

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

January 1, 2020 – December 31, 2021

Seneca County

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Section 1- Assurances

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

/s/ November 7, 2019

Tracy L. VanVleck, Social Services Commissioner

November 7, 2019, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

Section 2 Administration

Section 2.1 Administrative Structure

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

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

Seneca County reorganized in 1999, and created a Seneca County Division of Human Services. (Encl 1: Seneca County Division of Human Services Organizational Chart) Under the Division of Human Services umbrella exists the Department of Temporary Assistance, the Department of Child, Community and Family Services, the Department of Workforce Development and Youth Bureau (WFDYB), Support Collection Unit, Personal Care Aides Unit, Fraud Investigation Unit, Transportation Unit and Accounting Department. The Department of Workforce Development and Youth Bureau (WFDYB) acts as the primary employment unit for social services programming. It is aligned to plans, goals and funding of the Workforce Innovation and Opportunity Act, Temporary Assistance/ SNAP Employment and Training Programs, Intensive Case Management, TANF Summer Youth Employment Program (SYEP), Volunteer Income Tax Assistance (VITA) as well as other potential funding sources. WFDYB employment services include, but are not limited to, employability determinations, orientations, assessment, employment planning, assignments to work activities, monitoring of participation, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, coordination and provision of supportive services, and employment placement and retention services.

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

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

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

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

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Seneca Co Department of Workforce Development/ Youth Bureau (WFDYB)	\$227,180	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other TANF	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assessments and employment plans, conciliation and grievance activities, provision of work activities, monitoring and support for compliance with treatment plans for exempt individuals with the potential for restoration to self-sufficiency, disability evaluations and sanction related activities.
Seneca Co Department of WFDYB	\$94,345	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assessments and employment plans, conciliation and grievance activities, provision of work activities.
Seneca Co Department of WFDYB	\$297,217	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Intensive and transitional Case Management for Recipients and recently closed TANF Cases.
Seneca Co Department of WFDYB	\$32,076	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other Childcare Block Grant	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Staff Costs, determining eligibility and provision of reimbursement for approved, working clients eligible for reimbursement for child care and related expenses.
Seneca Co Department of WFDYB	\$80,609	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other WIOA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Suitable/screened clients lacking skills could receive classroom training or On-The-Job-Training (OJT); also bridge skills gap.
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

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

Table 2 – Other Service Providers

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

Provider	Funding Source(s) (if known)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
Wayne-Finger Lakes BOCES	EPE, Carl D. Perkins	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Career Plans, Assessment, ABE/TASC/EDP; Career, Family and Life Skills
Finger Lakes Community College	State & Federal ED, FFFS	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Readiness Training, Job Skills Training, Life Skills, Parenting Skills, Customer Service Training and ServSafe Training (estimated per agreement); ESL and Spanish HSE
Literacy Volunteers of Seneca County	NYSED, United Way	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assist to overcome literacy hurdles to employment. ESL, HSE and tutoring.
ACCES-VR	State ED	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Vocational Rehabilitation Services
Commission for the Blind (OCFS)		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Enhance employability, to maximize independence and to assist in the development of the capacities/strengths of people who are legally blind.
NYSDOL		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Employment Services
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Section 2.3 OTDA Jobs Staff Agreement

OTDA Jobs Program Services – Target Groups

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

Services		Target Groups	
Assessment/Employment Plan	=	Applicants	=
Supervised Job Search	=	FA & SNA with children	=
Job Readiness Training	=	SNA without Children	=
Job Club	=	SNAP	=
Job Placement Services	=	TANF 200%	=
Grant Diversion	=		
Job Development (employer outreach)	=		
WOTC pre-certifications	=		

Other Services Requested

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

Section 2.4 Access to Services at New York State Career Centers

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

- a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:
 - The district has employee(s) physically present at a Career Center
 - The district has contract staff physically present at a Career Center
 - The district makes available direct access to its program staff via phone or technology at a Career Center
 - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
 - Other: The Career Center is using the Career Center Customer Registration Form (ES100) and Career Center Supplemental Questionnaire (ES102)
- b. Please provide a description of how the district coordinates with Career Center partners with providing services to the district’s clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

The Seneca Career Center provides access and referral services to WIOA Career Center Partners that include: A4TD (Associates for Training & Development) -Title V of the Older Americans Act, Jobs for Veterans, Local Office for the Aging, Seneca Housing INC, JobCorps, Migrant/ Seasonal Farmworkers Program, Seneca Cayuga Community Action Agency, NYSDOL/Trade Adjustment Assistance/Trade Act (TAA), NYSDOL/Wagner-Peyser and Unemployment Insurance (UI).

Seneca County WFDYB is a member of the Finger Lakes Workforce System. The WFDYB Deputy Directors serve as members of the following Committees/Groups or directly support them: Finger Lakes One Stop Partners, Career Center FLWIB/Center Managers, Economic Development, Performance & Evaluation, and Marketing. WFDYB E&T Counselors serve on the WIOA Business Services Team and on the WIOA Training Team.

Seneca County WFDYB utilizes a digital referral form to refer and track referrals made to and between WIOA mandated partner agencies.

Section 3 Engagement and Work Preparation

Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))

For purposes of satisfying the federal requirement which states that parents or caretakers must be engaged in work as soon as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance, district’s definition of “Engaged in Work” is:

Compliance with assessment, employment planning, all activities included in the individual’s Employment/Self-Sufficiency plan including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 3.4. Also included is pursuit of other forms of income such as SSI and SSDI.

Include any additional information regarding the district’s local “engaged in work” requirements:

- a. Activities and programs to which the client may be referred during the assessment process for determining specific exempt status or disability limitations;
- b. Any activity that may be tailored to the requirements of special-needs or at-risk individuals, particularly as applicable to persons evaluated under Section 385.2 having to do with physical and mental disabilities and work limitations;
- c. Any activity not mentioned herein that may be deemed suitable within the scope, purpose, and philosophy of the Plan, Seneca County and the laws and regulations pertaining thereto.

Exempt individuals, although not required to actively participate in work activities, are offered the same range of services/activities as non-exempt individuals. This may include selected work activities on a limited basis as well as referrals for therapy, counseling, rehabilitation, training, etc. Additionally, participants are expected to follow recommended treatment plans, e.g. physical therapy, mental health treatment, monthly drug and alcohol treatment plans, and/or medical treatment and to timely document treatment.

Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Check one of the following:

The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.

In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

- Overview of upcoming assessment, employment plan development and required activities and responsibilities
- Services available through Seneca County WFDYB and partners
- Child care “in lieu of Temporary Assistance”
- Review of the consequences of applicant/recipients not fulfilling obligation to participate in any required activity

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

Temporary Assistance orientations are done on an individual basis. The orientation process is reviewed during the application process and is completed before the case opening. The WFDYB staff conducts orientation separately and individually. Recertification interviews are done separately by TA and WFDYB staff and on an individual basis.

Section 3.3 Assessment and Employment Planning

TA Assessment

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

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

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

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

During orientation staff meets one-on-one with the client to complete a preliminary assessment. (Att 2: Employment Assessment Information, EF24). At case opening staff meets with recipient and a more comprehensive assessment is done using WTCMS assessment.

- c. The district administrative unit or contractor responsible for conducting assessments is: Seneca County Workforce Development Department and Youth Bureau (WFDYB)
- d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]

Employment & Training Assistant- Minimum Qualifications:

(a) Completion of a minimum of 60 semester credit hours in a regionally accredited or NYS registered college or university; or (b) graduation from high school or possession of a high school equivalency diploma and two years of experience in job development, personnel counseling, or placement in an Employment and Training, community action,

or similar agency dealing with the employment and training of economically disadvantaged minority, handicapped, or low income persons; or (c) an equivalent combination of training and experience as defined by the limits of (a) and (b).

Employment & Training Counselor - Minimum Qualifications:

(a) Graduation from a regionally accredited or NYS registered college or university with a Bachelor's Degree; or (b) completion of a minimum of 60 credit hours in a regionally accredited or NYS registered college or university and two years of full-time paid experience as a counselor, caseworker, employment interviewer or similar title in a community action or similar agency dealing with the employment or training of economically disadvantaged, minority or low income persons; or (c) graduation from high school or possession of a high school equivalency diploma and four years of full-time experience as defined in (b); or (d) an equivalent combination of training and experience as defined by the limits of (a) through (c).

Employment & Training Coordinator - Minimum Qualifications: (a) Graduation from a regionally accredited or NYS registered college or university with a Bachelor's Degree; or (b) completion of a minimum of 60 credit hours in a regionally accredited or NYS registered college or university and three years of full-time paid experience as a counselor, caseworker, employment interviewer or similar title in a community action or similar agency dealing with the employment or training of economically disadvantaged, minority or low income persons; or (c) graduation from high school or possession of a high school equivalency diploma and four years of full-time experience as defined in (b); or (d) an equivalent combination of training and experience as defined by the limits of (a) through (c).

All positions receive in-house training through supervisory staff, state offerings, and the Finger Lakes Workforce Investment system, training on identifying barriers to employment and training, employability planning, career advisement, all services and programs operated by WFDYB and Finger Lakes Career Centers that may be of assistance to individuals seeking employment, systems for referral to services to overcome barriers; public transportation services, services to individuals with domestic violence issues, DV waivers, and services for individuals with substance use disorder or individual disabilities.

- e. Applicants in households **with** dependent children are required to participate in completion of an assessment:
 Yes No

- f. Applicants in households **without** dependent children are required to participate in completion of an assessment:
 Yes No

- g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:
 Yes No

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

The assessment is updated every six months at recertification and when any changes occur in the employment code.

Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

- The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
- The district enters employment plans directly into WTWCMS.
- The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTWCMS.
- The district develops individual employment plans using a local equivalent tool and later enters information into WTWCMS. Attached is the local equivalent.
 - The local equivalent **does not** contain additional elements other than what is required.
 - The local equivalent **does** contain additional elements beyond what is required, listed below:

Short Term Employability Development Plan: During orientation staff meets 1-1 with the client to complete a short term employability plan. (Att 3: Short-Term Employability Development Plan, EF23). At case opening staff meets with recipient and a more comprehensive employment plan is done using the WTWCMS employment plan.

WFDYB also incorporates into the Employability Development Plan the strategies and proposals developed by the client's ACCES-VR Counselor, Mental Health Counselor, or other qualified agency staff addressing the success of the client in employment. Requirements of the plan will include follow through by client of treatment recommendations.

b. Check one of the following:

- The same administrative unit or contractor that conducts employment assessments also develops employment plans.
- A different district administrative unit or contractor develops employment plans, and their qualifications include

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

Short Term Employability Development Plan: During orientation staff meets 1-1 with the client to complete a short term employability plan. (Att 3: Short-Term Employability Development Plan, EF23). At case opening staff meets with recipient

and a more comprehensive employment plan is done using the WTWCMS employment plan.

WFDYB also incorporates into the Employability Development Plan the strategies and proposals developed by the client’s ACCES-VR Counselor, Mental Health Counselor, or other qualified agency staff addressing the success of the client in employment. Requirements of the plan will include follow through by client of treatment recommendations.

- d. How often and under what circumstances is the employment plan updated?
The employment plan is updated as necessary or every six months at recertification and when any changes occur in the employment code.

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

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

Typically 14 days elapse after an individual’s case opening or status change before they are engaged in a countable employment activity. The main strategy used to meet participation rates is ongoing monitoring of recipients by case managers and supervisor. When SNAP plus TA grant amount allows, the district’s standard participation requirement for households with no children under age six is to assign 30 hours. For those households with a single caretaker of a child under age six the assignment is 20 hours. The district assigns all other case types up to 40 hours of work activities. An effort is made to assign enough hours to allow for cases of illness or other absences. Participation rates are monitored using Cognos and local reports.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	90	110

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

All staff assigned to TANF, SN-MOE and SN NON-MOE clients are responsible for thoroughly checking on a monthly basis the Cognos Reports under “OTDA, Employment Programs” the TANF/SN MOE and the SN NON-MOE detail reports. Assigned staff check the reports to make sure that the reports reflect accurate information. Any errors found or changes are acted upon immediately to ensure accurate reporting. Communication between the DSS TA staff and WFDYB staff is crucial because some of the corrections can only be done on WMS (DSS Temporary Assistance staff) and some can only be done on the WTWCMS system (WFDYB staff).

The Deputy Director and the Employment & Training Coordinator of WFDYB also review the bi-weekly Cognos OTDA reports (Earned Income/Employment Report, Participation and Engagement Status Report, Preliminary Federal Countable Not Countable Report, Monthly Employability Code Summary Report and Worker Participation Engagement Summary Report, etc.) to assist staff in targeting areas for improving participation rates.

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

All NTA SNAP recipients who are non-exempt are required to attend a WFDYB session for group orientation on resources available to increase family income. Non-exempt SNAP recipients are assigned to supervised job search and required to have 3 job search contacts per week and to report to WFDYB on a weekly basis to meet with their weekly case manager. Individuals are provided job search assistance and in submitting on line job applications in our career center. Individuals are assigned employment related workshops to attend.

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

N/A

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

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

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

TA applicants are required to have 5 job search contacts per week, with a minimum of 3 hours per week required for job search efforts. The applicants are required to report to WFDYB on a weekly basis to meet with their case manager. Other activities including placement into work experience, TASC and/or other basic education.

2. The district	Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
	TANF and SNA MOE	5	3	
	SNA Individuals	5	3	

istrict assigns TA **recipients** to Job Search. Yes No

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

TA recipients are required to have 5 job search contacts per week, with a minimum of 3 hours per week required for job search efforts. The recipients are required to report to WFDYB on at least a monthly basis, depending upon the engagement in other work activities.

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

WFDYB staff are aware of the DSS 3-month income reporting form (streamlined profit & loss statement) for the rare applicants/recipients already earning through self-employment. Self-employed people are scheduled to meet a business advisor from Onondaga Community College’s Small Business Development Center on her monthly appointment day in our office, and/or remotely at other times. We try to distinguish between hobbies and viable business ventures, with client self-sufficiency in mind, on a case-by-case basis. As for many entrepreneurs, often business development is only feasible as a supplement to employment for our clients. We encourage unlicensed, informal childcare providers making less than minimum wage either to expand by formalizing or to transition to work activities. Consideration is given to the parent’s access to childcare for his/her own children, ability to develop or use in-demand skills, job-keeping history, transportation resources, and so on, in deciding if this arrangement is the best for now. If unlicensed childcare is not the best option, the recipient will be

required to participate in the usual hours of activity weekly, not including the hours of provision of childcare. However, two weeks (or more if District permits on a case-by-case basis) will be allowed for the recipient to give notice to the parents of the children in care and to secure replacement care for his/her own children.

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

	Activity and Definition
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Unsubsidized Employment - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Subsidized Private Sector Employment - Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Subsidized Public Sector Employment - Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p>Work Experience - Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p> <p>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student’s education curriculum. (Note: Paid internships are to be reported as employment.)</p>

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>On-the-Job Training (OJT) - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Community Service - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Search - The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>
<ul style="list-style-type: none"> — SNAP 	<p>SNAP E&T Supervised Job Search- The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>

	Activity and Definition
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Readiness Training (JRT) Activities - Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual's employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> <p>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> • Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance. • Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Vocational Education - Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Job Skills Training - Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>

Activity and Definition	
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Education Training - Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Secondary School - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Provision of Childcare for Individual Participating in Community Service - Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>
<ul style="list-style-type: none"> — FA — SNA Fam — SNA Ind — SNAP 	<p>Other - Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>

Section 3.5 Job Development

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

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

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

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

A WFDYB Employment and Training staff member is assigned as full-time job developer (Business Service Representative) that functions as a liaison and contact for businesses and not-for-profit employers. The job developer contacts employers to market programs, and solicit jobs and work experience sites. The job developer completes all employer contracts and monitors sites; including WIOA-funded OJT contracts, TEAPs, collaboration with ACCES-VR for Work TryOuts, and “selling” WOTC and the federal bonding program.

Seneca County Industrial Development Agency has a Job Placement and Business Retention Services Representative that provides services to help support WFDYB’s efforts.

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Below is the description of how this is done, including number of staff, frequency of contacts.

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

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

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

The local state certified providers are Finger Lakes Community College (FLCC), Cayuga Community College (CCC), Tompkins Cortland Community College (TC3) and Wayne-Finger Lakes BOCES (WFL-BOCES). WFL-BOCES provides ABE and HSE on-site services 3 days per week; FLCC provides ESL and Spanish HSE classes in Geneva (accessible by bus). Literacy Volunteers of Seneca County provides basic literacy, basic computer training and English as a Second Language

programs for adults. Tutoring is one-to-one at locations and times mutually acceptable to both student and tutor. Literacy Volunteers partners with WFL-BOCES instructors to provide services.

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

If the assessment indicates that vocational education and/or job skills training would be appropriate the following procedure is followed:

Clients are matched to appropriate programs with the understanding that the successful completion of the training would produce a skill that is reasonably marketable within the local economy.

The funding streams used to pay for training are primarily WIOA and TAP/Pell grants, as well as grants secured by the training facilities. The WIOA system, through the Finger Lakes Workforce Investment Board (FLWIB), established partnerships with representatives that include providers of Adult Education/ Literacy, Vocational Rehabilitation and Higher Education. The Deputy Director is a member of the WIB's Consortium partnership. Some FFFS & SNAP E&T funding is used as needed to supplement. WFDYB also works with local colleges (FLCC, CCC and TC3) and WFL-BOCES.

- c. Describe the process and guideline workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity:

All individuals are assigned to take a TABE as soon as possible, usually within seven days of intake. This program is provided by WFL-BOCES. If the individual does not have their HSE they are assigned to class to work on obtaining it. If they have a high school diploma or HSE but their basic skills are low, then they are assigned to work on improving basic skills in ABE/HSE/ESL class, Work Keys Curriculum computerized lessons, or both. Literacy Volunteers can assist. Supportive services are offered so the individual can take advantage of these programs. See Section 3.8 for Strategies/Procedures for Accommodating Individuals with Limited English Proficiency.

- d. Describe the district's process and policy, including the guideline workers follow, when determining whether participation in educational activities is approved for individuals who have not attained a high school diploma who are interested in participating in an educational activity. Include in this section instances when the agency would deny participation in educational activities:

1. Individual is a recipient of TANF/SNA (indicating SNA households without children) or SNF (indicating SNA households with children, i.e. Safety Net families, SN-MOE), or SNAP and training is allowable under SNAP student rules.

2. The recipient demonstrates based on his/her individual assessment and Employment Plan, that he/she possesses the necessary skills, abilities, and aptitude to successfully complete the proposed training and get a job in the field with the existing credentials.
 3. Previous training history does not contain elements that would indicate a pattern of failure, without sufficient cause, to successfully pursue or complete programs, or a legal bar to employment in the desired field. More and more employers in this area are requiring high school completion for a new entrant to the field, even if the school does not make secondary completion an entrance requirement. Because of this trend, we strongly encourage continuation with HSE. In addition, a review and analysis will be completed regarding an individual's day care, other supportive service needs and family circumstances including any special needs of a child.
 5. Individual is able to meet the qualifications for entrance to training or training facility. Participation in education activities may be denied to individuals who engage in conduct that is disorderly, conduct that is insubordinate, conduct that is violent or conduct that endangers the safety, health or welfare of others. Disciplinary action, when necessary, will be firm and fair and will be handled on a case by case basis. If necessary, services would be referred to an alternate partner or another site/partner in our area.
- e. Describe the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities:
1. Individual is a recipient of TANF / SNA (indicating SNA households without children) or SNF (indicating SNA households with children, i.e. Safety Net families, SN-MOE), or SNAP and training is allowable under SNAP student rules.
 2. The recipient demonstrates based on his/her individual assessment and Employment Plan, that he/she possesses the necessary skills, abilities, and aptitude to successfully complete the proposed training and get a job in the field with the existing credentials. In addition, a review and analysis will be completed regarding an individual's day care, other supportive service needs and family circumstances including any special needs of a child.
 3. Previous training history does not contain elements that would indicate a pattern of failure, without sufficient cause, to successfully pursue or complete programs, or a legal bar to employment in the desired field.
 4. Individual is able to meet the qualifications for entrance to training or training facility. Participation in education activities may be denied to individuals who engage in conduct that is disorderly, conduct that is insubordinate, conduct that is violent or conduct that endangers the safety, morals, health or welfare of others. Disciplinary action, when necessary, will be firm and fair and will be handled on a case by case basis. If necessary, services would be provided by an alternate partner or another site/partner in our area.
- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:

A participant who was very close to achieving an educational credential in a demand occupation in this area might be approved for the post-secondary training needed to complete up to a baccalaureate. In general, we are more likely to see participants needing to complete an associate's degree in a demand occupation, and have approved the completion of the program of study. (We have no public 4-year colleges within commuting distance but are approving online education.)

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

Generally, the flexibility of an unpaid work experience program would best suit the schedule of a full-time post-secondary student. Our nursing homes are usually eager to flex a CNA's schedule around an LPN student's schedule. Federal Work-Study hours and community service could also be utilized.

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

Seneca County uses the same list of approved training providers as the Finger Lakes Workforce Investment Board (WIB). These providers are approved by the local WIB which consists of 51% business representation.

- i. The district procedure for advising participants of approved training providers is:

The case manager or training counselor refers and guides participants to the Finger Lakes WIB approved training provider list.

- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

Recipients are notified through their case manager/counselor of approved training. WFDYB staff both assess and develop employment plans with clients. Notification in person or via phone or mail of approval and/or requirements of a work activity is the responsibility of the staff. Notification is also provided to the individual of the support services and resources to assist them in complying with the selected work activity(ies). This update is reflected in the employment plan.

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

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

- A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
- The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
- The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
- The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
- The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
- Additional reasons as stated below:

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

Attendance is monitored by TA staff. At the initial orientation the school is called to verify that the individual is enrolled as a full time student. TA sends an attendance verification to the school district to complete. The student then provides the welfare examiner with a copy of their report card when issued.

- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:

The individual provides medical, substance use disorder, and/or psychiatric statements to the Agency. Those health-related limitations are factored into any assignment. Without disclosing the condition, the agency notifies the work activity contact in writing of any accommodations needed or any limitations. The participant may choose to disclose further information directly to the work activity contact. The counselor discusses the pros and cons of disclosure with the client.

Section 3.7 Work Verification

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

providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

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

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

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

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

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

The District's Quality Assurance Process is as follows:

The district will perform a random sample of (6) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment

case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTWCMS and documentation is in the file to support hours reported on WTWCMS and that the scheduled hours on WTWCMS is consistent with the documentation.

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

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

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

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

Use of Outside Providers/Vendors

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

Yes No

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

Yes No

If No, please describe the process used below:

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

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

When a combination of translated forms and informal interpretation services is inadequate for any clients with limited English proficiency (nearly always Spanish speakers), online translation services and phone interpretation services are utilized. WFDYB is staffed with a credentialed Bilingual Employment & Training Counselor (Spanish Speaking). Literacy Volunteers of Seneca County provides an opportunity for English as a second language students to improve their English-speaking skills and their speaking with confidence. FLCC offers Spanish HSE at the FLCC Geneva Center, accessible by bus.

Section 3.9 Strategies/Procedures for Increasing Program Attendance

Describe district policies and/or procedures in place to reduce the amount of time participants fail to participate in work activities, including absences that are with good cause:

Each participant is assigned a case manager. That person meets on a biweekly basis with the individual to work through any problems or barriers to participation.

Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants

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

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

When the sanctioned individual is within two weeks of the end of the durational period the case manager contacts via phone/mail to offer services and assistance to help the person have all the necessary supportive services in place so they can get back into compliance.

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

Periodically during an “until compliance” sanction, the case manager sends a letter to offer services and assistance to help the person have all the necessary supportive services in place so they can end the sanction.

Section 3.11 Strategies for reducing the need for TA

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

Diversion payments will be provided to applicants to assist them in starting or retaining employment and diverting them from the need to receive temporary assistance

Childcare

Employment related clothing

Transportation - Bus passes and gas cards

License and other work related fees

Job related safety equipment
Automobile repairs/towing
Automobile Insurance
Other payments on a case by case basis

Section 4 Support Services

(Reference 18 NYCRR 385.4)

Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants the following expenses which the district deems necessary for the individual to participate in orientation, assessment, employment planning, approved work activities and activities to restore self-sufficiency:

Childcare – not to exceed the state allowed rates
Employment related clothing - up to \$150
License and other work related fees – up to \$200
Job related safety equipment – up to \$200
Automobile repairs/towing – up to \$850
Automobile insurance – up to \$500
Transportation – gas card or bus passes or the mileage reimbursement rate at the IRS established rate for medical/moving purposes
Other payments and limits on a case by case basis (i.e. - Fingerprinting for background checks)

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

Please check all that apply:

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

Bus passes for the public transportation service will be provided to the participant as needed. If the individual has transportation, and gas cards are not the best mechanism, the mileage reimbursement rate is the IRS established medical/moving rate per www.irs.gov.

Gas cards are available to help an individual get to work.

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

The maximum distance a client would be expected to walk is 1.5 miles.

- d. The district will provide the following services to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:

The public transportation has limited "dial a ride" available for those individuals not on the main transportation line. The maximum distance a client would be expected to walk is 1.5 miles. This is at most a 30 minute walk to access other transportation or directly to work. The WFDYB will provide accommodations on a case by case basis for any individuals with limitations who walk to work activities.

Section 4.2 Transitional Support Services

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

Employment related clothing

License and other work related fees

Job related safety equipment

Automobile repairs/towing

Transportation – gas card or bus passes or the mileage reimbursement rate at the IRS established rate for medical/moving purposes. The agency, on rare occasions, will reimburse for the actual cost based on reasonable documentation submitted by the work activity participant.

Support payments are discretionary and require approval at the Deputy Director/Director level.

Other payments on a case by case basis.

The district will provide the following support services, for up to 90 days after case closing, to individuals whose TA cases have closed due to employment:

The district will provide the services described in Section 4.2 to individuals to maintain employment for up to 90 days after case closing due to employment. Such services will be provided on a case-by-case basis, requiring verification as necessary to establish need.

Section 4.3 Extended Support Services

As long as funding is available (through FFFS, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines:

- Employment related clothing
- License and other work related fees
- Job related safety equipment
- Automobile repairs/towing
- Automobile insurance
- Transportation – gas card or bus passes
- If the individual has transportation, and gas cards are not the best mechanism, the mileage reimbursement rate is the IRS established rate for medical/moving purposes. The agency, on rare occasions, will reimburse for the actual cost based on reasonable documentation submitted by the work activity.

Section 5 Conciliation, Sanction and Dispute Resolution Procedures

(Reference 18 NYCRR 385.11 and 385.12)

Section 5.1 Conciliation

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

- in person
- by phone
- by mail

A conciliation notice is issued when it is determined that an individual has refused or failed to comply with employment requirements. The Social Welfare Examiner and the Employment and Training Assistant/Counselor will consult and review all conciliations and assess for positive resolution. If it is determined that the individual was not willful, and/or had good cause for the failure to comply with employment requirements, no negative action will be taken. If there is a disagreement supervision from both departments will provide guidance.

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

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

A conciliation notice is issued when it is determined by client's employment worker and the social welfare examiner that an individual has refused or failed to comply with employment requirements. If it is determined that the individual was not willful, and/or had good cause for the failure to comply with employment requirements, no negative action will be taken.

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

- in person
- by phone
- by mail

A conciliation notice is issued when it is determined that an individual has refused or failed to comply with employment requirements. If it is determined that the individual was not willful, and/or had good cause for the failure to comply with employment requirements, no negative action will be taken.

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

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

A conciliation notice is issued when it is determined that an individual has refused or failed to comply with employment requirements. The Social Welfare Examiner and the Employment and Training Assistant/Counselor will consult and review all conciliations and assess for positive resolution. If it is determined that the individual was not willful, and/or had good cause for the failure to comply with employment requirements, no negative action will be taken. If there is a disagreement supervision from both departments will provide guidance.

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

Weekly or biweekly appointments with an employment worker help to keep SNAP recipients engaged in job search, workshops, or other required activities. If a SNAP recipient misses his/her scheduled orientation appointment, a subsequent letter is sent with a second appointment date and time. A conciliation notice is sent to inform the client of an impending sanction and that demonstrating compliance with the assigned work activity is the way to avoid a SNAP E&T sanction. Providing proof of 3 job searches with their response to conciliation within 10 days will demonstrate the clients compliance to avoid a SNAP Sanction.

Section 5.2 Sanctions

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

If an individual wishes to end their employment sanction they must contact their employment case manager They must verbally indicate a willingness to comply and

complete the assigned activity such as Job search, or Work Experience. If the individual complies for 10 days they will be deemed in compliance and the sanction will be lifted. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply.

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

If an individual wishes to end their employment sanction they must contact their employment case manager. They must verbally agree and demonstrate compliance by completing the assigned employment activity such as job searches or Work Experience. If the individual complies for the 10 days they will be deemed in compliance and the sanction will be lifted. SNAP benefits are restored when the duration of sanction has expired and client indicates a willingness to comply. An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefit.

Section 5.3 Dispute Resolution

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

The grievance is mediated by:

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

Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals

(Reference 18 NYCRR 385.2)

Section 6.1 Disability Determination Process and Tools

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

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

Other process (please describe):

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

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

The District Utilizes the LDSS-4526 form and accepts this statement from the client's physician(s).

At the application stage, if an applicant states a disability, either physical, mental health, or both, the DSS intake worker requests the LDSS-4526 form(s) be completed by the applicant's physician and returned within 10 days of the intake date. Once the form is returned, the DSS Social Welfare Examiner makes their determination of work limitations and the appropriate employment code.

WFDYB and TA staff regularly share medical reports, regardless of who requested them for our mutual clients. TA requests medicals at application and recertification appointments for anyone who discloses a disability or medical/psychiatric limitation. WFDYB requests the medical when the client has disclosed additional information or when a known limitation of 1-3 months' duration needs to be rechecked, or when additional medical information is needed to assist a client whose conditions are managed by multiple doctors' offices.

Section 6.2 Mental Health Screening and Assessment

The district is administering a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted, in addition to screening for a disability that occurs as part of the application or disability determination process

Yes No (*If No, section 6.2 is complete*)

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

If yes: Does the district use the LDSS 5009 - Mental Health Screening Tool and/or the computer assisted version of the Modified Mini Screening tool (MMS)?

Yes No

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

If using a screening tool other than the MMS, indicate the screening tool used:

Describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result:

Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))

An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist the individual in recovering from a mental or physical impairment, accept referral to and enrollment in a program of vocational rehabilitation, training, and/or other essential rehabilitation, and provide requested evidence that he/she is participating in the assigned program.

- a. Following is the district's procedure for determining if an individual who is unable to work due to mental or physical impairment has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 6.1 of this plan. Included here is who (e.g., medical practitioner, employment worker, TA worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also included is the source and type of information used to make the determination (e.g., information from individual's medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.):

We capture from medical reports (LDSS-4526 and facility-specific forms) the treatment or additional assessment recommendations made by medical practitioners and other health care practitioners. Their recommendations become the foundation of the person's self-sufficiency plan.

We rely heavily on the answers in the forward-looking parts of the LDSS-4526, recommendations for additional treatment, and the SSI referral section to help distinguish between the SSI/SSDI-only path, and the path to return to employment. Much of this also depends on the ability of the person with limitations to be either accommodated at work, or retrained in another field

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

The treatment plan's components are harvested from the various medical reports. When we suspect additional factors, as yet undiagnosed, we add referrals to other sources of assessment. Professional assessment using Medicaid can be difficult to find. We make facilitated referrals to ARC of Seneca Cayuga's Karl D. Warner Clinic when we suspect an undiagnosed developmental cognitive disability. When a neuropsych exam is

warranted for a person suspected of other mental disabilities, we make a facilitated referral to ACCES-VR for the diagnostic tests, but only for those whose goal is vocational rehabilitation.

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

WFDYB requires monthly documentation from most exempt clients of their attendance at the treatment or rehabilitative providers mentioned in their self-sufficiency plan. Case managers track the compliance with the treatment plan, assisted by the E&T Coordinator. New medical reports (requested by TA unit at recertification) or new limitations are the most frequent trigger to update a treatment plan.