

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

January 1, 2020 – December 31, 2021

## **Livingston County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Livingston 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 Livingston 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/ DMD          1/16/2020

Diane M. Deane, Social Services Commissioner

1/16/2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## **Section 2 Administration**

### **Section 2.1 Administrative Structure**

This agency's organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district's employment program.

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

Employability of clients is determined at application, recertification, and at interim changes by Social Welfare Examiners in the Temporary Assistance/SNAP/Day Care Unit. Clients that are determined to be non-exempt, or employable with limitations are referred to the Office of Workforce Development. Clients that are determined Exempt for 1-3 months or 4-6 months are called in quarterly to meet with Employment Counselors at both Workforce Development and Catholic Charities.

Employment Counselors from OWD and Catholic Charities of Livingston County are responsible to complete Employment Assessments and develop individual Employment Plans (within the regulatory timeframes) with each client. Employment Counselors are responsible for assigning clients to appropriate employment activities, monitoring client's compliance, following conciliation procedures if necessary, and notifying the Department of Social Services of the results of the conciliation.

### **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>
Livingston County Office of Workforce Development	\$176100	<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%	Employment assessments, employability plans, and support for compliance with employment plan, activities, job development, job search, job placement, job club, oversight of WEP.
Catholic Charities of Livingston County	\$129736	<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%	Employment assessments, employability plans, and support for compliance with employment plan, activities, job development, job search, job placement, job club.
Livingston County Council on Alcohol and Substance Abuse	\$60000	<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%	Pre-assessment, referral for full assessment and D&A employability determination, case management of applicants and recipients of Temporary Assistance which includes monitoring participation and reporting to DSS
Industrial Medicine	\$5000	<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%	Medical/psychological assessment for employability determination, second opinions of employability determinations, suggested referrals to SSI/SSD.
	\$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%	
	\$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>
Consumer Credit Counseling Services		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Financial Literacy and personal money management skills
CORE		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	ESL instruction, literacy and educational support to remove barriers to employment
Genesee Valley BOCES		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational/educational training, TABE testing, TASC instruction
Livingston County Mental Health		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Evaluate and treat mental and emotional barriers to employment
Literacy Volunteers		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	ESL instruction, address literacy barriers to employment
		<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>	<input type="checkbox"/>	<b>Target Groups</b>	<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)

Livingston County has not had a replacement of this position since the last removal and continues to request one as soon as one is available.

### 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.

The district contracts with the Career Center to provide employment services to TANF customers. The career center conducts assessments, case manages non-exempt clients, and co-enrolls clients in any of the other career center partner programs that may benefit the client. Several of the Career Center staff are cost allocated between TANF and WIOA, enabling them to provide services from both programs to TANF clients

## **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:

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:

Orientations by Social Welfare Examiners are conducted individually with applicants/recipients at their face-to-face eligibility/recertification appointments, and at any time the individual’s employability status changes. Orientations are conducted individually with applicants/recipients face-to-face. Same procedure for exempt and non-exempt.

### **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 WTWCMS. Attached is the local equivalent.

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

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

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

Information is gathered from the client and entered into CMS.

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

Contract staff - Employment Counselors at Liv Co. Office of Workforce Development and Catholic Charities of Livingston Co.

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)]

Employment Counselors at OWD: MINIMUM QUALIFICATIONS: Either:

1. Graduation from a regionally accredited or New York State registered college or university with a Bachelor's degree; or

2. Satisfactory completion of a minimum of 60 semester credit hours at a regionally accredited or New York State registered college or university and two years of full time experience as a Counselor, Employment Interviewer, or other related position with similar duties and responsibilities; or

3. Graduation from high school or possession of a high school equivalency diploma and four years of full time experience as defined in 2; or

4. An equivalent combination of training and experience as defined by the limits of 1 through 3.

NOTE: Verifiable part time and/or volunteer experience will be pro-rated toward meeting full time experience requirements.

Employment Counselors at Catholic Charities: Education:

Bachelor's degree, Experience: 1-2 years in human services setting.

e. Applicants in households **with** dependent children are required to participate in completion of an assessment:

Yes       No

f. Applicants in households **without** dependent children are required to participate in completion of an assessment:

Yes       No

g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:

Yes       No

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

Assessments are updated during regular face to face meetings with recipients when they have removed a prior barrier, or, when they have information to add that would improve their employability in a specific sector due to training or experience.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

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

The district enters employment plans directly into WTWCMS.

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

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

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

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

b. Check one of the following:

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

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

c. Describe the district procedure for the completion of an individual's employment plan.

Employment Counselors meet face to face with recipients to discuss their employment history, any training they have had, their likes and dislikes in employment areas as well as their employment goals. Plans are developed together to set realistic expectations to progress toward self sufficiency.

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

Employment Plans are updated during regular face to face meetings with recipients when they have removed a prior barrier, or, when they have information to add that would improve their employability in a specific sector due to training or experience.

### 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:

Recipients are engaged within 4 weeks of their case opening or their employability code changing from exempt to non-exempt. Individual plans are developed to assign sufficient hours necessary to meet the participation rate for the individuals case type and employability code, while considering the interests of the client and any individual skills/barriers, and 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	100	100

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

Contract staff use monthly and current COGNOS reports to monitor participation/engagement, and to identify clients that may need to increase their hours of participation.

- 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):

Livingston County does not mandate Non-Temporary Assistance SNAP applicants and recipients to participate in work activities. SNAP applicants/recipients are informed of job clubs, recruitment events and host employer activities offered at OWD.

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):

NTA SNAP recipients are informed of the available services of the Office Of Workforce Development by the DSS examiner at case opening and at recertification.

- 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:

Bi-weekly, the Office of Workforce Development conducts a 3 day Assessment/Job Readiness, Job Search training workshop. At the TA eligibility interview, all non-exempt TA applicants are assigned to a workshop. At the conclusion of the 3rd day of the workshop, the non-exempt applicants are entered into an ongoing Job Search until their case opens. Employment recruitments are held regularly at the Office of Workforce Development. All non-exempt applicants are required to attend the recruitments sessions.

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

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

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

Recipients are contacted by their employment counselor (OWD or Catholic Charities), and assigned to job search.

- 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. Self-employment is reviewed on a case-by-case basis. In most situations, the self employment will be approved as work participation if it meets the federal minimum wage standards.
- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

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

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



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

### Section 3.5 Job Development

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

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

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

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

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

OWD invites local employers to recruitment days at their office. Local employers meet with participants to identify qualified candidates for job opportunities. Identified candidates are referred to employers for interviews for job openings.

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:

OWD identifies service agencies that are certified through Department of Education, or are credentialed to provide education services.

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:

OWD identifies service agencies that are certified through Department of Education, or are credentialed to provide these services.

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:

OWD identifies service agencies that are certified through Department of Education, or are credentialed to provide these services.

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:

Clients must meet the minimum requirements to qualify for the programs. The agency would deny participation in the education activity if the client had already completed a comparable activity, or the activity was not consistent with the client's employability plan goals.

- 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:  
Consideration is given to client interests, literacy levels, aptitudes, skills, medical limitations, availability of programs and funding resources, and where job skills/vocational education seem to fit best in the over-all employability plan.
  
- 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:  
Approval for:
  - short-term (6 mo or less) certification programs for in-demand occupations,
  - on a case-by-case evaluation, completion of last year of 4 year degree that will assure graduation, accommodations will be made in the employability plan for study time/classes
  
- 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:  
No approval for education programs beyond the 12 months.
  
- h. Education and training providers are evaluated by the following standards:  
The following standards are criteria providers may be evaluated on:
  - 1. State approval or licensing
  - 2. Past performance
  - 3. Range of training/education activities available
  - 4. Qualifications of staff
  - 5. Documentation of fiscal responsibility
  - 6. Cost per enrollment/completion/entry to employment
  - 7. Achievement of goals at delivering agreed upon outcomesOWD accesses the list of in-demand occupations from the State Labor Department.
  
- i. The district procedure for advising participants of approved training providers is:  
Employment Counselors from OWD and Catholic Charities provide to participants a list of approved in-demand occupations and trainings. Clients may be referred to OWD staff for one-on-one appointment to provide more individual search/application for trainings.
  
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
Training programs notify clients of their approval to the program. Employment Counselors send referrals to clients that have been accepted.

k. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below:

— It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.

— A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.

— The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.

— The institution or student fails to monitor and report information regarding the student's attendance and performance as required.

— The student fails to progress toward the completion of a course of study without good cause, as determined by the district.

— The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.

— Additional reasons as stated below:

l. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:  
At initial eligibility and at 6 month recertifications, Temporary Assistance Examiners send school verification form DSS 3708 to verify 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:  
Temporary Assistant Examiners share the 4005a with Employment Counselors. The Employment Counselors assure that they assign clients to activities that can accommodate the client's limitations. When assigning to WEP, the Employment Counselor shares (in writing) the 4005a limitations with the WEP site to accommodate the limitation

### **Section 3.7 Work Verification**

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid

employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

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

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

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

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

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

**The District's Quality Assurance Process is as follows:**

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

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

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

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

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

### **Use of Outside Providers/Vendors**

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

Yes       No

If Yes, does the district's provider/vendor collected documentation, data entry and management of 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:

DSS staff use Language Service Line\Interpretalk services during interviews to communicate with individuals with Limited English Proficiency. Temporary Assistance Examiners identify individuals with Limited English Proficiency that are spanish-speaking, and refer them to CORE Learning Center which is the grant recipient for these services in Livingston County. This tutoring program improves the clients' ability to understand and communicate in English to increase their opportunities for employment, as well as their improve their ability to communicate with schools, day care providers, and other community resources. Individuals with Limited English Proficiency may also be assigned to the ESL program.

### **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:

When assigning clients to activities, Employment Counselors explain the requirement and importance of attending activities. The clients are advised to schedule personal appointments for minimum impact on their work activity schedule. Employment Counselors closely monitor attendance of their clients. When notified of an absence, the Employment Counselor contacts the client to determine the reason for the absence and decides if the absence is with good cause. During discussion with the client, they may identify problems or barriers, and adjust the employability plan/make referrals as appropriate.

### **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:

Contract staff contact their sanctioned clients by phone or home visit to discuss options for the client to end their sanction, and offer referrals to other resources for the duration of the sanction.

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

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

Temporary Assistance Examiners discuss options with sanctioned clients when the client has contact with the agency (recertifications, reporting of changes).

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

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

Temporary Assistance Examiners explain to applicants and recipients that TA is a temporary program, and the goal for self-sufficiency. Clients are encouraged to seek and accept employment, and are informed of the benefits of employment, as well as the supportive and transitional benefits available if become employed. TA Examiners explore the eligibility for diversion payments when clients apply for assistance. Employment Counselors from OWD and Catholic Charities reinforce with clients that TA is a temporary program, and their employability plan is their plan toward employment and self-sufficiency. Employment Counselors use the comparison chart to show clients the amount of income they would have when they go to work, the benefits they could still be eligible for (transitional benefits) as well as EITC refunds.

## **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:  
See attachment 2 - list of supportive services

- 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): See attachments 3A, B - chart for calculating transportation /mileage

- 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:

One mile or less one way.



- 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: Applicants are screened for eligibility for diversion payments, transportation monies to cover travel to/from employment until the client received their next paycheck, referrals to other agencies/organizations to ameliorate a short-term emergent need that would allow them to continue their employment. Clients are also screened for eligibility for other programs that may stretch their budget: SNAP, Day Care, HEAP. Clients without medical coverage are referred to Certified Application Counselors to apply for health care coverage.

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

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

See attachment 2 - list of supportive services

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:

See attachment 2 - list of supportive services

#### **Section 4.3 Extended Support Services**

As long as funding is available (through FFFS, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines:

none

### **Section 5 Conciliation, Sanction and Dispute Resolution Procedures**

(Reference 18 NYCRR 385.11 and 385.12)

#### **Section 5.1 Conciliation**

The district's conciliation process for TA applicants and recipients is in accordance with 18 NYCRR 385.11(a). Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

Conciliation notices are sent to clients that do not satisfactorily complete the assignments in their employment plan. Employment Counselors discuss the issues surrounding the failure to comply in order to determine if it was willful and without good cause as well as reinforce the importance of compliance, discuss possible changes to the Employment Plan, and encourage the client to comply.

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

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

The district's conciliation process for SNAP recipients is in accordance with 18 NYCRR 385.11. Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

Conciliation notices are sent to clients that do not satisfactorily complete the assignments in their employment plan. Employment Counselors reinforce the importance of compliance, discuss possible changes to the Employment Plan, and encourage the client to comply. Employment Counselor make sure clients are aware of their option to demonstrate compliance to avoid the SNAP sanction.

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

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

Conciliation notices are sent to clients that do not satisfactorily complete the assignments in their employment plan. Employment Counselors discuss the issues surrounding the failure to comply in order to determine if it was willful and without good cause as well as reinforce the importance of compliance, discuss possible changes to the Employment Plan, and encourage the client to comply.

The district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is:  
Employment Counselor or TA Examiners make sure clients are aware of their option to demonstrate compliance to avoid the SNAP sanction. If the client responds stating they know they do not have good cause but would like to demonstrate compliance, the TA Examiner or Employment Counselor explains to them they would need complete job search for 3 verified jobs applications, and submit their job search verification log within 10 days to demonstrate compliance to avoid the SNAP sanction. If clients submits their form listing 3 job applications, no SNAP sanction is imposed. If client does not submit completed verification form by the deadline date, the SNAP sanction is imposed. TA Examiner or Employment Counselor may contact the employers listed on the form to verify applications were submitted

## **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:  
Clients that have agreed to comply with employment to end their sanctions will be required to attend the appropriate work activity as assigned for one weekly activity cycle. The sanction is lifted immediately after the activity cycle is completed, and

benefits are restored retroactive to the date the client indicated a 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: Livingston County does not mandate participation in SNAP E&T for NTA SNAP cases. If a TA/SNAP client is sanctioned (30, 90 or 180 days), they must reapply for SNAP after their sanction duration is completed, and agree to comply with employment requirements at that time. An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that he/she is exempt from SNAP E&T requirements and is otherwise eligible for SNAP benefits.

### **Section 5.3 Dispute Resolution**

The district's procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district's response to their request for health-related accommodations is conducted in accordance with 18 NYCRR 385.11.

The grievance is mediated by:

- An agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
- Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

## **Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals**

(Reference 18 NYCRR 385.2)

### **Section 6.1 Disability Determination Process and Tools**

The district's process for determining an individual's disabilities and/or work limitations is in accordance with 18 NYCRR 385.2(d). Check **all** that apply, and describe the process:

- District participates in the OTDA managed contract for independent medical evaluations.
- District contracts directly with a physician to provide independent medical evaluations.
- District accepts physician's statement provided by participant.
- District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
- Other process (please describe):

Livingston County refers clients for an independent evaluation when: the client does not have a physician to complete the evaluation, when DSS wants a second opinion when a medical practitioner's evaluations continue to report no change in the client's status, when DSS wants an evaluation for potential referral to apply for SSI.

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:

Temporary Assistance Examiners and/or Employment Counselors review the recommendations of the medical practitioners and determine employability.

### **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 follows the medical practioners' recommendation for treatment plan.

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

The district follows the medical practioners' recommendation for treatment in developing the 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:

Clients in treatment plans are required to report their attendance monthly, as well as submit changes/progress in their condition. Updated medical practioner statements are required every 6 months.