

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

January 1, 2020 – December 31, 2021

Oneida County

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Section 1- Assurances

As a condition of the receipt of federal and State funds the OneidaCounty 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 OneidaCounty 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/ CFB 01/07/2020

Colleen Fahy-Box, Social Services Commissioner

01/07/2020, 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.

Oneida County Department of Social Services' Director of Employment serves directly under the Oneida County Commissioner of Social Services and is responsible for administering Oneida County's Employment Programs. The Employment Division's organizational chart is attached. Oneida County Department of Social Services Staff and Contract Staff share their expertise and resources to provide an integrated network of comprehensive, individualized employment services and activities for Temporary Assistance applicants, recipients, and SNAP recipients.

The Employment division continues to work with TA recipients even after they have achieved employment until their case closes due to excess income. Post-employment services available include: continued case management, assistance in accessing child support, daycare providers, better jobs, educational and vocational training, transitional childcare, transitional Medicaid and SNAP.

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
Upstate Cerebral Palsy	\$247,516	<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 case management for individuals with disabilities-enrollment into work activities, assistance with SSI application process, and referrals as needed.
Madison-Oneida BOCES	\$404,928	<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%	Pride in Work- A four week intensive job readiness program.
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$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%	

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
Workforce Investment Board of Herkimer Madison and Oneida Counties	OTDA	<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	Wage Subsidy - Training reimbursement for TA recipients in employment settings. Career Pathways II - Training provided in demand occupations. Youth Build - Career training along with HSE classes for individuals between the ages of 16-24.
Madison - Oneida BOCES	US Dept. of Education and NY State Dept. of Education	<ul style="list-style-type: none"> <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 classes High School Equivalency classes Adult Basic Education Distance Learning External Diploma Program Work Experience
Women's Employment and Resource Center	NY State DOL and OTDA	<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	Employment Readiness Vocational Education exploration Computer training Life skills Work experience
Mohawk Valley Refugee Center	US Refugee Resettlement & US Dept. of Health and Human Services	<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	Refugee services which include resettlement, interpretation, referrals for health and safety issues, English as a Second Language instruction, work experience, employment services, naturalization, and cultural events.
Oneida County Workforce Development	OTDA	<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	Summer Youth Employment Program - provides employment opportunities for school aged youth at community sites.
ACCESS VR	US Dept. of Education and NYS Dept. of Education	<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	Employment and Training services for individuals with disabilities.
		<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
		<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		Target Groups	
Assessment/Employment Plan	=	Applicants	=
Supervised Job Search	=	FA & SNA with children	=
Job Readiness Training	=	SNA without Children	=
Job Club	=	SNAP	=
Job Placement Services	=	TANF 200%	=
Grant Diversion	=		
Job Development (employer outreach)	=		
WOTC pre-certifications	=		

Other Services Requested

Described below are additional services/duties which will be requested of Jobs staff (e.g. WTWCMS data entry, case conferencing, job fairs)

Section 2.4 Access to Services at New York State Career Centers

In New York State, TANF is a required WIOA partner and must coordinate access to TANF services with the comprehensive Career Centers.

- a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:
 - The district has employee(s) physically present at a Career Center
 - The district has contract staff physically present at a Career Center
 - The district makes available direct access to its program staff via phone or technology at a Career Center
 - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
 - Other: Oneida County refers all of it's English speaking employable applicants to the local Career Center for assistance in their efforts to obtain employment. TANF applicants are given the Career Center registration form by Employment Division staff to fill out and bring with them to the Career Center to expedite the intake process. Safety Net applicants are sent to the Career Center as part of the Employment Readiness Program they go through.

- 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.

Along with sending our applicants to the Career Center, we get individual job postings and notices of Job Fairs via email from the center as they come available. This happens

daily. We also get weekly recruitment flyers emailed every week. These flyers have listings of local employers who are recruiting with information on requirements and how to apply. The emails are sent to the Director who in turn forwards the emails to all of the Employment Counselors to utilize when seeing their clientele. The flyers are also placed at the front desk of our reception area for our clientele to take.

The local Career Center in Utica holds a Job Fair on the last Wednesday of each month. Oneida Co DSS Employment Division sends a representative to the Job Fair to guide our clientele who attend.

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:

Applicants and recipients of Temporary Assistance receive all the required information regarding employment expectations and other requirements by the eligibility worker at first point of contact. Books I, II, and III are given individually at the time of application, which include time limits and requirements to engage in work, school attendance for teen parents and finding daycare if necessary. A complete explanation is given on additional supportive services available in our district that help applicants/recipients meet participation as well as helping them become self-sufficient. Recipients are given books I, II and III at every recertification. Orientation for applicants/recipients may be done as a group or individually to accommodate the need of the applicant/recipient. Special accommodations are utilized to meet any language barrier or disability need for the applicant/recipient.

In addition English speaking Safety Net applicants attend a group orientation at the Employment Center which reinforces information received from the eligibility worker.

TANF applicants receive an individual orientation conducted by an Employment Counselor.

Section 3.3 Assessment and Employment Planning

TA Assessment

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

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

The district enters assessments directly into WTCMS

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

The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.

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

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

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

All non-exempt English speaking TA applicants (SN, SNF, and FA) are assessed by an Oneida County DSS Workforce Development Employment Counselor immediately upon TA application using a State approved local district mini assessment form containing all the required elements of an assessment. A more comprehensive assessment is done once the case is opened. Non-English speakers are assessed with an appropriate interpreter upon case opening.

Disability Case Managers complete employment assessments for work exempt population of adults in households with children within 90 days of the date of eligibility and whenever necessary depending on medical status, programming and/or treatment status.

Disability Case Managers complete employment assessments for work exempt population of adults without children within 1 year of date of eligibility and whenever necessary depending on medical status, programming and/or treatment status.

Oneida County DSS Workforce Development Employment Counselors complete employment assessments for work exempt population of adults in households with children within 90 days of the date of eligibility and whenever necessary depending on medical status, programming and/or treatment status.

Oneida County DSS Workforce Development Employment Counselors complete employment assessments for work exempt population of adults without children within 1 year of date of eligibility and whenever necessary depending on medical status, programming and/or treatment status.

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

Oneida County DSS - Employment Division

- 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)]

Oneida County DSS Workforce Development Employment Counselors and a DSS Senior Workforce Development Counselor conduct assessments and employability plans under the supervision of a DSS Senior Workforce Development Employment Coordinator who has several years of experience, and has demonstrated effectiveness and knowledge of participation requirements and possesses a Bachelor's degree.

Disability Case Managers, contracted through Upstate Cerebral Palsy and located here in our office, conduct assessments and employability plans while working under the supervision of a DSS Grade B Supervisor in the Employment Unit who holds a Bachelor's degree, has several years of experience, and has demonstrated effectiveness and knowledge of participation requirements.

- 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?

Whenever necessary depending on medical status, programming and/or treatment status.

Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:

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

The district enters employment plans directly into WTCMS.

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

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

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

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

b. Check one of the following:

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

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

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

Oneida County DSS Workforce Development Employment Counselors complete an individual's employment plan immediately following the employment assessment. During the assessment, the clients needs and preferences as well as programming options are discussed. The employment plan is developed as a result of this discussion.

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

The employment plan is updated when the goals of the plan are attained, such as the completion of a program or whenever necessary taking in consideration, the needs of the individual as well as the needs of the agency to maintain participation rates.

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:

Each morning, the Senior Workforce Development Coordinator checks CMS for newly open and reopened cases. Additionally, a check is done for cases whose category has changed from a work exempt status to a TA non-exempt one. A paper case is established for each open recipient found and is assigned on CMS to one of our Oneida County DSS Workforce Development Counselors to call in for face to face assessment or assessment update and placement into appropriate work activities. They are seen assessed and referred for activities usually within 2 weeks. Work exempt adult cases are assigned to the appropriate Oneida County DSS Workforce Development Counselor or disability case manager for assessment and self-sufficiency plan.

Oneida County Employment Counselors and Disability Specialists monitor their individuals within their existing caseloads who are expecting the birth of a child and parents who are exempt due to the recent birth of a child for changes in status and authorize changes in employment codes as appropriate. When a child in a single parent household is 3 months of age, the parent is called in for reassessment. In a 2 parent household, the parent is called in for reassessment when the child is 6 weeks old.

Oneida County has a locally developed medical determination process. There are now 5 Disability Case Managers in the Employment Division and all adult TA recipients, regardless of category or exempt status, have a worker in the Employment Division

monitoring his/her case. When a medical is returned to the agency on a previously exempt TA adult, it is faxed to the Employment Division and given to the worker responsible for the case to make the employment determination and process all the necessary paperwork. The worker assigned to the case, whether it be a Disability Case Manager or a Oneida County DSS Workforce Development Counselor makes the employment determination. They track all the exempt cases and call them in for medical updates. When a client is found to be non-exempt, including work limited, a 4005(a) is issued, an appointment is immediately sent to him/her for a face to face assessment and appropriate work activities are assigned. At 6 month recertification appointments, most adults are referred for reassessment in person.

All Safety Net applicants attend an orientation at the Employment Unit, after which the non-exempt SN applicants are assessed. They are assigned to begin Pride in Work, a 35 hr. per week 4 week Job Readiness Program the following week. Upon completion of PIW, they are assigned immediately to Work Experience and/or other appropriate programming.

Oneida County DSS Workforce Development Employment Counselors and Disability Case Managers make direct referrals to all programs. They have all been trained and are periodically updated as needed on the available programs and how they relate to work activities. Conflicts, problems and or adjustments pertaining to any of the provider agencies and or programming including Work Experience sites are handled by the Director of Employment who oversees operations of the Employment Division. Meetings and site visits are routinely done to ensure successful collaborations.

Oneida County supports Work Experience as a primary Work Activity. All clients assigned are expected to participate for the maximum number of hours their TA and SNAP benefits combined allow. If there are not enough hours supported by the grants to meet participation rates, then they are assigned to additional activities to meet the rate.

Oneida County requires each nonexempt TA recipient to participate in approved Work Activities. All clients are required to participate in at least 20hrs./wk. of a core activity. Additional activities are assigned according to case requirements as they pertain to participation rates. Each case is handled on an individual basis, and programming, as well as hours are determined as such. Single parents with children under 6 years of age are required to participate at least 20hrs/wk and single parents with children over 6 years old are required to participate at least 30hrs/wk. Employment Counselors are instructed to have clients participate above the minimum required number of hours up to 40 whenever possible taking into consideration their individual case circumstances. The standard weekly hour participation requirement for Safety Net non-MOE individuals is 35 hours.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	1075	875

- 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:

Each month, the Director of Employment pulls up Cognos reports by Employment Counselor and gives them to the respective Counselors so the Counselors can make appointments with individuals in order to engage in employment activities for enough hours to meet participation requirements. The Counselors are also given reports of their employed population to make sure the schedules are projected out for the month and are matched with the budgets to ensure accuracy and consistency. The workers direct supervisor also gets the reports to monitor the workers progress in their efforts to meet 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):

Oneida County does not require NTA SNAP applicants or recipients to participate in work activities.

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

All NTA SNAP work registrants are sent a letter informing them that they can call the Employment Unit for information on how to obtain job search assistance. The letter also informs them that our local One Stop is available to them as a resource.

- e. Describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

1. The district assigns TA **applicants** to Job Search. Yes No

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

All TA adults with families are referred to the Employment Unit by the Intake Unit and are seen by either Employment Counselors or Disability Specialists depending on if there are any medical issues. The employable English speaking applicants are assessed and placed into a job search which is monitored weekly by the Employment Counselor.

All English speaking single individuals are sent to a group orientation held daily in Utica and twice a week in Rome. Those found to be employable are placed into a 4 week Job Readiness program which includes intensive job development in which the participants are required to look for work.

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

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

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

TA recipients are assigned to Job Search which is monitored by the respective Employment Counselor. The number of hours assigned varies according to the number of hours needed to meet participation rate requirements for that individual. The number of contacts to be made is dependent on the number of hours assigned. Participants are required to report job search outcomes on a weekly basis and are required to do so by appearing for an appointment with their respective Employment Counselor.

- 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. Oneida County does approve self-employment as part of an individual’s required work activities. The employment hours and wages are monitored by the Employment Counselor. If the individual’s earnings are below the lower of federal or state minimum wage , he/she will be given 4 weeks increase earnings to above the lower of federal or state minimum wage and if not, will be assigned to work activities to meet the participation requirements.
- 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"> — FA — SNA Fam — SNA Ind — 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"> — FA — SNA Fam — SNA Ind — 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"> — FA — SNA Fam — SNA Ind — 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"> — FA — SNA Fam — SNA Ind — 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"> — FA — SNA Fam — SNA Ind — 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.

Oneida County Workforce Development has 3 staff members who are involved in the job development portion of the Pride In Work program which operates at 2 different sites in Oneida County. The job developers contact local employers and check daily on status of pending job applications, and new job opportunities. They are encouraged to offer any incentives that may be available, such as Wage Subsidy, Tax Credits, and Grant Diversion for individuals who are eligible. Contact between The organizations is weekly.

Oneida County Employment Unit gets job referrals and updates on upcoming job fairs daily from the local Career Center. These are distributed to the Employment Counselors to discuss and give to their individuals. The Career Center also sends a weekly recruitment flyer to Oneida County DSS Employment Unit. This is given to all the Employment Counselors and copies are also placed at the front desk reception area for individuals to take.

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:

In Oneida County, most of the non-English speakers are part of a refugee resettlement program and are sponsored by The Mohawk Valley Resource Center for Refugees who offers English Language Instruction.

Adult Basic Education and HSE preparation are handled by Madison-Oneida BOCES through their educational programs. Madison-Oneida BOCES also offers English Language instruction. Madison-Oneida BOCES is accredited through New York State Department of Education.

- 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:

Traditional sources for Vocational Education such as BOCES which are accredited through New York State Education and Mohawk Valley Community College, are usually the first resort for training. Individuals are also referred to Working Solutions office at a One Stop location for prerequisites, testing, interest inventory, ect. Guidance toward appropriate training is provided. Training funds through various sources such as The Workforce Investment Board are arranged for those eligible as a scholarship to allow TA individuals to attend approved training. The Women's Employment and Resource Center also identifies appropriate work related training and funding streams for women served through their programs.

- 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:

At assessment all non-exempt adults are made aware of educational opportunities. Adults without a high school diploma/HSE or without basic literacy may be assigned to educational programming at Madison-Oneida BOCES. This would be coupled with a work experience in order to meet participation requirements. The Pride in Work Job Readiness Program may identify the need for educational activities for individuals. Employment Counselors make every attempt to engage individuals in appropriate educational activities in addition to their core activities. BOCES offers HSE instruction at different times during the day as well as the evenings and at different sites through the city of Utica to give individuals choices and enable to work classes into their schedules. Distance learning and External Degree programs are also available and are encouraged when appropriate.

- 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:

Oneida County Employment Counselors will approve, in a manner consistent with the approval of training policy, educational programs which are determined to be appropriate for HSE/Adult Basic Education/ESL or high school participation. In addition, in recognition of participation rate requirements, participants may also be assigned to core work activities such, as work experience for an appropriate number of hours based upon category of assistance and family circumstances. The agency would deny approval of education HSE/ESL in instances where the individual is requesting to take the programming at a Community College for a fee. The agency does not believe anyone should have to pay for these services or use grants (Pell/TAP) when there are plenty of opportunities to receive these services free of charge within our county.

- 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:

All participants must have a face to face in depth assessment and provide all background information on training preferences, eligibility for financial aid, and past training/work experience. In order to be approved for training, the participant must meet the following requirements:

- a. Lack a marketable job skill
 - b. Demonstrate ability to complete program
 - c. Possess pre-requisite skills to enter training - must possess high school diploma or high school equivalency diploma to attend college degree programs
 - d. Training program must lead to immediate employment
 - e. Training program must meet the needs of the local job market.
 - f. Hours of training must satisfy the work requirement hours or support support additional work activities
 - g. Training requiring fees or tuition will not be approved if training is available at no cost at another approved site
- 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:
2 year Associates Degree 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 participant will meet with his/her Employment Counselor and a plan will be developed to ensure the participant is meeting the core requirements. If the individual is not employed at least 20 hrs/wk, he or she will be placed in a work activity for enough hours to meet the requirements. The participant's school schedule will be taken into consideration when assigning the hours of the work activity. The participant will also be encouraged to pursue work study and or internships as these would count as core activities.
- h. Education and training providers are evaluated by the following standards:
- a. Are they accredited educational institutions or state recognized training sites?
 - b. Do they offer training which leads to marketable skills, high school diploma or high school equivalency diploma?
 - c. Successfulness of participants in reaching designated outcomes
- i. The district procedure for advising participants of approved training providers is:
At assessment by an Employment Counselor, and any subsequent contacts, participants can receive information on all local training providers including booklets on courses/programs and certificates offered.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:
At face to face interview, approval of training or enrollment in a work activity is reflected in writing in the Employment Plan developed with the participant.

- 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:
Temporary Assistance Examiners monitor at application and recertification.
- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:
Client confidentiality is maintained. As an individual is sent to an activity, the Employment Case Advisor discusses the site and strategies for participation and acknowledgement of any health related concerns. The referral form for Work Experience and other assigned activities has a section for written comments is provided to the site supervisor where limitations can be listed. No diagnosis or disclosure of medical condition is mentioned.

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 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 (12) 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 (12) 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 (6) 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 (6) 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:

Oneida County has a diverse population, particularly refugees sponsored by the Mohawk Valley Refugee Center. Applicants and recipients of TA and SNAP that are sponsored by the MVRC have case management provided through MVRC at no cost to local DSS – this includes acculturation, resettlement, medical needs, ESL classes in concert with Utica Public Schools, and employment referral and assistance.

Those non-English speakers not served under the resettlement provision may still attend ESL class at the MV Refugee Center.

Interpreting for non-English speakers is accomplished through County contracted LLE phone interpreters, MAMI, and the MV Refugee Center.

Oneida County DSS strives to hire staff that is bi-lingual in an attempt to work with all needy applicants and recipients.

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:

An Employment Supervisor makes routine visits to work sites to discuss any issues both programmatically and individual client based ones with the site supervisor.

Work sites call the Employment Counselors if problems arise so hours can be rescheduled within the month and problems can be resolved in a timely fashion.

Some sites have evenings and weekend Work Experience hours available.

All programs have a DSS employee as liaison – usually an Employment Supervisor - their duty is to maintain a positive relationship and communication with program providers, so that attendance issues can be addressed immediately.

The Oneida County Daycare unit is under the supervision of the Director of Employment and Daycare. Daycare staff can meet a parent or provider and share information with TA and Employment staff during one visit. The use of Child Care Time and Attendance software to communicate the needs and approvals of daycare among staff means less time missed by clients to meet with staff. Employment Counselors facilitate communication with a referral specialist from The Child Care Council of Cornell Cooperative Extension to help the individual find suitable child care at the time of the appointment, thus assuring that the individual has reliable care set up and is able to attend their job and /or programming

Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants

— District attempts to engage sanctioned participants as soon as they are sanctioned using the following strategies:

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

Oneida County engages sanctioned participants when the durational period of the sanction is completed through the use of our Sanctioned Engagement Project. This program is a collaboration between Employment, TA, and Resource / Investigations Units. At the completion of the durational period of the sanction, participants are sent a letter that they may end their sanction by contacting the agency and agreeing to participate as required. Participants who choose not to do this are referred to the Resource / Investigations unit, who send the participant an appointment to discuss how they are meeting their family needs on a reduced budget. An Employment Supervisor is at this interview and allows the participants the opportunity to comply, to end the sanction. Participants who do not agree to comply are required to meet with a Resource Investigator monthly to discuss meeting the family needs on a reduced budget.

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

Section 3.11 Strategies for reducing the need for TA

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

Oneida County attempts to meet the immediate need of TA applicants in the following manner, so that they do not require an open case for cash assistance –

SN applicants who are found to be non-exempt attend a mandatory full-time 4 week Job Readiness program which is highly successful in helping applicants find a job, and includes registering with the One Stop Centers for job leads.

Non-exempt TANF and SNF applicants are assigned to conduct a supervised job search monitored by an Employment Counselor with job leads provided and information on potential Grant Diversion payments to employers as an option to increase the likelihood of getting hires. Daycare applications for employed applicants can be expedited – if the provider can be approved. Those who are employed at time of application and found to still be eligible for Temporary Assistance are given the option of just receiving childcare subsidies in lieu of full TA benefits. This does not effect their eligibility for SNAP and Medicaid.

OCDSS can make diversion payments for a non-recurring payment to help meet a need that will prevent a TA applicant from needing cash assistance, such as a car repair to get to a job that

will be self-supporting. The criteria for authorizing such payment is: the one-time payment will result in not needing TA due to current employment or the verified promise of employment.

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:
1. OCDSS will provide housing relocation financial assistance for applicants and recipients who are not able to participate in assigned Work Activities due to the lack of private and public transportation.
 2. OCDSS will pay for clothing that is required to participate in approved Work Activities, including employment, up to a maximum of \$200. A statement from the site supervisor or employer and two estimates of the cost from a retail store are required.
 3. OCDSS will pay a maximum of \$500 for tools which an applicant or recipient requires to begin or retain a permanent job. A statement from the prospective employer and two estimates of cost for the tools will be required.
 4. OCDSS will pay for testing and licenses that are required in order for an individual to begin or retain a permanent job. A statement from the prospective employer is required.

Please note that all supportive services are available to TA and SNAP recipients on a case by case basis.

- b. The district will use the following approach to assist those participants who need transportation to and from an approved work activity site, including any applicable mileage reimbursement rate, and the method used by the district to arrive at that reimbursement rate. OTDA policy establishes a mileage reimbursement rate of no less than the IRS established rate for medical/moving purposes. In all instances, should the actual cost of transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, the district will reimburse for the actual costs based on reasonable documentation submitted by the work activity participant.

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/19 is 58 cents/mi)

- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/19 is 20 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):

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

If transportation cannot be arranged, the maximum distance a participant would be required to walk would be 1 mile each 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:
1. OCDSS will provide financial assistance for housing relocation for Temporary Assistance applicants who are not able to accept employment that would eliminate their need for cash assistance due to the lack of transportation.
 2. OCDSS will pay for clothing that is required to accept or maintain employment and eliminate the need for cash assistance, up to a maximum of \$200. A statement from employer and two estimates of the cost from a retail store are required.
 3. If the job will eliminate the need for cash assistance, OCDSS will pay a maximum \$600 to cover three months of car insurance that is necessary for the applicant to have transportation to and from a permanent job he has or has been offered. Two estimates of costs are required from the applicant.
 4. If the job will eliminate the need for cash assistance, an applicant may receive a maximum of \$1000 to repair an automobile owned by the applicant or other household member that is necessary for a Temporary Assistance applicant to travel to and from a permanent job he has or has been offered.
 5. If the job would eliminate the need for cash assistance, OCDSS will pay a maximum of \$500 for tools, which Temporary Assistance applicants require to begin or retain a permanent job. A statement from the prospective employer and two estimates of cost of the tools will be required.
 6. OCDSS will pay for testing and licenses that are required in order for an individual to begin or retain a permanent job. A statement from the prospective employer is required.

Section 4.2 Transitional Support Services

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

Transitional Childcare, Medicaid, and SNAP are explained to all employed recipients, as well as Child Support and referral for help with Earned Income Tax Credit filing.

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:

NA

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:

Transitional childcare may be available as well as continued Medicaid and SNAP. A 200% application is kept on file for all eligible families, to be accessed for any supportive programs.

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

A Letter of Conciliation is sent to the individual as soon as the Employment Counselor identifies a potential non-compliance issue. The notice states specific reasons for the notice and advises the recipient that he/she must respond within the required timeframe .

If the individual does not respond to the Letter of Conciliation within the number of days required, a request is sent by the Employment Counselor to the eligibility worker to impose an employment sanction consistent with NYCRR 385.12.

If the individual responds to the Letter of Conciliation within the required number of days and good cause/willfulness determination can be determined over the phone, the issue is dismissed. The individual is sent a written notice of the decision by the Employment Counselor and if necessary, an appointment to develop a new Employment Plan.

If the individual responds to the Letter of Conciliation in the required number of days and good cause/willfulness determination cannot be determined over the phone, the Temporary

Assistance applicant/recipient is given an appointment to meet with the Employment Counselor and an opportunity to bring in any documentation that may be necessary.

Following the meeting with the Employment Counselor, the Temporary Assistance applicant/recipient is advised in writing whether or not good cause/willfulness determination was determined. If good cause/willfulness determination was determined, the issue is dismissed and if necessary a new Employment Plan will be agreed to at that time.

If it is determined that the individual did not have good cause and that the individual willfully did not comply with work requirements, a request is sent from the Employment Counselor to the eligibility worker to impose an employment sanction consistent with NYCRR 385.12.

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

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

If the individual does not respond to the Letter of Conciliation within the number of days required, a request is sent by the Employment Counselor to the eligibility worker to impose an employment sanction consistent with 385.12.

If the individual responds to the Letter of Conciliation within the required number of days and good cause/willfulness determination can be determined over the phone, the issue is dismissed. The individual is sent a written notice of the decision by the Employment Counselor and if necessary, an appointment to develop a new Employment Plan.

If the individual responds to the Letter of Conciliation in the required number of days and good cause/willfulness determination cannot be determined over the phone, the Temporary Assistance applicant/recipient is given an appointment to meet with the Employment Counselor and an opportunity to bring in any documentation that may be necessary. If the individual fails to report for the conciliation appointment, a request by the Employment Counselor is sent to the Eligibility worker to impose an employment sanction consistent with 385.12.

Following the meeting with the case manager, the Temporary Assistance applicant/recipient will be advised in writing whether or not good cause/willfulness determination was determined. If good cause/willfulness determination was determined, the issue is dismissed and if necessary a new Employment Plan will be agreed to at that time.

If it is determined that the individual did not have good cause and that the individual willfully did not comply with work requirements, a request is sent from the Employment Counselor to the eligibility worker to impose an employment sanction consistent with 385.12.

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

A Letter of Conciliation will be sent to the individual as soon as the Employment Counselor identifies a potential non-compliance issue. The notice states specific reasons for the notice and advises the recipient that he/she must respond within the required timeframe.

If the individual does not respond to the Letter of Conciliation within the number of days required, a request is sent by the Employment Counselor to the Eligibility worker to impose a SNAP sanction consistent with 385.12.

If the individual responds to the Letter of Conciliation within the required number of days and good cause/willfulness determination can be determined over the phone, the issue is dismissed. The individual is sent a written notice of the decision by the Employment Counselor and if necessary, an appointment to develop a new Employment Plan.

If the individual responds to the Letter of Conciliation in the required number of days and good cause/willfulness determination cannot be determined over the phone, the individual is given an appointment to meet with the Employment Counselor and an opportunity to bring in any documentation that may be necessary. If the individual fails to report for the conciliation appointment, a request is sent by the Employment case manager to the Eligibility worker to impose a SNAP sanction consistent with 385.12.

Following the meeting with the case manager, the SNAP recipient is advised in person and in writing whether or not good cause/willfulness determination was determined. If good cause/willfulness determination was determined, the issue will be dismissed and if necessary a new Employment Plan is agreed to at that time.

If it is determined that the individual did not have good cause and that the individual willfully did not comply with work requirements, he/she will be afforded the opportunity to avoid a SNAP sanction by completing a work activity as assigned. A typical work activity will require the individual to make 5 job contacts in 5 days, log them into a job search worksheet and return the worksheet with the required 5 contacts to the worker within the 5 days. If the individual successfully completes the work activity as assigned, a SNAP sanction will not be imposed. If not, a request is sent by the Employment Counselor to the Eligibility worker to impose the SNAP sanction consistent with 385.12.

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

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

If the individual does not respond to the Letter of Conciliation within the number of days required, a request will be sent by the Employment Counselor to the Eligibility worker to impose a SNAP sanction consistent with 385.12.

If the individual responds to the Letter of Conciliation within the required number of days and good cause/willfulness determination can be determined over the phone, the issue will be dismissed. The individual will be sent a written notice of the decision by the Employment Counselor and if necessary, an appointment to develop a new Employment Plan.

If the individual responds to the Letter of Conciliation in the required number of days and good cause/willfulness determination cannot be determined over the phone, the individual will be given an appointment to meet with the Employment Counselor and an opportunity to bring in any documentation that may be necessary. If the individual fails to report for the conciliation appointment, a request will be sent by the Employment case manager to the Eligibility worker to impose a SNAP sanction consistent with 385.12.

Following the meeting with the case manager, the SNAP recipient will be advised in person and in writing whether or not good cause/willfulness determination was determined. If good cause/willfulness determination was determined, the issue will be dismissed and if necessary a new Employment Plan will be agreed to at that time.

If it is determined that the individual did not have good cause and that the individual willfully did not comply with work requirements, he/she will be afforded the opportunity to avoid a SNAP sanction by completing a work activity as assigned. A typical work activity will require the individual to make 5 job contacts in 5 days, log them into a job search worksheet and return the worksheet with the required 5 contacts to the worker within the 5 days. If the individual successfully completes the work activity as assigned, a SNAP sanction will not be imposed. If not, a request will be sent by the Employment Counselor to the Eligibility worker to impose the SNAP sanction consistent with 385.12.

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

If it is determined that the individual did not have good cause and that the individual willfully did not comply with work requirements, he/she will be afforded the opportunity to avoid a SNAP sanction by completing a work activity as assigned. A typical work activity will require the individual to make 5 job contacts in 5 days, log them into a job search worksheet and return the worksheet with the required 5 contacts to the worker within the 5 days. If the individual successfully completes the work activity as assigned, a SNAP sanction will not be imposed. If

not, a request will be sent by the Employment case manager to the Eligibility worker to impose the SNAP sanction consistent with 385.12.

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: Compliance in Oneida County is determined to be agreement to comply, in writing, following a sanction, at a face – to – face appointment with employment staff. This is followed by an appointment for reassessment of the recipient's household situation, any impediments to employment, and reassignment to a Work Activity. Temporary Assistance benefits are restored retroactive to the date the individual 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: Compliance in Oneida County is determined to be agreement to comply, in writing, following a durational sanction, at a face – to – face appointment with employment staff. This is followed by an appointment for reassessment of the recipient's household situation, any impediments to employment, and reassignment to a Work Activity. SNAP benefits are restored retroactive to the date the individual indicated a willingness to comply, (but no earlier than the expiration of the minimum duration period). 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 work 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):

Once an individual claims medical issues, an LDSS 4526 is given to the individual to have his/her health care practitioner fill out and return within the required timeframe. Once the form is returned, the agency will review it and make the determination of work limitations. If the medical form is not returned within the required timeframe, the agency proceeds with a case closure.

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:

Employment Counselors and Disability Specialists located in the Employment Unit work collaboratively and are responsible for determining the validity of an individual's claim of exemptions from work requirements or work limitations due to medical problems.

The Employment Counselor, with the assistance of the Disability Specialist, will review all medical documentation provided by the individual. The Employment Counselor will notify the client of the Agency's disability determination using the LDSS 4005/4005a. Through the use of the 4005/4005a forms, the client will be notified that he has the right to request a Fair Hearing within 10 days if he is dissatisfied with the decision.

If the client is not yet work ready, an employment/self-sufficiency plan is agreed upon, and he/she will be required to comply with medical recommendations, participate in assessment on an ongoing basis, apply for other sources of income, provide a new medical when requested, and participate in activities deemed necessary for him/her to take incremental steps necessary to eliminate the need for Temporary Assistance. The case is then monitored by Their respective Employment Counselor or Disability Specialist (contracted through United Cerebral Palsy). They will assess and reassess as necessary, obtain updated medical information and make employability determination based on the updated information, and make referrals as needed to ACCESS VR, Mental Health, Certified Alcohol Substance Counselor, and to our SSI Legal Aid project.

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 Employment Counselor with the assistance of the Disability Specialist will review all medical documentation provided by the individual. The LDSS 4526 is used to determine if an individual can restore or improve employability through treatment or other rehabilitative activities.

- 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 treatment plan for individuals determined to be in need of treatment, i.e. mental health counseling, physical therapy is based on the health care practitioner's recommendations as stated on the completed LDSS-4526 in which the employability determination was made from.

- 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 Employment Counselors and Disability Specialists will both be responsible for monitoring compliance with treatment plans depending on case assignment. Each worker will be responsible for his or her case. Monthly timesheets or documentation sent directly from the treatment provider is collected and used as confirmation of attendance. The individual's treatment plan will be updated each time an updated medical is received. New medicals are reviewed at recertifications or when the duration of the limitations expire.