

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

January 1, 2020 – December 31, 2021

## **St. Lawrence County**

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## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the St. Lawrence 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 St. Lawrence 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/ CRR            1/9/2020

Chris Rediehs, Social Services Commissioner

1/9/2020, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## Section 2 Administration

### Section 2.1 Administrative Structure

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

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

The Commissioner of Social Services is responsible for the direct supervision of the Employment unit Supervisor. The unit Supervisor is responsible for the direct supervision of the unit staff members and daily program operation. Employment unit staff are responsible for the daily services, to include: program activity development and referral, support service delivery to DSS applicants and recipients, dispute resolution, maintenance of the data record and conciliation and sanctions in conjunction with designated TA staff. There are no outside operators.

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

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

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

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

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
IMA(state contract)	\$1,000	<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%	Physical, Psychological, IQ Exams and Testing
	\$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%	

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

**Table 2 – Other Service Providers**

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

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
NYS DOL	DOL	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Job Listings, Job Referrals, Resume help, Job Fairs, JRT Workshops
American Job Center	Workforce Innovation and Opportunity Act	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Career Planning, Vocational Training, Career Counseling, Youth Programs to include Summer Youth Employment Program
Cornell University Cooperative Extension	Cornell University	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Working Families Workshop and Nutritional Job Readiness Training-to include Money management., Financial Literacy, Energy Conservation, Food Management
SLLBOCES	BOCES	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Educational Training, Vocational Training, SNAP Venture Program.
Access VR	NYS Ed	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Assessment, Career Planning, Continuing Educational Services, Job Search, Placement, Coaching, Vocational Training, Voc Rehab, support services
JOBS	OTDA	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Applicant TA, SNAP and 200% up front job services, Job Readiness and Job Search for recipients, Job referrals
Literacy Volunteers of NNY	NYS Ed	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Remedial reading and writing in English.
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

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

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

#### Other Services Requested

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

Provide front door employment services to TA applicants, SNAP, and TANF 200%. Provide resume preparation, application preparation, federal bonding information, and WOTC tax credit information.

### Section 2.4 Access to Services at New York State Career Centers

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

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

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

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

The Temporary Assistance Employment Program is a mandated partner for the WIOA programs. The district Employment Unit Supervisor and sometimes the local Commissioner of Social Services attend monthly partner meetings. Partners are currently engaged in forming strategies and referral processes for sharing of information



and clients. DSS Employment unit staff are colocated at American Job Centers in Canton, Massena, and Ogdensburg.

## 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:

N/A

### 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:

Explanation and schedule of local DSS Applicant Job Search requirements.

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:

Applicants are provided an orientation within 10-14 days of application. This may be done either in a group setting or on an individual basis depending on the area or personal circumstances. Medical and non-medical exempt individuals are provided an orientation on an individual basis within thirty days of application or when the case opens. Orientations are scheduled in Canton, Massena, Ogdensburg, or Gouverneur, for the convenience of the client.

### 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 WTWCMS. Attached is the local equivalent.

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

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

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

The employment assessment is an ongoing process. It starts at application and continues to the day of case closing. Employment assessments are completed every 6 months, or sooner, if client circumstances change. Employment assessments are completed by the Employment Counselor and the information is entered directly into WTWCMS.

c. The district administrative unit or contractor responsible for conducting assessments is:

The St.Lawrence County Department of Social Services Employment Unit.

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

Employment Counselors have been trained in effective assessment techniques on how to administer the Employment assessment. They also meet the County Civil Service requirements for Employment Counselor.

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?

Every 6 months or sooner, depending on the clients circumstances and if there are any changes to their circumstances, for example if a nonexempt individual has a physical or mental impairment that would limit their ability to participate in work activities.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

a. Check one of the following:

The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):

The district enters employment plans directly into WTWCMS.

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

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

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

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

b. Check one of the following:

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

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

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

The procedure follows the same as the Employment Assessment . The Employment Plan is completed at time of Assessment as the detailed Employment Assessment will be used to determine appropriate Plan details.

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

The Employment Plan is updated at least 6 months or sooner. In addition, it could also be updated as needed based on changes in individual circumstances.

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

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

The local district engages clients in employment activities on the day of application. Assessment is on-going and leads to the development and periodic modification of the client's Employment Plan. In cooperation with their Employment Counselor referrals for non-exempt Family Assistance cases to appropriate activities occur during the upfront Job Search / Job Readiness Training, after an assessment and the intializing of an employment plan. Clients whose status change from exempt to non-exempt will be

reassessed by Counselors within 30 days of the change in their status for Employment Plan modifications and subsequent engagement in work activities. Staff will continuously monitor the performance of clients engaged in activities and will reassess and revisit the employment plans as appropriate, amending or making additional referrals for clients as needed.

The local district will strive to fully engage each client in employment activities. The weekly hour participation standard requirement for Family Assistance cases is up to 40 hours per week. Safety Net Non-MOE will be up to 40 hours per week and work limited individuals will not exceed the hours recommended on their medical evaluation. The maximum assigned hours of countable activities per week will be up to 40 hours for all non-exempt cases.

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	276	341

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

The local district monitors performance by utilizing data available to all Employment Unit staff in WMS, WTWCMS and Cognos at both the unit and worker levels as well as by specific providers. Reports are carefully screened for information on client engagement and participation levels and assist in providing a continuous quality review in the determination of the need for activity assessment or referral. Reports utilized include, but are not limited to:

Safety Net Non-MOE and TANF and Safety Net MOE Worker Participation/ Engagement Summary Reports, run after the 18th of the month for the previous month report, to review the month's participation and engagement rates, which clients are in the count, who is non-exempt and not participating and in need of engagement.

Safety Net Non-MOE and TANF and Safety Net MOE Detail Reports, run after the 18th of the month for the previous month report, to review the participation rate and the clients in the count listed by name and activity.

The Preliminary Federal Countable/Not Countable Report and the Preliminary Safety Net Non-MOE Countable/Not Countable Report, run the third week of the month, used to monitor who is participating based on scheduled and /or actual hours for the current month.

The Omission of Hours Report, run before the 15th of the month, used to determine what timesheets are missing for the previous month.

WTWCMS Listing Reports to monitor caseloads of unit staff to include case types, numbers and distribution.

The Cognos Participation and Engagement Status Report grouped by worker to monitor current levels of engagement in employment activities for individual counselor caseloads.

- 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):

N/A

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):

NTA SNAP applicants and recipients that express interest in Job Search assistance are referred to the Employment Unit for aid and opportunities in locating employment. They have access to the Career Centers and partner agencies. Our OTDA Job Specialist is also stationed 2 half days per week at the front door to assist in employment services at the time of application.

- 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:

A daily applicant listing is sent to the Employment Unit Supervisor the day after application. It is then emailed to all Employment Counselors. The Employment Counselor then mails applicants an appointment letter for orientation/job search/assessment and also a job search log to be completed with 5 job search contacts to be provided at the first scheduled appointment. Individuals who show are then given another job search log to be completed with 5 more contacts to be submitted the following week. Individuals are given a schedule with dates of attendance. Counselors may also mandate appropriate Job Readiness Training or even a Job Club.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	5 contacts per week for 4 weeks	2 hours per week for 4 weeks	
SNA Individuals	5 contacts per week for 4 weeks	2 hours per week for 4 weeks	

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

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

TA recipients are required to participate in Job Search and are referred to Job Search activities such as Job Fairs, Job Clubs, Prep Club, Individual Job Search with the Employment Counselors or OTDA, SUNY Attain Lab. Our association with the American Job Center and the partner agencies easily provides us with opportunities for this referral process.

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.

Recipients that report self-employment to their Employment Counselor may have the time count towards their 40 weeks of participation. The Employment Counselor will review the clients budget and any documentation, including type of work, rate of pay, and hours per week. The client will need to present self-employment logs or a signed employers' statement. Countable hours will be based on the receipt of federal minimum wage for the occupation.

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><b>Unsubsidized Employment</b> - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>

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



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

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

### Section 3.5 Job Development

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

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

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

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

There are 5 Employment Counselors that are able to job develop. This may be done by referral to job fairs and specific employer outreach events. We also coordinate with local WIOA and NYSDOL partner staff to receive job listings and knowledge of referrals of mutual clients.

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:

St. Lawrence County has two service providers who offer Adult Basic Education, Test Assessing Secondary Completion (TASC) preparation, or English Language Instruction. Literacy Volunteers of St. Lawrence County provides English as a second language tutoring as well as basic skills instruction for low functioning clients. The St. Lawrence-Lewis Board of Cooperative Educational Services provides Adult Basic Education instruction and Test Assessing Secondary Completion preparation and testing. Both providers are cooperative partners and accept referrals on a continuous basis.

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

The local district is a partner member in the St. Lawrence County American Job Center which maintains a list of New York State eligible providers of vocational and occupational training. Current information on programs including prerequisites and costs are available through the Center. Information regarding Job Skills Training programs that contact the Center or DSS Employment Unit is readily disseminated to staff for client assessment / goal consideration.

- 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:

Employment Counselor observations and utilization of the TABE, (Test of Adult Basic Education), as well as client self-attestation during the assessment process determines the need, desire and ability of clients to participate in educational opportunities.

Referrals to the SLLBOCES for TASC or ABE, and Literacy Volunteers of Northern New York for basic literacy instruction or English as a second language tutoring are made as appropriate.

- 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:

Individuals who do not possess a high school equivalency or diploma or assess below the ninth grade level on the TABE are strongly encouraged to participate in remediation as an employment requirement and part of their Employment Plan. The agency would deny participation in educational activities when specific basic requirements or prerequisites for particular vocational or occupational training and careers may prohibit or limit client success or participation, i.e. driver's license, criminal back ground check, medical limitations.

- 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:  
The Employment Counselors through the assessment process identify the vocational education activity and/or job skills training that will assist the client with meeting both the short and long term goals set forth in the individual's employment plan. The Employment Counselor makes a recommendation to the Employment Unit Supervisor for approval, enters the enrollment on WTW CMS and provides notification to the client.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:

The district will approve up to two years of post-secondary education, that culminates with a certificate or degree, as a work activity.

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

The district enrolls clients into post-secondary education that is scheduled to exceed 12 months by semesters. In the fall semester, the enrollment would cover September, October, and November. The spring semester would cover February, March, and April. This strategy allows for the twelve month limit to be spread out over two years of education. In the months not enrolled in post-secondary activity the clients are expected to participate in work experience or community service to continue to be eligible for post-secondary education as an employment activity. Individual Employment Counselors monitor their caseloads using alerts to ensure that clients are receiving 20 hours of a work activity when they are beyond the limit.

- h. Education and training providers are evaluated by the following standards:  
.The district utilizes documented effectiveness of the training either by obtaining a summary of classroom training records or demonstrated effectiveness through positive outcomes such as job placement, enhanced skills for the workplace, obtaining professional certification, or obtaining certificates for successful skills demonstration and completion. Providers are credentialed by New York State Department of Education.
- i. The district procedure for advising participants of approved training providers is:  
The district maintains a list of approved training providers which is shared with individual clients at orientation, assessment, employment plan development and through other contacts with the Employment Counselor.
- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:  
St Lawrence County utilizes WTWCMS enrollment paperwork.
- 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:

The individual students' attendance and satisfactory participation is verified through contact with the school guidance office.

- 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 Employment Counselor notifies the work site / program provider in writing of the client's work limitations. Client feedback and onsite visits by the Employment Counselor are used to monitor site adherence to accommodating the limitations.

### **Section 3.7 Work Verification**

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;

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

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

The district will perform a random sample of (10) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTCMS and documentation is in the file to support hours reported on WTCMS and that the scheduled hours on WTCMS is consistent with the documentation.

The district will perform a random sample of (10) cases semi-annually for participation in **unpaid work activities** to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTCMS, excused absences and holiday time are documented in the case file and correctly reported on WTCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTCMS by district or provider staff.

The district will perform a random sample of (5) 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 (5) 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:

In St. Lawrence County there is occasion to serve non English speaking clients. Language Line posters are available in public areas so the client can point out their language. Arrangements are made to link them with an interpreter. The individual may be also referred to Literacy of Northern New York, which provides remediation in English as a second language.

### **Section 3.9 Strategies/Procedures for Increasing Program Attendance**

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

The Employment Unit staff work closely with clients to facilitate overcoming personal barriers impeding participation. Referral to other agencies for more specific intensive services is common. Carpooling and bus travel are encouraged when practical. Once in an activity, (except for unsubsidized private/public sector employment and on the job training), we have implemented a weekly time sheet system which allows for monitoring of attendance and quick response to problems. The time sheets also provide the documentation to allow us to pay support services to the client in a timely manner.

Clients are counseled on how to work with providers to "make up" lost time within a monthly timeframe. Therefore, when necessary and possible they are allowed to participate over and above their daily regularly scheduled hours to achieve attainment of their monthly scheduled hours.



The reason for an absence is noted by the provider on the client's timesheet. The Employment Counselor makes final determination of allowing "absence for good cause," e.g. health appointments, legal appointments, and unanticipated illness. The Counselors counsel clients to schedule appointments of any type around their scheduled hours in a work activity.

### **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:

The district staff contact clients that are sanctioned until compliance and allow the client to come into compliance with the sanction. Once compliance has been demonstrated the information is sent to TA/SNAP and the SWE can add that person to the case. Compliance is defined as attendance and satisfactory participation for designated hours per activity for at least five business days, if applicable. Support services are made available during the effort to comply.

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

Clients completing a durational limit of a sanction are sent a letter to meet with the Employment Counselor and counseled on how they can show compliance. Clients whose sanction has expired are required to meet with their Employment Counselor on a regular basis until in compliance or their case closes due to failure to attend an ongoing eligibility appointment.

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

NA

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

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

The district engages non-exempt applicants in job search and job readiness training within approximately two weeks following application. Scheduled for a four week period, applicants are required to make a minimum of five job contacts per week to a total minimum of 20 contacts. Employment Counselors work with the applicants/recipients in job clubs to enhance the opportunities for employment. Satisfactory participation is required. An OTDA Job Program Specialist is located at DSS 2 half days per week to provide employment services to TA applicants, SNAP applicants, and individuals whose incomes do not exceed 200% of the Federal poverty level in order to reduce the need for Temporary Assistance.

## **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:

Support services may include, but are not limited to transportation assistance; nonrecurring payments such as car repair, clothing, tools and equipment; payments to obtain a permit or license; certification/licensing fees, educational fees; etc. The district will not pay fines to obtain driver licenses. These services are reviewed on a case by case basis with respect to need for activity participation and/or with the intent to allocate payments when another agency providing an activity is unable to do so. There are life time maximum limits of \$1,100.00 on car repair and \$1,000.00 on car insurance. Clothing expenses may be paid up to \$150.00 per activity. Exceptions may be made at the discretion of the Employment Counselor with the Employment Supervisor's review and approval.

- 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): St. Lawrence County's base mileage reimbursement rate is to use 1/2 of the federal mileage reimbursement rate currently .29 cents per mile. We encourage carpooling and authorize the use of public transportation when possible. When necessary, the use of a taxi cab is authorized.

- 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 district does not allocate transportation support services for a participant if he/she resides within a two mile radius of the work activity site. Personal disabling circumstances, weather, and childcare provider location are cause for exceptions to this rule. Other types of exceptions are reviewed as they occur.

- 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 district may provide individuals the following support services to obtain and/or maintain employment-DMV associated allowable costs, transportation related

expenses, and clothing expenses. Requests are reviewed on a case by case basis, with respect to need, availability of funds, and availability of services through other resources or community programs.

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

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

Employed active clients may have the full array of services available to them, as well as the employment related services of their Employment Counselor, ie transportation assistance, car repair, clothing, tools, DMC costs. Documentation of attendance may be required.

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 may provide the full array of supportive services to post employment individuals as indicated above. Childcare reimbursement is provided through the Daycare Unit in the DSS Accounting Department.

#### **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:

Youth and adults that are certified 200% TANF eligible and participating in Workforce Innovation and Opportunities Act programs may be considered for the full array of supportive services as mentioned above. Services will be reviewed on a case by case basis with respect to need for activity participation, and/or with the intent to allocate payments when another agency providing an activity is unable to do so.

### **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

The conciliation process is as follows:

1. The client does not satisfactorily participate in an assigned activity as recorded in their Employment Plan showing referral and supportive services as appropriate.

2. The Employment Counselor gathers together the documentation and records on the CMS the breach in plan, date of occurrence, and action requested.

3. The Employment Counselor refers the conciliation request to the Employment Unit Supervisor for review and approval.

4. Upon approval, a conciliation letter is generated by the Employment Counselor utilizing WTWCMS. The conciliation notice letter is then mailed to the client.

5. The letter indicates to the client the reason for the conciliation, who to contact and the timeframe to do so, 10 days for both a Safety Net and Family Assistance case.

6. Once contact is made by the client, the Conciliator reviews the conciliation and may ask for further information from the Employment Counselor or client.

7. The Conciliator makes a decision based on the case presented by the client and available documentation. If the client responds within the time allotted and can demonstrate that the action was not willful and was with good cause the case will not be sent for sanction. If the documentation and information presented indicate a willfull cause for non-compliance or if no response is received from the client, the case is reviewed and sanction is recommended. The Conciliator will record on WTWCMS the outcome of the conciliation process. It is then sent to the Employment Unit Supervisor for review.

8. Upon the completion of a supervisory review, the referral for sanction is sent to the TA/SNAP Supervisor to be imposed.

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

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

The Employment Coordinator, who does not have a caseload, has been designated as the Conciliator. All conciliation referrals are sent to the Conciliator first. All outcomes from the conciliation process are then sent to the Unit Supervisor for review and concurrence.

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

SNAP conciliation process is the same as the TA process. If a SNAP Job Search log is submitted at conciliation, a SNAP sanction referral may not be made.

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

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

The Employment Coordinator, who does not have a caseload, has been designated as the Conciliator. All conciliation referrals are sent to the Conciliator first. All outcomes from the conciliation process are then sent to the Unit Supervisor for review and concurrence.

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

Compliance is demonstrated by the satisfactory completion of at least five verifiable employer contacts submitted for review prior to the date of 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:  
Individuals who are on a first non-compliance or whose durations have expired will be mailed a letter by the Employment Counselor requiring them to attend an appointment to determine willingness to comply. If the client indicates willingness they will be referred for activity enrollment. The sanction will only be removed upon satisfactory participation in an assigned activity. Compliance shall be defined as reporting to a required assignment, starting and participating satisfactorily for at least 5 business days before the sanction will be lifted.  
Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply. This cannot be earlier than the expiration of the minimum duration period.
- b. The district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 385.13), including the time period established for demonstrating compliance to the satisfaction of the district is:  
SNAP applicants and recipients whose sanction has expired will be mailed a Job Search log to record 5 employer contacts. In order to avoid a SNAP sanction the client responds with a minimum of five completed verifiable employer contacts on the log so that they will be deemed as in compliance. SNAP benefits are restored when the individual demonstrates compliance. This cannot be earlier than the expiration date of the minimum duration period. An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that they are exempt from SNAP work requirements and is otherwise eligible for SNAP benefits.

### **Section 5.3 Dispute Resolution**

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

The grievance is mediated by:

- An agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case

Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

## **Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals**

(Reference 18 NYCRR 385.2)

### **Section 6.1 Disability Determination Process and Tools**

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

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

Referrals to IMA are made for medical and psychological evaluations when required or warranted.

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:

### **Section 6.2 Mental Health Screening and Assessment**

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

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

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

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

- Yes       No

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

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

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

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

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

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

The Medical Review team, which consists of the Employment Supervisor, an Employment Counselor and as necessary the DCAP Coordinator, makes a determination based on medical documentation provided by service agencies, Employment Counselors, Social Welfare Examiners, medical specialists or primary health care providers. Based on all available information individuals are referred to appropriate treatment. If determined that the treatment will not lead to employability the individual is referred to the Disabled Client Assistance Program (DCAP).

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

When all available information is gathered, the Employment Counselor meets with the individual to complete an Employment Assessment and Employment Plan. The Employment Counselor counsels the individual as to what the treatment plan entails and

what will be required when they are enrolled. The Employment Counselor will then make a referral(s) to the appropriate agency for rehabilitative services.

- 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:

Client attendance and participation at the rehabilitative appointments are mandatory and written into the client's Employment Plan as Treatment. The Employment Counselors monitor and track compliance on a monthly basis through the use of enrollment on WTCMS and time sheets. When time sheets are not submitted timely the Employment Counselor will attempt to contact the client to check their circumstances. If unable to do so, the client may be referred for conciliation. Employment Counselors will make contact with clients on a regular basis as a follow up to the referral and engagement of services.