

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

January 1, 2020 – December 31, 2021

Oswego County

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Section 1- Assurances

As a condition of the receipt of federal and State funds the OswegoCounty 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 OswegoCounty 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/ Commissioner's Initials: SA 01/23/2020

Stacy Alvord, Social Services Commissioner

01/23/20, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

Section 2 Administration

Section 2.1 Administrative Structure

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

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

Attachment A provides an organizational chart for the Oswego County Department of Social Services highlighting the units responsible for the districts employment programs. Included are the Employment and Training, Temporary Assistance and Child Support units. While Employment and Training takes the lead in delivering employment services, teams comprised of staff from each unit deliver services to clients. Employment functions include but are not limited to assessment; employment plan development; assignment to work activities; monitoring of participation in work activities; job development, job placement and job retention activities; job readiness training; education and job skills training; developing and monitoring treatment plans for exempt individuals with potential for restoration to self-sufficiency; coordination and provision of supportive services; conciliation/dispute resolution; and disability determinations as they relate to employment activities. While the employment unit takes the lead in administering these services, information is shared and services are coordinated with the other units as needed.

Administrative oversight is provided through a DSS Managers group comprised of:

- Commissioner of Social Services
- Deputy Commissioner of Social Services
- Director of Assistance Programs
- Coordinator of Child Support Enforcement
- Director of Community Services
- Director of Employment and Training
- Director of Fiscal Management
- Director of Social Services

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

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

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

individuals with the potential for restoration to self-sufficiency; job development; job placement and retention services; and other employment related activities.

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

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Oswego County Employment and Training	\$754,100	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other SN	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Employability determination; development of assessments and employment plans; conciliation and disputer resolution; provision of work activities, case management and monitoring; 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 activities.
Oswego County Employment and Training	\$77,800	<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%	Employability determination; development of assessments and employment plans; conciliation and dispute resolution; provision of work activities, case management and monitoring; job development, job placement and retention services; and other employment activities.

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
Farnham Family Services	\$155,770	<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%	Completes on-site Drug and Alcohol screenings and assessments, employability determinations, tracks attendance, progress and compliance of drug and alcohol treatment requirements.
Oswego County Opportunities	\$133,500	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Case Management Services to assist individuals subject to the work requirements to identify and overcome barriers to participation.
	\$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%	

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
ACCES-VR	NYSED	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals with disabilities to obtain training and prepare for, obtain, and retain employment.
ARISE		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals with disabilities.
CiTi	NYSED	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals to remediate basic skills, address english language barriers, prepare for High School Equivalency exam, and to obtain work readiness skills.
Cornell Cooperative Extension		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist families with financial literacy, budgeting, and food/nutrition needs (ie. APPLES workshops and budgeting food money, nutrition, meal preparation).
SUNY Oswego VITA		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist families with income tax preparation.
Child Care and Development Council of Oswego County		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist families with child care needs. Services to assist individuals to become registered child care providers.
Oswego Public Library		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals to develop computer skills and prepare for employment.
Oswego County Workforce NY		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals to prepare for, obtain and retain employment.
Oswego County Opportunities		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to begin early childhood education (Headstart) and address nutrition needs (WIC).
A4TD		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals ages 55 and over with job readiness training and internship.

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Pathfinder Bank		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals with budgeting, understanding credit, banking and keeping safe in an electronic world (Money Smart workshops).
HHUNY		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals with home health care management services.
Food Banks in Oswego County		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals with food/nutrition needs.
HUD Housing Offices in Oswego County		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals with housing needs.
The Salvation Army		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Pathway of Hope Program. Services to assist individuals with case management, goal setting and connections to resources.
Farnham Family Services		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals in recovery from substance abuse issues with peer advocacy
COCOOA		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Services to assist individuals in recovery from substance abuse issues with peer advocacy
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Section 2.3 OTDA Jobs Staff Agreement

OTDA Jobs Program Services – Target Groups

(“X” signifies those that apply in this district)

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)

Not applicable

Section 2.4 Access to Services at New York State Career Centers

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

a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:

- The district has employee(s) physically present at a Career Center
- The district has contract staff physically present at a Career Center
- The district makes available direct access to its program staff via phone or technology at a Career Center
- The district makes available copies of the LDSS-2921 (Common Application) at a Career Center

Other:

b. Please provide a description of how the district coordinates with Career Center partners with providing services to the district’s clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

OCDSS, through an agreement with Oswego County Employment and Training, has staff who provide mandatory employment programs located at the One-stop, this has enabled staff to develop a working relationship with staff from other agencies located in the One-Stop. This includes an informal referral process with NYSDOL, the NYS Veterans Program, ACCES-VR, and A4TD. In addition, information is shared on job postings/job leads, on-site employer recruitments/open interview sessions, upcoming

education and vocational training opportunities, and on-site vocational/college recruitments.

OCDSS also has an established process for referring individuals with a criminal history to a NYSDOL staff member that works with this population and provides information, resources and job referrals.

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:

Oswego County will use the State definition above to define "Engaged in Work".

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:

OCDSS has an up-front Applicant Orientation for all individuals applying for Public Assistance. Staff from the Employment and Training unit conduct the orientation. Orientations are generally conducted in groups. However, a one to one orientation can be provided when the district determines it is appropriate. The Applicant Orientation includes the following:

- Information regarding the temporary nature of public assistance with emphasis on time limits
- Alternatives to Temporary Assistance
- Information on child care in lieu of TA
- Information on one-time payments
- Available tax credits
- Drug and alcohol requirements
- Medical review process for those claiming unable to work/work limited
- Domestic Violence and abuse information and services
- Student Loan repayment obligation
- Employment requirements
- Work requirements for applicants and recipients
- Career center services
- Child care, transportation and other employment related supportive services

-Other community resources available

-Transitional benefits

-Training opportunities

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

The orientation is conducted by staff from the Employment and Training unit at the Oswego County Department of Social Services. All applicants (exempt and non-exempt) are scheduled to participate in the orientation. Orientations are generally conducted in a group setting. However, individual sessions may be conducted when appropriate, at the discretion of the local district. At recertification, the orientation information is provided to individual's in writing (attached).

Section 3.3 Assessment and Employment Planning

TA Assessment

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

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

The district enters assessments directly into WTCMS

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

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

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

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

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

The applicant is scheduled for an Employment Assessment on the day that the applicant attends the face to face interview with Temporary Assistance unit staff. The Employment Assessment is generally scheduled within 10 days of the face-to-face interview. Employment Assessments are held at both the Mexico and Fulton offices. Adult applicants (those age 25 or older and all applicants claiming an exemption) generally attend in the Mexico location, while youth applicants (up through age 24 that are not claiming an exemption) generally attend Employment Assessment at the Fulton One Stop where additional resources are available to assist youth to meet their employment needs.

Those attending Employment Assessment are scheduled for a group meeting where the "locator" version of Test of Adult Basic Education (TABE) is administered to assess basic math and reading levels. Following the TABE, employment staff meet one-to-one with each individual to complete the NYS Assessment Form LDSS-4980), and the NYS Employment Plan (LDSS-4978).

Employment staff review the NYS Assessment form with each individual, and use this information to determine work readiness. Non-exempt individuals determined work ready are assigned to an applicant job search and job readiness workshops as appropriate. Individuals who are non-exempt, but not work ready are assigned to workshops and/or referred to other services to address their needs. At the point the individual is determined work ready, s/he is assigned to job search and/or appropriate workshop activities. Further work activity requirements, that may be assigned at a later date, are also discussed with the individual, such as educational training, voc ed, job skills training and work experience. Other available resources are also discussed with the individuals as appropriate. Those attending Employment Assessment in Fulton are also made aware of the resources available through the One Stop youth programs to assist them to meet their employment goals.

Employment staff use the NYS Employment Plan (LDSS-4978) to establish a plan of service to move the individual to self-sufficiency. The plan is developed with each individual and outlines/defines the activities the individual will be assigned to participate in to reach his/her employment goal. The employment plan also addresses any barriers faced by the individual and the supportive services necessary for the individual to participate in employment activities. The Employment Plan is developed with each individual based on the required activities and the individuals employment goal, interests, needs and preferences. If preferences cannot be accommodated, it is noted in the plan.

Training on the Oswego County Sexual Harrassment and Discrimination Policy is also made available (not mandatory) on the day of the Mexico group assessments. This training is mandated for Oswego County employees and other individuals Oswego County is liable for, including individuals being assigned to a work site to complete work experience. This training may be mandated as a Job Readiness Training workshop in both the Mexico and Fulton offices for individuals to attend if/when needed.

- c. The district administrative unit or contractor responsible for conducting assessments is:
The Employment and Training unit is responsible for conducting employment assessments.
- d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]
Employment Specialists conduct the assessments. Employment Specialists have a Bachelor's degree and receive training in conducting assessment and employment plan development.
- 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?

An assessment is completed at application and at a minimum of every 12 months. The assessment is also updated upon contact with the individual if there are any noted changes in the assessment criteria.

OCDSS utilizes the alert on WTW to determine assessments coming due within 30 days, or assessments that are past due.

Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:
- The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
 - The district enters employment plans directly into WTWCMS.
 - The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTWCMS.
 - The district develops individual employment plans using a local equivalent tool and later enters information into WTWCMS. Attached is the local equivalent.
 - The local equivalent **does not** contain additional elements other than what is required.
 - The local equivalent **does** contain additional elements beyond what is required, listed below:
- b. Check one of the following:
- The same administrative unit or contractor that conducts employment assessments also develops employment plans.
 - A different district administrative unit or contractor develops employment plans, and their qualifications include
- c. Describe the district procedure for the completion of an individual's employment plan.

An Employment Plan is completed with the individual on the day of the Employment Assessment, following the review of the LDSS-4980 with the individual.

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

An individual's employment plan is updated when there are changes to any of the elements in the plan. This can include changes to employment goals, supportive services provided and outcomes, including work activity assignments. The individual signs the updated Employment Plan when present and is provided a copy of the plan. If the individual is not present, the changes are discussed verbally with the individual and noted on the plan and in the case record, and a copy of the updated plan is sent to the individual.

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:

OCDSS strives for a weekly participation requirement of up to 40 hours per week for each individual. While this is the established standard, each case is reviewed and individuals are ultimately assigned based on the circumstances of their case. Work hours assigned may vary due to work exemptions, work limitations and/or other case circumstances.

Applicants participate in Employment Assessment generally within 10 days of their face to face temporary assistance interview. The assignment to work activities begins at the Employment Assessment. Non-exempt individuals determined work ready are assigned to job search and job readiness trainings. Failure to participate may result in a negative action on their case.

At the Employment Assessment, work experience and other appropriate work activities are reviewed. At the point the Temporary Assistance case opens, the individual is assigned to Work Experience and/or other appropriate work activities based on the circumstances of each case.

Upon notification of an individual's status change from exempt to non-exempt status, the individual is scheduled for a case eligibility review meeting. Meetings are generally scheduled within one week of the notice of change in status. Employment staff meet with the individual to complete a NYS Employment Plan, address barriers and supportive services, and assign the individual to job search. The individual is provided the job search contact record which is used for individuals to record their job search contacts and is given a job search follow-up appointment for a future date. The individual is also assigned to other appropriate work activities based on his/her needs, program requirements and employment goals. Activities may include, but are not limited to, educational training, voc ed, job readiness training, job skills training, and work

experience. Oswego County uses WTCMS and Cognos reports to monitor participation rates.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	523	546

- 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:

OCDSS uses the current and monthly Cognos reports to monitor the district's progress toward meeting work participation requirements. Staff are provided with both the preliminary countable and non countable report and the participation and engagement report specific to their caseload each month. The COGNOS Earned Income reports and Adults in Sanction status report are also shared with staff monthly. These reports are used to ensure information in the system is accurate and complete, and to identify cases needing to be engaged or assigned to additional work activities. Supervisory and management staff also use reports to review progress (for individual staff and in aggregate) and identify areas needing further attention.

- 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):

While job search assistance is offered, OCDSS does not mandate NTA SNAP applicants and recipients to participate in SNAP E&T work activities. However, NTA SNAP applicants and recipients are provided written information regarding services the services available to assist with employment needs. NTA SNAP applicants and recipients are also made aware of ABAWD requirements with their Notice of Decision on their SNAP case.

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):

Assistance Program staff inform NTA SNAP work registrants of the services available at the time of application. The NTA-SNAP applicants are sent the information in writing. The letter sent is scanned and saved in the case record.

- 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:

Non-exempt, work ready TA applicants are assigned to job search at the Employment Assessment. Employment staff provide an overview of job search requirements, have applicants sign a job search contract and provide a log to record job search contacts. Applicants are provided direction on completing the job search log, including the minimum number of contacts required each week. Applicants are then scheduled for a job search follow up appointments 1-2 weeks following the assessment. Follow-up group job search meetings are then scheduled every two weeks.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	5	5	Contacts are recorded on a job search log.
SNA Individuals	5	5	Contacts are recorded on a job search log.

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

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

Once the TA case opens, the individual continues job search as a recipient. Follow-up job search appointments for recipients are scheduled at a minimum of once per month. These are generally group Job Search appointments, but can be scheduled one to one. For recipients who did not participate in an applicant job search but are now appropriate for job search, employment staff meet with the recipient to update the employment plan, explain job search requirements, review supportive services needs, provide a job search log and schedule the individual for follow-up job search appointments. OCDSS does not report job search participation hours in WTW CMS.

- 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. OCDSS approves self-employment as part of an individual's required work activities when the number of hours of paid employment can be verified. Agency Self-Employment and/or Independent Contractor agency forms are provided to the individual to obtain verification of start date, earnings and number of hours of employment.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

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

Activity and Definition	
<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>
<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>

Activity and Definition	
<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 WTCMS 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.
<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>

Activity and Definition	
<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.:

OCDSS operates a Subsidized Employment program funded through the Flexible Fund for Family Services (FFFS). Employment and Training staff are responsible for administering this program. Staff solicit job openings for Temporary Assistance applicants and recipients based on the individuals interests/needs. Employers are provided an opportunity to interview each candidate for available job openings. Positions in the public, private or non-profit sectors may be considered. Once the employer selects a trainee, a training period is established taking into consideration the background and skills of the individual being trained. The employer is reimbursed the trainees wages during the designated training period to offset the employer's cost of training. Full-time, permanent positions are targeted for the Subsidized Employment program. However, part time positions can be considered as appropriate. Employment and Training unit staff contact employers on an on-going basis. Once an individual is placed with an employer, the Employment Specialist maintains contact with the trainee and the employer as needed, or a minimum of once each month, throughout the training period.

Employment and Training unit staff also coordinate with other workforce programs and serve as "business service representatives" on the One Stop Business Services Team; this helps to ensure all job leads are shared between the respective workforce programs so all appropriate candidates can be considered.

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.

OCDSS has an informal agreement with the One Stop Center to share information on job development activities. The Job Development staff at the One Stop use electronic means (i.e. e-mail, NYS Job Bank, Social Media) to share information on job leads and employer recruitments. As One Stop staff develop/learn of job openings and/or employer recruitments, information is shared with local district employment staff to make them aware of the job openings, job requirements, and the process for referring individuals. Employer recruitments are held on-site at the One Stop Career Center and at the Career Center located at the Department of Social Services. Staff provide outreach to individuals inviting them to attend the recruitments.

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:

Through affiliation with the the Oswego County Workforce Development Board, OCDSS works with partner agencies to identify appropriate education programs available in Oswego County. Oswego County DSS has access to ABE, HSE, and ESOL programs through CITI (formerly Oswego County BOCES); these agencies serve as providers for these programs.

Oswego County DSS will conduct an assessment of the educational skills of Temporary Assistance recipients. The district may mandate recipients who lack a high school diploma or a HSE, those identified as basic skills deficient, and/or those in need of ESOL classes, to participate in educational programs.

- 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:

OCDSS coordinates with the One Stop Career Center and uses Local Workforce Development Boards approved Demand Occupation List to identify the jobs in demand in the local/regional labor market which training will be approved for. Training providers used must be an approved provider on the New York State Eligible Training Provider List (NYS ETPL). Training providers can apply for approval on the NYS ETPL at any time. Individual requesting training in an occupation not currently on the Demand Occupation List make a case for approval of the training if they can show there are three or more verifiable job openings using a bona fide job search engine, or by providing a commitment to hire letter from a local employer.

- 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:

OCDSS conducts an assessment of the educational skills of Temporary Assistance recipients. All non-exempt recipients who lack a high school diploma or HSE, those who are basis skills deficient, and/or those in need of ESOL classes are made aware of the educational services available to meet their needs. Individuals may be mandated to participate in these programs as part of their Employment Plan.

- 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:

OCDSS's policy is to approve non-exempt individuals for educational programs in addition to their required participation in other mandated work activities.

- 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:

Non-exempt Temporary Assistance applicants/recipients interested in participating in job skills or vocational education activities meet with an Employment Specialist to determine if the work activity is the most effective method of achieving self-sufficiency. Factors to be considered in approving this work activity may include: cost of training, ability to meet federally mandated participation rates, past history of work activities/training activity assignments and success/non success in completing these activities, the need for training, individual's current skill levels, an individuals ability to find gainful employment with their current skill level, the individuals aptitude for a particular occupation, and local demand of businesses/employers.

Before an individual is approved for training, the individual must complete a training approval process, which may include market research, to show they understand the job opportunities available, working conditions, work shifts, job expectations and expected earnings for their chosen field of training. They should also demonstrate a history of follow through on employment/work requirements. Those accepted for training must commit to finding and accepting employment as a result of the training. This commitment is established by reviewing their history in regards to successful completion of past required work activities, the quality of their market research, and their response to questions asked during the interview process. Oswego County DSS retains the final say regarding approval/disapproval of job skills or vocational educational activities.

Individuals are required to continue to participate in work activities throughout the approval process.

Individuals claiming a work exemption must receive clearance from their provider (e.g. D/A, Medical ,Mental Health) in order to be considered for job skills or vocational training activities.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:
The highest level allowed is a two year degree program, or the last two years of a bachelors degree program if the individual has already completed two years of college prior to applying for approval for job skills or vocational skills training and meets all other requirements under section 3.6 (e) of this plan.
- 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:
Temporary Assistance applicants/recipients who request approval for training beyond the 12 month lifetime limitation will not be approved unless the training is in conjunction with one of the following core work activities for a minimum of 20 hours per week: paid employment, work experience, and/or work study.
- h. Education and training providers are evaluated by the following standards:
OCDSS uses a variety of methods to evaluate training providers. These include but are not limited to:
 - A Work Experience Program (WEP) Worksite Agreement process is used to evaluate public and community work experience sites.

- An OJT proposal/contract process to evaluate OJT and similar subsidized employment programs.
 - Utilizing the New York State Eligible Training Providers Listing (NYS ETPL) and the Oswego County Demand Occupation List for Job Skills Training and Vocational Training approvals.
- i. The district procedure for advising participants of approved training providers is: OCDSS assesses each individual based on their needs, appropriateness for and ability to benefit from training, and local labor market conditions. Any training program considered must be in an occupation in demand in the local labor market. Participants seeking training are generally required to perform market research exploring the local job market and training providers who offer what the applicant is looking for. Oswego County does not direct participants to specific training providers, other than listed OJT worksites. Rather, the New York State Eligible Training Providers Listing (NYS ETPL) is used as a guide and the training applicant selects the training provider that best meets their needs. Individuals are allowed to make a case for training if they can show there are three verifiable job openings in the local labor market for a training in an occupation that is not on the demand occupation list, or with an employer commitment to hire letter.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:
Individuals are notified of approval for training or enrollment in a work activity through meetings with an Employment Advisor/Employment Specialist. Individuals are notified verbally and/or in writing of all assignments and appointments.
- 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:

The work study is for less than 20 hours per week and the student refuses to participate in another core activity as assigned by OCDSS.

The student is on an employment sanction for failure to participate in an assigned work activity.

- I. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:

OCDSS adopts each Oswego County school districts enrollment policy in support of their effort to get teen students to attend and graduate from high school in accordance with New York State Education Law. The district will require verification of school enrollment 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:

At the Temporary Assistance face to face interview, applicants complete the "Screening For Participation In Or Exemption From Work Activities Form", prior to assignment to any work activity. If the applicant states " I am able to work (may or may not be employed at this time), but have verifiable mental or medical health limitations which may impair my ability to perform work related functions" the applicant is required to submit medical verification of those limitations. The submitted documentation is used to identify limitations and any accommodations needed prior to the assignment to a work activity. If an accommodation is needed for a recipient to participate in a work activity such as work experience, the Employment Specialist provides the work site with written notification of an individual's needed accommodation(s) and works with the worksite to identify and address the needed accommodations. The Employment Specialist continues to monitor the client's progress throughout the work assignments.

Applicants and recipients who declare limitations outside the interview process are removed from any assigned work activities and are required to submit verification of their limitations and accommodations. Based on the submitted documentation, any limitations and accommodations are considered prior to re-assignment to a work activity.

Applicants stating they are able to work without limitations, and those who decline to answer, are considered non-exempt from work activities. An Employment Specialist determines "work readiness" and assigns each individual to appropriate work activities. Once the applicant becomes a recipient, the Employment Specialist continues to work with each individual and assigns them to additional work activities as appropriate.

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 WTCMS follow the same process that would be used by the district worker?

Yes No

If No, please describe the process used below:

Not Applicable. All information is entered by OCDSS staff.

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:

OCDSS has the following arrangements in place to address the needs of non English speaking participants in accessing services:

- The district's Assistance Programs unit employs Spanish speaking staff (our main alternative language)
- Access to Interpretalk; a language interpretation service can be accessed to address the needs of non English speaking participants.
- Informal agreement are in place with Oswego County CiTi to provide ABE and ESOL classes for non/limited English speaking participants.
- An adaptive technology computer is available to communicate with hearing/speech impaired individuals.

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:

OCDSS policies in place to reduce the amount of time participants fail to participate in work activities include the following:

- OCDSS has all Temporary Assistance applicants attend an Employment Assessment. At the Employment Assessment participants are educated on the benefits of full participation in work activities and barriers to participation are addressed.
- The employment plan is developed with each participant taking into consideration employment goals, education and employment needs, interests, skills, and any barriers to employment (with a plan to overcome) prior to assignment to work activities..
- Meetings are held with participants to review progress, concerns, and to remind the participant of the importance of full attendance and how this can be used to help them in securing employment, as well as the ramifications for non-compliance.
- OCDSS may refer participants to Oswego County Opportunités to be assigned to a Case Management Assistant (CMA) when appropriate. CMA's are able to work 1:1 with the participant to overcome anybarriers encountered in maintaining work activity attendance.

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:

OCDSS utilized the 'Adults in Sanction Status' report to assist with monitoring individuals in sanction status. OCDSS works with sanctioned participants by requiring that they attend case eligibility review meetings as part of the determination of continuing eligibility for Temporary Assistance. These meetings provide the participant with an opportunity to meet with an Employment Specialist to discuss the reason(s) for non-compliance and what's needed to engage the individual to end their sanction. This may include discussion of issues such as barriers to employment and ways to overcome these barriers; the negative impact sanctions have a family and the Temporary Assistance case; child care needs; health concerns; financial obstacles; and short and long-term goals to self-sufficiency.

The Employment Specialist may also request documentation to show how the participant is meeting current responsibilities (i.e. rent, utilities) with the reduction in their Temporary Assistance grant. Exploration of resources (i.e. child support, employment) to assist the participant to meet their responsibilities are also reviewed. Failure of the individual to attend these meetings may result in a case closing.

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

As outlined above, Oswego County's strategy to engage sanctioned participants involves immediate engagement of sanctioned participants through case eligibility review meetings. These meetings continue for the duration of the sanction.

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

As outlined above, Oswego County's strategy to engage sanctioned participants involves immediate engagement of sanctioned participants through case eligibility review meetings. These meetings continue for the duration of the sanction.

Section 3.11 Strategies for reducing the need for TA

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

OCDSS has an up-front Applicant Orientation for all individuals applying for Public Assistance. Staff from the Employment and Training conduct this orientation. Orientations are conducted in groups and include the following information offering alternatives to assistance:

- Information regarding the temporary nature of public assistance with emphasis on time limits
- Alternatives to Temporary Assistance
- Information on childcare in lieu of TA
- Information on one-time payments
- Available tax credits and Child care assistance
- Job search/placement assistance

Non-exempt Family Assistance and Safety Net applicants determined “work ready” after Employment Assessment are placed on a job search and assigned to job readiness training workshops in an attempt to assist applicants to secure employment prior to case opening. Failure to participate in this results in a case denial. Applicants are required to contact a minimum of five (5) employers per week. They are required to document these contacts on a job search contact record. We anticipate that each contact will be one-hour long. Therefore, we expect clients to spend a minimum of five (5) hours per week on job search. The type of contacts are based on the applicant’s individual needs and may include contacts made in person at a business/employer, on-line application, application/resume by mail, or telephone. A business/employer contact will not count more than once every three (3) months, unless deemed necessary by the employer. The Employment and Training unit staff will generally meet with applicants on a bi-weekly basis to review these contacts.

Non-exempt applicants who are not determined work ready are assigned to appropriate work shop(s) and/or referred to other services to address identified needs. Employment staff will continue to monitor services and work with the applicant to address the work readiness issue. Those applicants who fail to participate in assigned workshops/services would go through the conciliation process. Once the individual is determined “work ready”, s/he is assigned to job search.

Every applicant for temporary assistance is screened at intake to determine if external resources are available to meet their needs.

Services available through TANF 200% and supportive services that assist employed individuals, such as auto repairs, auto insurance, and work related clothing, are also reviewed with individuals at orientation, one to one, and at workshops.

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:

Supportive Services may include, but are not limited to, transportation assistance such as automotive insurance, automotive repairs, and fees associated with driver's license, driver's permit, and automotive registrations; certification/licensing fees; child care; clothing/uniform costs; educational related activities; gasoline allowance; job related safety equipment; license/work related fees; incentive cards etc.

Requests for supportive services are reviewed on a case-by-case basis, with respect to need, availability of funds, and the availability of services from other resources and/or community programs to meet that need. Each request is reviewed to see if cost effective and reasonable. Maximum allowable costs are established for each service (see below).

Supportive Service:	Dollar Limit:
Automobile Insurance	Actual cost for a six month policy (NYS legal minimum unless collision is required)
Automobile Repairs	\$2500.00
Fees for Driver's License/Permit	Actual cost
Fees for Automobile Title/Registration	Actual cost
Books, Fees, Supplies	Actual verified cost if required for an approved training program
Childcare	Applicable District Market Rate
Clothing	\$150.00
Driver's Education/Defensive Driving	\$500.00
Educational Fees	Actual verified cost if required for an approved training program
License and Other Work Related Fees	\$250.00
Tires	\$600.00 (\$150 per tire)
Tools and Equipment	\$500.00
Transportation	IRS medical/moving rate
Gas Card	\$50.00
Incentive Card(s)	\$100.00
Tuition	Actual cost less federal and state financial aide, up to a maximum of \$4,000.00

Supportive services may be provided to enable an eligible individual to participate in an employment activity or to accept or retain employment. Supportive Services are issued in accordance with agency policy up to the dollar caps listed. Exceptions to both the supportive services available and the caps can be made by the commissioner or his/her designee. Oswego County Department of Social Services retains the final say regarding approval of supportive services requests.

- 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): OCDSS will use the following approaches to assist participants assigned to work activities that require transportation assistance:

- OCDSS will issue mileage reimbursement to participants at the IRS medical/ moving rate for the distance traveled to and from an employment activity, including the costs for taking a child(ren) to a childcare provider. If the IRS medical/moving rate changes, the district will adjust the mileage reimbursement rate to match said rate.
- Bus tokens and passes will be purchased and will be issued to participants upon request and need
- Bus schedules will be made available and the district will assist participants to identify the appropriate bus service and route.
- The district will attempt to schedule participants lacking transportation in work activities as close to their residence as possible.
- The district will encourage car-pooling as a means of transportation when appropriate.
- The district will seek out worksites throughout the county in an effort to ensure there are sites within relatively close proximity to participants' homes. A participant may suggest a worksite location to the district and the district will contact the proposed site to solicit participation in the program.
- The district will continue to explore other options (e.g. Voluntary Transportation Coalition; Ride Share agreements) to address transportation needs.

- 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:

Due to the rural nature of the county and adverse winter weather conditions, Oswego County establishes a distance not to exceed one (1) mile as the maximum distance the district will require a participant to walk to a work activity assignment or access public transportation. Oswego County will not allocate transportation supportive services for participants that reside within a one (1) mile radius of the work activity site. Exceptions to this policy can be made by the district on a case-by-case basis due to extenuating circumstances, such as transporting children to/from day care, a participants verified disabling condition etc.

- 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:
OCDSS may provide supportive services to individuals at risk of needing TA, provided the service is needed to obtain and/or maintain employment. Supportive services may include but are not limited to: automotive insurance, automotive repairs, fees associated with: driver's license, driver's permit, automotive registrations, tires and clothing/uniform costs. Requests for any supportive services are reviewed on a case-by-case basis, with respect to need, availability of funds, and availability of services through other resources or community programs. Requests are approved if they meet the criteria and fall within the maximum allowable costs (see section 4.1(a)). Exceptions can be made by the commissioner or his/her designee. Requests for supportive services not listed above are reviewed on a case-by-case situation using this criteria.

OCDSS may provide upfront mileage costs for a participant to accept employment with a verified job offer. The maximum allowable cost will be determined by multiplying the IRS rate for medical/moving by the number miles to get to/from the employer, for each day scheduled to work until which time the participant receives their first pay check, up to a maximum of \$75.00.

OCDSS has the following arrangements in place to address the needs of non English speaking participants in accessing supportive services:

- The district employs Spanish speaking staff (our main alternative language)
- Access to Interpretalk; a language interpretation service
- Informal agreement with Oswego County CiTi for ABE and ESL classes for the limited English speaking participants.

An adaptive technology computer is available for individuals with a disability.

Section 4.2 Transitional Support Services

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

OCDSS may provide individuals eligible for TANF 200% services the supportive services outlined in Section 4.1 to maintain employment. Requests for supportive services are reviewed on a case-by-case basis, with respect to need, availability of funds, and availability of services through other resources and/or community programs. Requests may be approved if they meet this criteria and fall within the maximum allowable costs. Exceptions can be made by the commissioner or his designee. Requests for supportive services not listed above are reviewed on a case-by-case situation using this criteria. The district retains the final say regarding approval of supportive services requests.

OCDSS may provide incentive cards for TANF 200% eligible individuals that are active on a Temporary Assistance case that obtain employment a minimum of 20 hours per week, obtain their TASC or a Vocational Education license/certificate. The incentive cards are also offered at established benchmarks if the participant remains active on Temporary Assistance.

OCDSS maintains regular contact with the TANF 200% eligible participants that close Temporary Assistance due to excess earned income or client request due to earned income, for up to one year after case closing. Questionnaires are mailed to the participants to complete and return to identify any barriers or obstacles they may be experiencing, that may prevent them from maintaining employment (i.e. child care, transportation). Any issues noted are addressed by staff. The district may provide incentive cards for a maximum of \$50.00 per month to the participants that return the completed questionnaire and maintain employment of a minimum of 20 hours per week. This is reviewed on a case-by-case basis, with respect to need and availability of funds.

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:

OCDSS may make the supportive services outlined in Section 4.1 available to an individual whose case has closed due to employment, provided the supportive service is necessary for the individual to retain employment, pending the availability of funds. Exceptions to the supportive services to be provided and/or maximum limits as established in Section 4.1 can be made by

the commissioner or his/her designee. The district will maintain regular contact with TANF participants that closed TA due to excess earned income for up to one year after the case has closed due to new or increased earned income.

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:

OCDSS may provide individuals eligible for TANF 200% services the following supportive services to obtain and/or maintain employment: automotive insurance, automotive repairs, fees associated with: driver's license, driver's permit, automotive registrations, tires, incentive/gas cards, tools and equipment and clothing/uniform costs. Requests for supportive services are reviewed on a case-by-case basis, with respect to need, availability of funds, and availability of services through other resources and/or community programs. Requests may be approved if they meet this criteria and are within the maximum allowable costs per section 4.1. Exceptions can be made by the commissioner or his designee. Requests for supportive services not listed above are reviewed on a case-by-case situation using this criteria. OCDSS retains the final say regarding approval of supportive service requests.

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

OCDSS applicants/recipients who fail to comply with employment program requirements receive a written conciliation notification providing an opportunity for conciliation. The conciliation notification advises the client to contact the agency within 10 days to explain his/her reason(s) for failing to comply with the work activity and to establish good cause. If the individual fails to contact OCDSS within the allowed timeframe, all information available to the district will be considered in determining if the client's non-compliance was both willful and without good cause.

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

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

The Employment Specialist renders a decision regarding willfulness and good cause. Those determined not to be willful or who have good cause are rescheduled. Good cause may

include reasons such as employment, a court appearance, or illness. Those determined willful and without good cause are referred to Temporary Assistance to take action and issue a timely written notice. Employment and Training Staff can agree to a positive resolution on a case-by-case basis.

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

OCDSS applicants/recipients who fail to comply with SNAP work activities receive a written conciliation notification providing an opportunity for a conciliation. The conciliation notification advises the client to contact the agency within 10 days to provide a good cause reason for failing to comply with the work activity. Good cause may include reasons such as employment, a court appearance, or illness. The notification also explains how to avoid a SNAP sanction by demonstrating compliance with an assigned work activity. If the individual fails to contact OCDSS within the allowed timeframe and does not complete the assigned work activity as an option to avoid the sanction, all information available to the district will be considered in determining if the client's non-compliance was both willful and without good cause. If the individual demonstrates compliance by complying with the assigned work activity, the individual is not referred for sanction.

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

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

The Employment Specialist renders a decision regarding willfulness and good cause. Good cause may include reasons such as employment, a court appearance or illness. Those determined not to be willful or who have good cause are rescheduled for the work activity. Those determined willful and without good cause and have not demonstrated compliance with the assigned SNAP work requirement are referred to Temporary Assistance/SNAP to take action and issue a timely written notice.

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

To demonstrate compliance, SNAP recipients must comply with the requirement to look for work. Recipients need to complete 5 verifiable job applications and properly complete the Job Search Contract Record and return the Record with the completed contacts within the conciliation timeframe (10 days). If recipient contacts Employment Specialist within the conciliation timeframe, an extension may be granted on a case-by-case basis.

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:

At the completion of a durational sanction, individuals who wish to end their employment sanction need to agree to comply with work activities and demonstrate compliance by participating in the work activity that the sanction occurred (or an appropriate work activity as determined by OCDSS) for five(5) or more consecutive business days. If the participant does not participate for five(5) or more consecutive business days, the participant is determined to not be in compliance with work requirements and the sanction continues.

If the individual has agreed to comply and has demonstrated compliance, a referral is completed to request the Temporary Assistance unit lift the sanction effective the date the individual agreed to comply, but no earlier than the expiration of the sanction period. If an individual has documented an exemption from TA work requirements, a referral is completed to Temporary Assistance requesting the sanction be lifted effective the date the exemption is verified, but not earlier than the expiration of the sanction period.

- b. The district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:
At the completion of a durational sanction, individuals who wish to end their employment sanction need to agree to comply with work activities and demonstrate compliance by participating in the work activity that the sanction occurred (or an appropriate work activity as determined by OCDSS) for five(5) or more consecutive business days. If the participant does not participate for five(5) or more consecutive business days, the participant is determined to not be in compliance with work requirements. 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):

If an individual declares a disability or work limitation, the individual is given a Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to their practitioner to complete. The individual is required to return the completed form within 10 days. If the individual states they are unable to work or have a work limitation due to mental health issues and attend Oswego County Behavioral Health Services (OHBS), the individual signs the releases of information (ROIs) and the ROIs and form are sent to OHBS on behalf of the individual, with a request that the practitioner complete and return the form within 10 days. If OHBS does not return the completed form, the individual is then given a Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to the practitioner to complete.

OCDSS may allow a written statement from the practitioner if the statement contains the necessary elements to determine disability. If an individual states they are unable to obtain medical documentation and requests assistance, OCDSS will assist the individual with obtaining the documentation.

OCDSS staff, which can include Employment Specialist, Temporary Assistance Staff and Supervisory Staff are responsible to review medical documentation, monitor the recommended treatment plan, determine the employment status, and review progress no fewer than three months, unless otherwise indicated on the completed Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form and no greater than 12 months.

A recipient claiming a medical exemption is required to provide a medical update within 10 days, by submitting a completed medical form. If the individual states they are unable to work or have a work limitation due to mental health issues and attend Oswego County Behavioral Health Services (OHBS), the agency obtains updated ROIs as needed and the ROIs and form are sent to OHBS on behalf of the individual, with a request that the practitioner complete and return the form within 10 days. If OHBS does not return the completed form, the individual is then given a Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to the practitioner to complete. If the form is not received in the agency within that timeframe, and the individual does not state they are unable to obtain the documentation and request that the agency assist with obtaining the documentation, the case is referred for closing.

OCDSS reserves the right to contract with an independent medical exam provider to conduct physical, mental and IQ evaluations. In addition, should an individual be referred to an independent medical exam, Oswego County may use this information, along with any other documentation to determine the status of an individual's disability and potential to be restored to self-sufficiency.

The mandated Alcohol and Substance Abuse Screenings and Assessments are completed on-site, by a contracted Office of Alcohol and Substance Abuse Services (OASAS) licensed provider. Individuals determined from the screening to need a drug/alcohol assessment, that are not already established into a treatment program, complete the assessment on-site with the contracted OASAS provider staff. If the individual is recommended for Drug and Alcohol treatment by the contracted OASAS provider, an appointment to start treatment is scheduled with an off site treatment provider. The individual is notified in writing of the scheduled appointment date and time, their employability determination as determined by the onsite OASAS provider, and the requirement to comply with any treatment recommendations. The on-site OASAS provider obtains the individual's attendance at a minimum of monthly, and progress reports at a minimum of every 3 months. The on-site OASAS provider provides Case Management in conjunction with Employment Staff to monitor treatment requirements and progress. If the individual is determined able to work around treatment, the treatment may be required as part of the individual's Employment Plan and attendance and progress monitored.

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:

OCDSS reviews information obtained from the individual, individual's medical providers, drug and alcohol providers, on-site OASAS provider, independent medical evaluations, and any other information deemed pertinent by OCDSS to determine the status of the individual's disability as well as the individual's potential to be restored to self-sufficiency. Local district staff use this information to determine if the individual is exempt, nonexempt, or work limited. The individual is notified in writing of the district's disability determination via forms LDSS-4005/4005a.

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.):

OCDSS staff, which can include Employment Specialist, Temporary Assistance Staff, and Supervisory Staff reviews information obtained from the participant, participant's medical providers, drug and alcohol providers, independent medical evaluations, and any other information deemed pertinent by OCDSS to determine the status of the individual's disability as well as the individual's potential to be restored to self-sufficiency. Local district staff use this information to determine if the individual is exempt, nonexempt, or work limited.

Contracted on-site OASAS provider staff complete the Drug and Alcohol Screenings and Assessments on-site and determine employability. If individual is found to be in need of treatment, the on-site OASAS provider staff schedule an appointment for the individual to start treatment. If an individual is determined able to work around their treatment, Employment and Training staff may require Drug and Alcohol treatment as part of the individual's employment plan.

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

OCDSS staff, which can include Employment Specialist, Temporary Assistance Staff, and Supervisory Staff, reviews information obtained from the participant, participant's medical providers, drug and alcohol providers, independent medical evaluations, and any other information deemed pertinent by OCDSS to determine the status of the individual's disability as well as the individual's potential to be restored to self-sufficiency. A participant's Treatment Plan is determined and referrals to appropriate treatment are made by the Practitioner/Provider. The Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form and drug and alcohol treatment progress reports requested from the local Drug and Alcohol Providers are most often the documentation received indicating the treatment recommendation and treatment program identification.

LDSS 4005 and 4005a are issued to the individual as appropriate.

If the individual is determined to be exempt due to substance abuse at the time of the Drug and Alcohol screening/assessment with the on-site provider, the individual is notified in writing by the onsite contracted OASAS provider. If the individual is determined able to work around Drug and Alcohol treatment, treatment may be required as part of the individual's employment plan and the client is notified by the on-site contracted OASAS provider and a 4005a is issued by OCDSS staff. If an individual's exemption changes from non-exempt to exempt due to their Drug and Alcohol abuse/treatment, the individual is notified in writing by OCDSS staff.

- 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 case management staff, which may include Employment Specialist, Temporary Assistance Staff and Supervisory Staff are responsible to review medical documentation, monitor the recommended treatment plan, determine the employment status, and review progress no fewer than three months (unless otherwise indicated on the medical form) and no greater than twelve months. OCDSS Employment and Training staff maintains a database indicating the follow up date that medical reports are due for individuals claiming a medical exemption or limitation. Prior to the date that the most current medical documentation on files expires, the individual is sent a document requirement form and a Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to their practitioner to complete. The individual is required to return the completed form within 10 days. If the individual states they are unable to work or have a work limitation due to mental health issues and attend Oswego County Behavioral Health Services (OHBS), the individual signs the releases of information (ROIs) and the ROIs and form are sent to OHBS on behalf of the individual, with a request that the practitioner complete and return the form within 10 days. If the ROIs are not current, the individual is called into the agency to sign updated ROIs, prior to the date that the medical is needed to be updated. If OHBS does not return the completed form, the individual is then given a Medical Examination for

Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to the practioner to complete.

To monitor compliance with Drug and Alcohol treatment requirements, the on-site contracted OASAS provider staff obtains individuals attendance reports/timesheets from the Drug and Alcohol treatment providers at a minimum of monthly, and progress reports at a minimum of every 3 months. The on-site OASAS provider staff provides Case Management in conjunction with Employment Staff to monitor treatment requirements and progress. If the individual is determined able to work around treatment, the treatment may be entered on the individual's Employment Plan and attendance and progress monitored in the same manner.