

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

January 1, 2020 – December 31, 2021

Otsego County

Contents

Section 1- Assurances	3
Section 2 Administration	5
Section 2.1 Administrative Structure.....	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies	5
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	5
Table 2 – Other Service Providers	7
Section 2.3 OTDA Jobs Staff Agreement	8
OTDA Jobs Program Services – Target Groups	8
Other Services Requested	8
Section 2.4 Access to Services at New York State Career Centers	8
Section 3 Engagement and Work Preparation	9
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)).....	9
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	9
Section 3.3 Assessment and Employment Planning.....	10
TA Assessment	10
TA Employment Plan.....	11
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)	12
Section 3.5 Job Development.....	19
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9).....	19
Section 3.7 Work Verification.....	22
The Quality Assurance (QA) plan include the following elements:	23
The District’s Quality Assurance Process is as follows:	23
Use of Outside Providers/Vendors	24
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency.....	24
Section 3.9 Strategies/Procedures for Increasing Program Attendance	24
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants	25
Section 3.11 Strategies for reducing the need for TA	25
Section 4 Support Services	25
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District.....	25
Section 4.2 Transitional Support Services	27
Section 4.3 Extended Support Services	27
Section 5 Conciliation, Sanction and Dispute Resolution Procedures	27
Section 5.1 Conciliation	27
Section 5.2 Sanctions	29
Section 5.3 Dispute Resolution.....	29
Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals	29
Section 6.1 Disability Determination Process and Tools.....	30
Section 6.2 Mental Health Screening and Assessment	30
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))	31

Section 1- Assurances

As a condition of the receipt of federal and State funds the Otsego County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2020 through December 31, 2021. As Commissioner of Otsego County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

/s/ EB 1/2/20

Eve Bouboulis , Social Services Commissioner

1/2/20, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended
7/21/2020	Section 3.4 Participation Rates and Work Activities item (d) of the previously approved plan is amended. The plan has been amended to no longer mandate all non-exempt Non-Temporary Assistance (NTA) SNAP recipients to participate in SNAP Employment and Training (SNAP E&T) work activities. At application for NTA/SNAP work registrants are informed of job search services by an information letter provided at intake.

(To be completed by OTDA)

Section 2 Administration

Section 2.1 Administrative Structure

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

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

The Otsego County Department of Social Services Employment Unit works with Temporary Assistance, (TA) and Supplemental Nutritional Assistance Program (SNAP) applicants and recipients. The unit determines employability, completes assessments and employment plans, makes referrals for activities and monitors compliance. While monitoring compliance of the applicant or recipient, conciliations and good cause determinations are also completed. Cases are referred to the Income Maintenance worker for application denials or for posting sanctions as appropriate based on the regulations. Supervisory staff reviews all case actions to include, but not limited, to determining employability and any difference of decisions that may arise on case actions or with the client. Coordination of the Work Experience program (WEP), making referrals to program sites, monitoring compliance and worksite development are also the responsibility of the Unit.

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
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

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

Table 2 – Other Service Providers

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

Provider	Funding Source (s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Del/Chen/Mad/Ots BOCES Norwich, NY		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Educational Resources Program, Vocational Education
Oneonta Adult Education Oneonta, NY		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Test Assessing Secondary Completion (TASC) Preparation, Adult Basic Education (ABE), English as a Second Language (ESOL), Literacy Testing
Afton Consortium of Schools Afton, NY		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Test Assessing Secondary Completion(TASC), Literacy Testing
One Stop Service Center Oneonta, NY		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Interest and Aptitude Testing, Resume services, Employment resources, Job readiness training, Job search assistance, One Stop Registration
Otsego County Behavioral Health Services		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Drug and Alcohol Assessment and Counseling
		<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	<input type="checkbox"/>	Applicants	<input type="checkbox"/>
Supervised Job Search	<input type="checkbox"/>	FA & SNA with children	<input type="checkbox"/>
Job Readiness Training	<input type="checkbox"/>	SNA without Children	<input type="checkbox"/>
Job Club	<input type="checkbox"/>	SNAP	<input type="checkbox"/>
Job Placement Services	<input type="checkbox"/>	TANF 200%	<input type="checkbox"/>
Grant Diversion	<input type="checkbox"/>		
Job Development (employer outreach)	<input type="checkbox"/>		
WOTC pre-certifications	<input type="checkbox"/>		

Other Services Requested

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

Section 2.4 Access to Services at New York State Career Centers

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

- a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:
 - The district has employee(s) physically present at a Career Center
 - The district has contract staff physically present at a Career Center
 - The district makes available direct access to its program staff via phone or technology at a Career Center
 - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
 - Other:

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

The district and the Career Center maintains a single point of contact to allow for open communication. Referrals are made weekly for A/R of Temporary Assistance to access resources available and to register at the Career Center. Resources such as; Workshops, Career Counseling and assistance with job searching as well as other agencies located at the Center. Director of Income Maintenance attends local WIOA meetings.

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:

NA

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:

*Video “Work Pays NY” Helping You Make Ends Meet

* Video “Temporary Assistance for Permanent Change”

* “In Lieu of TA Child Care” option is reviewed

* 200% TANF Applications completed-TANF and Non Custodial Parent

* Review of the Able Bodied Adult Without Dependent

Children(ABAWD)requirements.

Orientation can be available one on one with the Employment Unit Staff if the

applicant cannot attend the group orientation and shows good cause. For example;

Employment conflict, medical reason, residing out of district for treatment purposes. All

applicants, exempt or non -exempt, are referred to the orientation. Other community

based organizations may participate in the orientation when available.

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 Local District Department of Social Services(LDSS)

Employment staff for all Exempt/non Exempt TA applicants in conjunction with the TA eligibility

process within 30 days of TA application. The orientation is provided in a group setting and conducted once each week.

For redetermination of TA cases, the above-described orientation is conducted by LDSS Employment staff with the recipient, one on one, after recertification interview is completed with the Income Maintenance Worker.

Section 3.3 Assessment and Employment Planning

TA Assessment

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

- a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):
 - The district enters assessments directly into WTWCMS
 - The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
 - The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. Attached is the local equivalent.
 - The local equivalent does not contain additional elements other than what is required.
 - The local equivalent does contain additional elements beyond what is required, listed below:

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

All TA individuals are assessed by an Employment and Training Assistant using the LDSS 4980 NYS Employment Assessment within thirty days of application unless circumstances prohibit completion(i.e.employment conflict,residing out of district.)

The employment worker will enter the assessment on Welfare to Work Caseload Management System (WTWCMS) when the TA case opens and a folder is created.

Assessment is an ongoing process. When changes are reported in the household that may create or inflate any barriers, the Employment Worker will review and update the assessment and Employment Plan. As needed, additional resources or activities may be addressed to enhance the clients self-sufficiency. Teens enrolled and participating in school on a full time basis will be monitored through the use of the DSS-3708, School Attendance Verification, at application and recertification by

an eligibility worker (Welfare Examiner). Monitoring is achieved via the results of the completed DSS 3708. If verification is not received a referral is sent by the eligibility worker to the employment worker and a call in notice is sent to the client to meet with the Employment and Training Assistant to review their status and complete an assessment and plan.

- c. The district administrative unit or contractor responsible for conducting assessments is: Local Department of Social Services Employment Unit.
- 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 and Training Assistants (ETA's) that are designated to conduct employment assessments meet the civil service requirements of that position. The designated staff has been deemed to have demonstrated effectiveness in assessment and employability development. Orientation has been provided through our staff development coordinator. Staff training is provided by Supervisors.
- 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?
Assessment is an ongoing process and reevaluated annually. If changes are reported that create, inflate or remove any barriers, the Employment Worker will review and update the assessment appropriately.

Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:
 - The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
 - The district enters employment plans directly into WTCMS.

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

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

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

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

b. Check one of the following:

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

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

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

All TA individuals complete an Employment Plan with an Employment and Training Assistant using the LDSS 4978 NYS Employment Plan within thirty days of application unless circumstances prohibit completion (i.e. employment conflict, residing out of district.)

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

The Employment Plan is updated when changes are reported in the household that may create, inflate or remove any barriers and when activities assignments change. The Employment Worker will review and update the Plan accordingly with the client.

Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)

a. Describe below how the district plans to meet federal and State TA participation rate requirements. Included is the weekly hours standard participation requirement for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

The local district plans to meet Federal and State Temporary Assistance participation requirements by continuously providing training to and monitoring the performance of district staff and agencies that accept referrals from the district to conduct Welfare to Work (WTW) activities. All non-exempt recipients will be engaged in work activities within 30 days of case opening or change in status from exempt non-exempt pending availability of activities. If limitations need to be considered, this may impact the standard 30 day timeframe. If so, then as soon as practicable, but no later than 24 months after receiving assistance. The district will require that participation will be at a minimum of,

those standards set forth in 18 NYRCRR 385.8 and 385.9, but reserves the right to assign any recipient in up to 40 hours of work.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	45	120

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

The local district monitors performance by utilizing data available in WMS and COGNOS. The local district has on site staff that can create additional reports in COGNOS, as needed. These reports allows the LDSS to monitor activities and performance of the worker, unit and agency level. Supervisors have access to this information on their desktops and employment staff will be given monthly reports. The WTCMS system will also be utilized for continuous quality review.

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) recipients to participate in SNAP E&T work activities. If the district is offering Supervised Job Search as an E&T activity component, the district must describe how the job search activity will be supervised and tracked, including the frequency of monitoring the participant’s job search efforts. (Please note: Case management services must be provided to all participants enrolled in an E&T activity):

The district is not mandating SNAP E&T work activities assignments for NTA-SNAP recipients. At application NTA SNAP work registrants are informed of job search services by an informational letter at intake.

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):

NA

- 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 TA applicants are enrolled into a Supervised Job Search during an orientation or individually if necessary, by the LDSS Employment Unit staff. Staff explains how to complete the job search form and what resources are available to the participant. The participant is also advised of the requirement to notify the agency if employment is obtained. The applicant must report weekly to the LDSS employment worker or program provider and submit a completed Job Search log that contains employer contact information and the amount of time spent to complete each job application/contact, including travel time between employers. It is expected that the weekly logs must contain five suitable contacts. A minimum of 10 hours per week of participation is required. The LDSS employment worker or program provider will review job search forms and issue a new form for the following week. In addition to the supervised job search, TA applicants are referred to the Career Center- Chenango Delaware Otsego (CDO) One Stop to be registered for services and be provided employment related assistance. Applicants may attend workshops which cover an introduction to the computer, creating an email account, how to conduct a job search online, completing applications, resumes, budgeting, transitional supports, interviewing, appropriate dress, etc., as needed. The workshops are presented by the CDO One Stop on an individual or group appointment to provide ongoing job search assistance. Job search contacts are verified by the LDSS Employment Clerk and or the LDSS Employment Worker on a daily basis. Contacts are made with employers to develop an exchange of information to verify contacts

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	5	10	
SNA Individuals	5	10	

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

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

Non-exempt TA recipients are enrolled into a Supervised Job Search during an orientation or individually if necessary, by the LDSS Employment Unit staff. Staff explains how to complete the job search form and what resources are available to the participant. The participant is also advised of the requirement to notify the agency if employment is obtained. The recipient must report weekly to the LDSS employment worker or program provider and submit a completed Job Search log that contains employer contact information and the amount of time spent to complete each job application/contact, including travel time between employers. It is expected that the weekly logs must contain five suitable contacts. A minimum of 10 hours per week of participation is required. The LDSS employment worker or program provider will review job search forms and issue a new form for the following week. In addition to the supervised job search, TA recipients are referred to the Career Center- Chenango Delaware Otsego (CDO) One Stop to be registered for services and be provided employment related assistance. Recipients may attend workshops which

- cover an introduction to the computer, creating an email account, how to conduct a job search online, completing applications, resumes, budgeting, transitional supports, interviewing, appropriate dress, etc., as needed. The workshops are presented by the CDO One Stop on an individual or group appointment to provide ongoing job search assistance. Job search contacts are verified by the LDSS Employment Clerk and or the LDSS Employment Worker on a daily basis. Contacts are made with employers to develop an exchange of information to verify job search contacts.
- 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. An individual that is self employed and who receives less than then the state hourly minimum wage in payment will be required to participate in 35 hours of activity each week, to include the hours of provision of self-employment. Otsego County DSS will allow two months to all self employed individuals to increase their business income, additional time may be permitted as determined by the district based on case circumstances.
- 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
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	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.

Activity and Definition	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p>On-the-Job Training (OJT) - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> 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	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p>Job Readiness Training (JRT) Activities - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> • Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance. • Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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.:

Job development is initiated by district staff when contacting Employers to verify job search contacts. Staff will discuss possible openings or any future availability.

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.

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:

Oneonta Adult Education, (OAE) is the district's provider for ABE/HSE and ESL programs. OAE's central location is accessible to our local bus service; the off site locations can accommodate many rural areas of the county as well. OAE offers HSE/ABE/ESL classes at the local OAE office or other OAE sites. Afton Consortium is also available as needed and appropriate and located at the local Career Center-One Stop Office and off site in various locations. Clients under twenty-one years of age, who do not have a high school diploma or HSE, are referred to their local school district for directions on returning to school or attending HSE classes.

- b. Describe how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:

The district uses educational program providers who offer programs that are certified and approved by the State of New York Department of Education.

- 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:

All applicants for Temporary Assistance are referred for literacy/math testing. Reading and math levels are determined by the local Oneonta Adult Education Center (OAE). When reading or math or both are less than a 9th grade level, regardless of the individual's educational level and employability, the individual is referred to HSE/ABE classes provided by OAE at the local OAE office or other available sites as appropriate for the client. Educational activities, to include HSE and ABE are part of the individual's employment plan as indicated by the testing results. Clients under twenty-one, who do not have a high school diploma, a HSE or their reading or math or both less than a 9th grade level, are referred to their local school district for directions on returning to school or attending HSE classes.

- 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:

Approval is based on the completed assessment, literacy/math testing results, interest testing, when appropriate, and the clients personal interests and goals. The Employment Development Plan will include the approved activities. If the individual has not obtained a high school diploma or HSE, the individual is encouraged and may be required to enroll in an educational program, such as HSE classes, to prepare them to attain a high school diploma or HSE. The educational activity would be denied if the participant did not complete their assessment or the literacy testing.

- 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:

Approval is based on the completed assessment and literacy/math testing. The Employment Development Plan will include the approved activities. If the individual has not obtained their high school diploma or HSE, the client is encouraged and may be required to enroll in an educational program, such as HSE classes, in addition to a job skills or vocational education activity.

- 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:

Post-secondary level of education must be of no more than two years in duration and result in a degree, certificate or credential.

- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:

The Employment Worker will update the employment plan to include other appropriate work activities, job search, WEP etc. Referrals to such activities will be made to ensure the participant would be meeting the participation rate.

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

The district uses educational program providers who offer programs that are certified and approved by the State of New York Department of Education.

The LDSS will refer to <https://www.cdoworkforce.org/component/jdownloads/send/2-public-documents/27-demand-occupations> website to determine which demand occupations are located in the LDSS region.

i. The district procedure for advising participants of approved training providers is:
The client is advised of approved training providers by staff during their assessment and with on-going case management.

j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:
Recipients will receive written notice of approval of their request for training or denial of the same based on the criteria described in section 3.6.
Recipients who are enrolled in other work activities will be notified by a letter via WTWCMS providing the following information: the enrollment date of the specific activity, the number of hours available per month, and the interview date, if appropriate. If work experience, the participant will be given an assignment letter via WTWCMS that includes enrollment date, hours available, worksite and address of worksite, information regarding daycare and transportation is discussed at employment assessment.

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

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

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

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

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

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

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

Additional reasons as stated below:

- I. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:
Teens enrolled and participating in school on a full time basis will be monitored through the use of the DSS-3708, School Attendance Verification, at application and recertification by an eligibility worker (Welfare Examiner). Monitoring is achieved via the results of the completed DSS 3708. If verification is not received a referral is sent by the eligibility worker to the employment worker and a call in notice is sent to the client to review their status.

- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:
The district will share necessary information, regarding the individual's limitations with the activity site supervisor, in writing prior to the activity start date to ensure that the individual's limitations are accommodated. If the site supervisor has further questions they can contact the Employment Unit worker.

Section 3.7 Work Verification

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

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

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

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at AQI.WV.SelfAudits@otda.ny.gov for State review including specific information on each of

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

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

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

The District's Quality Assurance Process is as follows:

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

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

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

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

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

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

Use of Outside Providers/Vendors

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

Yes No

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

Yes No

If No, please describe the process used below:

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

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

Bilingual staff may be available but if not, the Department will obtain bilingual services to ensure the clients needs are addressed. Some worksites can accommodate non-English speaking participants in their work experience as well as classroom training to provide ESL instruction on site. In the event these resources are not available, Language Line Telephone Interpretation Services will be utilized.

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:

The Employment Unit maintains contact with the Housing Unit and the LDSS Service Units to engage, provide support and continuity to the client to aid in becoming successful in completing their Employment Plan activities. All clients are instructed by the LDSS to arrange for back-up child care and schedule all personal appointments, whether it is school or medical related, around their required work assignments. If outside appointments occur during their assigned

hours, clients are instructed to either come late or leave early, and make up their missed hours within the month. The client is educated on the local bus systems; provided with schedules and phone numbers as well as monthly calendars to assist with organizing the client's schedule.

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:

In house staff meet with the client to discuss household income and expenses and determine how the household needs are being met. District will help create a plan of action including but not limited to:

*Job searching

*Job coaching while developing employment opportunities

*Explaining budgeting and how wages can benefit the household

*Assist in accessing available resources to enhance their self-sufficiency. The client is also afforded the opportunity to reengage in work activities to end the sanction.

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

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

Section 3.11 Strategies for reducing the need for TA

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

Employment worker and/or eligibility examiners educate all TA applicants of the employment requirements, TA eligibility, resource standards, and potential resources available to the individual.

Other diversion options are to apply for SNAP, Medical Assistance, Unemployment Insurance, Child Care Subsidy, child support and one time (emergency) cash assistance for such things as rent arrears, heating fuel, car insurance and car repairs to avoid ongoing assistance. Individuals can enroll and complete an active job search, and participate in job search workshops when available. Available funding may be used to assist with transportation if employment is secured.

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:

The district will provide case management and payments for transportation (as described below), work related clothing, licensing fees, required safety equipment, tools and equipment.

- 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):

The Employment worker will work with the applicants/recipients who do not live where public transportation is available to identify alternate means such as car pools, friends, neighbors or family and assist them to develop a transportation plan. When an individual is placed in a work experience assignment, the district will make a reasonable effort to assign the individual as close as possible to the individual's home. Should the actual cost of transportation needed to participate in an assigned work activity exceed the reimbursement rate determined by the district, Otsego County will reimburse for the actual costs, based on documentation submitted by the work activity participant.

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

The maximum distance that is required for a participant to walk to work or a work activity or to access public transportation will not exceed 2 miles each way. In all instances, individuals with limitations will be accommodated.

- d. The district will provide the following services to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:
Clothing allowance, as necessary for participation in assigned activities, up to \$150.00 per year. Car insurance payment up to \$500.00 per year. The insurance policy must

meet minimum State requirements. Increased policy costs related to violations, convictions or other reasons for inflated costs, will not be paid by the LDSS. Any premium balance the A/R must pay in order to activate or keep the policy in force, must be made prior to the LDSS issuance of payment. Driver's license/permits, up to \$100.00 for each item per year. Vehicle registration/title and fees up to \$200.00 per year. Car repairs, up to a maximum of \$500.00 or the retail value of the automobile, whichever is less per year. Professional license fees, up to \$100.00 for each license, necessary for participation in assigned employment activities or employment per year. Tuition, books and supplies associated with an approved training program, up to \$2,000.00 for one year of programming. A/R cooperation with WIOA to seek other funding to meet unmet costs will be a prerequisite to LDSS payment. Other expenses as deemed necessary by the LDSS to maintain participation in a work activity or to maintain or secure employment, up to \$500.00 per year.

Section 4.2 Transitional Support Services

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

The Employment Staff will complete an exit interview with the client, by phone or in person, whichever is convenient. Support Services will be explained and the LDSS worker will inform the client on how to contact the agency when they have any questions and to provide case management services. The agency will also send a congratulation letter to the employed individual which will include information regarding support services, transitional supports and other local agency and community based organizations phone numbers that may be a viable resource to the employed individual.

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:

Clothing and personal needs, public transportation or other means of transportation, car insurance and repairs, driver's license/permit and or vehicle registration/title and fees, professional license, drivers education, tuition, employment counseling; any other allowable expenses as deemed necessary and reasonable by the LDSS to maintain employment. Approval of any and all requests is subject to availability of Federal, State, and local funds.

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:

Bus passes, gas cards and other such programs as available at the time of need.

Section 5 Conciliation, Sanction and Dispute Resolution Procedures

(Reference 18 NYCRR 385.11 and 385.12)

Section 5.1 Conciliation

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

- in person
- by phone
- by mail

A notice of conciliation is issued. The notice shall indicate that a failure or refusal to participate has occurred; indicate that the individual has a right to provide reasons for such failure or refusal to participate; Recipients must respond within the required timeframe for their case type. If there is a response, a conference is held with the client and employment worker. A supervisor will be available to mediate a client dispute if the need arises.

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

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

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

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

- in person
- by phone
- by mail

A notice of conciliation is issued. The notice shall indicate that a failure or refusal to participate has occurred. The notice also indicates that the individual must either contact the indicated worker within the required timeframe and provide either documented good cause for failure to participate or documentation exempting them from participating in the assigned work activity or demonstrate compliance as indicated in the notice.

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

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

If the individual contacts the indicated worker within the required timeframe and provides either documented good cause for failure to participate or documentation exempting them from participating good cause is determined based on documents received or during a conference.

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

When documented good cause or an exemption is not evident the client is given the opportunity

to demonstrate compliance. The LDSS will refer an individual to an assigned activity; the client must report as assigned on time and prepared to engage in the assigned activity. The client must successfully complete, at least one scheduled day on site to be in compliance. If the sanction was taken on a job search that was not provided, not complete or could not be verified, compliance will be to provide a complete, verified weekly job search of five contacts within the indicated times issued in the Conciliation notice.

Section 5.2 Sanctions

- a. The district’s procedure for determining compliance for those TA recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:
The LDSS will refer an individual to an assigned activity; the client must report as assigned on time and prepared to engage in the assigned activity. The client must successfully complete, at least one scheduled day on site to be in compliance. If the sanction was taken on a job search that was not provided, not complete or could not be verified, compliance will be to provide a complete, verified weekly job search.

- b. The district’s procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:
The Recipients must request to be added back to the case after the minimum duration has ended. Compliance will be demonstrated within ten (10) days by meeting with the Employment worker and completing the assessment process. Once the assessment process is completed SNAP benefits can be restored retroactively to the date the individual indicated a willingness to comply but no earlier than the expiration date of the minimum duration period. Those who document an exemption may have their SNAP sanction lifted before the end of the durational sanction period.

Section 5.3 Dispute Resolution

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

The grievance is mediated by:

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

Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals

(Reference 18 NYCRR 385.2)

Section 6.1 Disability Determination Process and Tools

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

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

Medical documents are provided to the LDSS from the client or via a medical professional.

The local process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited is as follows:

- District directs the contracted physician or individual's physician to determine status.
- District review team reviews and determines status (described below).
- Specialized disability/medical staff or unit reviews and determines status (described below)
- Other:

Employment worker and Supervisor, when necessary, reviews and determines status to include the process for issuing the notice to the individual informing them of their exempt/nonexempt status (LDSS 4005/LDSS 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.):

The Employment worker and Supervisor, when necessary, will review the case file and any documentation provided by the client. Case management meetings with the treatment providers to determine the clients degree of impairment, and how treatment can improve the client's ability to become self sufficient are scheduled.

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

When the client requires a temporary medical exemption from employment requirements a self sufficiency plan is created with the Employment worker. The plan consists of the treatment requirements indicated on the medical documentation provided. The plan is monitored and updated as needed depending on the treatment recommendations.

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

The Employment worker monitors and tracks all treatment attendance and progress. Monthly attendance calendars are provided to the client to give to the treatment professional to complete and verify attendance in treatment as well as any missed or rescheduled appointments. The calendar also allows for any comments. The client is

required to provide the attendance calendar monthly. The Employment Worker will contact the treatment professional on an ongoing basis to monitor compliance and employability changes as well as meeting with the client to assess their rehabilitation.