

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

January 1, 2020 – December 31, 2021

## **Putnam County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Putnam 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 PutnamCounty 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/ MJP            02/04/2020

Michael J Piazza Jr., Social Services Commissioner

02/04/2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## Section 2 Administration

### Section 2.1 Administrative Structure

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

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

The Employment Unit within the Putnam County Department of Social Services is fully responsible for the operation of the district’s employment program. The staff in the unit performs the following functions: employability determinations, orientation, assessment, employment planning, assignment to work activity, monitoring of participation, conciliation, sanction, dispute resolution, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, coordination and provision of supportive services, and job placement and retention 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.

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Industrial Medicine Associates	\$3,500.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Medical Employability Assessments, fee for service, state negotiated rates, annual estimated at \$3500 in our annual county budget

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

**Table 2 – Other Service Providers**

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

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
NYS DOL DEWS staff	unknown	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assist clients with their job search efforts, including job placement.
CAREERS	unknown	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Workforce readiness skills Résumé preparation Interviewing skills Job Placement On-the-job training Follow-along services
Putnam Northern Westchester BOCES	unknown	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	ABE, HSE & ESL programs
Westchester Community College	unknown	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assist clients with resume writing.
		<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%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

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

<b>Services</b>	=	<b>Target Groups</b>	=
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)

Putnam County does not utilize OTDA Jobs program staff.

### 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.
 

Putnam DSS is the subrecipient of WIOA funding and we have been colocated at this career center with NYSDOL since the inception of WIA, our DSS customers are automatically referred to NYSDOL to avail of the services they provide. Putnam's local WIOA Business Services Team is referred to as the Red Carpet Team and we are represented on that team by WIOA staff.



## **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:

1. Addressing drug or alcohol rehabilitation/treatment issues; or,
2. Involved with medical rehabilitation; or,
3. Caring for an incapacitated household member.

### **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:

Information regarding public transportation; childcare in lieu of assistance; client’s responsibilities; receipt of Books I, II & III.

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:

Orientation is handled on an individual basis, as part of an applicant/recipient’s employment assessment/intake.

### **Section 3.3 Assessment and Employment Planning**

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

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

The district enters assessments directly into WTWCMS

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

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

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

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

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

All adults, exempt and nonexempt, in households with dependent children and 16 and 17 year olds not in school will receive assessments within 90 days of eligibility. Additionally, all adult applicants and recipients of public assistance residing in households without dependent children will receive assessments within a year following their application. The Employment & Training Assistant will meet with a client and complete the aforementioned attachment by discussing each section with the client.

c. The district administrative unit or contractor responsible for conducting assessments is: Employment Unit of Putnam County Department of Social Services.

d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]

a) 60 semester credit hours from a regionally accredited college; or,

b) two years of experience in the employment or personnel field

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

Yes       No

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

Yes       No

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

Yes       No

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

Assessments are updated annually, unless a change transpires in the interim.

### 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.

With an employable individual, employment plans are most often completed by an Employment Counselor with the client during one of their initial Supervised Job Search appointments. In the case of someone local, who is medically exempt, where treatment tracking is involved, they are given an employment plan appointment to meet with an Employment Counselor . In the case of someone remotely medically exempt, the Employment Counselor handles the employment plan through the mail or over the phone.

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

Employment plans are updated annually and as we become aware that changes have occurred, such as a change in someone's employability status or when a client secures employment or an employment activity assignment changes or there is a treatment related change.

### **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:

All applicants are engaged immediately, either in documenting their exemption or participating in allowable activities. Clients who are transitioning from exempt to nonexempt status takes an average of a week. Our plan is to meet Federal and state participation rate requirements by assigning clients to activities that will meet the required number of hours, typically between 30-40 hours weekly.

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	15	50

- 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:

Reports will be reviewed on a routine basis in an effort to increase local participation rates. The reports that are used most frequently used for this purpose are as follows:

Employability Code Duration Report

Job Search and Job Readiness Tracking Report

Preliminary Federal Countable Not Countable Report

Preliminary Federal Countable Not Countable Report (Activity Provider)

Preliminary Federal Countable Not Countable Report (Prior Month)

Preliminary SNA Non-MOE Countable Not Countable Report (Prior Month)

Universe Case Listing Report

Budgeted Earned Income Report

TANF and SN MOE Detail Report

SN Non-MOE Detail Report

SN MOE Engagement Report

TANF Engagement Report

- 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):

NTA SNAP applicants and recipients that are determined to be ABAWD's will be mandated into employment activities : Most typically, will be assigned 20 hours of job zone search per week, with a minimum of 10 contacts weekly, placing more importance on the actual hours, instead of the number of contacts. At local discretion, other employment activities, such as work experience may be assigned up to 20 hours weekly as the SNAP grant will allow.

All NTA-SNAP work registrants are advised at application and recertification of the job search assistance available, upon request, through the district's Employment Unit.

All ABAWD's will be expected to complete a Supervised WIOA Job Zone Search handbook. Included in hours of job search is travel time between employer/interview sites and time spent on the interview or application process.

After each weekly job search date, staff will verify job search details supplied by job searching applicants and recipients. This verification process will be done randomly and the outcome will be detailed in the case narrative section of a client's Employment file. If an applicant/recipient's job search listing is discovered to be falsely represented, appropriate action will be taken.

Supportive services will be offered to applicants/recipients to enhance job search efforts.

In addition, case management services are provided which include a comprehensive intake assessment, oversight during weekly reviews of job zone search efforts and access on a daily basis to the center's resource room and job leads or job referrals.

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):

The ABAWD population is mandated and all NTA-SNAP work registrants are advised at application and recertification of the job search assistance available, upon request, through the district's Employment Unit.

- 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:

TANF Applicant with child under the age of 6: 25 actual hours of job search weekly, with a minimum of 13 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.

TANF Applicant with child over the age of 6: 35 actual hours of job search weekly, with a minimum of 18 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.

Work Limited TANF Applicants: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.

Safety Net Applicants/Fully Employable: 40 hours of job search per week, with a minimum of 20 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.

Work Limited Safety Net Applicants: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.

All Applicants will be expected to complete a Supervised Job Search handbook. Included in hours of job search is travel time between employer/interview sites and time spent on the interview or application process.

After each weekly job search date, staff will verify job search details supplied by job searching TANF & SN applicants. This verification process will be done randomly and the outcome will be detailed in the case narrative section of a client's Employment file. If an applicant's job search listing is discovered to be falsely represented, a denial will ensue.

Supportive services will be offered to applicants to enhance job search efforts.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	10	20	Minimums apply to those without limitations
SNA Individuals	20	40	Minimums apply to those without limitations

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

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

TANF Recipients with child under the age of 6: 25 actual hours of job search weekly, with a minimum of 13 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.

TANF Recipient with child over the age of 6: 35 actual hours of job search weekly, with a minimum of 18 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.

Work Limited TANF Recipients: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.

Safety Net Recipients: The total number of assigned work activity hours will be 40, between Work Experience and Supervised Job Search. The number of hours that an individual has to participate in Work Experience is determined by his or her grant, including SNAP allotment, and the balance of 40 will be his or her Supervised Job Search responsibility. The number of contacts weekly will be a minimum of half of the assigned hours, again, placing more importance on the actual hours, instead of the number of contacts.

Safety Net Recipients/Work Limited: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.

Recipients will be expected to complete a Job Search handbook. Included in hours of job search is travel time between employer/interview sites and time spent on the interview or application process.

After each weekly job search date, staff will verify job search details supplied by job searching TANF & SN recipients. This verification process will be done randomly and the outcome will be detailed in the case narrative section of a client's Employment file. If a recipient's job search listing is discovered to be falsely represented, a conciliation will ensue.

Supportive services will be offered to recipients to enhance job search efforts.

- 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.

For Temporary Assistance population, self employment is only an approved work activity when sufficient earnings are declared, 30 X NYS minimum wage=\$354 in 2020 and \$375 in 2020. For the SNAP ABAWD population, the federal minimum wage is used, 30 X \$7.25= \$217.50.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An "X" in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance

Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

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



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

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

### Section 3.5 Job Development

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

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

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

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

On a very infrequent basis two members of the Employment staff will do Job Development. We rely more on the expertise of the NYSDOL staff.

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.

All of our clients are referred to the DOL DEWS staff for Job Development/Placement purposes. Usually, there are three full time NYSDOL staff people on site. Most frequently, our clients are placed in existing positions, as opposed to developed positions. The Business Services Representative who handles multiple locations in the Hudson Valley area does Job Development weekly by phone, email and in person.

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

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

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

The district makes referrals to Putnam Northern Westchester BOCES for their ABE, HSE and ESL programs. Unfortunately, the demand, historically, hasn't proven to be cost effective to providers, so there are limited programs available.

- 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:

We utilize programs that are licensed by the New York State Education Department and offer short term training opportunities with strong job placement rates. Typically, the provider of these services is Putnam Northern Westchester BOCES.

- 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:

During the assessment process, questions are asked which solicit information concerning whether or not a participant has a high school diploma or its equivalent and testing is done to ascertain if the participant has a basic literacy level of 9 or higher. If a participant doesn't possess a high school diploma or a HSE or he or she tests lower than 9, then a referral is discussed and made when deemed appropriate and in those cases where a referral transpires, the hours are factored into the work activity assignment.

- 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:  
The Employment & WIOA Coordinator will approve HSE instruction for individuals who have not attained a high school diploma and are interested in receiving HSE instruction.
- 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:  
As a work first model, job search, employment or work experience are the most typically assigned activities. At the discretion of the Employment & WIOA Coordinator, short term job skills or vocational education assignments may be approved for a Family Assistance or a Safety Net recipient, who requests approval to attend an approved program. Recipients making such requests will be evaluated according to the following standards:
  1. Current Abilities - An individual's ability to reasonably compete for jobs in the existing economy, which would reduce or eliminate dependency, without further training or education. An assessment of work history and skill level in trades or occupations shall be made.
  2. Training History - The amount and type of previous training an individual has had and his/her performance. Past training is an indicator of whether the individual will seriously pursue future training opportunities and whether previous training qualifies an individual for existing job opportunities.
  3. Education Level - The individual must possess the prerequisite skills necessary for participation in a particular program.
  4. Aptitude - An individual's talent and motivation shall be evaluated as to ability to succeed and benefit from proposed training. An evaluation shall be made in a consistent and reasonable manner of past work, training and compliance performance.
- 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:  
We operate a work first model, so typically, short term trainings or educational pursuits that we deem necessary so that employment can be secured would be approved. However, we reserve the right to approve up to a four year college program on the rare occasion that it is deemed appropriate. For example, when an individual presents who might be almost finished with their four year degree.
- 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:

Individuals requesting approval for post-secondary education beyond the 12 month lifetime limit will be advised that we operate a work first model. In the rare instance, when an individual has a skills gap that we feel warrants training before employment can be obtained, then their training will be approved, upon the condition that they participate in either work experience or paid employment averaging 20 hours weekly.

- h. Education and training providers are evaluated by the following standards:  
The program must be licensed by the New York State Education Department.

The program must be consistent with participation requirements of welfare reform.

The program must greatly enhance the individual's opportunity to secure unsubsidized employment by offering a sequence of courses, which are directly related to preparation for a current or emerging occupation leading to self-sufficiency.

Job placement rates and retention will be used as a measure of success of the program. Must demonstrate a willingness to comply with qualitative and quantitative progress reports and attendance recording and reporting as required.

- i. The district procedure for advising participants of approved training providers is:  
A list of approved providers will be established annually as individual clients gain training approval, then, those particular providers will be added to our annual list. In the event that a client seeks training approval, he or she will be advised of the status of the provider list. If the client desires a copy of the list it will be furnished to him or her upon request. This subject is also discussed at orientation.

- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
For unsubsidized employment, work experience, on-the-job training, job search, job readiness and certain community service, approval is virtually automatic. Clients are notified of their assignment in writing.

For educational/vocational training requests that are approved, clients are mailed an approval letter.

In addition, clients receive a copy of the WTW Employability Plan, Attachment III, which is written jointly.

- 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:  
Attendance is monitored by contacting the guidance counselor and making special arrangements to collect attendance records monthly. Discretion is exercised with this population to minimize the stigma of having the student responsible for gathering teachers' signatures and submitting attendance records directly.
- 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:  
When a health related limitation is involved in a work activity assignment, staff converse with various worksites to inquire whether or not they can accommodate the specific limitation. If not, an alternate worksite is selected. If so, the assignment proceeds and a special written notation of the client's limitation(s) are sent to the work site.

### **Section 3.7 Work Verification**

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

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

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

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

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

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

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

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

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

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:

### 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:



Our most frequent non-English speaking participants are Spanish speakers and we utilize bilingual county staff to translate to that population. We handle other languages on a case by case basis and if necessary we can pay for translation services. Additionally, all non-English participants are referred to ESL classes.

### **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:

During the assessment process, which takes place at application, discussions ensue concerning childcare & transportation barriers. As deemed appropriate, referrals are made. In an effort to motivate client participation, during the employment planning process, a referral is made to a Caseworker, who makes herself available to aide in the job searching process. Additionally, she counsels clients on the importance of having back-up child care arrangements and offers strategies to reduce the extent to which personal needs conflict with work schedules. Finally, upon notification that a client has failed to participate in a work activity, the outreach process begins by issuing a conciliation notice to the client.

### **Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants**

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

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

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

A caseworker makes a homevisit to discuss what the individual needs to do to have his or her sanction lifted and offers assistance with that process.

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

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

As funding permits, using FFFS, we offer supportive services at the "front door", often for automobile purchase purposes, so that applicants can maintain employment and avoid the need for additional assistance entirely. In order to be eligible for a FFFS funded one-time payment, applicants have to be determined TANF 200% eligible in accordance with 00-LCM-20 by the Temporary Assistance unit. In addition, they must be employed at least 30 hours weekly, earning the minimum wage or greater hourly. All of the itemized supportive services are authorized at the discretion of the Employment & WIOA Coordinator. Individuals under investigation for Intentional Program Violations will not be considered for diversionary services.

## **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:

Transportation - at no more than the cost of public transportation if available, or, if not, mileage will be reimbursed at the county's adopted reimbursement rate, as specified in section 4.1(b). This includes transportation of children of participants to child day care or camp or other programs when such camp or program is designed to include activities, which assist the family in achieving self-sufficiency and enable children to avoid welfare dependency in their adult years.

Automobile repairs- reasonable costs of necessary repairs of a participant's automobile, up to a maximum of \$2000, note the retail value of the automobile must be greater than the cost of the repairs. (Not available to the Non-TA SNAP population)

Automobile insurance - up to a maximum of \$2000 . (Not available to the Non-TA SNAP population)

Automobile purchase - up to \$ 4500 towards the purchase of a used automobile when deemed cost effective by the local district.(Not available to the Non-TA SNAP population)

Taxis - Payment for employment related taxi service will be considered on a case-by-case basis, for up to 120 days, as long as there is a long term transportation plan in development. The 120 day maximum can be extended at the discretion of the WIOA & Employment Coordinator.

Clothing - up to \$300 for clothing, including, but not limited to, uniforms and footwear.

Tools/Equipment - up to \$500 for necessary tools and or equipment, including, but not limited to job related safety equipment.

Fees - up to \$300 for each license or other employment related fee.

Hair Cuts - up to \$ 20 for haircuts to obtain or maintain employment.

Relocation Expenses - Moving, security and realty expenses as defined by Temporary Assistance policy if relocation is due to employment.(Not available to the Non-TA SNAP population)

Miscellaneous - up to \$500 per individual for other employment related expenses.

Assistance with auto repairs, auto insurance and automobile purchases will be limited to once in an individual's lifetime. However, one individual can potentially receive all three

supportive services during his or her lifetime. Exceptions to the lifetime limit can be made at the discretion of the Employment & WIOA Coordinator.

Other than child-care or transportation, the above supportive services require prior approval of the Employment & WIOA Coordinator.

All of the itemized supportive services are authorized at the discretion of the Employment & WIOA Coordinator. Individuals under investigation for Intentional Program Violations will not be considered for supportive services, unless the supportive service is necessary for that individual to comply with an assigned employment activity.

In addition to the above expenses, to the extent local resources permit, the local district shall provide case management for pregnant adolescents, adolescent parents and at risk youth under eighteen years of age, persons with limited English proficiency and individuals whose employability plans indicate the need for two or more concurrent work activities.

Medical Assistance will also be provided to recipients of ongoing Temporary Assistance under the comparable Medicaid eligibility categories for low-income families (LIF) and singles/childless couples (S/CC). Transitional Medical Assistance (TMA) will be provided for low-income families who lose eligibility due to earnings to the extent permitted by regulations.

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

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/19 is 58 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/19 is 20 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):

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

Clients will be informed of the expectation of walking a reasonable distance to a work site. Reasonable distance will be defined, in accordance with OTDA policy, as two miles

one way for an adult walking by him or herself. For adults with children who need to be accompanied to day care on the way to a work activity reasonable distance is defined locally as one mile walking distance one way. Individuals who provide medical documentation that they are unable to walk these distances, due to mental/physical 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: As stated in Section 3.11, whenever fiscally possible, we offer diversionary supportive services in an effort to prevent the need for public assistance. Additionally, all unemployed employable applicants are referred to the DOL DEWS staff to explore available employment opportunities.

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

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

A caseworker remains available to assist clients on an as needed basis.

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:

Consistent with statute and regulations, we will provide transitional SNAP, transitional Medicaid & transitional childcare.

### **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:

All those supportive services identified in Section 4 consistent with statute and regulations.

## **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

At the discretion of the Employment & WIOA Coordinator, on a rare occasion, a conciliation may be handled through the mail or over the phone. Applicants and recipients must respond within the required timeframe for their case type. In the presence of a mediator, clients are asked to provide an explanation of the circumstances surrounding their noncompliance and provide any supporting documentation. Once the appointment has concluded, the employment worker

considers the explanation and documentation presented, determining whether or not the willful and without good cause standard applies, and then advises the mediator and the Temporary Assistance unit of the outcome. The mediator issues a letter advising the client of the decision of the conciliation appointment. If the matter is unresolved, then the agency issues proper notice.

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

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

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

- in person
- by phone
- by mail

At the discretion of the Employment & WIOA Coordinator, on a rare occasion, a conciliation may be handled through the mail or over the phone. Applicants and recipients must respond within the required timeframe for their case type. In the presence of a mediator, clients are asked to provide an explanation of the circumstances surrounding their noncompliance and provide any supporting documentation. Once the appointment has concluded, the employment worker considers the explanation and documentation presented, determining whether or not the willful and without good cause standard applies, and then advises the mediator and the Temporary Assistance unit of the outcome. The mediator issues a letter advising the client of the decision of the conciliation appointment. If the matter is unresolved, then the agency issues proper notice.

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

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

Clients are asked to provide an explanation of the circumstances surrounding their noncompliance and the employment worker or the supervisor, or both, consider that explanation and render a decision regarding good cause/willfulness.

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

Clients who wish to demonstrate compliance will be required to comply with a work experience assignment of up to twenty hours weekly based upon the grant involved and if a worksite isn't available, then they will be required to document that they have completed twenty hours of job zone searching within five consecutive business days.

## 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:

Sanctioned individuals, who wish to demonstrate compliance, need to contact the employment unit to inquire what they need to do specifically to have their sanction lifted. Typically demonstrating compliance is tied to the activity which prompted the sanction. As follows:

A missed assessment requires the completion of an assessment appointment.

A missed employment plan appointment requires the completion of an employment plan appointment.

Noncompliance with supervised job search involves reporting into one of the regularly scheduled supervised job search days with the appropriate number of job searches.

Noncompliance with work experience would involve compliance for five consecutive days with work experience for the assigned number of hours.

An employment related sanction can be lifted by finding comparable employment and conveying the details to the Employment unit or in lieu of finding comparable employment, a client can request permission to be monitored by one of the Employment unit Counselors in the Resource room for 5 consecutive weekdays as they job search on the computers for a total of 30 hours, 5 days X 6 hours per day.

Once the client has demonstrated compliance, temporary assistance benefit levels will be restored accordingly, retroactive to the date that the district was told that the client wished to comply, but no earlier than the expiration of the minimum duration period.

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

Sanctioned individuals who wish to end an SNAP employment related sanction, WE1, WE2 or WE3 must first tell the employment unit that they are willing to comply with work activities and demonstrate compliance. Clients will demonstrate compliance by participating in the same assigned work activity for the number of hours assigned within 5 consecutive business days. Once the client has demonstrated compliance, their SNAP benefit levels will be restored retroactive to the date that the district was told by the client that he or she wished to comply, but no earlier than the expiration of the minimum duration period. An individual may be eligible for SNAP benefits before the end of the durational sanction 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 at application or recertification, or during the assessment process, a client is identified as having a physical or mental impairment which would limit his or her ability to participate in work activities the client will be verbally advised and for the TANF population referred to Industrial Medicine Associates (IMA) for a medical evaluation and the individual is informed to bring any medical documentation to the IMA exam, or within 4 days following the date of the exam, for IMA to consider. Both the SN and NTA SNAP population, are given the medical examination form (DSS 4526) to have their medical practitioner complete and return within ten days, along with the DSS2642 which officially affords them ten days.

In the case where a Safety Net client presents a completed medical(DSS4526), the district will review it and make a determination based on information contained in that medical.

Upon receipt of a fully completed medical or an IMA evaluation, the client is provided a LDSS4005 or 4005(a), via mail or in person, to notify him or her of the disability determination and the right to request a fair hearing.

If a SNAP recipient fails to supply documentation of a claimed exemption, he/she will be determined to be non-exempt from SNAP work requirements.

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:

In cases where IMA is not utilized, Employment workers review and determine status. Upon receipt of a fully completed medical , the client is provided a LDSS4005 or 4005(a), via mail or in person, to notify him or her of the disability determination and the right to request a fair hearing.

Each time a determination or re-determination is made of an exempt or non-exempt status the appropriate LDSS-4005 or LDSS 4005(a) notice is sent to the individual.

## **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.):

TANF clients are referred to IMA for their medical/psychiatric employability determinations. SN clients are issued a medical examination form, an LDSS-4526, to have completed by a medical practitioner and returned to the agency within ten (10) days and they are given an LDSS- 2642, Documentation Requirements, to officially declare they have ten days to submit the completed LDSS-4526. If the form is not returned within the required time period, the public assistance application will be denied or the case will be closed.

If medical documentation is received, based on the findings of the medical practitioner, the district will determine the participant's work requirements. Notification of the Temporary Assistance Work Requirements Determination Non-Exempt or Exempt is issued based on the district's determination.

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

In the case where a client is deemed exempt or work limited, clients are held accountable to participate in rehabilitative activities as prescribed by the medical practitioner.

- 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 Unit is responsible for tracking the individual's participation/attendance in treatment. Clients are notified in writing, see attachment IV, of their obligation to comply with all treatment recommendations. This responsibility is included in Employment plans, which clients are required to sign.

They are advised that monthly timesheets, see attachment V, will be required. If a timesheet reflects noncompliance with treatment, a call is usually placed to the treatment provider to explore the possibility that good cause existed, in the absence of good cause, the agency proceeds with a sanction or a denial.

The treatment plan is updated with every new medical evaluation (LDSS 4526/IMA) or if there is a change in treatment as recommended by the medical practitioner.

In addition, when applicable, the Temporary Assistance unit requires submission of LDSS-4527, "Alcoholism and Substance Abuse Treatment Program Progress Report" on a quarterly basis and if the Temporary assistance unit finds noncompliance indicated on that report, again, the agency will proceed with a sanction.