

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

January 1, 2022 - December 31, 2023

Columbia County

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1. Administration

1.1 Administrative Structure

- a. This agency's organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district's employment program. *(Attachments must be uploaded to the system through the "Documents" screen prior to submitting the plan. Use the textbox below to provide any additional information.)*

Please see attached

- b. Below is a description of the office(s) in and/or outside of the Department of Social Services that are involved in the operation of the district's employment program and include the responsibilities of each office.

The employment unit consists of one Principal Social Welfare Examiner, one Senior Social Welfare examiner, two Social Welfare Examiners and one OASAS CASAC, as well as one Clerk/Typist. This unit is responsible for the operation of the Columbia County Department of Social Services' Employment program.

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

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

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

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Twin Counties	\$75,000	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input checked="" type="checkbox"/> Other Safety net	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	D/A CASAC to do D/A assessments and tracking

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Columbia Greene Medical Center	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input checked="" type="checkbox"/> Other Admin	<input type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Physicals are done prior to a CWEP assignment to determine eligibility and/or limitations. This is an open contract and no dollar amount has been established.

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

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
CGCC-One Stop	Others: WIOA	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Career Resource Room: Resumes, Job leads, Assistance with Job interviews, Career Development workshops.
Questar III	Local	<input type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	HSE
Adult Education Programs	Others: unknown	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	HSE for those over 18. Local Libraries
Mental Health Association	Others: Bill for services	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	A consumer of Mental health that is 18 yrs of age or older. Life skills, job training and Mental health services.
Acces- VR Counselor Services	Others: unknown	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Conduct interviews and helps clients complete an application for the program. Refer them to a counselor to determine what the training needs are.
Summer Youth	Others: OTDA-NYS summer youth program monies given to LDSS and allocate directly to the Workforce investment board	<input checked="" type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Summer Youth employment Program and educational experience.

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

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

The Principal Social Welfare Examiner of the Employment Unit is the direct supervisor of the Twin County Staff that are housed here at the agency. Monthly numbers are reviewed along with case review. The Pr. SWE also provides input to workers evaluations.

1.3 OTDA Jobs Staff Agreement

a. OTDA Jobs Program Services - Target Groups. Check all services and target groups that apply:

Services:

- Assessment/Employment Plan
- Supervised Job Search
- Job Readiness Training
- Job Club
- Job Placement Services
- Grant Diversion
- Job Development (employer outreach)
- WOTC pre-certifications

Target Groups:

- Applicants
- FA & SNA with children
- SNA without children
- SNAP
- TANF 200%

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

1.4 Access to Services at New York State Career Centers

a. Described below is how the district provides access to its programs and services with Career Center partners (select 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. Described below is how the district coordinates with Career Center partners to provide services to the district's clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

The local district refers appropriate clients to the services provided at the Career Center. The clients are always given an appointment time at the time of assessment and notified via paper of this, either directly or by mail. The district sends a list of the clients that have appointments set, to the Career center via email or fax. We then call the Career center on the verified days to confirm attendance.

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

- a. Check one of the following:
- The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
 - In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:
- b. Described below is how the district completes the required orientation for all applicants and recipients of TA (e.g. in a group setting, individually, or a combination of both). Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

At the time of application and recertification the TA worker signs the applicant/recipient up for an appointment with an employment worker. At this time the district has individual orientations. At the time of the appointment, the employment worker will review the activities and supportive services that can be provided. The services they are informed of are including but not limited to education, employment and training opportunities, availability of child care and transportation and work activities through the social services. Assessments are done at this time as well.

2.2 Temporary Assistance (TA) Employment Assessment

- a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:
- The district enters assessments directly into WTWCMS
 - The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
 - The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. Please attach the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them below:

b. Described below is the district procedure for the completion of an employment assessment:

At the time of the application or recertification, the client is given an appointment to meet with an employment worker to do an assessment. The appointment is by phone as a default, unless otherwise requested from the client. If the client is in the agency for an application or recertification the employment worker will meet with them while they are here. If it was a phone interview the client will be mailed an appointment letter with a date and time to expect a call.

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

The Employment unit

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

Social Welfare Examiners with demonstrated effectiveness in assessment and employability development prepare the assessments and plans required by this section.

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

- Yes
 No

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

- Yes
 No

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

- Yes
 No

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

Assessments are updated at any new application and recertification or if there is a change in the individual's status.

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

a. The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:

- The district enters employment plans directly into WTCMS.
 The district uses the LDSS-4978 (New York State Employment Plan) and later enters information into WTCMS.
 The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them 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. Described below is the district procedure for the completion of an individual's employment plan:

The employment plan is done with the individual after each assessment appointment.

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

At each new application and recertification or any change in the individual's status.

3. Engagement

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

- a. Federal requirements state that parents or caretakers must be engaged in work as soon as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance. The district’s definition of “Engaged in Work” is:

Compliance with assessment, employment planning, all activities included in the individual’s Employment/Self-Sufficiency plan, including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 4.1. Also included is pursuit of other forms of income such as SSI and SSDI.

- b. Described below is additional information regarding the district’s “Engaged in Work” requirements:

There is no additional information at this time.

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

The district utilizes the Language line to communicate with the client if needed. The language line desk guides are available to all workers and posters are hung in the agency in accordance with 06-ADM-05. All non-English speaking clients are given the option to utilize the language line. Our Non-English speaking clients will often have a translation spokesperson with them from the community.

3.3 Strategies/Procedures for Increasing Program Attendance

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

The Employment Unit provides the case management for program attendance. We have created a form that each provider has to complete and return to the agency on a weekly or biweekly basis. The employment unit worker will meet with the clients to review any barriers they may be having and how to work through them. Such examples would be back up day care, transportation issues, how to handle workplace conflicts and offer them any training that would assist them. The employment workers will review the importance of being on time to employment, how to present or any other issues that a client may be having on a case by case basis.

3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

- a. Select all that apply:

- Described below are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
- Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
- Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

At the next client contact or recertification the sanctioned participant is encouraged to engage in the necessary activity and may request to be added back on to the case after the durational period has ended and the client is in compliance.

3.5 Strategies for Reducing the Need for TA

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

The district will provide applicant/recipients a brochure including information about the services available that will assist them in reducing the need for Temporary Assistance. This brochure is given to the client at initial Assessment/Job Search. This includes diversion payments and information about other Support services.

4. Work Activities

4.1 Allowable Work Activities

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

Case Type	Activity and Definition
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	Work Experience – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	Job Search – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	Vocational Education – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	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.

Case Type	Activity and Definition
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p>Subsidized Private Sector Employment – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" 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>

Case Type	Activity and Definition
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	Community Service – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	Provision of Childcare for Individual Participating in Community Service – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.
<input type="checkbox"/> FA <input type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	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.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	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.
<input checked="" type="checkbox"/> FA <input type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	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.

4.2 Job Development

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

- Yes
 No

If Yes, select how the district participates in job development activities.

District staff contacts employers to solicit jobs for TA and SNAP Participants. Describe below 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. Describe below how this is done, including number of staff, frequency of contacts, etc.

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

- a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education, 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:

We have several local not for profit agencies that are available to provide these services such as Columbia Greene Community College, Questar and the local libraries. They have shown a high success rate working with our clients.

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

The district works closely with Columbia Greene Community college in which our local Workforce office is located. We refer any and all applicable clients to the local Workforce office for assignment to the appropriate training program.

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

The employment worker completes an assessment with the client and discusses what educational opportunities are available. The employment worker will refer them to the appropriate activity and may mandate them to comply. Any client that does not have a high school diploma or HSE is referred to the appropriate agency to obtain an HSE.

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

CCDSS supports the attainment of HSE for any applicant/recipient that does not have a high school diploma. The attainment of the HSE is almost always essential in attaining employment. We do not deny participation in the attainment of HSE, ABE or ESL. We may deny participation in other educational activities if the individual has the ability to become employed without that activity. Other educational activities will be reviewed to determine if they will result in employment and be approved on that basis.

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

They must meet the standards and procedures of the specific education/training for which they will be enrolled.

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

Past performance, successful outcomes, diploma, degree and certification attainment.

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

Applicant/Recipients will be notified during orientation of all approved training providers. If a client presents us with another training provider, we will review the information to make sure it complies with approved training and inform the client of the outcome in person or in writing.

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

Participants are notified in writing of enrollment in a work activity. The letter includes all pertinent information including location, time and date of activity.

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

The LDSS-3708 will be utilized to monitor the student's successful enrollment in school. It will be sent with all recerts and applications as needed. A request for verification in writing from the school may be requested as well.

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

Work site supervisors are informed in writing of the client's limitations so accommodations can be made.

4.4 Post-Secondary Education Approval and Enrollment Policies

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

The district will approve up to 12 months of post-secondary education as an approved work activity.

- b. Described below is 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 applicant/recipient will be required to complete a weekly average of at least 20 hours in paid employment activities, work experience or community service past the 12 month lifetime limit of post-secondary education.

- c. 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 (Select all that apply):
- It has been determined that the student voluntarily quit their 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:

5. Work Requirements

5.1 Meeting TA Work Requirements

- a. Described below is how the district plans to meet federal and State TA participation rate requirements. Include in this description the weekly hours standard participation requirements for individuals in the different case and household types, along with the typical time period it takes for nonexempt individuals to be engaged in activities for both newly opened cases and individuals whose status changed from exempt to nonexempt. (Information regarding engaging exempt individuals is entered in Section 9).

Our district's weekly standard for client participation varies slightly based on the case type and household composition. For PA, 1 adult HH with a child under 6 is required to participate 30 hours weekly with at least 20 of those 30 hours in one or more core activities. For PA, 1 adult HH with dependents, but no child under 6, is required to participate at least 35 hours weekly of which at least 30 are in one or more core activities. If a single adult HH with no dependents, we schedule 40 hours weekly in one or more core activities in order to make the 35 hour weekly participation rate. For two adult HH with dependents, each adult is scheduled for up to 40 hours according to their abilities and available childcare. Time spent in job search may include travel time, but does not include travel time from residence to the first job search site or from the last job search site back to the residence. The required number of contacts and hours may be adjusted for individuals participating in additional work activities to ensure that no more than a total of 40 hours per week of participation in activities is assigned. The same day that an individual applies for assistance they are given an appointment to attend Job Search/Orientation/Assessment. Non-exempt applicants and recipients are given a job search form. They attend weekly individual job search appointments until they obtain employment, their status changes or they are no longer open for assistance. Non-exempt individuals are given an appointment for an assessment, an

employment plan is completed and they are enrolled in appropriate employment related activities upon the case opening. Those clients that are going from exempt to nonexempt will be engaged in a work activity within 30 days, usually less.

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

Household Type	Number Served
Households with Dependent Children Average Monthly	120
Households without Dependent Children Average Monthly	45

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

We utilize Cognos for many different current and monthly reports. The report we utilize the most would be the employability code duration report which helps us track the length a client has been under a specific employment code. This helps primarily with clients coded 70, 31, and 24. We use Cognos reports to complete the work verification report. The work verification report helps us check for accuracy of the work completed by the employment and TA workers and make sure the information in both files matches. We look at the participation and engagement status report. Looking at this report helps us re-engage clients and make sure they are participating and that the participation counts.

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

The district assigns TA applicants to Job Search.

- Yes
 No

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individual's search for work

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
SNA Individuals	10	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individual's search for work

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

The district assigns TA recipients to Job Search.

- Yes
 No

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individual's search for work
SNA Individuals	10	30	The job search log will be reviewed on a weekly basis by the responsible staff person to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply and interview for a job as well as time spent preparing, sending follow-up materials to potential employers and traveling between potential employers. The worker who meets with individuals assigned to job search activities also identifies appropriate job openings and supports each individual's search for work

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

The policy and process that the workers follow when determining participation in self employment as an approved part of the individual's required work activities is as follows: The worker will complete the self employment worksheet and divide the amount of income from self-employment by the minimum wage. If it does not meet the minimum of 30 hours at minimum wage we will enroll the client into work activities.

5.2 Meeting SNAP Work Requirements

- a. Described below is the extent to which the district requires NTA SNAP recipients to participate in SNAP E&T work activities. (Please note: Case management services must be provided to all participants enrolled in SNAP E&T activity):

n/a

- b. If the district is offering Supervised Job Search as an E&T activity component, describe below how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts.

n/a

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

At application and recertification, the SNAP recipients are informed about the employment unit and are offered assistance in finding employment if needed.

6. Quality Assurance/Work Verification

6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
 - Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
 - Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
 - Assess that the data entered into either WTWCMS, 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.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
6 cases
- b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
6 cases

- c. Below is the number of random sample cases in which a case member is reported as an TA employability code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA employability code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
3 cases
- d. Below is the number of random sample cases in which a case member is reported as an employability code 31 – “Parent or caretaker relative of a child under 12 months of age”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
3 cases

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

6.2 Use of Outside Providers/Vendors

- a. Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?
 Yes
 No
- b. If Yes, does the district’s provider/vendor documentation collection, data entry and management of WTWCMS follow the same process that would be used by the district worker?
 Yes
 No
- c. If No, describe below the process used:

7. Supportive Services

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

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

Participants in an approved activity may be eligible to receive the following assistance as needed, on a case-by-case basis:

- Car repairs will be up to \$750.00 or the value of the car, whichever is less. Only repairs that are needed to keep the motor operating in a safe manner will be considered.

- Car insurance payments will be paid a month at a time, with a maximum of six months to be paid.

- Car payments will be paid a month at a time, with a maximum of three months to be paid. In order to receive assistance for any of the above, client must submit the following:

- Car title and registration in their name or spouse's name on the case.

- A repair estimate

- A copy of the car payment booklet/statement and a plan on how the next payment will be made

Each of these will be evaluated on a case-by-case basis to determine eligibility for payment.

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

Bus pass/token

Gas card/voucher

Mileage reimbursement at IRS Business rate (effective 1/1/21 is 56 cents/mi)

Mileage reimbursement at IRS Medical/Moving rate (effective 1/1/21 is 16 cents/mi)

Other mileage rate (please explain methodology used to establish reimbursement rate):

The LDSS authorizes transportation for approved employment activities. LDSS uses the IRS Medical/Moving rate as stated above for the current year. If the individual's actual cost exceeds this rate the individual will be compensated for the additional costs based on reasonable documentation.

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

The LDSS authorizes transportation for approved employment activities. The maximum that an individual may be expected to walk is two miles as long as there is no disability that would make it difficult or impossible to walk.

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

CCDSS will provide temporary transportation, gas monies, vehicle repair, vehicle insurance, work clothing, money for some license/permits, child care referrals.

7.2 Post-Employment/Transitional Supportive Services

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

The district provides daycare, temporary transportation services as listed previously as well as Medicaid and SNAP for those who are eligible.

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

For a period of 90 days after closing the CCDSS will provide the same supportive services as listed previously to the extent permitted by local resources.

7.3 Extended Support Services

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

All supportive services previously listed consistent with statute and regulations and to the extent funding is available.

8. Conciliation, Sanction and Dispute Resolution Procedures

8.1 Conciliation

- a. The district's conciliation process for TA applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(a). Indicate below how conciliations are conducted. (Select all that apply and describe the procedure below).

- In person
- By phone
- By mail

A letter is sent to the individual giving them time to respond to conciliation within the required timeframe for a particular case. When the individual contacts us by any of the above methods, it is reviewed by the worker and/or supervisor to determine if the individual's actions were willful and without good cause. We may require proof of a doctor visit or whatever was claimed as good cause.

- b. Who makes the TA good cause/willfulness determination? (Select all that apply)
- The client's employment worker
 - A supervisor in the district
 - A separate entity (describe below):

- c. The district's conciliation process for SNAP applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(d). Indicate below how conciliations are conducted. (Select all that apply and describe the procedure below)

- In person
- By phone
- By mail

A letter is sent to the individual giving them time to respond to conciliation within the required timeframe for a particular case. When the individual contacts us by any of the above methods, it is reviewed by the worker and/or supervisor to determine if the individual's actions were willful and without good cause. We may require proof of a doctor visit or whatever was claimed as good cause.

- d. Who makes the SNAP E&T good cause/willfulness determination? (Select all that apply)

- The client's employment worker
- A supervisor in the district
- A separate entity (describe below):

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

The district will conciliate and meet with the recipient to re-engage them in Job Search activities at 5 job searches. The district will complete an employment assessment if the act of noncompliance for SNAP purposes is non-compliance with employment assessment.

8.2 Sanction

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

Upon completion of the minimum sanction duration, individuals who wish to end their employment sanction must now show compliance by writing a statement that they are willing to comply. They are assigned to a work assignment and must attend and/or participate for 10 business days. Once the individual has demonstrated compliance, Temporary Assistance benefits are restored retroactive to the date the individual indicated willingness to comply, but not earlier than the expiration of the minimum duration period. Individuals who are medically unable to participate will be provided a medical. Temporary Assistance benefits are restored retroactive to the date the individual claimed to be unable to participate (but no earlier than the expiration of the minimum duration period) provided the individual has cooperated with efforts to document the exemption.

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

Upon completion of the minimum sanction duration, individuals who wish to end their employment sanction must now show compliance by writing a statement that they are willing to comply for all combination TA/SNAP recipients whose SNAP employment sanction duration has expired. They are assigned to a work assignment and must attend and/or participate for 10 business days. Each of the above categories can come into the agency or contact the agency via mail or phone and request to demonstrate compliance prior to their sanction duration being up so that they are in compliance at the time of sanction duration ending. An individual may be eligible for SNAP benefits before the end of a durational period if the individual documents that he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefits. For the NTA SNAP recipients, we do not mandate SNAP E&T activities, so all they would need to do is reapply once the duration has expired.

8.3 Dispute Resolution

- a. The district's procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district's response to their request for health-related accommodations must be conducted in accordance with 18 NYCRR 385.11(c). Indicate below who mediates the grievance.
- An independent entity which has an agreement with the district
 - 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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

- a. The district's process for determining an individual's disabilities and/or work limitations must be in accordance with 18 NYCRR 385.2(d). Indicate below what the district's process is for determining an individual's disabilities and/or work limitations. (Select 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

The employment worker reviews available documentation and individual's disabilities and/or work limitations. The supervisor reviews the decision. In some cases, the Principal, Senior and Worker have a conference to make the determination. The decision is based upon

review of all the available documentation. The client is then notified in writing of the LDSS decision via the LDSS- 4005/4005(a).

- b. Indicated below is the process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited and describe the process by which the determination is made. (Select all that apply)
- District directs the contracted physician or individual's physician to determine status.
 - District review team reviews and determines status (described below).
 - Specialized disability/medical staff or unit reviews and determines status (described below).
 - Other

The employment worker determines whether the individual is exempt, non-exempt or work-limited. The decision is then reviewed by the Supervisor. In some instances, a conference is held with the Principal, Supervisor and worker to make a final determination.

9.2 Mental Health Screening and Assessment

- a. In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?
- Yes
 - No
- b. Describe the district's policy for determining when a program participant is offered a mental health screen:
- c. What screening tools does the district use? (Select all that apply)
- LDSS 5009 - Mental Health Screening Tool
 - The computer assisted version of the Modified Mini Screening tool (MMS)
 - Other Screening tool (describe below)
- d. If using the MMS, indicate below the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation.
- e. Describe below the procedure the district uses if the screening tool warrants a mental health evaluation referral

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

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

Described below is the district's procedure for determining if an individual, who is unable to work due to mental or physical impairment, has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the

determination of the individual's disability exemption as covered in Section 9.1 of this Plan. Indicate who makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities (e.g., medical practitioner, employment worker, TA worker, local review team, etc.). Also indicate the source and type of information used to make the determination (e.g., information from individual's medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.).

If an applicant/recipient claims a disability they are given the LDSS-4526 to be completed by the appropriate medical professional. The returned LDSS-4526 is reviewed by both the Employment Examiner and Supervisor and a plan for self-sufficiency is formulated based on the client's diagnosis, treatment recommendations, and limitations. Referrals to treatment or other rehabilitative activities are processed by the Examiner. Documentation is collected in a timely fashion to monitor the status and compliance with the treatment plan. Updated medical documentation is requested from the client as needed.

Other forms of documentation are also accepted such as a Dr. Note, prescriptions and past history of the client. A visible determination can also be made after meeting with the client to assess barriers. If any barriers, mental or physical are suspected the client will be referred to the appropriate provider for an ongoing determination to be made.

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

Based on the information received from the medical examination and the employment assessment, the applicant/recipient and the employment worker develop an appropriate plan of action.

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

The Employment Unit sends out monthly letters to the providers requesting verification of the ongoing treatment compliance.

10. District Certification

10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Columbia 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, 2022 through December 31, 2023. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

12/2/2021
Robert Gibson
Commissioner