to avoid a SNAP E&T related sanction is:

Individuals are able to demonstrate compliance and avoid a SNAP E&T sanction by submitting the Job Seekers Log that is included with the conciliation notice. They must make a minimum of 5 verifiable employer contacts and submit this information to the Agency within 10 days of the conciliation.

Section 5.2 Sanctions

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

Individuals are notified when they are nearing the end of their sanction period. They are set up with an appointment to come in to the District and speak with the SWE. At this contact, the SWE will request that the individual sign "The Agreement to Comply with Employment Program Requirements" as their indication that they are "willing to comply" with employment requirements. The examiner will notify DET that the individual will need to have their employment plan updated and signed. Once the durational sanction period has been completed, the individual has updated their employment plan and satisfactorily complied with 5 days (one week) of the required activity the sanction will end. Individuals will have their sanction removed and benefits restored retroactive to the date that the individual indicated their willingness to comply but no earlier than the expiration of the minimum duration 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:

SNAP applicants or recipients whose sanction duration has expired will be mailed a Job Seekers log to record 5 employer contacts. If the client responds with a minimum of five completed, verifiable employer contacts on the Job Seekers log or by other acceptable documentation within 5 days they will be deemed as in compliance and the sanction lifted. SNAP benefits are restored when the individual demonstrates compliance (but no earlier than the expiration of the minimum duration period).

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 District does contract with IMA for medical, psychological, and IQ evaluations. This generally occurs when the individual does not have a regular physician, there is a discrepancy in the medical documentation submitted, or the medical provider will not complete the Disability forms. The District does accept physician's statements directly provided by the individual if the statement has very clearly stated that the individual is employable or not employable, or employable with limitations, with a full description of what the disability is and its estimated duration, and if limited, what exactly the limitations are. If the statement submitted by the individual is not clear the Employment Worker or SWE may contact the physician's office to see if they can get clarification. If the disability or the individuals limitations are still not clear the individual would then be referred to IMA for another examination and a clear medical statement.

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 SWE makes the employability decision based upon supporting medical evidence. Participants will be afforded the opportunity to present evidence from their own medical providers regarding the need for exemptions or limitations from employment activities. If such evidence is unavailable or insufficient the participant will be scheduled for an evaluation by a medical provider certified in Occupational Medicine. Individuals will have ten days to submit requested medical documentation.

Participants with documented disabilities will be notified of the results of the exemption determination and their right to a Fair Hearing by means of the LDSS-4005 or LDSS-4005(a).

Participants will then be referred for appropriate rehabilitative services and/or eligibility for disability retirement benefits or Supplemental Social Security.

Section 6.2 Mental Health Screening and Assessment

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

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

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

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

Yes No

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

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

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

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

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

- a. Following is the district's procedure for determining if an individual who is unable to work due to mental or physical impairment has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 6.1 of this plan. Included here is who (e.g., medical practitioner, employment worker, TA worker, local review team, etc.) makes or assists in this determination that an individual can

restore or improve employability through treatment or other rehabilitative activities. Also included is the source and type of information used to make the determination (e.g., information from individual's medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

The District relies on the recommendation of the medical providers as to the individuals ability to be restored to self-sufficiency. In questionable circumstances, the individual will be referred to IMA for further evaluation and recommendations.

The District also uses a case management meeting approach to address these issues. In doing so , we draw upon the strengths of all involved with the individual to obtain different insights to the same problem which often leads to a creative solution, plan or approach.

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

A Wellness Plan (attachment 3) will be completed and the DET counselor will determine if the current treatment plan is appropriate by reviewing the doctors statement, talking with the SWE and any other workers involved in the case. The DET counselor makes any collateral contacts that may be needed.

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

The District has developed a standard attendance form (attachment 9) to monitor the participation of the individual in substance abuse treatment and /or rehabilitation programs, and also treatment for mental health and physical impairment. The individual and the medical professional they are seeing sign the time sheets. The DET counselor and the CASAC worker monitor the attendance sheets. The DET counselor enters the compliance information into the WTWCMS system.