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

January 1, 2022 - December 31, 2023

Wyoming 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.)

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 LDSS SNAP and TA staff are responsible and provide employment services including the conciliation process, sanctions, and dispute resolutions. Employment services include: employability determinations, orientation, assessment, employment planning, assignment to work activities, monitoring of participation, development and monitoring treatment plans for exempt individuals. Literacy West conducts TABE testing, provides educational classes, training, and allows clientele to use their computers for job searches. Referrals are made to Literacy West for SNAP E&T employment requirements.

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
Wyoming County Workplace Health Services	\$750	☐ FFFS ☐ SNAP E&T ☑ Local ☐ Other	 ☒ FA ☒ SNA Family ☒ SNA Individual ☒ SNAP ☐ TANF 200% 	Provides physical exams to provide DSS with medical clearance for work on an individual accompanied by written notification of any restrictions from usual work activities. The cost is \$75 per exam
Costillo Languages	\$2,000	☐ FFFS ☐ SNAP E&T ☐ Local ☑ Other local funds		Interpretation & translation

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
Clarity	Others: unknown	□ FA □ SNA Family □ SNA Individual □ SNAP □ TANF 200%	Mental health
Spectrum Health Services	Others: unknown	□ FA □ SNA Family □ SNA Individual □ SNAP □ TANF 200%	Mental Health counseling, drug and alcohol treatment, personalized recovery orientated services, health homecare coordination, supportive housing
Core Learning Center	Others: unknown	 ☑ FA ☑ SNA Family ☑ SNA Individual ☑ SNAP ☐ TANF 200% 	Pre-test assessing, secondary completion (TASC) classes, TASC classes, TABE testing, computer literacy classes, Adult Basic Education (ABE) classes
Wyoming County Community Action	Others: unknown	□ FA □ SNA Family □ SNA Individual □ SNAP □ TANF 200%	Job search assistance, career counseling, direct job referrals, resume writing, computer lab, and job placement services.
Attain Lab	Others: unknown	 □ FA □ SNA Family □ SNA Individual □ SNAP □ TANF 200% 	Computer skills
BOCES	Others: Funding source is unknown	 □ FA □ SNA Family □ SNA Individual □ SNAP □ TANF 200% 	Vocational Education

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Continental School of Beauty	Others: unknown		Vocational Educational Training

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:

Costillo Languages is used as needed. We pay them and then do a charge back to whatever program area it belongs to, so it could be child welfare, eligibility, employment, etc. The funding stream would be paid out of administration and then charged back out of each program area.

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 Placement Services
☐ Grant Diversion
☐ Job Development (employer outreach)
☐ WOTC pre-certifications

Target Groups:
☐ Applicants
☐ FA & SNA with children

☐ FA & SNA with children
☐ SNA without children

☐ SNAP ☐ TANF 200%

☐ Job Club

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

No JOBS 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 Career Center e-mails DSS a monthly calendar of events, classes, or job fairs . This information is utilized to refer clients to the applicable jobs, workshops, resume writing, and/or work-sites. Information regarding the Career Center is provided to clients during job search enrollment, during orientation, and during client interviews. LDSS also attends WIOA meetings to keep up on current referrals and information.
	Orientation, Assessment and Employment Plan 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:
	Orientation is completed in both group and individual settings and is conducted by the

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:
	After the Temporary Assistance case is opened, the Community Services Worker sends correspondence via WTWCMS to TANF and non-exempt SN recipients with a scheduled appointment to complete the Employment Assessment and Plan. The assessments are conducted in a timely manner: 90 days for households with dependent children, in addition to 16 and 17-year-olds that are not in school; 180 days for households without dependent children. The Community Services Worker then identifies barriers and strengths of each individual.
c.	Which district administrative unit or contractor is responsible for conducting assessments?
	The Employment Unit of the Temporary Assistance Unit of the Department of Social Services.
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)):
	At a minimum, provisional or permanent status of a Community Services Worker, Social Services Program Specialist/Trainee and Sr. Social Services Program Specialist.
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?

The assessment is updated when the client's employment status changes from exempt to non-exempt, there is a change in circumstances, or at minimum of every six months.

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:
	After the Temporary Assistance case is opened, the Community Services Worker sends correspondence via WTWCMS to TANF and non-exempt SN recipients with a scheduled appointment to complete the Employment Assessment and Plan. The Employment Plan is conducted in a timely manner: 90 days for households with dependent children, in addition to 16 and 17 year old's that are not in school; 180 days for households without dependent children. The Community Services Worker then identifies barriers and strengths of each individual
d.	How often and under what circumstances is the employment plan updated?
	The assessment is updated when the client's employment status changes from exempt to non-exempt, there is a change in circumstances, or at minimum of every six months.

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:

None

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:

Language line in addition to a contract with Costillo Languages for interpretation and translation services.

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:

Workers in the Temporary Assistance unit will ensure that linkages (such as child care and transportation) are in place prior to participation to limit absenteeism. In addition, once engaged, phone calls are placed to the participant as well as the work site to ensure any underlining issues can be resolved minimizing absenteeism. Timesheets are received monthly and monitored for attendance.

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:
\boxtimes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:
	During the sanction process the Program Specialist and Community Services Workers and the sanctioned individual via telephone to discuss their reasons for non-

During the sanction process the Program Specialist and Community Services Worker contacts the sanctioned individual via telephone to discuss their reasons for non-compliance.

Consequences and supportive services are reinforced, as well as family responsibilities. If no progress is made, face to face contacts are conducted.

3.5 Strategies for Reducing the Need for TA

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

Applicants are met with individually at which time they are advised of their options. A dialogue takes place, whereby all supportive services are discussed, giving the client a myriad of avenues to choose; such as full child support, daycare, EITC, SNAP, short term diversion payments, CST, and HEAP.

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
⊠ FA	Unsubsidized Employment – Full time or part time employment in the public or private
SNA FAM	sector that is not subsidized by TANF or any other public program (excluding employer
SNA Ind SNA IND	tax credits). Unsubsidized employment includes self-employment and/or paid internships.
SNAP	

Case Type	Activity and Definition
□ FA □ SNA FAM □ SNA Ind	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
⊠ SNAP	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.
☐ FA☐ SNA FAM☐ SNA Ind☐ 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.
☐ FA ☐ SNA FAM ☐ SNA Ind ☐ 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.
☐ FA ☐ SNA FAM ☐ SNA Ind ☐ 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.
☐ FA☐ SNA FAM☐ SNA Ind☐ SNAP	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.
☐ FA ☐ SNA FAM ☐ SNA Ind ☐ SNAP	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.

Case Type	Activity and Definition
□ FA□ SNA FAM□ SNA Ind□ SNAP	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.
☐ FA☐ SNA FAM☐ SNA Ind☐ SNAP	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.
☐ FA☐ SNA FAM☐ SNA Ind☐ 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.
☐ FA☐ SNA FAM☐ SNA Ind☐ 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.
	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.
☒ FA☒ SNA FAM☒ SNA Ind☒ 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.
☒ FA☒ SNA FAM☒ SNA Ind☒ 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.

The LDSS has a good relationship with local temporary employment agencies that will conduct on-site applications and/or interviews. LDSS employments unit receives flyers when job fairs are in the area and direct referrals are made from there.

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.

None

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:
 - LDSS has an agreement with Core Learning Center for TABE testing. We also utilize the SUNY Attain Lab, Wyoming County Community Action(One-Stop) and Core Learning Center for one-on-one tutoring, in addition to working with the individuals that do not meet the minimum reading requirements by some employers
- 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:
 - LDSS utilizes Genesee Valley BOCES, Mt. Morris BOCES, and the Continental School of Beauty for Vocational Educational Training. The agency refers individuals to Wyoming County Community Action, Core Learning Center or the SUNY Attain Lab which offer Job Skills Training for individuals that have expressed interest in such activities at the time of their initial assessment.

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:

Information on educational activities is relayed during the orientation process and again at the assessment stage to all individuals that do not have a high school diploma. Individuals are given a referral at orientation to attend TABE testing. Once scores are received individuals are placed in appropriate educational activities via a referral.

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 refers all individuals who express interest in this activity based on their assessment, aptitude, prior participation or compliance with education activities, availability of supportive services via a referral to various locations upon availability with the time, location and hours of operation. The only time that individuals would be denied this activity is if locations are completely full and not accepting any new participants

- 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:
 - a. The individual's current ability to reasonably compete for jobs without additional training.
 - b. Attendance and satisfactory progress of evaluations from previously assigned work activities.
 - c. Prerequisite educational levels needed to be successful in the program;
 - d. The participant's readiness to seek employment after the training is completed. This readiness includes the availability of child care and transportation.
 - e. Participants must complete at least one month of successful work experience before the approval of the training can be granted. Prior approval is required. The training cannot exceed 52 weeks in length and must be in a demand occupation and must provide a sufficient skill to enable the trainee to move directly into employment.
- f. Described below are the standards by which education and training providers are evaluated:

Providers, such as all schools within the county, Genesee Community College and Genesee Valley BOCES are approved, as they are certified by State Education

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

Information is relayed during the orientation process and during the one-on-one meetings with individuals at assessment.

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

The participants are notified of approval for enrollment in a work activity both in writing and verbally.

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

Allowable attendance for teens shall be defined as each school's attendance policy, as set per State Educational Department criteria. The agency sends a school letter every six months to monitor their attendance. The Community Services Worker receives monthly attendance reports for 18 year old high school students.

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:

Obtaining a complete physical that lists the individual's limitations and insures that any and all work activities are in compliance with health-related limitations by the workplace health organization. Notice of limitations, if any, are made in writing or via e-mail to the work site supervisor. Work activities and work sites will be monitored periodically to ensure that work sites and assigned work activities are responding to participant's work limitations.

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 highest level of post-secondary education that LDSS approves is a 2 year degree

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:

During enrollment in post-secondary education they are also assigned to 20 hours per week in a core activity.

- 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 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:

If a participant refuses a bon-a-fide offer of employment or on the job training that is comparable in both type of work and flexibility of the scheduled work-study, externship, internship or other work placement, they are not eligible to participate.

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).

Within seven business days of application, Temporary Assistance and Safety Net applicants are scheduled for Orientation, TABE testing, if applicable, Drug & Alcohol assessments, Work Place Health evaluations, (if they indicate they have some type of limitation), job search enrollment and child support. In addition, individuals that are non- exempt are given direct job referrals along with available job listings. Non-exempt individuals are required to make ten (10) job search contacts per week. Once the case is opened, the TA and SN recipients that are non-exempt are enrolled within ten days in work activities. The same time frame is also used for individuals who transition from exempt to non-exempt status. The LDSS advises TANF & SN households they may be required to complete up to 40 hours of work related activities with WEP hours being limited to the monthly PA grant plus the Supplemental Nutrition Assistance Program (SNAP) allotment divided by the State or Federal minimum wage, whichever is higher. However, hours of participation are determined on a case by case basis as appropriate due to work limitations, child under 6 in the household or other case circumstances.

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

Household Type	Number Served
Households with Dependent Children Average Monthly	10
Households without Dependent Children Average Monthly	20

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:

Reports from COGNOS are run twice a month to monitor an individual's progress towards work participation requirements and ensuring full engagement by adults in work and/or work activities.

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	20	Applicants are required to complete a minimum of 20 hours weekly, with no fewer than 10 employer contacts per week along with time spent on other job search efforts, such as identifying potential employers, preparing and or submitting resumes, employer follow-up letters, or reporting to job fairs. A client's job search log is utilized for tracking and direct job referrals are given. At the present time, applicants are returning every week on a one-on-one basis to review their job search logs and efforts. General information also presented at this time. Case management services are provided by referring individuals and families to other units within the Agency or other Departments within the Community to assist with other needs such as Job Readiness Training, interviewing skills, resume writing, pursuit of child support, child care, and clothing for interviews or necessary to obtain employment.

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
SNA Individuals	10	20	Applicants are required to complete a minimum of 20 hours weekly, with no fewer than 10 employer contacts per week along with time spent on other job search efforts, such as identifying potential employers, preparing and or submitting resumes, employer follow-up letters, or reporting to job fairs. A client's job search log is utilized for tracking and direct job referrals are given. At the present time, applicants are returning every week on a one-on-one basis to review their job search logs and efforts. General information also presented at this time. Case management services are provided by referring individuals and families to other units within the Agency or other Departments within the Community to assist with other needs such as Job Readiness Training, interviewing skills, resume writing, pursuit of child support, child care, and clothing for interviews or necessary to obtain employment.

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.
□ No	

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	10	20	Recipients are required to complete a minimum of 20 hours weekly, with no fewer than 10 employer contacts per week along with time spent on other job search efforts, such as identifying potential employers, preparing and or submitting resumes, employer follow-up letters, or reporting to job fairs. A client's job search log is utilized for tracking and direct job referrals are given. At the present time all SN, TANF and SN Families are seen on a one-on-one basis, to review their job search logs & efforts. The local district also reviews and approves self- employment as part of the individuals required work activities. General information also presented at this time. Case management services are provided by reviewing individual and family needs and making referrals to other units within the Agency and to other Departments within the Community that may assist the individual in obtaining employment by attending classes for interviewing skills, job readiness training, child support, child care, and necessary clothing for interview.
SNA Individuals	10	20	Recipients are required to complete a minimum of 20 hours weekly, with no fewer than 10 employer contacts per week along with time spent on other job search efforts, such as identifying potential employers, preparing and or submitting resumes, employer follow-up letters, or reporting to job fairs. A client's job search log is utilized for tracking and direct job referrals are given. At the present time all SN, TANF and SN Families are seen on a one-on-one basis, to review their job search logs & efforts. The local district also reviews and approves self- employment as part of the individuals required work activities.

Recipient Job	Min.	Min.	Additional Information
Search	Contacts	Hours	
			General information also presented at this time. Case management services are provided by reviewing individual and family needs and making referrals to other units within the Agency and to other Departments within the Community that may assist the individual in obtaining employment by attending classes for interviewing skills, job readiness training, child support, child care, and necessary clothing for interview

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.

If the district always approves self-employment as part of an individual's required work activities, please note this policy below.

LDSS accepts all self-employment as an eligible work activity, but each case is reviewed on a case-by-case basis to determine the reported hours meet the eligibility criteria. If the hours are not sufficient to meet the individual's hourly participation requirements, the individual must participate in additional activities. The agency will allow the self-employed individuals six months to increase their business income. After six months if the self-employed individual is not earning income equal to minimum wage, they will be required to participate in additional 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):

All NTA-SNAP recipients are mandated to engage in a supervised job search for a maximum of 15 hours per week for 6 weeks or attend the Core Learning Center for other work activities, not to exceed 15 hours per week. Case management services are provided, and supportive services are also provided, if needed. The Core Learning Center conducts assessments and goal setting for each individual to address any barriers.

- 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.
 - All NTA-SNAP recipients are mandated to engage in a supervised job search for a maximum of 15 hours per week or attend the Core Learning Center for other work activities, not to exceed 15 hours per week. All supervised job searches are supervised and tracked by the Community Services Worker. Weekly reports are received from the Core Learning Center, which are reviewed for compliance. All supervised job search contacts are also reviewed by the Community Services Worker. A data-base is maintained by the Community Services Worker of all participants
- 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):

All supervised job searches are supervised and tracked by the Community Services Worker. Weekly reports are received from the Core Learning Center, which are reviewed for compliance. All supervised job search contacts are also reviewed by the Community Services Worker. A data-base is maintained by the Community Services Worker of all participants.

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 <u>AQI.WV.SelfAudits@otda.ny.gov</u> 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
- 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 selfsufficiency:

Transportation through reimbursement equal to the mileage rate the IRS permits as a tax deductions to/from medical/moving appointments (publication 502) for private vehicles and/or bus passes; provision of vehicle repairs, licensure, insurance, or registration costs, tools, clothing, or other special needs identified by the Department and essential to obtain or retain employment.

D.	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 reimbursementate 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 1/1/21is 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:

The Agency looks at employers within the area where the recipient or applicant resides; whereas they could walk up to two miles one way to work and/or to access public transportation. This is not a hardship for most people and there would be employers within that distance range. Reasonable accommodations are made for individuals with work limitations.

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:

Transportation through reimbursement equal to the mileage rate the IRS permits as a tax deductions to/from medical/moving appointments (publication 502) for private vehicles and/or bus passes; provision or vehicle repairs, licensure, insurance or registration costs, tools, clothing, or other special needs identified by the Department and essential to obtain or retain employment. All requests for supportive services are reviewed for reasonableness and cost effectiveness (for vehicle repairs, blue book values are reviewed and taken into consideration).

7.2 Post-Employment/Transitional Supportive Services

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

All support services as identified in 4.1, job readiness training, Case Management Services, Transitional Child Care, Medicaid, SNAP and transportation; providing they meet the eligibility criteria.

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:

All supportive services as identified in 4.1, job readiness training, Case Management Services, Transitional Child Care, Medicaid, SNAP and transportation: providing they meet the eligibility criteria.

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.):

CST- Services to obtain and retain employment ranging from payment for vehicle insurance,

	registration and vehicle repairs.
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 notice will be issued to the individual to indicate a failure or a refusal to participate in an employment placement and/or a work activity. The individual must respond within the allotted time frame. If the individual fails to respond to the conciliation notice within the required number of days or if the district determines from the conciliation that the participant's refusal or failure to comply was willful and without good cause, the district will issue a 10-day notice to discontinue or impose a sanction.
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):

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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	
	When the recipient fails to comply with SNAP Work Requirements, the worker will send a LDSS 4230A - SNAP Conciliation and Option to Avoid a Sanction form notifying the recipient of non-compliance and requiring that they contact the agency within 10 days to document good cause, or an exemption from participation in SNAP work activities.	
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:	
	Once the recipient contacts the agency to determine good cause or wants to come into compliance, the worker sends out a LDSS 2642, Document Requirement, along with either a supervised Job Search Log to complete and return within 5 business days or a scheduled appointment to attend the Core Learning Center within 5 business days.	
8.2 Sanction		
_	Described below is the district's precedure for determining compliance for those TA	

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:

After a durational sanction, a recipient, may request to re-engage in job activities and show compliance by completing the activity that they failed to comply with. If it is Supervised job search, the recipient will have to complete 10 job contacts, which needs to be completed within a 7-day timeframe.

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:

An individual may be eligible for SNAP benefits before the end of the durational sanction period if the individual documents that he/she is exempt from SNAP work requirements and is otherwise eligible for SNAP benefits. After a durational sanction period ends, a recipient may request to end their sanction by re-engaging in the Supervised job search program for 15 hours per week or re-engage in activities at the Core Learning Center for 15 hours per week.

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		
R	Disability Determinations, Documentation and equirements 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 		
	All applicants and recipients that claim a disability and/or work limitations are allowed to submit information from their medical provider within 10 days of their Work Place Health physical to be used in consideration. However, the Work Place Health determination is the final determination regarding referral of individuals to employment activities.		
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 		
	All applicants and recipients that claim a disability and/or work limitations are allowed to submit information from their medical provider within 10 days of their Work Place Health physical or before, but the Work Place Health determination is the final determination regarding referral of individuals to employment activities. Work Place Health determines an individual's work status for full or part-time employability, in addition to determining if a client is able to work with or without restrictions or if they are able to work at all.		

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.).

Medical statements are reviewed by the Principal or Sr. Program Specialist to determine if individuals may be restored to self-sufficiency through rehabilitation. The individual will be required to provide information from their practitioner, as to whether the client may be restored to self-sufficiency, if the issue is Mental Health. If the issue is a physical condition, but through rehabilitation can be restored to self-sufficiency, the individual may be referred to the district's practitioner for an examination to determine whether the client may recover from the physical impairment. Under these circumstances the client must

comply with medical recommendations. The treatment is then monitored by the Community Services Worker, Program Specialists, Senior and Principal Program Specialist to ensure the client is accepting/complying with the medical care necessary to improve his/her ability to work.

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

A treatment plan is incorporated into the individual's employment plan and is made in conjunction with the individual and any and all evaluations or services that they are involved in. A referral is sent via WTWCMS to the individual outlining appropriate treatment to restore the client to self-sufficiency.

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 Agency is in contact with treatment providers on a monthly basis to monitor attendance and progress. One hundred percent attendance is required unless good cause is provided for an absence. Satisfactory progress will be tracked closely by the Department staff and will be based upon specific goals identified by the Department staff and clients. The treatment plan is updated by the provider each time the individual completes a session.

10. District Certification

10.1 Certification

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

1/27/2022 Kimberley Barber Commissioner