

Orange County

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

January 01, 2024 - December 31, 2025

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1. Administration

1.1 Administrative Structure

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

Please see attached organizational 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 Orange County Department of Social Services (DSS) contracts all employment services to the Orange County Employment & Training Administration (ETA). We are a county agency along with DSS and have been providing these services for more than two decades. The income maintenance office of DSS is responsible for budgets and overall case management. The ETA is responsible for all employment and training activities including WTWCMS functions.

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.

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

Contracts or Agreements with Agencies Who Provide TA and SNAP Employment Services

| Provider | Total Contract Cost per Year | Funding Source(s) | Categories of Clients Served | Programs, Services or Activities Provided |
|--|-------------------------------------|---------------------------|---|--|
| Orange County Employment & Training Administration | \$3,529,626 | FFFS SNAP E&T Local | FA SNA Family SNA Individual SNAP TANF 200% | Case management, client orientation, assessment, employment planning, job readiness and job search assistance, support service provision, referrals including childcare, transportation program, counseling workshops, vocational and on the job training. Job placement, retention, support, and other services needed to assist and overcome barriers to employment. ETA utilizes funds to run a SNAP E&T program providing the same as the above services and resources to those receiving SNAP benefits. Local transportation program used to transport clients to and from paid work, employment programs, training job search and childcare locations. |
| Merakey | \$460,805 | FFFS Local | FA SNA Family SNA Individual | In-home program to work with exempt populations to assist with either returning to work or obtaining SSI/SSD. |
| Gallagher Bus Co | \$6,000 | Local | FA SNA Family SNA Individual SNAP TANF 200% | DSS purchases city bus tickets for eligible consumers to ride for free. |

- 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.

Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and TANF 200%.

Agencies and Providers to whom the District Refers for Employment Services

| Provider | Funding Source(s) | Categories of Clients Served | Programs, Services or Activities Provided |
|--------------------------------------|---|---|--|
| Orange County Home Visiting Programs | FFFS Local Others: State funding from governor's office | FA SNA Family SNAP TANF 200% | Home visiting support for pregnant and parenting families. Including education about health and development of babies and children, pregnancy, newborn care, and other supports. Promoting bonding, attachment, and school readiness. Enrollment until child is five or enters school or Head Start. |
| Orange Ulster BOCES | Other: WIOA | FA SNA Family SNA Individual SNAP TANF 200% | HSE/GED, ESL, vocational training. |
| SUNY Orange | Others: WIOA, Financial Aide | FA SNA Family SNA Individual SNAP TANF 200% | Vocational training, certificate, and degree programs. |

- 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:

Director of Economic Independence from DSS meets with Employment Coordinator from ETA twice per month and Executive Team from both agencies meet every other month. DSS fiscal staff also work with ETA to ensure all programs are following planned procedures and goals.

1.3 OTDA Jobs Staff Agreement

- a. OTDA Jobs Program Services - Target Groups (reply yes or no to the options as they apply):

Services Provided by Jobs Staff

| Yes or No: | Services Provided: |
|------------|-------------------------------------|
| N/A | Assessment/Employment Plan |
| N/A | Supervised job search |
| N/A | Job readiness training |
| N/A | Job club |
| N/A | Job placement services |
| N/A | Grant diversion |
| N/A | Job development (employer outreach) |
| N/A | WOTC pre-certification |

Jobs Staff Target Groups

| Yes or No: | Target Groups: |
|------------|------------------------|
| N/A | Applicants |
| N/A | FA & SNA with children |
| N/A | SNA without children |
| N/A | SNAP |
| N/A | TANF 200% |

- b. Described below are the additional services/duties Jobs Staff will be requested to perform (e.g., Welfare to Work Case Management System (WTWCMS) data entry, case conferencing, job fairs).

N/A

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 (reply yes or no to the options as they apply):

Programs and Services Provided at Career Centers

| Yes or No: | Programs and Services Provided: |
|------------|--|
| Yes | The district has employee(s) physically present at a Career Center |

| Yes or No: | Programs and Services Provided: |
|-------------------|--|
| Yes | The district has contract staff physically present at a Career Center |
| No | The district makes available direct access to its program staff via phone or technology at a Career Center |
| Yes | The district makes available copies of the LDSS-2921 (Common Application) at a Career Center |
| No | Other (described here): |

- 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 Orange County Employment and Training Administration Welfare to Work Unit is physically located in all three Orange Works Career Centers in Orange County, including Newburgh, Middletown, and Port Jervis. The OC ETA runs WTW programs as well as all WIOA programs and are co-located with NYS Department of Labor for over 20 years. Orange County is a leader in this collaboration and was one of the first counties to offer one stop services.

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

- a. How does the district provide orientation (reply yes or no to the options as they apply)?

District Orientation Procedures

| Yes or No: | District Orientation: |
|-------------------|--|
| No | The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation. |
| Yes | In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: Orientation presenter tells participants about the Orange County Home Visiting Programs, including Healthy Families NY (HFNY) and Perinatal and Infant Community Health Collaborative (PICHC). Sample handout is attached in Documents. |

- b. Described below is how the district completes the required orientation for all applicants and recipients of TA at application and recertification. Orientation can be held in-person, either in a group setting, individually, or a combination of both. It can also be held virtually, over the phone, or by sending orientation material to the client by mail. Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

Orientations are mostly held in-person, in a group setting. If a consumer cannot attend, an individual, virtual, telephone or mailed materials, can be arranged. Orientation procedures for exempt individuals and nonexempt individuals are the same.

2.2 Temporary Assistance (TA) Employment Assessment

- a. How does the district conduct assessments as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

District Assessment Procedures

| Yes or No: | How the district conducts assessments |
|------------|--|
| Yes | The district enters assessments directly into WTWCMS. |
| No | The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS. |
| No | The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. If applicable, the local equivalent contains additional elements beyond what is required: |

- b. Described below is the district procedure for the completion of an employment assessment, including when initial assessments are conducted and whether an assessment is conducted in-person, virtually by phone, or a combination of both:

The district will provide an individual assessment of all adult members of households with dependent children and 16 and 17 year old members of households with dependent children who have left school without completing or receiving an equivalency diploma. The assessment will be completed within 90 days of determining that the individual is eligible for assistance.

The district will provide an employability assessment for applicants and recipients without dependent children who are exempt and for those who are not exempt from assignment to work activities and will be completed within 90 days.

The procedure for completing an assessment will include the client reporting to the Employment Unit and meeting with an employment staff member who will question, discuss, clarify and collect information about the individual and/or his or her family to accurately record information useful to identify client needs, goals, limitations, aptitudes and any other pertinent information. This information will be documented using the Assessment folder on WTWCMS and can have additional or future details entered as needed.

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

Orange County Employment & Training Administration (ETA)

- 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)):

Graduation from a regionally accredited or New York State registered college or university with a Bachelor’s Degree in related field with no work experience; OR Graduation from a regionally accredited or NYS registered college or university with an Associate’s Degree plus one (1) year experience working in job training, placement or human service program; OR three (3) years equivalent work experience. Preferred skills include good knowledge of workforce development programs, policies, and procedures. Good knowledge of the cultural, environmental, and personal factors influencing the lives of persons who are economically disadvantaged, low income, unemployed or otherwise facing barriers to employment. Bilingual skills are preferred.

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

Yes

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

Yes

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

Yes

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

Every six months and/or any time there is a significant change to the case which could impact employment or employability.

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

- a. How does the district develop individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a) (reply yes or no to the options as they apply)?

District Employment Plan Procedures

| Yes or No: | How the district develops employment plans |
|------------|--|
| Yes | The district enters employment plans directly into WTWCMS. |
| No | The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTWCMS. |

| Yes or No: | How the district develops employment plans |
|------------|--|
| No | The district develops individual employment plans using a local equivalent tool. If applicable, the local equivalent contains the following additional elements beyond what is required: |

- b. Who develops the employment plan (reply yes or no to the options as the apply)?

District Employment Plan Development

| Yes or No: | Who develops the districts employment plans |
|------------|--|
| Yes | The same administrative unit or contractor that conducts employment assessments also develops employment plans. |
| No | A different administrative unit or contractor develops employment plans and the contractor’s qualifications include: |

- c. Described below is the district procedure for the completion of an individual's employment plan:

The district will provide an employment plan for all consumers to document a plan of action for which to move forward and proceed with. This mandated document gives consumers a tangible guide, providing an organized plan for which to work toward. This plan will include employment preferences, goals (short and long term), challenges, barriers, support services (such as childcare and transportation) and others. Goals should be specific, measurable, attainable, relevant, and timely. Whenever an employment plan is created or updated, the client is provided a copy.

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

Every six months and/or any time there is a significant change to the case, such as an employment activity. which could impact employment or employability. Whenever an employment plan is created or updated, the client is provided a copy.

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:

Engagement is attempted by ETA staff to ensure participation by vigorous attempts at communication with consumers. Any type of communication is attempted, such as phone calls, home visits, electronic communications such as emails, and other efforts are exhausted. Once contacted, one on one conversations that address client needs, utilizing employment plans, relying on partners and supports, and engaging consumers in employment and employment related activities are explored. The estimated time period it takes for individuals to be engaged in activities for both newly opened cases and those who have changed from exempt to nonexempt is approximately 4-6 weeks. Some will take less time, some will take more time, but 4-6 weeks is a good average.

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

The unit has several bilingual staff in each office to accommodate the needs of non-English speaking participants. The staff also has access to a telephone service that offers translator services when needed.

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:

Staff perform outreach by telephone, mail, email, and other means of contact in order to engage clients and reduce the occurrence of participants failing to attend work activities. In addition, staff have case conferences and meetings to discuss barriers and engagement strategies to problem solve and find solutions. Often, situations will occur and supports such as daycare, transportation and housing and others may play a role in noncompliance. The outreach performed by staff is very important because if the barrier can be identified, most of the time it can be resolved with support from the unit. In addition, information about Orange Works Career Center recruitments, new vocational training programs, workshops and other interesting activities are also shared.

3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

- a. The following are strategies used to engage sanctioned participants. If a district uses one of the options, a description will be provided (reply yes or no to the options as they apply and provide a description for “yes” responses):

Strategies and Procedures for Engaging Sanctioned TA Participants

| Yes or No: | Strategies and Procedures for Engaging Sanctioned TA Participants |
|------------|--|
| Yes | Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: |

| Yes or No: | Strategies and Procedures for Engaging Sanctioned TA Participants |
|------------|---|
| | The district attempts to engage sanctioned clients in a several ways. Staff react proactively to recapture participation and are mindful of the type of sanction imposed. For example, for a WE1 sanction, the staff informs the participant immediately (either by mail, telephone call or calling into our office for an appointment) that compliance will immediately lift their sanction. Every attempt to get participants to come in to resolve their issue is attempted. For longer, durational sanctions, outreach and engagement efforts are attempted in the same manner, but participants are advised that their sanction will not be lifted until the durational time period is over. |
| Yes | Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Outreach to participants by telephone call, letters in the mail or other means of contact to engage them to re-engage are attempted |
| Yes | Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Again, engagement attempts are made by telephone calls, mailings, and other outreach |

3.5 Strategies for Reducing the Need for TA

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

Some ETA staff including case managers and job developers, perform diversion activities by assisting clients with job search activities such as scheduling interviews, providing transportation and other supportive services that may assist an applicant with obtaining a job before his or her case is opened. In addition, the Career Center hosts employer recruitments and job fairs that are available to all county residents. Often, clients are hired before their cases open and also may reduce or even close some cases when employment is obtained. In addition, the tireless efforts of the staff to assist in helping clients find jobs and to help them every step of the way to meet their goal of self-sufficiency is the most effective strategy practiced daily.

4. Work Activities

4.1 Allowable Work Activities

- a. Below is a list of 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.

Allowable Work Activities by Case Type

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

| Activity and Definition | Case Type |
|--|---------------------------------------|
| <p>Secondary School – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p> | <p>FA SNAFAM SNA SNAP</p> |
| <p>Job Skills Training – Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p> | <p>FA SNAFAM SNA SNAP</p> |
| <p>Education Training – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), 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> | <p>FA SNAFAM SNA SNAP</p> |
| <p>Job Readiness Training (JRT) Activities – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p> | <p>FA SNAFAM SNA SNAP</p> |

| Activity and Definition | Case Type |
|---|-----------------------------|
| <p>Subsidized Private Sector Employment – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p> | FA SNAFAM SNA SNAP |
| <p>Subsidized Public Sector Employment – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p> | FA SNAFAM SNA SNAP |
| <p>Community Service – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> | FA SNAFAM SNA SNAP |
| <p>Provision of Childcare for Individual Participating in Community Service – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p> | FA SNAFAM SNA SNAP |
| <p>SNAP E&T Supervised Job Search – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p> | N/A |
| <p>On-the-Job-Training (OJT) – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> | FA SNAFAM SNA SNAP |

| Activity and Definition | Case Type |
|---|-----------------------------|
| 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. | FA SNAFAM SNA SNAP |

4.2 Job Development

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

Yes

How does the district participate in job development activities (reply yes or no to the options as they apply)?

How the District Participates in Job Development Activities

| Yes or No: | How the district participates in job development activities |
|------------|--|
| Yes | <p>District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.:</p> <p>The OC DSS contracts with the Orange County Employment and Training Administration (OCETA) to coordinate all employment services to non-exempt public assistance recipients, including TA and/or SNAP participants. OCETA, like OC DSS, is a county government agency under Orange County Government and therefore, can be considered part of the "district". A coordinator oversees all program activities in three offices across the county, with each office having line supervisors to monitor case managers. There are also two clerical support staff as well as transportation staff and per diem drivers to assist clients with getting to employment, employment related activities and training.</p> <p>The line supervisors, called Employment Services Coordinators oversee the day-to-day activities of our job development program, called the Job Readiness Training Program (JRT). Staff in this unit are trainers in job readiness preparation, job developers (who do job development, employer contacts and job placements). There are a total of 6 staff in the JRT program. This program is locally funded because it is such an asset and important part of our successful outcomes. Staff make employer contacts daily as well as assisting job seekers with their job search. Some include online, over the telephone, and in person collaboration to assist. The main function of their job is to place our participants in jobs and daily assist them with applications, interviews and/or any other support necessary to help them gain employment. If job seekers become employed and do not have transportation, it will be provided to them if possible, utilizing one of our county vans or a taxi. In addition, a Career Center staff professional, Workforce Systems Associate, has a listing of center friendly employers, and also plans recruitments and job fairs. The unit has access to these resources. On-site recruitments in the Orange Works Career Centers as well as arranging OJT contracts and other employment opportunities for job seekers.</p> |
| Yes | <p>District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.:</p> |

| Yes or No: | How the district participates in job development activities |
|------------|--|
| | As previously noted, the OC DSS contracts with the Orange County Employment and Training Administration (OCETA) to coordinate all employment services to non-exempt public assistance recipients, including TA and/or SNAP participants. OCETA, like OC DSS, is a county government agency under Orange County Government and therefore, can be considered part of the "district". There are 6 Job Readiness Training staff, 3 supervisors, and other staff contribute daily to job development efforts. |

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 (ABE), 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. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.

Providers have been accredited and approved by the NYS Education Department and have had long term relationships with the Career Center of Orange County and ETA. Orange Ulster BOCES, SUNY Orange, Best Resources, and the Literacy Council of Orange County (all recognized and certified by NYS Education Department) are contacted and referrals are made based on the client's needs and goals. These programs include adult basic education, high school equivalency and English language instructional services.

- 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. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

The district identifies providers by referring to the NYS eligible training provider (ETP) list. This list includes Workforce Development Board and WIOA approved providers who have committed to working with the county. The district will approve as a work activity, up to a four-year college program when appropriate and suitable related to the client becoming employed based on the education for up to one year of the training program. The approval process is based on consideration of a participant's suitability, interests, aptitudes, and likelihood of whether or not the participant will most likely become employed based on the training outcomes. A demonstration of good attendance, motivation, and overall attitude toward participation in employment and training activities is considered.

- c. Described below are the district's 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. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.

The process includes case managers identifying those who do not have basic literacy or high school diploma by interviewing during the completion of the assessment process. In addition, clients are referred to the district's Job Readiness Training Program (JRT) where the TABE test is administered (when possible, considering COVID safety guidelines). Once identified, clients are referred to needed services. HSE programs are provided by nearby educational partners agencies who offer HSE, ABE and ESL. Transportation and childcare barriers are addressed and provided as best we can.

- 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.

Case managers and staff follow guidelines set by educational institutions such as our local BOCES and SUNY Orange to determine whether participation in educational activities is approved for those without a high school diploma. Instances when the district would deny participation would happen if the desired program had a pre-requisite of a high school diploma, HSE or specific reading or math level. For those who do not have a high school diploma or HSE, staff encourage and recommend participation in classes and usually include this educational activity as part of their individual employment plan.

- 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 approval process is based on consideration of a participant's suitability, interests, aptitudes, and likelihood of whether or not the participant will most likely become employed based on the training outcomes. A demonstration of good attendance, motivation, and overall attitude toward participation in employment and training activities is considered.

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

A Vendor Training Monitoring Guide is utilized and considers and evaluates the program's historical success, how many participants get jobs from the training, how many retain their jobs, credentials and certifications of the training institution and individual trainers, labor market demands related to the training, and other related considerations.

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

Participants are advised of training providers during their initial orientation; by their employment case manager when discussions are had about training during the employment plan development; and during the JRT Program as an option to reach their goal of employment and independence. There is an electronic list of providers that can be viewed by participants as well.

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

Participants are notified for approval for training or enrollment in writing and often on the telephone. The activity will be included in their Employment Plan found on WTWCMS.

- 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.

ETA requests attendance documentation from the school district that the youth(s) are attending. This proof is requested to the school guidance counselor on a school-year quarterly basis, at the end of each marking period.

- 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.

During the assessment process, staff review health related limitations and are mindful of these when assigning work activities. In addition, medical documentation must be presented to verify the limitation. If the individual does not have one or needs a medical provider, a referral is made to the district's contracted provider, Industrial Medical Associates. (IMA). Work activity providers are notified of an individual's work limitations in writing.

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 (please ensure to include the current providers the districts partners with for the provision of post-secondary education programs in Table 1 or Table 2 under Section 1.2 of this plan):

The district will approve as a work activity, up to a four year college program when appropriate and suitable related to the client becoming employed based on the education.

- b. 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 described below (reply yes or no to options as they apply):

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

| Yes or No: | Conditions for disapproval of work activity |
|------------|--|
| Yes | It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA. |
| Yes | 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. |
| Yes | 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. |

| Yes or No: | Conditions for disapproval of work activity |
|-------------------|--|
| Yes | The institution or student fails to monitor and report information regarding the student's attendance and performance as required. |
| Yes | The student fails to progress toward the completion of a course of study without good cause, as determined by the district. |
| Yes | 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. |
| N/A | Additional reasons as stated here: |

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. Included in this description is 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).

Orange County plans to meet federal and state participation rates by assessing client needs, utilizing employment plans, relying on partners and supports, and engaging consumers in employment and employment related activities. The weekly standard participation requirement for a single parent with a child under age 6, will be 20 hours. A two-parent household with children will be required to do 55 hours combined. A single-parent household with children will be required to complete 30 hours, and a single safety net individual with no children, will be required to do 35 hours. The estimated time period it takes for individuals to be engaged in activities for both newly opened cases and those who have changed from exempt to nonexempt is approximately 4-6 weeks. Some will take less time, some will take more time, but 4-6 weeks is an average.

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

Number of Individuals Who Receive Employment Services

| Household Type | Number Served |
|---|----------------------|
| Households with Dependent Children Average Monthly | 350 |
| Households without Dependent Children Average Monthly | 300 |

- 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:

COGNOS and other reports including those on the Listings Menu on WTWCMS are utilized to monitor cases and participation. The district also performs monthly reviews of caseloads and then meeting individually with staff to discuss issues, identify errors, and work collaboratively to motivate clients to participate.

- d. Does the district assign TA applicants to Job Search?

No

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:

Applicant Job Search

| Applicant Job Search | Min. Contacts | Min. Hours | Additional Information |
|-----------------------------|----------------------|-------------------|-------------------------------|
| TANF and SNA MOE | N/A | N/A | N/A |
| SNA Individuals | N/A | N/A | N/A |

- e. Does the district assign TA recipients to Job Search?

Yes

If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. 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 using the “Additional Information” column.

TA Recipient Job Search

| Recipient Job Search | Min. Contacts | Min. Hours | Additional Information |
|-----------------------------|----------------------|-------------------|--|
| TANF and SNA MOE | 10 | 30 | Consumers are required to report job search outcomes bi-monthly (every other week). The consumer will report to the case manager by submitting job search logs. Frequency will be once every two weeks. The case manager will discuss efforts with the consumer, including job search tips, outcomes, efforts and will assist when needed. If the client needs support services, such as transportation, childcare, interview clothes or other |

| Recipient Job Search | Min. Contacts | Min. Hours | Additional Information |
|----------------------|---------------|------------|--|
| | | | related resources, the case manager will provide these when possible and appropriate. |
| SNA Individuals | 10 | 30 | Consumers are required to report job search outcomes bi-monthly (every other week). The consumer will report to the case manager by submitting job search logs. Frequency will be once every two weeks. The case manager will discuss efforts with the consumer, including job search tips, outcomes, efforts and will assist when needed. If the client needs support services, such as transportation, childcare, interview clothes or other related resources, the case manager will provide these when possible and appropriate. |

- 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:

On a case-by-case basis, if a consumer can demonstrate he or she is self-employed and can produce proof or documentation that shows fulfillment of required hours, the activity would be approved.

5.2 Informing SNAP Applicants and Recipients of Work Requirements

The district informs SNAP households where at least one member is subject to a work requirement of the applicable work rules at certification, recertification, and when a previously exempt household member or new household member becomes subject to work requirements. Notification is provided verbally and in writing.

- a. Described below is how SNAP applicants and recipients are informed in writing of SNAP work requirements (reply yes or no to options as they apply).

Written Information Provided to SNAP Applicants and Recipients

| Yes or No: | How written information is provided to SNAP applicants and recipients |
|------------|--|
| Yes | Eligibility staff use the LDSS-5193 <i>Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD)</i> and the LDSS-5193A <i>Important Information about SNAP Work Rules (General and Mandatory E&T)</i> as appropriate. |
| No | Eligibility staff use a local equivalent consolidated work requirements notice to inform SNAP applicant and recipient households of their work requirements. Please attach a copy of the district’s OTDA approved local equivalent. |

- b. Described below is the process eligibility staff follow to provide a comprehensive oral explanation to SNAP households of work requirements, including General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules which pertain to non-exempt individuals in the household.

In addition to the LDSS-5193 & 5193A, district uses the 4826C interview guide to make consumers aware of their SNAP work requirements. This local form has been approved by OTDA and is attached. Both forms/information are given in writing and discussed verbally.

- c. Described below is how the district documents in the case record how the written information about SNAP work requirements was provided to the household (reply yes or no to options as they apply).

How the District Documents the Written Requirement in the Case Record

| Yes or No: | How written information is provided to SNAP applicants and recipients |
|-------------------|---|
| Yes | The district retains copies of all LDSS-5193/LDSS-5193A in the case record. |
| No | The district retains copies of local equivalent notices provided to the household in the case record. |

- d. Described below is the district’s process for documenting in the case record how the oral explanation of SNAP work requirements was provided to the household (reply yes or no to options as they apply).

How the District Documents the Oral Requirement in the Case Record

| Yes or No: | How oral information is provided to SNAP applicants and recipients |
|-------------------|---|
| No | Eligibility staff complete the LDSS-4826C and retain a copy in the case record. |
| Yes | Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record. |
| Yes | Eligibility staff document the case record through case notes/comments. |

5.3 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):

NTA SNAP recipients are not required to participate in work activities. Case management services are provided upon request and letters, email and other correspondences are mailed to inform about services, job fairs, etc.

- 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.

The district does not offer supervised job search as an E&T activity.

- 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):

The districts offers job search activities and support with job search upon request. Workshops, resource room, job fairs and other related activities can be provided.

5.4 Advising Households of Employment and Training Services

At the time of recertification, non-exempt SNAP recipients who are members of certain TA/SNAP and NTA/SNAP households must be advised of the availability of employment and training services within the district and/or region. This requirement applies non-exempt recipients in households containing at least one adult, with no elderly or disabled individuals, and with no earned income at their last certification or required report.

- a. Described below is who the district provides information about employment and training services to (reply yes or no to the options as they apply):

Who the District Provides Employment and Training Services Information to

| Yes or No: | Who the district provides employment and training services information to: |
|------------|--|
| Yes | Required population only |
| No | Other groups described here: |

- b. Described below is the method the district uses to advise SNAP recipients of available employment and training services at recertification (reply yes or no to the options as they apply):

How the District Provides Employment and Training Services Information

| Yes or No: | How the district provides employment and training services information |
|------------|--|
| Yes | Materials and information provided in print form |
| No | Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website: |
| No | Material and information provided via email. |

5.5 Provider Determinations

- a. Not every activity assignment/referral to training might be the right fit for every participant. As such, districts are required per federal regulations at 7 CFR 273.7(c)(18) to have procedures in place for when a provider/contractor determines an individual is not a good fit for a particular activity or program they are referred or assigned to. This is called the provider determination process. Described below is the district's process for provider determination, including the process for screening individuals prior to referral to a provider, how to communicate information related to provider determinations with the district, how workers communicate information related to provider determinations with the client, and documenting provider determinations.

The Assessment information from WTWCMS is reviewed and considered to determine assignment/referrals to training. In addition, the JRT program affords staff the opportunity to spend time with participants to make the best referrals considering each individual situation. In addition, TABE testing, Metrix, and other evaluations can be used to determine suitability and aptitudes of chosen program. Provider determination procedures including letting district staff know whether or not a potential participant is approved for the assignment/referral will be followed in writing, a phone call or an in-person discussion. Workers will communicate information related to provider determinations with the client either in by email, phone call or an in-person meeting. Provider determinations will be documented in WTWCMS case notes. The provider will notify district staff of the determination within 10 days of making the determination and the client will be informed by the district of the determination within 10 days of the provider notifying the district of the determination.

- b. Described below is the district process for informing providers of their authority and responsibility to determine if an individual is not a good fit for a particular activity or program.

ETA has worked with Orange Ulster BOCES and SUNY Orange, the two most utilized training providers, for many years. ETA has an memorandum of understanding (MOU) with each school, and staff are well aware of their authority and responsibility. Contact between ETA and educational staff is a constant activity, providing updates, attendance, and progress of students/participants.

- c. Described below is the district process for provider oversight to ensure that provider determinations are not unfair or used to discriminate against protected classes.

There are a few strategies used to ensure this. First, staff from ETA are district/county employees who are required to take discrimination and other professional development training through Orange County Human Resources, on a regular basis. Also, each educational provider is on the NYS Eligible Training Provider List (ETPL). Providers must be evaluated and screened before being approved and only approved training providers will be used. In addition, staff continuously follow up with educational providers and participants on a regular basis and are instructed to voice any concerns or difficulties she/he/they may be having. Making sure both participant and provider are a good match is carefully evaluated prior to referral.

6. Quality Assurance/Work Verification

6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) 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 (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA 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.

12

- 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.

12

- 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

- d. Below is the number of random sample cases in which a case member is reported as an TA 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

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?

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?

N/A

c. If No, describe below the process used:

N/A

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:

-Day Care registration fees - consistent with amount specified in our childcare plan. Limit \$50 first child, \$25 for each additional provider.

-Clothing, uniforms, and footwear necessary for specific activities and employment-up to \$500.00

-License and other work-related fees- up to \$300.00 for licenses and other fees necessary to participate in training and /or accept and retain employment.

-Job related safety equipment- up to \$400.00 per period of eligibility for protective gloves, boots, headgear, etc. needed to accept and/or retain employment

-Tools and equipment - up to \$500.00 per period of eligibility for tools/equipment necessary for training and/or to accept or retain employment.

-Automobile repair- up to \$2,000.00 not to exceed market value of the vehicle

-Automobile insurance- up to \$1,500.00 for recipients/participants vehicle when it is the least costly way to provide transportation for duration of employment activity or up to ninety (90) days after entry to employment.

-Automobile/Driver Training up to \$1,200 per year

-Transportation - supports including, bus passes, van fleet, and taxi service. Least expensive mode of transportation will be determined by the district. Most cost-effective means will be used.

-Car Seats up to \$150 for children with parents who are participating in paid work- or work-related activities

-Bicycles up to \$350 including helmet and lock needed to assist in needed transportation to employment and/or employment activities.

- 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 (reply yes or no to the options as they apply).

Transportation Services Provided to Clients

| Yes or No: | Transportation Assistance Provided |
|-------------------|--|
| Yes | Bus pass/token |
| No | Gas card/voucher |
| No | Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile) |
| Yes | Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile) |
| No | Other mileage rate (the methodology used to establish reimbursement rate is described here): |

- 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 maximum distance the client would be expected to walk is two miles. Work limitations will be addressed and accommodated with respect to the two-mile walking distance requirement. The guidelines workers follow when determining when to allow clients to walk less than the two-mile limit will consider factors such as weather conditions, terrain, safety of the route, and families with children who have special circumstances will also be considered.

- 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:

The JRT Program staff tracks, and unit case managers monitor participant post-employment needs or those at risk by maintaining contact, providing resources, referrals and services such as childcare information, transportation resources and other supports. Retention services such as client counseling, barrier intervention and employer relations are some activities addressed with those at risk.

7.2 Post-Employment/Transitional Supportive Services

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

As mentioned, JRT Program staff and other employment unit staff will provide support services to consumers and their employers following job placement and will work collaboratively with employment case managers to make any provisions needed to make consumer success.

- 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:

Child Care (when a case closes for excess income, transitional benefits are available up to one year based on income eligibility of under 200% federal poverty level);
 Transportation (bus passes, van transportation);
 Clothing, uniform, and footwear;
 Job related tools and equipment;
 Automobile insurance and repair;
 Car seats;
 Bicycles; and
 Camp fees for children.

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.):

Transportation services (case by case basis, according to availability); and
 Job Search and Career Center services and resources.

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 (reply yes or no to the options as they apply).

How the District Conducts Conciliation for TA Applicants and Recipients

| Yes or No: | How conciliation is conducted |
|------------|-------------------------------|
| Yes | In person |
| Yes | By phone |
| Yes | By mail |

The districts process for conduction TA conciliations is described below:

The process is as follows: Conciliations are always sent to consumers by mail. The client may respond in person by visiting our office, by phone (via conversation with case manager or supervisor) or in writing. Through this contact with the case manager, the client will explain the circumstances for the noncompliance and if the case manager feels the reason is valid, the conciliation will end with a positive resolution and the client will be assigned to a new activity. The determination considers willfulness and good cause.

- b. Who makes the TA good cause/willfulness determination (reply yes or no to the options as they apply)?

How the District Makes the Good Cause/Willfulness Determination for TA Applicants and Recipients

| Yes or No: | Who makes the TA good cause/willfulness determination? |
|------------|--|
| Yes | The client's employment worker |
| Yes | A supervisor in the district |
| No | A separate entity (described here): |

- 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 (reply yes or not to the options as they apply).

How the District Conducts Conciliation for SNAP Applicants and Recipients

| Yes or No: | How conciliation is conducted |
|------------|-------------------------------|
| Yes | In person |
| Yes | By phone |
| Yes | By mail |

The district's process for conducting SNAP conciliations is described below:

The process is as follows: Conciliations are always sent to consumers by mail. The client may respond in person by visiting our office, by phone (via conversation with case manager or supervisor) or in writing. Through this contact with the case manager, the client will explain the circumstances for the noncompliance and if the case manager feels the reason is valid, the conciliation will end with a positive resolution and the client will be assigned to a new activity. The determination considers willfulness and good cause.

- d. Who makes the SNAP E&T good cause/willfulness determination (reply yes or no to the options as they apply)?

How the District Makes the Good Cause/Willfulness Determination for SNAP Applicants and Recipients

| Yes or No: | Who makes the TA good cause/willfulness determination? |
|-------------------|---|
| Yes | The client's employment worker |
| Yes | A supervisor in the district |
| No | A separate entity (described here): |

- 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:

For a client to avoid having a sanction imposed, he/she/they would comply with the following procedure: 20 hours of job search and a minimum of 10 contacts must be completed in 10 days. This procedure applies to all SNAP recipients trying to demonstrate compliance to avoid a SNAP E& T related sanction, including families and households without dependent children.

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:

Clients who agree to participate in work or work activities may have their sanctions ended after completion of the minimum duration. An individual must participate in an activity for a minimum of ten consecutive days to show their compliance. 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 duration period). If after the durational sanction period has ended, the client claims to be work exempt, the client will be given the opportunity to submit medical documentation to verify the exemption from the work requirements and will be added back to the case, provided that the individual has complied with efforts to document the exemption, in the same time frame as a non-exempt individual who has complied with temporary assistance benefits restored retroactive to the date the individual indicated a willingness to comply.

- 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:

Clients who agree to participate in a work activity may have their sanctions ended after completion of the minimum duration. An individual must participate in an activity for a minimum of ten consecutive days to show their compliance. An individual may be eligible for SNAP benefits before the end of the durational period if the individual documents that he/she is exempt from SNAP E&T requirements and is otherwise eligible for SNAP benefits.

Clients are informed they can demonstrate compliance at the end of their durational period by the case manager and via regulations provided to them by DSS at the time of application.

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 (reply yes or no to the options as they apply).

Grievance Mediation

| Yes or No: | Who makes the TA good cause/willfulness determination? |
|------------|--|
| No | An independent entity which has an agreement with the district. |
| Yes | Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case. |
| No | 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 (reply yes or no to the options as they apply).

Our district has a district managed contract to provide independent medical evaluations. Our district has a district managed contract to provide independent medical evaluations through IMA. Determinations made by IMA are considered final decisions on what type and duration of the exemption. Medicals from the clients’ doctors are reviewed by Senior Social Welfare Examiners, placed on a data base and referred to the medical home visit vendor. The Senior Social Welfare Examiner will determine the duration of the exemption based on the doctors’ recommendations. If it is longer than 12 months, they will be referred to our SSI determination unit. In all cases the district will notify the individual of the determination in writing with the LDSS- 4005/a Notification of Temporary Assistance Work Requirements Determination (Exempt/Non-Exempt).

Process for Determining Disabilities and/or Work Limitations

| Yes or No: | How the district determines an individual’s disabilities and/or work limitation |
|------------|---|
| Yes | District participates in the OTDA managed contract for independent medical evaluations. |

| Yes or No: | How the district determines an individual's disabilities and/or work limitation |
|-------------------|---|
| No | District contracts directly with a physician to provide independent medical evaluations. |
| Yes | District accepts physician's statement provided by participant. |
| Yes | District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary. |
| Yes | Other process: Our district has a district managed contract to provide independent medical evaluations. Our district has a district managed contract to provide independent medical evaluations through IMA. Determinations made by IMA are considered final decisions on what type and duration of the exemption. Medicals from the clients' doctors are reviewed by Senior Social Welfare Examiners, placed on a database, and referred to the medical home visit vendor. The Senior Social Welfare Examiner will determine the duration of the exemption based on the doctors' recommendations. If it is longer than 12 months, they will be referred to our SSI determination unit. In all cases the district will notify the individual of the determination in writing with the LDSS- 4005/a Notification of Temporary Assistance Work Requirements Determination (Exempt/Non-Exempt). |

- b. Described below is the district's procedure for notifying an individual of their exempt or non-exempt determination whenever an individual alleges to be unable to participate, or the individual otherwise participates in the employability disability review, including when an individual is notified that their status changes from exempt to non-exempt:

A letter is sent via mail to consumer. This letter is the 4005 or 4005A which outlines the consumer's employability status and including their requirements for participation.

- c. Described below is how the district notifies an individual of their exempt or non-exempt determination (reply yes or not to the options as they apply):

Process for Notifying an Individual of Their Exempt or Non-Exempt Status

| Yes or No: | District's process for reviewing medical documentation |
|-------------------|---|
| Yes | The district sends the LDSS-4005 or LDSS-4005a and a retains a copy in the case record. |
| No | The district sends a local equivalent and retains a copy in the case record. |

- d. 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 (reply yes or no to the options as they apply).

Process for Reviewing Medical Documentation

| Yes or No: | District’s process for reviewing medical documentation |
|-------------------|--|
| Yes | District directs the contracted physician or individual’s physician to determine status. |
| Yes | District review team reviews and determines status (described here): |
| No | Specialized disability/medical staff or unit reviews and determines status (described here): |
| Yes | Other process: A web-based system that schedules medical appointments with IMA is in place. Also, if a consumer has their own doctor, they can have him/her/they complete required medical forms. |

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?

No

- b. Describe the district’s policy for determining when a program participant is offered a mental health screen:

N/A

- c. What screening tools does the district use (reply yes or no to the options as they apply)?

Screening Tools the District Uses

| Yes or No: | Screening Tools |
|-------------------|---|
| N/A | LDSS 5009 - Mental Health Screening Tool |
| N/A | The computer assisted version of the Modified Mini Screening tool (MMS) |
| N/A | Other Screening tool (described here): |

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

N/A

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

N/A

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.).

The DSS case worker makes the determination whether an individual has the potential to be restored to self-sufficiency based on information received from the individual's private physician or the results of an independent examination from IMA. At this point the DSS examiner makes a referral to OC ETA employment unit at Orange Works for orientation and assessment.

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

The local DSS has a case management team called the TESP team. TESP stands for Temporary Exemptions Support Program. This team is available to gather information and provide intensive case management for all clients that display a need for mental health treatment. This case manager will assure that the clients mental health needs are met and that the client attends treatment. Case management team members gather information from treatment providers to ensure all needs are being met and treatment plan is being followed. When clients demonstrate an ability to return to employment, they are referred to OC ETA. For those who have other health issues, the local DSS will follow the documented prescribed treatment plan of the client's physician. For those who do not have documented health issues, or for those whose physical impairments are not clear or questionable, the local DSS will send clients to Industrial Medicine Associates (IMA) to assess medical needs and will follow the treatment plan prescribed accordingly.

- 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 TESP case manager tracks the progress of the client's treatment and attendance. All client's cases are reviewed on a monthly basis and all medicals must be resubmitted every three months. Monthly attendance is received. In addition, there are caseworkers assigned to tracking the participants compliance with treatment for any health issues (not related to mental health) such as home visits, requesting follow up documentation regarding the impairment, appointment for therapy or treatment and other related activities. This information is reviewed, and a case conference is held with the Employment Unit and appropriate plans are made.

10. District Certification

10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Orange 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, 2024 through December 31, 2025. 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.

1/18/2024
Darcie Miller
Commissioner