

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

January 1, 2022 - December 31, 2023

## **Steuben County**

# Table of Contents

1. Administration .....	1
1.1 Administrative Structure .....	1
1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies .....	1
1.3 OTDA Jobs Staff Agreement.....	3
1.4 Access to Services at New York State Career Centers .....	4
2. Orientation, Assessment and Employment Plan.....	5
2.1 Orientation (Reference 18 NYCRR 385.5) .....	5
2.2 Temporary Assistance (TA) Employment Assessment.....	6
2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7) .....	7
3. Engagement.....	8
3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)).....	8
3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency ...	8
3.3 Strategies/Procedures for Increasing Program Attendance .....	8
3.4 Strategies/Procedures for Engaging Sanctioned TA Participants .....	9
3.5 Strategies for Reducing the Need for TA.....	9
4. Work Activities .....	10
4.1 Allowable Work Activities .....	10
4.2 Job Development.....	12
4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) .....	13
4.4 Post-Secondary Education Approval and Enrollment Policies .....	15
5. Work Requirements .....	16
5.1 Meeting TA Work Requirements .....	16
5.2 Meeting SNAP Work Requirements .....	20
6. Quality Assurance/Work Verification .....	21
6.1 Quality Assurance Process - Random Case Sampling.....	21
6.2 Use of Outside Providers/Vendors .....	22
7. Supportive Services .....	23
7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District .....	23
7.2 Post-Employment/Transitional Supportive Services .....	24
7.3 Extended Support Services.....	24
8. Conciliation, Sanction and Dispute Resolution Procedures .....	25
8.1 Conciliation .....	25
8.2 Sanction.....	26
8.3 Dispute Resolution.....	27
9. Disability Determinations, Documentation and Requirements of Exempt Individuals.....	27

9.1 Disability Determination Process and Tools .....	27
9.2 Mental Health Screening and Assessment.....	28
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)) .....	29
10. District Certification .....	30
10.1 Certification.....	30
Amendments.....	31

# 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.)*

See attached Steuben County Department of Social Services Org Chart

- 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 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 Work Program Coordinator, a Senior Social Welfare Examiner, four (4) Social Welfare Examiners, a Typists. 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 provides clerical support to the Unit. The Work Program Coordinator oversees and supervises all staff activities, manages the staff, and has oversight of the general operations of the 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-Schuyler-Steuben (CCS) Workforce NY Career Centers in Bath, Corning and Hornell who work with individuals for employment placement and retention services.

## 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.

<b>Provider</b>	<b>Total Contract Cost/Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Pro Action of Steuben and Yates, Inc	\$285,650	<input checked="" type="checkbox"/> FFFS <input checked="" type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<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%	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 Schuyler-Steuben Workforce NY.
Transportation Initiative	\$64,122	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input checked="" type="checkbox"/> Other Grant Revenue	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Provides transportation services in the form of vehicle loans or repair of motor vehicles and related expenses (i.e. registration/insurance)
Greater Southern Tier BOCES	\$20,000	<input checked="" type="checkbox"/> FFFS <input checked="" type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<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%	TABE testing; HSE classes; trainings as requested
Steuben County Department of Public Works	\$304,700	<input checked="" type="checkbox"/> FFFS <input checked="" type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<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%	Provides supervised mobile work experience for recipients

- 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.

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Corning Community College	Others: no direct financial agreement	<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%	Local community college -recipient education and training
Alfred State College	Others: No direct financial agreement	<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%	State University of New York - recipient training and education

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:

There are reporting requirements include, but are not limited to, a monthly report of numbers served. This report should break down the number of individuals that are TANF/SN/SNAP eligible and those that are 200% eligible. Reports shall be submitted to the Department of Social Services by the 10th of the following month. Monthly meetings are also held with the Pro Action.

### 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. WTCMS data entry, case conferencing, job fairs).

This District does not have OTDA job staff.

## 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 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](http://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.

## 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:

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.
- \*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.
- \*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.

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:

Every effort is made to conduct in-person group orientation for all individuals at the conclusion of the Temporary Assistance interview. Employment Social Welfare Examiners, Contract Job Developers, Child Day Care contract staff, and Maximus staff are all present during in person Orientation. Individuals who are not able to attend in-person orientation will be contacted by the employment SWE within 10 days to schedule orientation to be conducted by phone. Information related to Contract Job Developers, Child Day Care, and Maximus is provided to all individuals who receive Orientation conducted by phone.



## 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 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. 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:

For individuals who attend in-person group orientation, an employment assessment is conducted following the orientation. For those who are not able to attend in-person group orientation, the assessment is conducted after the individual participates in one-on-one orientation over the phone. 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. Most adult individuals seeking Temporary Assistance are required to take the TABE test as part of the assessment process. For individuals who attend an in-person group orientation the TABE test is generally administered on the same date as the orientation. If in-person orientation cannot be accommodated, an appointment for a TABE test is scheduled 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 if the individual is verified to be 18-19 years olds and enrolled in High School.

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

Department Employment Unit Social Welfare Examiners.

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

- 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?

Employment assessments are completed 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.

### **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 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 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:

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?

Employment plans are completed at a minimum every six months including at recertification. Employment plans 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.

### **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 are no additional district "Engage in Work" requirement.

#### **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:

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.

#### **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 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 five (5) crews (currently only 4 are active). 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.

### **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:

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.

- Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:

When a sanctioned participant has completed their duration and had demonstrated compliance the participant will be encouraged to contact Temporary Assistance to complete paperwork to be added back to the case (if it is a family case) or to apply for assistance. Once the application for assistance is received, Orientation handouts will be provided, and a new Assessment and a new Plan will be developed with the participant.

- Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

Contact with sanctioned households should occur no less than once a month while sanctioned.

### **3.5 Strategies for Reducing the Need for TA**

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

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 to divert applicants from needing TA.

## 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	<b>Unsubsidized Employment</b> – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Work Experience</b> – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Job Search</b> – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Vocational Education</b> – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Secondary School</b> – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.

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><b>Job Skills Training</b> – Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Job Readiness Training (JRT) Activities</b> – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p><b>Subsidized Private Sector Employment</b> – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<p><b>Subsidized Public Sector Employment</b> – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>

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	<b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.
<input type="checkbox"/> FA <input type="checkbox"/> SNA FAM <input type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>SNAP E&amp;T Supervised Job Search</b> – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.
<input type="checkbox"/> FA <input type="checkbox"/> SNA FAM <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.

## 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.

Contract staff completes this task.

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.

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 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.

### **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:

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.

- 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 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. 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:

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. 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:

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

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

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.

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

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 during orientation, which all applicants are invited to attend or receive information on. 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.

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

District advises participants of approved training via communication from the Social Welfare Examiner by a phone call or mailed notification. District notifies participant of approved enrollment in a work activity by mail.

- 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:

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.

- 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:

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. Time sheets provided by each work site allows us to monitor hours.

#### **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:

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.

- 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:

Steuben County tracks the number of months an individual is engaged in postsecondary 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.

- 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).

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 for:

Household Type	Number Served
Households with Dependent Children Average Monthly	80
Households without Dependent Children Average Monthly	100

- 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:

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. 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	5	7	At the conclusion of Orientation, after the individual has been determined non-exempt from work requirements and supportive service needs are evaluated, the applicant will be referred to an Employment Development Specialist The Employment Development Specialist will schedule the applicant to either appear in person or via phone. Applicant is required to provide printable verification of each job search as well as the date applied, company name,

			address, phone number, contact person (if in person), position applied for, and actual time spent on the job search activity. Applicant will complete the job search form and submit to Employment Development Specialist each week during weekly scheduled appointment. At each weekly appointment, Employment Development Specialist will collect job search forms and any supporting documentation for each job search and document actual hours of participation in WTCMS. This documentation is provided to DSS at the end of each month to be scanned into IEDR. Case management services are offered by Employment Development Specialists to evaluate, assign, and review job applications at any time.
<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
SNA Individuals	5	7	At the conclusion of Orientation, after the individual has been determined non-exempt from work requirements and supportive service needs are evaluated the applicant will be referred to an Employment Development Specialist The Employment Development Specialist will schedule the applicant to either appear in person or via phone. Applicant is required to provide printable verification of each job search as well as the date applied, company name, address, phone number, contact person (if in person), position applied for and actual time spent on the job search activity. Applicant will complete the job search form and submit to Employment Development Specialist each week during weekly scheduled appointment. At each weekly appointment, Employment Development Specialist will collect job search forms and any supporting documentation for each job search and document actual hours of participation in WTCMS. This documentation is provided to DSS at the end of each month to be scanned into IEDR. Case management services are offered by Employment Development Specialists to evaluate, assign, and review job applications at any time.

- 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

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	5	7	Recipients continue to participate in job search activity when their case is open. Recipient is required to provide printable verification of each job search as well as the date applied, company name, address, phone number, contact person (if in person), position applied for and actual time spent on the job search activity. Recipient will complete the job search form and submit to Employment Development Specialist each week during weekly scheduled appointment. At each weekly appointment, Employment Development Specialist will collect job search forms and any supporting documentation for each job search and document actual hours of participation in WTWCMS. This documentation is provided to DSS at the end of each month to be scanned into IEDR. Case management services are offered by Employment Development Specialists to evaluate, assign, and review job applications at any time.
SNA Individuals	5	7	Recipients continue to participate in job search activity when their case is open. Recipient is required to provide printable verification of each job search as well as the date applied, company name, address, phone number, contact person (if in person), position applied for and actual time spent on the job search activity. Recipient will complete the job search form and submit to Employment Development Specialist each week during weekly scheduled appointment. At each weekly appointment, Employment Development Specialist will collect job search forms and any supporting documentation for each job search and document actual hours of participation in WTWCMS. This documentation is provided to DSS at the end of each month to be scanned into IEDR. Case management services are offered by Employment Development Specialists to evaluate, assign, and review job applications at any time.

- 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 District approves self employment as an approved work activity on a case by case basis. At Assessment the Employment Social Welfare Examiner will review the reported income to determine if the client is earning minimum wage. If the client is not earning minimum wage, they will be advised they have 3 months from the date of assessment to earn minimum wage or higher in addition to working the minimum number of hours per week to meet participation requirements. Clients not meeting these requirements at the end of three months will be assigned to 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):

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.

- 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.

Non-Temporary Assistance SNAP applicants and recipients are not mandated to participate in work activities. SNAP applicants/recipients are informed of job clubs, recruitment events and host employer activities offered through WIOA.

- 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):

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.

## 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](mailto:AQI.WV.SelfAudits@otda.ny.gov) for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either 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.  
14 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.  
14 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.  
6 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.  
6 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:

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.

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, 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. 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):

- 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:

One mile.

- 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:

Applicants are screened for eligibility for diversion payments, gas cards or bus tokens for transportation to/from employment until the client received their next paycheck, referrals to other agencies/organizations to assist with any a short-term emergency needs allowing them continue their employment. Clients are also screened for eligibility for other programs that may assist such as SNAP, Day Care, and HEAP. Clients without medical coverage are referred to apply for health care coverage.

## **7.2 Post-Employment/Transitional Supportive Services**

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

All transitional and supportive services will be afforded qualified recipients. This could be clothing and or tools for work, daycare and transportation assistance with a Transportation grant for vehicle repair/purchase or gas cards to support job retention for eligible Temporary Assistance recipients

- 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:

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. Referrals to other agencies/organizations as needed.

## **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.):

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.

## 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

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.

- 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

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.

- 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:

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.

## 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:

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. 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:

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.

## 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 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.

- 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 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.

## 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:

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 BILT Coordinator, who possesses a LMHC 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.

- 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)

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

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

not using

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

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.

### **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 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. The District's Physical and Mental Health Medical Forms are uploaded separately.

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

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. 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.

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.

## **10. District Certification**

### **10.1 Certification**

As a condition of the receipt of federal and State funds the Local District Commissioner of 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, 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.

6/17/2022  
Kathryn Muller  
Commissioner

## Amendments

Date	Sections Amended
6/17/2022	Sections 2.1b and 2.2b updated to reflect the district is beginning to conduct in-person orientations and assessments, as needed. sections 5.1d and 5.1e to reflect actual hours of participation in job search rather than the 1.5 hours of time the district was crediting for each job search, which is not allowable.