

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

January 1, 2020 – December 31, 2021

Steuben County

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Section 1- Assurances

As a condition of the receipt of federal and State funds the Steuben 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 Steuben 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/ KAM 01/28/2020

Kathryn A. Muller, Social Services Commissioner

01/28/2020, 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 Steuben County Department of Social Services is responsible for the operation of the Temporary Assistance and Supplemental Nutrition Assistance Program (SNAP) Employment Services program within the County. This program is under supervision of the Director of Temporary and Disability Assistance and consists of a Principle Social Welfare Examiner, a Work Program Coordinator, four (4) Senior Social Welfare Examiners, seventeen (17) Social Welfare Examiners, three (3) Typists, two (2) Community Service Workers and contracted ABAWD monitor. Senior Social Welfare Examiners oversee the Social Welfare Examiners who are responsible for employability determinations, orientation, assessment, employment planning, assignment to work activities, monitoring of participation, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, referrals and coordination for supportive services, conciliation, sanction, and dispute resolution. Typist and Community Service Workers provide clerical support to the Unit. The Principal and Work Program Coordinator oversees and supervises all staff activities, manages the staff, and has oversight of the general operations of the TA\Employment Unit and contracted staff. The Director of Temporary and Disability Assistance is responsible for monitoring program operators contracted by the Department.

Transporters are available to assist as needed with transportation to Independent Medical Exams.

Additional contracts have been established for Employment Development Specialists and a Lead Job Developer who operate at the Chemung-Schuylar-Steuben (CCS) Workforce NY Career Centers in Bath, Corning and Hornell who work with individuals for 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
Pro Action of Steuben & Yates, Inc	\$332,050	<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%	Case Management at CSS Workforce NY Career Centers and related job search facilitation. Services and activities may include, but are not limited to: 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 and brokered trainings through an approved organization including Chemung-Schuylers-Steuben Workforce NY.
Pathways, Inc.	\$36,000	<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%	Review and monitoring of ABAWD requirements and compliance with same and other specified duties. Transportation.
Transportation Initiative	\$20,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other Grant revenue	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Provides transportation services in the form of repair of motor vehicles and related expenses (i.e. registration/insurance)

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
Greater Southern Tier BOCES	\$20,000	<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%	TABE Testing; HSE classes; trainings as requested
Building Independence for the Long Term	\$779,671	<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%	This is a multi-disciplinary team that includes a Master's level certified Social Worker, NYS licensed Psychologist, a Mental Health certified therapist and a CASAC, Domestic Violence Liaison, Disability Specialist, CASAC Assistant, Administrative Assistant, Homeless Intervention Specialist. Typical services include Case Management, Drug and Alcohol screening, assessment, advocacy, crisis intervention, DV assessment and waivers, information and referral to services, parenting, housing services, incidental, transportation, and wrap around services.
Steuben County Department of Public Works	\$419,498	<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%	Provides supervised mobile work experience for clients.

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
Corning Community College		<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	Area community college - clients referred for education and training.
Alfred State College		<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200% 	Area State University of New York - clients referred for education and training.

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:

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 Employment Coordinator and the Director of Temporary and Disability Assistance participate in monthly partner meetings with Pro Action. The Director of Temporary and Disability Assistance, or designee participate in management level partner meetings quarterly. Case managers currently located at the Career Centers provide updates on individuals served and have access to DSS staff via telephone or email at any time for questions, concerns or direction needed to assist individuals. Job Developers also provide weekly updates to DSS staff and have open access as well. Contract staff has

remote access to WTCMS and utilizes this to enter notes and obtain necessary information to assist the clients. Career Center partners that are not contracted directly with the District can access staff at any time as well. Steuben County DSS has located computers in two of the Career Centers that allow any individual to utilize www.mybenefits.ny.gov and to complete applications or check on benefits. The Application for Certain Benefits and Services (DSS 2921) is available at each Career Center.

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:

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 of:

- participant’s responsibility to cooperate and participate in assigned activities and the consequences for failing to do so.
- potential assignment of up to 40 hours of employment or employment related activities weekly to all non-exempt individuals.
- how the hours that an individual is assigned to WEP is limited to the number of hours is determined by dividing the household’s TA grant plus SNAP allotment by the higher of the Federal or State minimum wage.
- Job Search requirements.
- requirements to meet with CSS Workforce NY Case Managers and consequences for failing to do so.
- acceptable medical providers and acceptable medical documentation for physical and psychological evaluations.
- the need for TABE (Test for Adult Basic Education) testing and who is exempt from same.
- how Temporary Assistance regulations allow households that would otherwise be eligible for Temporary Assistance to receive child care in lieu of the cash benefits. Any individual requesting to take this option will be referred to a Social Welfare Examiner.

- transitional Child Care may allow family assistance cases that close as a result of new or increased earnings to remain eligible for child care services, if qualified.
- the need to complete an Employment Plan at case opening.
- the local procedure dictates that Steuben County can require individuals without a high school diploma or equivalent to attend Basic Education classes
- the fact that Steuben County does not recognize Individual Education Plans (IEP) as high school diplomas and thus all individuals in possession of same will be referred to Basic Education classes..
- time limits for TANF and Safety Net and the consequences of meeting time limits
- regulations that any unmarried minor parent (under age 18) with a child in his or her care must be enrolled in high school and must be living with a parent, guardian or adult relative or other living arrangement approved by DSS in order to be eligible for Temporary Assistance for himself/herself, the child may continue receiving cash assistance.
- ABAWD definition and requirements; including countable activities.

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:

Group orientation is conducted by DSS staff and takes place during the application process. Under special circumstances individuals may receive a one-on-one orientation with DSS staff. At recertification, a one-on-one review of the orientation information takes place.

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:

Generally all Employment Assessments are completed after a case is open. All TANF applicants and recipients (regardless of exemption status), and 16 and 17 year-olds not in school and all households with dependent children receive a staff assisted assessment within 90 days of their eligibility. Additionally, households without dependent children, receive a staff assisted assessment generally within 90 days but no longer than one year after their application. Steuben County DSS TA/Employment Social Welfare Examiners conduct assessments. The TABE is also administered for most adult individuals seeking Temporary Assistance. The TABE is generally completed within two weeks of the date of application for Temporary Assistance. TABE is not required if the applicant provides documentation that they possess an associate's (or higher) degree and/or the individual is verified to be 18-19 year olds and enrolled in High School

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

TA/Employment Social Welfare Examiners

- 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)]

Social Welfare Examiners are hired under Civil Service title "Social Welfare Examiner"

- 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?

Employment assessments will be updated at a minimum, every six months including at recertification. Employment assessments will also be updated whenever there is a reason to believe that an individual has a physical or mental impairment limiting their work activities or whenever there is a change in an individual's circumstances effecting their 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.

Employment plans are completed for all non-exempt clients. Individuals are scheduled to meet with a Social Welfare Examiner to complete the plan. The district utilized the LDSS-4878 when a computer is not readily available or otherwise is completed directly in WTW CMS. When completed in WTW CMS a copy of the completed form is printed and provided to the client. When completed via LDSS-4878 the document is scanned into IEDR.

The employment plan is to be goal specific to the individual and encompass the individual's preferences (as indicated in the assessment) and any limitations.

Specific short and long term goals will be devised with the individual and written step by step to ensure full understanding and expectation.

Work activities will be assigned with consideration for any documented limitations and preferences if the individual.

If the individual's preferences cannot be considered, reasons why will be documented.

Any supportive services will be identified.

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

The Employment plan will be updated at a minimum, every six months including at recertification. The plan will also be updated whenever there is a reason to believe that an individual has a physical or mental impairment limiting their work activities or whenever there is a change in an individual's circumstances effecting their work activities, supportive services or goals.

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 weekly/monthly standard participation requirement may vary according to each family’s situation. For example, households with no dependent children, households with dependent children, single parent households or two parent households as defined in Section 385.8. Although the Agency encourages 30-40 hours per week of participation in “core and non-core” activities, participation in activities is assigned by Social Welfare Examiners is based on the needs and concerns addressed in the individual’s employment plan. The District monitors said participation using WTW/CMS and available reports as well as COGNOS reports.

Once a Temporary Assistance case becomes active, the Steuben County Department of Social Services Employment Unit begins engaging clients in work activities immediately. The same is true for clients whose status has changed from exempt to non-exempt.

Steuben County Department of Social Services may assign individuals up to 40 hours weekly. The hours assigned to WEP are limited to the number of hours determined by dividing the household’s TA grant plus SNAP allotment by the higher of the federal or State minimum wage.

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

	Households with Dependent Children Average Monthly	Households without Dependent Children Average Monthly
Individuals	350	450

- 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:

Steuben County uses Cognos reports to track Clients’ activities and let workers know which clients are not participating. Cognos reports are also used to formulate our County reports and Quarterly Reports. Most used reports are A&QI, Current Reports (Earned income Employment report, Employment code duration report, JS and JRT report, Participation and engagement status report) and Monthly Reports (Combined engagement report, TANF & SN Moe Detail Report, SN NON-Moe Detail Report).

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) recipients to participate in SNAP E&T work activities. If the district is offering Supervised Job Search as an E&T

activity component, the district must describe how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts. (Please note: Case management services must be provided to all participants enrolled in an E&T activity):

Steuben County is not mandating NTA SNAP applicants/recipients to participate in work activities. However, all employment services including job search, training, application assistance, etc. is available to all TANF, SN, MIXED and NTA SNAP individuals. All applicants are informed of the availability of Job Search assistance as well as other activities countable for meeting requirements when making application for SNAP during the interview.

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 recipients are informed of the availability of Job Search assistance as well as other activities countable for meeting requirements when making application for SNAP during the interview. Upon request the District will forward information regarding the resources available through ProAction and the local Workforce NY Career Centers.

- 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:

At initial interview for Temporary Assistance all applicants will be scheduled to participate in orientation.

All non-exempt applicants are referred to a Self-Sufficiency Assessment class. This class is held weekly and is made up of job search and employment readiness components. All eligible TANF applicants are required to participate. The Assistant Job Developer/ Employment Development Specialist leads this training and covers such topics as interviewing, resume preparation, and other soft-skills needed for successfully obtaining and maintaining employment. Proper job searching techniques are discussed and demonstrated and job searches are assigned.

Non- exempt applicants are required to perform up to five (5) job searches prior to Orientation. Orientation is scheduled during week two of the Self Sufficiency Training. The completed job search is necessary for admission into Orientation.

All individuals with a documented medical exemption depicting a recommendation for an application for disability benefits are referred to the Disability Advocate in the BILT

Unit to assist in the process of obtaining those benefits or others as deemed appropriate.

If deemed necessary for continued engagement additional grants fund provide individuals clothing, gasoline, vehicle repair, licensing fees, certification dues and other justifiable costs.

Non-exempt applicants can be assigned to job search for a minimum of 5 employer contacts weekly. Once assigned it is expected that applicants will spend no less than 7.5 hours per week for job search related activities and continue in self-sufficiency training.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	5	7.5	must be verifiable
SNA Individuals	5	7.5	must be verifiable

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

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

Non- exempt recipients will be assigned to job search dependent upon the number of hours and types of other activities. The goal is a minimum of five contacts per week and recipients spend no less than 7.5 hours per week for job search related activities. Intensive job search will require additional hours and additional contact. TA recipients will report their job search weekly to an appropriate staff or contracted staff person. All non-exempt individuals who are assigned to job search or job readiness training must report to the local Workforce NY Career Centers at a frequency of one time weekly to meet with Employment development specialists. This is done to meet the requirement of a weekly contact for all individuals registered in job-search activities. Case Management services are offered and may be required to assist individuals to pursue job leads, as well as obtain assistance with resume writing, interviewing and miscellaneous employment related activities that the Center offers.

- 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.
The District approves self-employment as part of an individual's required work activities.
- 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
<ul style="list-style-type: none"> <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>
<ul style="list-style-type: none"> <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>
<ul style="list-style-type: none"> <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>
<ul style="list-style-type: none"> <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>
<ul style="list-style-type: none"> <input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP 	<p>On-the-Job Training (OJT) - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>

Activity and Definition	
<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>
<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.

Activity and Definition	
<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>
<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.:

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.

The Steuben County Department of Social Services Employment Unit currently contracts for (1) Lead Job Developer and (3) Employment Development Specialists. The primary objective for these positions is to help clients work toward self-sufficiency by obtaining and maintaining gainful employment while staying in compliance with DSS job search requirements, thereby reducing the need for assistance. This is accomplished in part by assisting clients with overcoming barriers to employment by providing supportive services including obtaining proper identification, interview appropriate clothing, assistance with transportation, etc. Employment Development Specialists work one-on-one with recipients on a weekly basis to do intensive job search activities which include resume preparation, interviewing skills, and effective job searching methods. Work with local employers is also done to build relationships that might facilitate entry into employment opportunities, as well as advocating on the client's behalf as appropriate. The Lead Job Developer and Employment Development Specialists also work closely with the client's Social Welfare Examiner to promote training opportunities when applicable. The Lead Job Developer supervises the program's day to day operations including staff training, maintaining necessary program reporting, curriculum updates, intensive case management services, etc. The staff works together to conduct Job Readiness Training and Extreme Job Search activities with recipients as needed.

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:

TABE testing is provided through a contract between Steuben DSS and GST BOCES. Services for Adult Basic Education and TABE are not provided by any other agency in Steuben County. GST BOCES reputation is exemplary and they provide for Work Force Development across the Chemung, Schuyler and Steuben area.

Staff from GST BOCES is in attendance at all orientation sessions. They are responsible for administering and scoring all TABE tests and providing DSS with results.

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

The District has established relationships with appropriate job skills and educational training providers. Contracts are negotiated with reputable providers for education and training as they relate to the educational needs of individuals and local demand occupations.

- 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 applicant/recipients without a high school diploma or equivalent are required to participate in Adult Basic Education classes sponsored by GST BOCES. This requirement is a part of the individual's Employment Plan and is used to enhance hours of participation requirements.

Individuals who score at or below a ninth grade level are offered an opportunity to participate in an educational activity.

Individuals with less than a fourth grade reading level, based on the TABE assessment, are also included in this population. Service provision for them is conducted through Literacy Volunteers.

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

The district guidelines dictate that individuals without a high school diploma or equivalent must participate in Adult Basic Education activities which can include other activities based on progression through Adult Basic Education. Individuals enrolling in continuing education and training must meet the minimum requirements of the program enrollment unless otherwise approved by provider. Individuals with college degrees are reviewed on a case by case basis. Each decision is based on Demand Occupation list and/or recommendation from ACCES-VR in order to make the individual employable.

Individuals may be denied enrollment in an educational activity if they have a reading level less than fourth grade based on TABE testing results.

- 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 assigned Social Welfare Examiner reviews an individual's TABE results, particularly the basic skills literacy levels. Based upon the results gathered from the testing and the participant's history of compliance, performance in other educational activities and

general desire to enroll, referrals are made to either enroll a participant into a program that will provide education to earn a HSE or enter into a job skills or vocational education program. Participants are not approved for vocational education beyond 12 months unless program requirements justify additional commitment.

- 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:
Pursuit of an Associate's degree is the highest level of post-secondary education that the district will approve. If the recipient already has an associates and that individual cannot find employment, is underemployed or the wage available does not constitute a living wage, the District will consider additional post-secondary level education in a field listed on the Demand Occupation List.
- 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:
Steuben County tracks the number of months an individual is engaged in post-secondary education. At the completion of 12 months, individuals have a new Employment plan developed that includes required activities to meet participation rates. The only activity we do not engage these individuals in is job search.
- h. Education and training providers are evaluated by the following standards:
Steuben County Department of Social Services maintains a contract with Pro Action to provide training through CSS Workforce for recipients of Temporary Assistance. Funding is set-aside from the SNAP Employment and Training funds as well as the Flexible Funds for Family Services (FFFS) to offset the cost of these programs. Participants in the programs are selected after completion of TABE testing, remedial classes. CSS Workforce NY Career Centers offer computer labs that will be accessed for job skills development.
- Approval of agencies to provide education/training activities will be based upon:
- Agency must be State approved/licensed.
 - Past performance.
 - Type of services the agency can provide.
 - Cost per enrollment, completion and entry into employment.
 - If a new provider, or new services from an approved provider, staff qualifications.
 - New providers must provide documentation of fiscal responsibility.
- i. The district procedure for advising participants of approved training providers is:
At the time the Employment Plan is completed, and at any other such time an individual requests approval for training, s/he will be provided with the names of training agencies that provide services in the individual area of interest. Steuben County has a limited number of training agencies and most individuals within the county are aware of which agencies provide each type of training. The procedure for requesting training, and the approved agencies which provide training within the county, is also discussed at the group orientation session, which all applicants must attend. Social Welfare Examiners

and Employment Development Specialists also work closely with individuals who are interested in training to assist them in finding appropriate providers, programs and funding.

- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:
Anytime an individual is approved for training or is enrolled in a work activity appropriate notices are sent to confirm the assignment.

- 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:
School verification will be sent for each individual in this category at the beginning of each school year and/or at recertification or as deemed necessary.

- 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:
Careful review of the medicals is conducted by the Senior Social Welfare Examiner at the Department of Social Services. Provider locations and work-site supervisors are notified in writing of any 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 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 (14) 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 (14) 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 (6) 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 (6) 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:

As needed, translation services are provided to Non-English speaking participants. The Department provides translators and interpreters upon request. The District chooses the most appropriate vendor from the approved vendor list established by the District.

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 Steuben County Department of Social Services maintains an MOU with the Steuben County Department of Public Works for mobile work crews. Currently this contract is for four (4) crews. Both department and contract staff work diligently with individuals who are facing sanction status or are currently sanctioned. Telephone, in-office contact and home visiting have assisted in keeping clients from being sanctioned and assisted those individuals who are sanctioned to become compliant. In addition, the Department refers clients to GST BOCES for adult basic education, as well as referrals being made to job readiness and job skills development offered throughout the County. Additionally, referrals to childcare or BILT if barriers are identified.

The Job Developers conduct monthly Job Readiness training and intensive job search activities are done on a case by case basis with individuals referred to the Job Developers.

Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants

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

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

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

Employment Development Specialist work with individuals who are currently sanctioned to engage them. Telephone, in-office contact and home visits will be scheduled and household budgeting will be discussed as well as any other options for overcoming their sanction. If individuals cannot explain how they are meeting their household needs while sanctioned, the household will be scheduled for an eligibility review with a Social Welfare Examiner. If the household fails to attend the eligibility review, their cases faces closure. If the household attend the eligibility review the Employment Development Specialists will continue to work with the households/individuals to encourage compliance. Contact with sanctioned households should occur no less than once a month while sanctioned.

Section 3.11 Strategies for reducing the need for TA

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

In an effort to reduce the need for an individual or household Temporary Assistance, will administer available grant funds for clothing, gasoline, vehicle repair, licensing fees, certification dues and other justifiable expenses so that an individual can obtain or retain a job.

The District also utilizes services provided by the Building Independence for the Long Term (BILT) Unit to assist individuals with addiction and disabilities as well as those who are homeless or in domestic violence situations.

Non Exempt individuals are assigned to work with Employment Development Specialists for assistance in job development, placement and retention.

Supportive services are offered such as day care and transportation referrals.

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:

Medical assistance will be covered through Medicaid, based upon the Medicaid payment schedule. If an individual is required to secure an employment physical payment shall be made by the department if said individual is not in receipt of Medicaid, at a rate set periodically by the Department. Expenses incurred as the result of an injury suffered in an assigned work activity will be reviewed and, if appropriate, will be submitted as a Worker's Compensation claim to the appropriate carrier.

Vehicle repairs/insurance when necessary to allow participation in an assigned activity, or to accept employment, may be made on a one-time basis and shall not exceed \$500. Repairs must be made to a licensed/certified repair shop with payment made directly to the vendor. Request for vehicle insurance may be made and, if approved, payment will be made directly to the carrier.

Clothing/uniforms, when necessary for participation in an assigned activity or to accept employment, may be requested in writing and must include an itemized listing of items requested. A payment may be authorized, if eligible, for \$150 one time in every twelve (12) month period. Payment will be made directly to the vendor if possible.

Tools/equipment necessary for approved training or educational activities may be made on a one-time basis. Said payment must be requested in writing accompanied by an itemized list of items to be purchased. Payment will be made directly to the vendor.

Testing and licensing fees may be requested in writing and will be authorized to those individuals requesting same for the purpose of advancing employment opportunities.

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

Please check all that apply:

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

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

One Mile.

- 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: All non-exempt applicants are referred to a Self-Sufficiency Assessment class. This class is held weekly and is made up of job search and employment readiness components. All eligible TANF applicants are required to participate. The Assistant Job Developer/ Employment Development Specialist leads this training and covers such topics as interviewing, resume preparation, and other soft-skills needed for successfully obtaining and maintaining employment. Proper job searching techniques are discussed and demonstrated and job searches are assigned. Non- exempt applicants are required to perform up to five (5) job searches prior to Orientation. Orientation is scheduled during

week two of the Self Sufficiency Training. The completed job search is necessary for admission into Orientation. All individuals with a disability are referred to the Disability Advocate in the BILT Unit to assist in obtaining other benefits as deemed appropriate. Additionally, the Department, in an effort to reduce the need for an individual or household to require Temporary Assistance, will often provide grants to individuals for clothing, gasoline, vehicle repair, licensing fees, certification dues and other justifiable costs.

Section 4.2 Transitional Support Services

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

All transitional and supportive services will be afforded qualified recipients. Transportation grants for vehicle repair and gas cards are also used to support job retention for eligible Temporary Assistance recipients.

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 transitional services in the manner and amounts as support services are provided to clients assigned to work activities with the following exceptions: No medical support services shall be provided unless the individual has Medicaid coverage. Transportation services shall be provided through the Transportation Grant to qualified individuals as long as funds are available. Gas Cards and vouchers for necessary tools or clothing paid directly to the vendor.

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:

Qualified individuals may be eligible for transportation services through the Transportation Grant funding. Transitional Child Care services will also be made available to qualified households leaving Temporary Assistance.

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

Clients who are non-compliant by failing to report to a job activity for two (2) consecutive days will be mailed the appropriate conciliation notices. A phone call is made to the individual when the conciliation is mailed providing the individual the opportunity to provide their reason for

noncompliance to the Social Welfare Examiner and/or schedule an appointment to discuss the noncompliance with the Social welfare Examiner. The Social Welfare Examiner will then determine whether the non-compliance was both willful and without good cause.

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

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

Good Cause recommendations are made by the Social Welfare Examiner and are approved or denied by the Senior Social Welfare Examiner or Employment Coordinator. Good cause for non-compliance can include verified medical appointments, verified court appointments, lack of appropriate child care, lack of transportation, and verified illness of individual or family member. Any other explanation will be reviewed on a case by case basis.

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

TA-SNAP clients who are non-compliant by failing to report to a job activity for two (2) consecutive days will be mailed the appropriate conciliation notices. The Social Welfare Examiner will then determine whether the non-compliance was both willful and without good cause. No activities are conciliated for SNAP only clients.

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

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

Good Cause recommendations are made by the Social Welfare Examiner and are approved or denied by the Senior Social Welfare Examiner or Employment Coordinator. Good cause for non-compliance can include verified medical appointments, verified court appointments, lack of appropriate child care, lack of transportation, and verified illness of individual or family member. Any other explanation will be reviewed on a case by case basis

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

District will afford the SNAP recipient the opportunity to complete one week (5 days) of Job Search; completing 15 searches in that time period. Conciliation is handled in the same manner as Temporary Assistance recipients. Clients will be determined non-compliant and forwarded a conciliation notice after failing to report to a job activity for two (2) consecutive days. They will be afforded the opportunity to comply prior to imposing any negative action.

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:
Recipients who are sanctioned for failing to comply with work experience assignments and/or voluntarily quitting a job will become compliant upon: completion of the applicable sanction duration period; signing compliance papers; and participating in and completing three (3) consecutive days on a Mobile Work crew or at a Work Experience location for the first sanction, five (5) consecutive days on the Mobile Work Program or at a Work Experience location for the second sanction and ten (10) consecutive days on the Mobile Work Program or at a Work Experience location for the third and subsequent sanction.

Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum sanction duration period).

Individuals who are reapplying at the end of a sanction duration need only to complete applicant employment requirements.

Recipients who fail to complete the required job searches will be compliant after either participating for three (3) consecutive days on a Mobile Work Crew or at a Work Experience location and/or demonstrating that job search requirements have been met.

Those individuals who are sanctioned for failing to comply with job club, job readiness training, vocational education, and/or Adult Basic Education must meet one of the above criteria.

- 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:
Applicants and/or Recipients must agree (in writing) within 10 days to comply with SNAP Employment rules.

Recipients who are sanctioned for failing to comply with work experience assignments and/or voluntarily quitting a job will become compliant upon: completion of the applicable sanction duration period; signing compliance papers; and participating in and completing three (3) consecutive days on a Mobile Work crew or at a Work Experience location for the first sanction, five (5) consecutive days on the Mobile Work Program or at a Work Experience location for the second sanction and ten (10) consecutive days on the Mobile Work Program or at a Work Experience location for the third and subsequent sanction.

Snap recipients may reestablish SNAP eligibility during the sanction period if the individual is determined by the district to be exempt from SNAP E&T work requirements.

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 TA/Employment Unit is assisted by the BILT team which employs staff who assist applicants and recipients in the process of applying for disability benefits. This process is initiated once a medical statement indicating a long-term disability has been received from one or more of the above entities and the District agrees with the medical statement. Referral to IMA for an independent evaluation will be made when an individual indicates that they do not agree with their physician's evaluation; the agency's determination and/or when no other medical provider is available to do an evaluation. Upon receipt of medical verification, the applicant/recipient will be referred to the Disability Advocate in the BILT Unit if the medical review indicates, in the agency's judgment, that an application for SSI is appropriate for the applicant/recipient. Form LDSS-4005 or LDSS form 4005(a) will be sent to all applicant/recipients anytime there is a change in their employability code.

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:

As noted above, the Employment Unit is assisted by members of the BILT Team to assist in determining employability status. Meetings are scheduled between the units for case review as needed. A course of action which best suits the individual's needs is then determined.

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.

The Social Welfare Examiner makes a referral to the BILT (Building Independence for the Long Term) unit when they have met or are meeting with an individual who expresses a mental health concern. If a medical form is returned indicating past mental health issues a referral may also be made. Individual's behavior is also noted and can generate a referral. The BILT Staff Social Worker meets with individuals immediately as they are co-located at DSS. The Staff Social Worker determines what tool will be needed and which tool is appropriate. The staff person in the BILT team administering the tool is the Staff Social Worker, an LMSW and/or the Staff Psychologist, a Psy.D; the BILT Coordinator, who possesses a LMHC/ MS in Counseling will administer the tool in their absence. All are employees of Steuben County Community Services contracted by DSS to be located on-site.

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:

Mental Health Screening tool developed by local district staff listed above.

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

The Staff that administers the tool are mental health professionals who make a determination based on responses to the tool and make the appropriate referrals on behalf of the applicant/recipient. Often there is a prior history of involvement with a mental health professional and/or the applicant/recipient discloses that they are seeking assistance for same. They will be referred as well. There is a direct communication to Steuben Community Services for crisis intervention if needed.

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.):

If an individual claims s/he has a mental or physical impairment disabling them from work activities the individual is provided with document requirement form LDSS 4526 indicating the need to provide medical documentation of said disabling condition to the district within ten (10) days.

If there is an indicated physical impairment and the physician recommends rehabilitation, the individual will be required to engage in such rehabilitation and provide documentation of such rehabilitation and further provide regular written reports regarding the progress of such rehabilitation as it pertains to restoration to self-sufficiency.

If the district believes the individual may benefit from rehabilitation even though the physician has not recommended same, the district may request that an independent medical examination or case review be conducted by a qualified physician in an effort to 1) gain a second opinion regarding the extent of a client's disability and if appropriate, 2) help establish a course of rehabilitation which will help restore the client's self-sufficiency.

If the indicated disabling condition is related to mental health or alcohol/substance abuse, the Social Welfare Examiner will refer the individual to the Steuben County BILT (Building Independence for the Long Term) Unit, which provides an evaluation, makes recommendations or refers to appropriate providers on behalf of the client.

If an individual indicates that s/he is unable to provide medical documentation and/or the district and the individual do not agree on the medical limitations, a referral will be made to Industrial Medicine Associates (IMA) for evaluation and recommended rehabilitation.

- 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 district develops treatment plans for recipients with physical limitation in accordance with recommendations from a client's physician of record or independent medical examiner as outlined above.

Recipients with mental health and alcohol/substance abuse related issues; the BILT Unit staff member develops treatment plans for said population. Individuals may be referred for physical therapy, occupational therapy, mental health counseling, substance abuse counseling, and other services thereto for the development of an employment plan with recommendations for treatment being a part thereof.

- 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:

Individuals who have developed a treatment plan for physical ailments, mental health or alcohol/substance abuse issues are required to maintain monthly contact with the Social Welfare Examiner and/or the BILT team as appropriate. Attendance reports are sent from the provider via e-mail, mail, or facsimile. For individuals with mental health and/or substance abuse related issues, individuals meet regularly with the appropriate BILT team staff member. The BILT team staff also engages in regular contact with agencies which provide mental health and alcohol/substance abuse services to monitor the progress of individuals referred by the agency.