# **Rensselaer County**

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

January 01, 2024 - December 31, 2025

# Table of Contents

1	. Administration	1
	1.1 Administrative Structure	1
	1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies	2
	1.3 OTDA Jobs Staff Agreement	5
	1.4 Access to Services at New York State Career Centers	
2	Orientation, Assessment and Employment Plan	7
	2.1 Orientation (Reference 18 NYCRR 385.5)	
	2.2 Temporary Assistance (TA) Employment Assessment	
	2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)	
3	Engagement	
	3.1 Federal "Engaged in Work" Requirement (Reference 18 NYCRR 385.2 (f))	.10
	3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficience	у
	3.3 Strategies/Procedures for Increasing Program Attendance	.10
	3.4 Strategies/Procedures for Engaging Sanctioned TA Participants	.11
	3.5 Strategies for Reducing the Need for TA	.11
4	Work Activities	.12
	4.1 Allowable Work Activities	.12
	4.2 Job Development	.15
	4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)	.15
	4.4 Post-Secondary Education Approval and Enrollment Policies	.18
5	. Work Requirements	.19
	5.1 Meeting TA Work Requirements	.19
	5.2 Informing SNAP Applicants and Recipients of Work Requirements	.21
	5.3 Meeting SNAP Work Requirements	.23
	5.4 Advising Households of Employment and Training Services	.23
	5.5 Provider Determinations	.24
6	. Quality Assurance/Work Verification	.25
	6.1 Quality Assurance Process - Random Case Sampling	.25
	6.2 Use of Outside Providers/Vendors	.27
7	. Supportive Services	.27
	7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the	07
	District	
	7.2 Post-Employment/Transitional Supportive Services	
_	7.3 Extended Support Services	
8	. Conciliation, Sanction and Dispute Resolution Procedures	29

	8.1 Conciliation	29
	8.2 Sanction	31
	8.3 Dispute Resolution	32
9	. Disability Determinations, Documentation and Requirements of Exempt Individuals	32
	9.1 Disability Determination Process and Tools	32
	9.2 Mental Health Screening and Assessment	34
	9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))	34
1	0. District Certification	36
	10.1 Certification	36

# 1. Administration

#### 1.1 Administrative Structure

a. 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. (Attachments must be uploaded to the system through the "Documents" screen prior to submitting the plan. Use the textbox below to provide any additional information.)

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.

b. Below 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 and include the responsibilities of each office.

Rensselaer County Department of Social Services Units involved in the Welfare-To-Work Program are as follows:

TANF/Safety Net Moe/Safety Net Non-Moe Unit: Consisting of 1 Principal II, 1 Principal I, 5 Sr. Examiners, 18 Examiners, 6 Clerks

Population Served: TANF/Safety Net Moe/Safety Net Non-Moe SNAP applicants and recipients.

Services Included: Orientation, Eligibility Determination, Individual Assessments and Employment Plans, Budget/Case Management, Conciliations, Sanction Management, Engaging recipients in Job Searching and providing support services.

SNAP Unit: Consisting of 1 Principal II, 2 Senior Examiners, 17 Examiners, 6 Clerks Population Served: SNAP applicants and recipients.

Services included: Orientation, Eligibility Determination, Budget/Case Management, Conciliations, Sanction Management

Employment Unit (Project HIRE): Consisting of 1 Principal I, 2 Senior Examiners II, 4 Senior Examiners, 1 Clerk

Population Served: TANF/Safety-Net-MOE/Safety-Net-Non-MOE SNAP Applicants/Recipients

Services Include: Orientation, Employment Assessments, Employment Plans, Case Management, Assignment of Work Experience and other activities, Conciliations, Dispute Resolution, Employment Strategies, Supportive Services, Post Employment Services

Rensselaer County Department of Social Services Daycare Unit

Rensselaer County CASAC Manager

Rensselaer County Veterans Service Agency

Rensselaer County Mental Health Department

Rensselaer County Employment and Training

Rensselaer County Re-Entry Task Force

# 1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies

a. 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 assessment 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 proper monitoring and oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

# Contracts or Agreements with Agencies Who Provide TA and SNAP Employment Services

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
NYS OTDA Consultative Examination Contract	\$20,000	Local	FA SNA Family SNA Individual	Provides second medical opinion for employability. RE: Industrial Medical Associates
Unity House	\$31,500	Local	FA SNA Family SNA Individual	Provides a liaison to Rensselaer County Department of Social Services for determining waivers for Domestic Violence victims.
All Language Translations	\$17,500	FFFS Local	FA SNA Family SNA Individual SNAP	Provides language translator/interpreter services.

b. 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.

Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and TANF 200%.

## Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Healthy Family NY (HFNY) - St. Peter's Health Partners	Others: Federal	FA SNA Family SNA Individual SNAP TANF 200%	Applicants and recipients of public assistance may receive voluntary parental, infant and early childhood home visiting services. Services: improve parental and child health, enhance parent-child relationships, improve child development and school readiness, family economic self-sufficiency, and a reduction of child abuse and neglect.
ACCES-VR	Others: OTHER: NYS ED	FA SNA Family SNA Individual SNAP TANF 200%	Provides vocational training and employment services for motivated individuals with disabilities.
Rensselaer County Re- Entry Task Force	Others: OTHER: DCJS/DOCS	FA SNA Family SNA Individual SNAP TANF 200%	Job Fair
WIOA - Rensselaer County One Stop Center	Others: OTHERS: Federal	FA SNA Family SNA Individual SNAP TANF 200%	Provide services through the Rensselaer County One Stop Office for job searching, resume preparation, summer youth employment, and provide limited funds for certain job specific training.
Questar III	Others: OTHERS: NYS Department of Education	FA SNA Family SNA Individual	Administering Test for Adult Basic Education (TABE Test) and enrolling individuals in High School Equivalency (HSE) classes.
Capital District Educational Opportunity (HVCC)	Others: OTHERS: NYS Education	FA SNA Family SNA Individual SNAP	Administering Test for Adult Basic Education (TABE Test) and enrolling individuals in High School Equivalency (HSE) classes and Perkins funding.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Literacy Volunteers of Rensselaer County	Others: OTHERS: donations and volunteers	FA SNA Family SNA Individual SNAP TANF 200%	Assist individuals to learn to read, write and speak English.
Rensselaer County Career Center	Others: OTHERS: NYS Education	FA SNA Family SNA Individual SNAP TANF 200%	Identifies jobs that are a fit for client's experience and skills. Helps individuals prepare for and connect to jobs.
ATTAIN - (EOC)	Others: OTHERS: NYS Education	FA SNA Family SNA Individual SNAP TANF 200%	The ATTAIN (Advanced Technology Training and Information Networking) associated with EOC provide computer labs which are located in Troy and Albany. They offer, computer training from beginner to advanced, along with internet access.
Commission on Economic Opportunity (CEO)	Others: Federal	FA SNA Family SNA Individual SNAP TANF 200%	Referrals to Head Start, Early Head Start, WIC and other programs to remove barriers to employment. Referrals to Early Head Start for the Home Visiting Program - families can voluntarily enroll who are pregnant or with a child up to 3 years old. Services may include comprehensive health/nutrition care for pregnant individuals, infants/toddlers and their families. Meet with a Family Development Specialist for parents to learn about their child's development and learn to plan parent/child activities to enhance their child's growth.

c. Monitoring and Oversight of TANF and SNAP E&T Funded Contracts/Agreements

Described below is the process used to monitor district held contracts/agreements with providers that use TANF and SNAP E&T funds for employment services:

NYS OTDA CONSULATIVE EXAMINATION CONTRACT - 1. Project Hire or Safety Net makes appointment.

- 2. Receive email from Industrial Medical Associates (IMA) stating that the client did or did not report.
- 3. IMA report is checked monthly w/state and the unit records to reconcile for payment. (copy of the IMA bill is sent to the state and the deputy commissioner).
- 4. Quarterly report sent to state and deputy commissioner.

UNITY HOUSE - 1. Spreadsheet & documentation made available to deputy commissioner.

#### ALL LANGUAGE TRANSLATIONS

- 1. Billing form filled out by unit staff who requested the interpreter enters start time, end time.
- 2. The billing form is signed by the interpreter and sent to accounting

# 1.3 OTDA Jobs Staff Agreement

a. OTDA Jobs Program Services - Target Groups (reply yes or no to the options as they apply):

## **Services Provided by Jobs Staff**

Yes or No:	Services Provided:
N/A	Assessment/Employment Plan
N/A	Supervised job search
N/A	Job readiness training
N/A	Job club
N/A	Job placement services
N/A	Grant diversion
N/A	Job development (employer outreach)
N/A	WOTC pre-certification

#### **Jobs Staff Target Groups**

Yes or No:	Target Groups:
N/A	Applicants
N/A	FA & SNA with children
N/A	SNA without children
N/A	SNAP
N/A	TANF 200%

b. Described below are the additional services/duties Jobs Staff will be requested to perform (e.g., Welfare to Work Case Management System (WTWCMS) data entry, case conferencing, job fairs).

N/A

#### 1.4 Access to Services at New York State Career Centers

a. Described below is how the district provides access to its programs and services with Career Center partners (reply yes or no to the options as they apply):

## **Programs and Services Provided at Career Centers**

Yes or No:	Programs and Services Provided:
No	The district has employee(s) physically present at a Career Center
No	The district has contract staff physically present at a Career Center
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
No	Other (described here):

b. Described below is how the district coordinates with Career Center partners to provide 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 Rensselaer Co. One Stop Career Center, the comprehensive American Job Center for Rensselaer County, is an integral partner in serving Rensselaer Co. DSS applicants & recipients. Through shared services with the Project HIRE Unit, DSS job search ready applicants & recipients are directly referred via appointment to the Career Center for enrollment in WIOA career development services. These services include registration, initial assessment to determine appropriate career development services, enrollment into OSOS job matching system, resume development, creation of Job Zone Accounts, career assessments & access to multitude of career readiness workshops. Additionally, individuals who are in need of short-term classroom or on the-job training services may have the opportunity for tuition assistance funding through WIOA Title I. Rensselaer Co. DSS also partners with the Career Center & the Re-Entry Task Force on quarterly Job Fairs that are hosted at the DSS Building. Career Center NYSDOL Business Services staff coordinate employers to attend these job fairs that are attended on average by 20 businesses & 80 job seekers.

# 2. Orientation, Assessment and Employment Plan

# 2.1 Orientation (Reference 18 NYCRR 385.5)

a. How does the district provide orientation (reply yes or no to the options as they apply)?

#### **District Orientation Procedures**

Yes or No:	District Orientation:
Yes	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
No	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:

b. Described below is how the district completes the required orientation for all applicants and recipients of TA at application and recertification. Orientation can be held in-person, either in a group setting, individually, or a combination of both. It can also be held virtually, over the phone, or by sending orientation material to the client by mail. Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

Orientation is provided at application and recertification. The initial orientation process is done on an individual basis within the application and eligibility appointments within the TANF/SAFETY-NET MOE, and SAFETY-NET NON-MOE unit. The Employment Unit (Project HIRE) staff reiterates and completes the orientation process on an individual basis during the Employment Assessment and the developing of the client's Employment Plan. Furthering education with the Educational Opportunity Center (EOC) with services provided and assessments for furthering job readiness. Re-orientation may occur at other times as warranted between staff and client. Orientation is usually done in person; however, orientation can be provided virtually by client request.

# 2.2 Temporary Assistance (TA) Employment Assessment

a. How does the district conduct assessments as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

#### **District Assessment Procedures**

Yes or No:	How the district conducts assessments
Yes	The district enters assessments directly into WTWCMS.
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
No	The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. If applicable, the local equivalent contains additional elements beyond what is required:

b. Described below is the district procedure for the completion of an employment assessment, including when initial assessments are conducted and whether an assessment is conducted in-person, virtually by phone, or a combination of both:

All adult clients and those clients 16 and older who are not attending school are given an employment assessment. The Assessment is completed during the application process. TANF (within 30 days) and due to new regulations SAFETY NET MOE (is now also within 30 days instead of 45) applicants are assessed by Project HIRE. SAFETY NET NON-MOE (within one year) applicants/recipients are assessed by that unit at time of interview. The information gathered by this process is part of a comprehensive strategy to help the individual become self-sufficient. The assessment is usually done in person; however, the assessment can be provided virtually by client request.

c. Which district administrative unit or contractor is responsible for conducting assessments?

The Project HIRE unit does the initial employment assessment/employment plans and reassessments and updates of employment plans for all TANF and SAFETY NET MOE individuals. The TANF SAFETY NET NON-MOE unit is responsible, for that unit's individuals and for the original assessment and employment plan and updates. The SN Non-MOE assessments and employment plans are completed at the eligibility interview. The information gathered at this process is part of a comprehensive strategy to help the individual become self-sufficient.

d. Described below are the minimum qualifications of the employees conducting the assessment (refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)):

The Project HIRE staff who do the individual's employment assessment and employment plan are either Senior Examiners or Senior Examiner II's. They have completed the Welfare-to-Work Core Training Program and The Welfare-to-Work Caseload Management System Training provided by OTDA. The TANF SAFETY NET NON-MOE Staff who perform this duty are either Senior Examiners or Examiners. They have been given training through OTDA training courses listed above or have been trained by that unit's Principal II.

e. Are applicants in households with dependent children required to participate in completion of an employment assessment?

Yes.

f. Are applicants in households without dependent children required to participate in completion of an employment assessment?

Yes.

g. Are exempt adults in households without dependent children required to participate in completion of an employment assessment?

Yes.

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

The assessment is updated at the time of recertification and at any time the client's circumstances change or at completion of an activity. A copy of their Employment Plan is provided to the individual when updates are made.

# 2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)

a. How does the district develop individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

## **District Employment Plan Procedures**

Yes or No:	How the district develops employment plans	
Yes	The district enters employment plans directly into WTWCMS.	
No	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTWCMS.	
No	The district develops individual employment plans using a local equivalent tool. If applicable, the local equivalent contains the following additional elements beyond what is required:	

b. Who develops the employment plan (reply yes or no to the options as the apply)?

#### **District Employment Plan Development**

Yes or No:	Who develops the districts employment plans	
Yes	The same administrative unit or contractor that conducts employment assessments also develops employment plans.	
No	A different administrative unit or contractor develops employment plans and the contractor's qualifications include:	

c. Described below is the district procedure for the completion of an individual's employment plan:

The employment plans are completed at case opening by the Project Hire unit for TANF/SN/MOE and SN non-MOE clients by a Senior Examiner or a Senior Examiner II. After the completion of the employment plan, or an updated employment plan, a copy is provided to the client. Employment plans are usually done in person. However, if necessary, the employment plan can be provided virtually.

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

The employment plans are updated at the time of recertification and at any time the client's circumstances change or at the completion of an activity.

# 3. Engagement

# 3.1 Federal "Engaged in Work" Requirement (Reference 18 NYCRR 385.2 (f))

- a. Federal requirements state 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. The 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 4.1. Also included is pursuit of other forms of income such as SSI and SSDI.
- b. Described below is additional information regarding the district's "Engaged in Work" requirements:

Rensselaer County Department of Social Services requires individuals to look for and secure appropriate childcare, any medical, substance abuse treatments, ESL classes, HSE classes in order to reduce barriers to employment and increase the potential for self-sufficiency at the earliest point in time. Rensselaer County Department of Social Services assists the client in this process with a referral to Bright Side Up, Capital District Educational Opportunity Center, Questar III-BOCES, or Literacy Volunteers of Rensselaer County, as appropriate. The individual is responsible for securing medical and substance abuse treatments.

# 3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

a. Described below is how the district accommodates non-English speaking participants' access to employment activities and services:

Rensselaer County Department of Social Services has a contract with All Language Translations. This provider allows the district to communicate with all the different languages the agency has encountered. Also, this provider can have sign language interpreters available to the agency. We have also used translators from the U.S. Committee for Refugees and Immigrants (USCRI) when necessary. Rensselaer County also accommodates individuals who do not speak English and prefer to have a family member or community friends act as an interpreter.

# 3.3 Strategies/Procedures for Increasing Program Attendance

a. Described below are the district policies and/or procedures used to reduce the number of times participants fail to participate in work activities. This includes absences with good cause:

Individuals are counseled about the importance of reporting to paid or unpaid work on time and the relationship of attendance and success in the workplace. Clients are advised during the assessment and employment plan process of having a reliable backup plan for childcare and to do their upmost on scheduling appointments when they are not at the workplace. The

agency acquires school schedules from many of the county's school systems and daycare systems so the workers can remind clients to pre-plan for those dates.

# 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

a. The following are strategies used to engage sanctioned participants. If a district uses one of the options, a description will be provided (reply yes or no to the options as the apply and provide a description for "yes" responses):

## Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: Seniors and/or Senior II's attempt to engage the individual that has been referred for sanction to increase their job search efforts to obtain employment as certain support services such as childcare and transportation assisting are still available to them. Individuals are encouraged to go to the Rensselaer County One Stop located at 1600 7th Ave., Troy, NY to review online employment opportunities and receive specific job referrals. Seniors and/or Senior II's discuss with their clients how to avoid future sanctions, provide information on childcare (Brightside Up) and the Career Center, etc.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Seniors and/or Senior II's make phone calls to the individual if the participant has a viable phone number. Otherwise, they mail scheduled appointments approximately 30 days before the durational period ends and will continue making the effort on a 30-day basis from that point on. Project HIRE Seniors and/or Senior II's will notify TANF/SAFETY NET MOE unit that when a client reports for recertification, the Project HIRE Seniors and/or Senior II's will need to also meet with the client.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Seniors and/or Senior II's start mailing scheduled appointments and making phone calls, if the district has viable phone numbers, approximately 2 weeks to 30 days before the durational period ends.

# 3.5 Strategies for Reducing the Need for TA

a. Described below are the district's strategies for reducing the need for TA:

Individuals at time of application are asked about applying for NYS Unemployment Insurance, NYS Disability claims and payments, Workers Compensation, SSI/SSD applications and payments, child, or spousal support and if housing, childcare or transportation could be potentially provided by a relative or friend. Clients are asked to do job searching at time of assessment. Referrals to appropriate community-based assistance are made available to the individual. Documentation of utility shut off, eviction notices, or a client requesting specific assistance, such as moving expenses, when accompanied by written documentation of means of continued support, can be utilized for reducing the need of Temporary Assistance.

# 4. Work Activities

# 4.1 Allowable Work Activities

a. Below is a list of activities available to individuals receiving Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), and Supplemental Nutrition Assistance Program (SNAP) benefits. In the chart below, the case type is listed next to each activity available to it in the district.

## **Allowable Work Activities by Case Type**

Activity and Definition	Case Type
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP
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 (ABE), 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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
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.	FA SNAFAM SNA 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.	FA SNAFAM SNA SNAP
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.	FA SNAFAM SNA SNAP
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.	N/A
<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.	N/A
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.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
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.	N/A

# 4.2 Job Development

a. Does the district conduct or access job development services to expand job opportunities for TA and SNAP participants?

Yes.

How does the district participate in job development activities (reply yes or no to the options as they apply)?

## How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: All Project Hire Senior Examiners, Senior Examiners II's and Principal conduct outreach for job development by phone and/or email together with Rensselaer County One Stop and the Rensselaer County Re-Entry Task Force, partners and holds Job Fairs at the District Office at 1600 7th Ave Troy, NY. Rensselaer County reviews resumes and provides individuals with job leads. At least two outreach attempts are made by telephone when the client is unresponsive. Project Hire refers clients to the Rensselaer County One Stop which is also located at 1600 7th Ave., Troy, NY. Frequency of contacts varies depending on client need.
No	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.:

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

a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), 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. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.

Rensselaer County Department of Social Services refers individuals for the abovementioned services to Questar III BOCES, Educational Opportunity Center, and Literacy Volunteers of Rensselaer County. These three agencies have positive outcomes with individuals receiving HSE certifications and English secondary language skills. Rensselaer County Department of Social Services does not have formal agreements with Questar III-BOCES, Capital District Educational Opportunity Center, or Literacy Volunteers of Rensselaer County, but these agencies serve the same population as the Rensselaer County Department of Social Services and provide the required services, thereby making them the best available option for individuals working with Rensselaer County Department of Social Services.

b. Described below is 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. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

Rensselaer County Department of Social Services refers individuals to the Capital District Educational Opportunity Center and Hudson Valley Community College; these two providers are part of the SUNY system. The Department also uses Questar III BOCES part of NYSED. Also, the Rensselaer County Career Center is used for potential WIOA Title I trainings funds. All trainings are approved and on the New York State eligible provider list. These programs provide positive outcomes in terms of certificates, degrees, and hands-on-training at costs that are more affordable for individuals working with the Department as compared to available alternatives.

c. Described below are the district's process and guidelines 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. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.

At the time of assessment and development of the employment plan, workers discuss the need in this job market to have at a minimum of a HSE certificate. The individual is offered the opportunity to participate in the Questar III and Capital District Educational Opportunity programs to obtain a HSE certificate. Clients under 18 years old who are not enrolled in High School will be given a mandatory assignment to participate in either Questar III or Capital District Educational Opportunity programs.

d. Described below are the district's process and policy, including the guidelines 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 district would deny participation in educational activities.

Individuals are given encouragement and supportive services to foster an opportunity for success in obtaining their HSE equivalency. Our workers will evaluate past attempts and try to identify reasons for the individual not being successful, such as an undiagnosed learning disability, transportation and childcare support. The plan that is developed would need the individual to accept the added responsibility and commitment to this new opportunity. Individuals with multiple past instances of not following through with goals of previous attempts would be assigned other work activities until they show forth, they are willing to complete and commit to this new educational opportunity. Clients under 18 years old who are not enrolled in High School will be given a mandatory assignment to participate in either Questar III or Capital District Educational Opportunity programs.

e. Described below is the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities.

The individuals are identified at the time of assessment and an employment plan is development. Workers discuss with the clients their interest in obtaining skills through education to become self-sufficient and the commitment on their part for success in this endeavor. Review of necessary supportive services will be done for the success of the individual and must be adequate. Individuals with multiple past instances of not following through with the goals of previous attempts would be assigned other work activities until they show forth, they are willing to completely commit to this new educational opportunity

f. Described below are the standards by which education and training providers are evaluated.

Providers are evaluated by their institutional accreditations, rating of placements of graduates in positions that are directly related to the given courses of training and the amount of indebtedness the individual will be left with versus the quality of the program.

g. Described below is the district's procedure for advising participants of approved training.

Discussions take place with participants during the assessment formation of the employment plan. Individuals are given literature that is available from the approved training providers when available. Clients are also advised to visit the provider in person and talk to the representatives about their programs.

h. Described below is the district's procedure for notifying participants they are approved for training or enrollment in a work activity.

The employment plan is developed in person between the individual and their Project HIRE worker with both parties signing off on the plan. Also, additional documents of referrals, participant's rights and obligations, scheduled appointments and program schedules are signed by the individual and the client's worker. If an in-person contact cannot happen, a phone interview could take place with any documents developed which are mailed to the client to be signed and returned to Rensselaer County Department of Social Services by mail, fax, email or NYDocSubmit within 10 days.

i. Described below is how the district will monitor the high school attendance for 16–18-year-olds in order for them to retain their TA exempt status.

Rensselaer County Department of Social Services monitors the high school attendance of 16-18 years old by verifying at time of application and recertification with written proof of enrollment in a high school.

j. Described below is the district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity.

Rensselaer County Department of Social Services will provide written documentation to the individual's limitation and need of an accommodation to the work activity provider.

# 4.4 Post-Secondary Education Approval and Enrollment Policies

a. Described below is the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program (please ensure to include the current providers the districts partners with for the provision of post-secondary education programs in Table 1 or Table 2 under Section 1.2 of this plan):

An associate degree in a career specific field which would qualify the individual for employment in a job that is reasonably obtained in this area.

Rensselaer County Department of Social Services refers individuals to the Capital District Educational Opportunity Center and Hudson Valley Community College: these two providers are part of the SUNY system. The Department also uses Questar III BOCES part of NYSED. Also, the Rensselaer County Career Center is used for potential WIOA Title I training funds. All trainings are approved and on the New York State eligible provider list. These programs provide positive outcomes in terms of certificates, degrees, and hands-on-training at costs that are more affordable for individuals working with the Department as compared to available alternatives.

b. 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 described below (reply yes or no to options as they apply):

## Conditions For Disapproval of Work Activities For Individuals Enrolled in College

Yes or No:	Conditions for disapproval of work activity
Yes	It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
Yes	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.
Yes	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.
Yes	The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
Yes	The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
Yes	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.
No	Additional reasons as stated here:

# 5. Work Requirements

# **5.1 Meeting TA Work Requirements**

a. Described below is how the district plans to meet federal and State TA participation rate requirements. Included in this description is the weekly hours standard participation requirements 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 whose status changed from exempt to nonexempt. (Information regarding engaging exempt individuals is entered in Section 9).

All non-exempt applicants in Rensselaer County participate in job searching. As the client's cases become active, they continue with supervised job searching until they are assessed, and an employment plan is developed. At that time, a comprehensive strategy of vocational education, supervised job searching, work experience, and job readiness training will be assigned to the client in order for the client to reach their goal of self-sufficiency and for the district to meet Federal and State participation goals. The minimum district standard for single parent/caretaker of a child under six years old is 20 hrs/wk, for a single parent with a child six years of age and older is 30 hrs/wk, a two-parent household would be 35 hrs/wk for each parent and a single individual without children would be 35 hrs/wk. Typically, the time period between cases opening and engagement in activities is 30 days. Job Search should have an upper limit of 12 weeks and is not intended to be a standalone year-round activity.

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

#### Number of Individuals Who Receive Employment Services

Household Type	Number Served
Households with Dependent Children Average Monthly	320
Households without Dependent Children Average Monthly	150

c. Described below is 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:

Rensselaer County Department of Social Services uses reports that can be generated from the COGNOS and WTWCMS systems on a monthly basis. Those individuals who are engaged but not meeting participation rates are given appointments so that staff can verify activity hours, review employment plans and alternatives to enhance participation rates.

d. Does the district assign TA applicants to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Use the "Additional Information" column in the chart below to describe how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

Yes.

#### Applicant Job Search

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10		On the day of assessment, the individual is expected to perform job searches and continues until the case is active. For clients with children the individual is instructed to do 10 contacts within 10 days of assessment, logging them on the job search form provided by the agency and to continue this assignment until the case opens. Clients are counseled on post interview follow up, such as follow up phone calls to employers, putting together professional references in preparation to employer contact.
SNA Individuals	10		For clients without children, the individual is instructed to make 10 contacts with applications within a ten-day period logging them on the job search form provided by the agency and to continue this assignment until the case opens. Clients are counseled on post interview follow up, such as follow up phone calls to employers, putting together professional references in preparation to employer contact.

e. Does the district assign TA recipients to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. 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 using the "Additional Information" column.

Yes.

#### **TA Recipient Job Search**

Recipient Job	Min.	Min.	Additional Information
Search	Contacts	Hours	
TANF and SNA MOE	10	20	When a client becomes a recipient WITH children under six years old on the case, they are instructed to do 20 hours of job searching per week which includes applying for the position and logging them on the job search form provided by the agency. A client WITH a child six years of age and older would be required to do 30 hours of job searching, applying for each position and logging them on the job search form provided by the agency. Clients

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			WITH children are required to turn in the job search log no less frequent than weekly. Clients are counseled on post interview follow up, such as follow up phone calls to employers, putting together professional references in preparation to employer contact.
SNA Individuals	10	35	Clients WITHOUT children are required to do a minimum of 10 job contacts each week with applications and at least 35 hours of job search averaged weekly. Individuals participating in a combination of different activities will not be required to participate more than 40 hours per week in activities. Clients are required to return the forms and documentation bi-weekly to the TANF SAFETY NET NON-MOE unit. Clients are counseled on post interview follow up, such as follow up phone calls to employers, putting together professional references in preparation to employer contact.

f. Described below is the district's process and policy used for determining whether participation in self-employment is approved as part of an individual's required work activities, including the guidelines workers follow. If the district always approves self-employment as part of an individual's required work activities, please note this policy below:

Rensselaer County Department of Social Services approves self-employment as a work activity. The hours will be determined by taking client's written documentation of gross income (after subtracting certain allowable business expenses) divided by the federal minimum wage. The client may be assigned other activities to ensure the client meets the hours required for participation.

# 5.2 Informing SNAP Applicants and Recipients of Work Requirements

The district informs SNAP households where at least one member is subject to a work requirement of the applicable work rules at certification, recertification, and when a previously exempt household member or new household member becomes subject to work requirements. Notification is provided verbally and in writing.

a. Described below is how SNAP applicants and recipients are informed in writing of SNAP work requirements (reply yes or no to options as they apply).

## Written Information Provided to SNAP Applicants and Recipients

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	Eligibility staff use the LDSS-5193 Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD) and the LDSS-5193A Important Information about SNAP Work Rules (General and Mandatory E&T) as appropriate.
No	Eligibility staff use a local equivalent consolidated work requirements notice to inform SNAP applicant and recipient households of their work

Yes or No:	How written information is provided to SNAP applicants and recipients
	requirements. Please attach a copy of the district's OTDA approved local equivalent.

b. Described below is the process eligibility staff follow to provide a comprehensive oral explanation to SNAP households of work requirements, including General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules which pertain to non-exempt individuals in the household.

The process is that staff reviews and discusses the work rules and requirements with each household member which includes: work requirements, exemptions, how to maintain eligibility, how to remain in compliance, consequences for failure to comply, examples of good cause reasons are given, districts responsible to reimburse recipients for reasonable costs of associated with participation, USDA contact information and instruction for discrimination, and provides a copy of the 5193A or 5193 to each household member which shows exactly what work rules each household member is responsible for following. Staff use the Snap Application and Snap Recertification Screening Guide as a checklist to make sure all steps are completed during interview process. (See attached copy of each guide in document section under Other - Screening Guides.

c. Described below is how the district documents in the case record how the written information about SNAP work requirements was provided to the household (reply yes or no to options as they apply).

#### How the District Documents the Written Requirement in the Case Record

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	The district retains copies of all LDSS-5193/LDSS-5193A in the case record.
No	The district retains copies of local equivalent notices provided to the household in the case record.

d. Described below is the district's process for documenting in the case record how the oral explanation of SNAP work requirements was provided to the household (reply yes or no to options as they apply).

#### How the District Documents the Oral Requirement in the Case Record

Yes or No:	How oral information is provided to SNAP applicants and recipients
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
Yes	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
No	Eligibility staff document the case record through case notes/comments.

# **5.3 Meeting SNAP Work Requirements**

- a. Described below is the extent to which the district requires NTA SNAP recipients to participate in SNAP E&T work activities. (Please note: Case management services must be provided to all participants enrolled in SNAP E&T activity):
  - Rensselaer County DSS does not mandate NTA SNAP applicants or recipients to participate in work activities.
- b. If the district is offering Supervised Job Search as an E&T activity component, describe below how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts.

N/A

c. If the district is not mandating SNAP E&T work activity assignments, please describe below 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 offer job search assistance to NTA SNAP applicants and recipients):

Upon request, clients who are seeking assistance and information on various jobs that may be available in the district and/or region, clients will be given job flyers, the Dept of Labor web site and/or will be informed about the services available at the Employment and Training Career Center at 1600 - 7th Avenue.

# 5.4 Advising Households of Employment and Training Services

At the time of recertification, non-exempt SNAP recipients who are members of certain TA/SNAP and NTA/SNAP households must be advised of the availability of employment and training services within the district and/or region. This requirement applies non-exempt recipients in households containing at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report.

a. Described below is who the district provides information about employment and training services to (reply yes or no to the options as they apply):

#### Who the District Provides Employment and Training Services Information to

Yes or No:	Who the district provides employment and training services information to:
Yes	Required population only
Yes	Other groups described here: At time of recertification, staff must advise non-exempt Snap recipients who are members of TA/Snap, and /or NTA Snap households containing at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report, of the availability of employment and training services within the district or region. Employment and training services are not limited to Snap E & T.

b. Described below is the method the district uses to advise SNAP recipients of available employment and training services at recertification (reply yes or no to the options as they apply):

#### How the District Provides Employment and Training Services Information

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
Yes	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website: Recipients are given the link to the NYS Department of Labor, <a href="JobZone (ny.gov">JobZone (ny.gov)</a> ) https://jobzone.labor.ny.gov/jz/views/jobzone/search/jobSearchResult .jsf;JSESSIONID=6601552bc06b413fb6205dba022faa9f
No	Material and information provided via email.

#### 5.5 Provider Determinations

a. Not every activity assignment/referral to training might be the right fit for every participant. As such, districts are required per federal regulations at 7 CFR 273.7(c)(18) to have procedures in place for when a provider/contractor determines an individual is not a good fit for a particular activity or program they are referred or assigned to. This is called the provider determination process. Described below is the district's process for provider determination, including the process for screening individuals prior to referral to a provider, how to communicate information related to provider determinations with the district, how workers communicate information related to provider determinations with the client, and documenting provider determinations.

As our agency enters into an agreement with a provider, a complete and thorough introduction is done. It is important that a clear picture of who the agency serves and what type of candidate the provider is looking for. DSS completes an individual assessment with a potential candidate for the particular work site. The candidate is asked multiple questions that are tailored to the provider's/work site needs. Depending on how the candidate answers the series of questions will determine if they will be a good fit to work with this provider. Once the candidate has met with the provider and the provider feels they are not a good fit, the provider will communicate these issues or concerns with the Project Hire supervisor within 10 days. The district has 10 calendar days from the date the district receives notification of the provider determination to inform the participant of the provider determination. The Project Hire supervisor will notify the participant of the provider determination, explain the next steps and inform the participant that a provider determination does not mean the participant is being sanctioned. The participant will also receive PH contact information if they have any further questions.

 Described below is the district process for informing providers of their authority and responsibility to determine if an individual is not a good fit for a particular activity or program.

All fully executed contracts have clear language as to the rights and responsibilities of each provider, including the federal mandate of the 10-day notification timeframe that the participant is or is not a good fit for the activity assignment/referral to training, as well as the rights and responsibilities of the Department of Social Services. If a client is deemed not to be a good fit, an explanation from the provider will be appreciated on why the candidate was not a good fit which will help in the placement of future candidates.

c. Described below is the district process for provider oversight to ensure that provider determinations are not unfair or used to discriminate against protected classes.

The provider must have policies and procedures in place against discrimination and unfair treatment according to federal and state laws. These policies and procedures must be in place by the provider/worksite before a contract between the provider/work site and Rensselaer County Department of Social Services is fully executed.

# 6. Quality Assurance/Work Verification

# 6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) 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 (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

c. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 38 – "Parent needed in the home full time to care for an incapacitated/disabled household member" or TA Employability Code 48 – "Needed in the home to care for an incapacitated child full time – time limit exemption". Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

d. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 31 – "Parent or caretaker relative of a child under 12 months of age". Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

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.

#### 6.2 Use of Outside Providers/Vendors

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

No

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

N/A

c. If No, describe below the process used:

N/A

# 7. Supportive Services

# 7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District

a. The district must provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide 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 selfsufficiency:

Rensselaer County Department of Social Services will provide supportive services for clothing or tools up to a limit of \$175 per 12 month rolling period to those individuals where Rensselaer County Department of Social Services referred the individual to a specific employer or work experience site or in other instances on a case-by-case basis as deemed necessary or appropriate by Rensselaer County Department of Social Services. When a client does not have access to their own computer, laptop, internet service or smart phone with enough available minutes to participate in Work Activities, they are referred to the EOC Attain Lab or the Rensselaer County One Stop Center. Also, the district uses a variety of means to assist an individual to obtain transportation to and from employment. This assistance is custom designed for each individual based on the availability of public transportation and the availability of a vehicle they have access to. Monthly per ride bus pass/tokens are provided either at the Project Hire office or funds placed on the client's EBT card. Two ride bus tokens are also available for clients as needed. If no public transportation is available to the individual and they are starting paid employment and the individual has access to an uninsured motor vehicle, the agency may pay the first month's installment of the insurance up to \$200. Vehicle repairs up to \$650 will be done on a case-by-case basis if the client is employed and either does not work or live on a bus route that is within the two-

- mile walking regulation. The agency will base car repair expenses on the repair estimate, age of the vehicle (less than 12 years old) and accumulated milage of less than 175,000 miles. These insurance and car repairs are only once during a 12-month rolling time period.
- b. Indicated below are the services the district will use 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 (reply yes or no to the options as they apply).

#### **Transportation Services Provided to Clients**

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
No	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
Yes	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
No	Other mileage rate (the methodology used to establish reimbursement rate is described here):

c. OTDA policy establishes a distance not to exceed two miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. Describe below the distance an individual may be required to walk, each way, to a work activity or to access public transportation:

Rensselaer County Department of Social Services abides by the two-mile, one-way walking limit established by OTDA policy. This walking requirement may be adjusted downward on a case-by-case basis because of medical limitations, or when a parent/caretaker walking with a small child or infant during periods of inclement weather conditions.

d. Described below are the services the district will provide to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:

Rensselaer County Department of Social Services may provide to eligible families the following services: childcare, transportation assistance, employment counselling and referral of the individual to other services available from community-based organizations. These services are issued through the Employment Unit (Project HIRE), Family Assistance, Safety Net MOE and the Safety Net Unit. Individuals are also given the website for My Benefits: www.mybenefits.ny.gov

# 7.2 Post-Employment/Transitional Supportive Services

a. Described below are the supports and strategies the district will provide to support job retention:

Rensselaer County Department of Social Services may provide to eligible families the following supports for job retention: childcare, transportation assistance, employment counselling and referral of the individual to other services available from community-based organizations. These supports are issued through the Employment Unit (Project HIRE), Family Assistance, Safety Net MOE and the Safety Net Unit. Individuals are also given the website for My Benefits: www.mybenefits.ny.gov

b. Described below are the support services (for up to 90 days after case closing) the district will provide to individuals whose TA cases have closed due to employment:

Rensselaer County Department of Social Services provides the following support services for those individuals of TANF and SNMOE whose cases close for employment: SNAP benefits, low-income childcare assistance, Medicaid, transportation bus swipers and employment counseling.

# 7.3 Extended Support Services

a. Described below are the support services the district will provide for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines. These services can be provided as long as funding is available (FFFS, etc.):

Individuals will be able to receive information on applying for low-income childcare through Workforce Development (WDI) program by Rensselaer County Department of Social Services Daycare Unit. Also, information and referrals to existing community services will be provided.

# 8. Conciliation, Sanction and Dispute Resolution Procedures

## 8.1 Conciliation

a. The district's conciliation process for TA applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(a). Indicate below how conciliations are conducted (reply yes or no to the options as they apply).

#### **How the District Conducts Conciliation for TA Applicants and Recipients**

Yes or No:	How conciliation is conducted
Yes	In person
Yes	By phone
Yes	By mail

The districts process for conduction TA conciliations is described below:

Conciliation notices will be sent by the Project HIRE staff or a TANF senior examiner to those individuals who are not in compliance using the WTWCMS system. The individual then has 10 days to respond from the date of the notice to request a conciliation. Individuals who respond to the conciliation notice within the ten days will be given an opportunity to document they did not willfully and without good cause fail or refuse to comply with an assignment or to dispute an activity assignment. For those individuals who do not respond to the conciliation notice or do not show their actions were not willful and without good cause, a ten-day notice of intent to sanction will be issued by the district.

b. Who makes the TA good cause/willfulness determination (reply yes or no to the options as they apply)?

# How the District Makes the Good Cause/Willfulness Determination for TA Applicants and Recipients

Yes or No:	Who makes the TA good cause/willfulness determination?
Yes	The client's employment worker
Yes	A supervisor in the district
No	A separate entity (described here):

c. The district's conciliation process for SNAP applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(d). Indicate below how conciliations are conducted (reply yes or not to the options as they apply).

#### How the District Conducts Conciliation for SNAP Applicants and Recipients

Yes or No:	How conciliation is conducted
Yes	In person
No	By phone
Yes	By mail

The district's process for conducting SNAP conciliations is described below:

Conciliation notices concerning SNAP E&T will be sent by the Project HIRE staff or a TANF senior examiner to those individuals who are not in compliance using the WTWCMS system. The individual then has 10 days to respond from the date of the notice to request a conciliation. Individuals who respond to the conciliation notice within the ten days will be given an opportunity to show that they did not willfully fail or refuse to comply with an assignment or to dispute an activity assignment. For those individuals who do not respond to the conciliation notice or do not show their actions were not willful and without good cause will be offered an opportunity to demonstrate compliance with the SNAP-E&T activity of 10 supervised job search contacts as assigned by the district to avoid the SNAP sanction. If the individual does not accept the opportunity to avoid the SNAP sanction, then a ten-day notice of intent to sanction will be issued by the district.

The conciliation process will also apply to NTA SNAP applicants or recipients who explicitly

state a job quit or a reduction of hours. The individual then has 10 days to respond from the date of the notice to request a conciliation. If the individual does not accept the opportunity to avoid the SNAP sanction, then a ten-day notice of intent to sanction will be issued by the district's senior Snap examiner.

d. Who makes the SNAP E&T good cause/willfulness determination (reply yes or no to the options as they apply)?

# How the District Makes the Good Cause/Willfulness Determination for SNAP Applicants and Recipients

Yes or No:	Who makes the TA good cause/willfulness determination?
Yes	The client's employment worker
Yes	A supervisor in the district
No	A separate entity (described here):

e. Described below is the district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction:

The individual will receive a conciliation notice through the postal service. Within that document they are given instructions to call a contact number to schedule an appointment to discuss the issue of non-compliance. If a sanction is warranted, the individual would be given a job search log and instructions on how to complete the log. The individual will return the log within 10 days indicating 10 employment applications on the form to demonstrate compliance and thus avoid a SNAP E&T related sanction.

## 8.2 Sanction

a. Described below is 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:

The recipient after the minimum duration has passed must provide proof of current employment or will be required to complete a job search consisting of 10 employment applications within 5 days.

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

The recipient after the minimum duration has passed, the individual must comply by completing 10 employment applications within 5 days. individuals that document an exemption from work requirements may have the SNAP sanction lifted before the end of the durational sanction period.

# 8.3 Dispute Resolution

a. 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 must be conducted in accordance with 18 NYCRR 385.11(c). Indicate below who mediates the grievance (reply yes or no to the options as they apply).

#### **Grievance Mediation**

Yes or No:	Who makes the TA good cause/willfulness determination?
No	An independent entity which has an agreement with the district.
Yes	Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case.
No	Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation.

# 9. Disability Determinations, Documentation and Requirements of Exempt Individuals

# 9.1 Disability Determination Process and Tools

a. The district's process for determining an individual's disabilities and/or work limitations must be in accordance with 18 NYCRR 385.2(d). Indicate below what the district's process is for determining an individual's disabilities and/or work limitations (reply yes or no to the options as they apply).

#### **Process for Determining Disabilities and/or Work Limitations**

Yes or No:	How the district determines an individual's disabilities and/or work limitation
Yes	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: When medical documentation is received by the TANF, SAFETY NET MOE or SAFETY NET NON-MOE unit's, the examiner assigned to the case will review the information and, if the client's ability to be employed or assigned to other activities, or the extent of any limitations is clearly documented, make the necessary determination of exempt, non-exempt, or work limited. The unit's examiner would process employment code changes to accurately reflect the client's current condition and process the necessary 4005 or 4005a form. If additional review of the documentation is needed, then a senior examiner or the unit's principal II would make the determination as to the client's exempt, non-exempt, or

Yes or No:	How the district determines an individual's disabilities and/or work limitation
	work limitations. If a determination still cannot be made by the senior examiner II or principal II, the individual would be referred to Industrial Medical Associates (IMA) for clarification.  When Project HIRE initiates the medical review for employment status, the documentation received is reviewed by the senior examiner or senior examiner II assigned to the case for determination of exempt, non-exempt, or work limited; the 4005 and 4005a are processed accordingly. If additional review of the documentation is needed, then the principal I (supervisor) would make the determination as to the client's exempt, non-exempt, or work limitations. If a determination still cannot be made by the Senior principal I, the individual would be referred to Industrial Medical Associates (IMA) for clarification.

b. Described below is the district's procedure for notifying an individual of their exempt or non-exempt determination whenever an individual alleges to be unable to participate, or the individual otherwise participates in the employability disability review, including when an individual is notified that their status changes from exempt to non-exempt:

If a client claims they have a disability or limitations that prevents them from being employed, the district will issue a LDSS-4526 to the client to be completed and returned to the district within 10 days. If the client can demonstrate good cause for needing an extension due to physician being unable to evaluate an extension of up to 30 days may be granted.

c. Described below is how the district notifies an individual of their exempt or non-exempt determination (reply yes or not to the options as they apply):

#### Process for Notifying an Individual of Their Exempt or Non-Exempt Status

Yes or No:	District's process for reviewing medical documentation
Yes	The district sends the LDSS-4005 or LDSS-4005a and a retains a copy in the case record.
No	The district sends a local equivalent and retains a copy in the case record.

d. Indicated below is the process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited and describe the process by which the determination is made (reply yes or no to the options as they apply).

#### **Process for Reviewing Medical Documentation**

Yes or No:	District's process for reviewing medical documentation
Yes	District directs the contracted physician or individual's physician to determine status.
No	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):

Yes or No:	District's process for reviewing medical documentation
No	Other process:

# 9.2 Mental Health Screening and Assessment

a. In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?

No.

b. Describe the district's policy for determining when a program participant is offered a mental health screen:

N/A

c. What screening tools does the district use (reply yes or no to the options as they apply)?

#### **Screening Tools the District Uses**

Yes or No:	Screening Tools
No	LDSS 5009 - Mental Health Screening Tool
No	The computer assisted version of the Modified Mini Screening tool (MMS)
No	Other Screening tool (described here):

d. If using the MMS, indicate below the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation.

N/A

e. Describe below the procedure the district uses if the screening tool warrants a mental health evaluation referral:

N/A

# 9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))

a. An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist them 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 the individual is participating in the assigned program.

Described below 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 9.1 of this Plan.

Indicate who makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities (e.g., medical practitioner, employment worker, TA worker, local review team, etc.). Also indicate 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 determination as to whether an individual will respond to treatment or other rehabilitation to improve or restore their ability to be employed or participate in other actives is governed by the client's personal medical practitioner, specialist, or OTDA's managed contract for independent evaluations. This information would be contained in the reports received by the district from the various professionals that have been consulted either by the client or the agency. The treatment plan is updated bi-weekly when possible but at least monthly.

b. Described below is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc.

For TANF and SAFETY MOE individuals, the Project HIRE senior examiner and/or senior examiner II assigned to the case would follow up with the appropriate plan developed by the medical practitioner. For the TANF/ NON MOE client the examiner would follow-up with the appropriate plan developed by the medical practitioner. The district would assist with appropriate supportive services to support the rehabilitation process. As the client progresses in this process, referrals to other agencies will be done as warranted including, but not limited to, Access-VR, Northeast Career Planning, Unity House PROS, and Samaritan PROS.

c. Described below is the district's procedure for tracking the participant's compliance with their 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 Rensselaer County Department of Social Services worker assigned to the case in the applicable unit oversees the treatment plan. This would include compliance with the plan, attendance records, and progress of the client. After reviewing the monthly documentation or recertification documentation, updates are made to the client's case as needed according to medical documentation.

# 10. District Certification

## 10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Rensselaer 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, 2024, through December 31, 2025. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations, and provisions of this Plan.

1/10/2024 Michael McMahon Commissioner