

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

January 1, 2022 - December 31, 2023

## **Sullivan 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.

Department of Family Services (DFS) contracts all employment services to the local Center for Workforce Development (CWD). The responsibilities of the Training Specialists at CWD include: conducting orientation, working with participants to complete Employment Assessments and Individual Employment Plans (IEP), assessing supportive services needed, maintaining case records in WTWCMS, making referrals to programs such as Job Search, Job Readiness Training (JRT), and Work Experience Program (WEP). Training Specialists will also monitor progress towards self-sufficiency and attendance for work activities. They will also conciliate cases when there has been non-compliance. Dispute resolution will be managed by Employment Services Coordinator at DFS.

## 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
TANF Employment Services Administration & CWD	\$400,000	<input checked="" type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input checked="" type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Agency staff assess, coordinates, screens, and monitors clients to prepare them for employability. Investigate barriers to employment (i.e. drug/alcohol), referring recipients to contractual employment agency. Coordinate transportation for employment and training activities for TANF participants. Any transportation provided to SNA-MOE families will be limited to employed individuals or provided on a short-term nonrecurring basis to meet a certain occurrence of need that will not extend beyond a 4-month period.

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
SUNY Sullivan	Others: TANF, WIOA, Access VR, NYS Ed	<input checked="" type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	HHA/CNA
Literacy Volunteers of Sullivan County, Inc	Others: TANF, WIOA, Access VR, NYS Ed	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Educational Programs including HSE
Access VR	Local	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	ACCES-VR assists individuals with disabilities to achieve and maintain employment and to support independent living through training, education, rehabilitation, and career development
ATTAIN Lab	FFFS SNAP E & T Local	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	An assortment of academic, occupational, and employability courses.
Hospitality Green	FFFS Local	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Career Readiness 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:

The department conducts monitoring of both the Welfare to Work Employment and Training contract with the Center for Workforce Development and the Transportation Contract with Rolling V Bus Corporation. Each month data is reviewed and a dashboard is maintained to track the following:

Engagement Rate; Participation Rate; Entries to Employment; Number of enrolled Job Readiness Skills Training (Boot camp., ATAAIN Lab, etc.); Caseload Numbers; Number of Active Employable Cases; Number of Referrals to ACCES-VR; Number of Work Activity Sites (CWEP); Number of Referrals for Orientation; Number of Assessments Completed; Number of Employment Plans Created or Updated; Number of No Calls/No Shows for Transportation; Number Referred for Conciliation both TANF and SN; Number Referred for Sanction both TANF and SN; Number of Cases Closed or Benefits Reduced Due to Employment.

### 1.3 OTDA Jobs Staff Agreement

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

Services:

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

Target Groups:

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

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

## 1.4 Access to Services at New York State Career Centers

- a. Described below is how the district provides access to its programs and services with Career Center partners (select all that apply):
- The district has employee(s) physically present at a Career Center
  - The district has contract staff physically present at a Career Center
  - The district makes available direct access to its program staff via phone or technology at a Career Center
  - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
  - Other:
- b. Described below is how the district coordinates with Career Center partners to provide services to the district's clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

The district has an MOU with the Center for Workforce Development (CWD) to implement the Welfare to Work program. The CWD is co-located at the NYSDOL at the Sullivan Works Career Center. CWD provides clients with employment and case management services which includes referrals, when appropriate, to workforce partners such as NYSDOL, ACCESS-VR and Sullivan BOCES, SUNY Sullivan, and Literacy Volunteers. Clients can arrange to use all resources in the Career Center for required employment and training services.

## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

- a. Check one of the following:
- The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
  - In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:
    1. The strong message of the importance and value of work versus welfare and how work is vital to achieving self-sufficiency for the individual and their family.
    2. An understanding of their responsibilities and obligations related to compliance as well as, potential consequences of non-compliance. The time limit for receipt of benefits is also addressed.
    3. The services available to them through the Career Center now and when they move off of Public Assistance and continue to maintain self-sufficiency.
    4. Referrals to the Career Center system partner agencies and community service.
    5. For participants that have been identified as homeless, they will be provided information on laws, landlord and tenant expectations and rights. Also, how to effectively seek housing and secure a lease.
    6. For participants in need of childcare, information pertaining to the Childcare Council will be provided.

- 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:

Due to current COVID restrictions Applicants are mailed all paperwork required for Orientation. Also along with Orientation paperwork an appointment date for an over the phone assessment is sent. Orientation video is available on the county website for those who have access to the internet.

This process will be reevaluated if COVID restrictions are lifted.

## 2.2 Temporary Assistance (TA) Employment Assessment

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

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

All applicants and recipients in households with dependent children (regardless of employment status) receive a staff-assisted assessment within 90 days of their eligibility for assistance. Households without dependent children receive a staff assisted assessment within a year of application. Currently, due to COVID restrictions all applicants are required to call in for an over the phone assessment. During the assessment interview the Employment Specialist will review all orientation forms with the individual and complete the assessment. They will then develop an Individual Employment Plan (IEP) with the client. This plan will address the assignment to appropriate work activities and any necessary supportive services. Non-exempt individuals will also undergo TABE testing. Test results will be used to help develop the Employment Plan. Exempt individuals with medical issues will, when appropriate be required to participate in activities (counseling, physical therapy, etc.) designed to restore them to self-sufficiency. Both the assessment information and the Employment Plan are entered into WTCMS.

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

The Center for Workforce Development is responsible for conducting employment related assessments. District Employment Coordinator is conducting assessment updates for exempt individuals.

- 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)):

The CWD staff charged with administering the assessment tool will have, at a minimum, an Associate's degree or two years experience evaluating education and vocational levels of participants.



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

Yes

No

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

Yes

No

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

Yes

No

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

Employment assessments are updated annually and when significant changes occur regarding employability.

### **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:

The Employment Plan is developed at the same time that assessment is being done. All of the information collected during the assessment is considered when developing an individual's Employment Plan.

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

The Employment Plan is updated annually. The plan will also be updated when circumstances, goals or physical abilities warrant change.

### **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:

The majority of non-English speaking individuals that access services in Sullivan County speak Spanish as their primary language. The One Stop Center has an employee that acts as a Spanish speaking interpreter. If the employee is not available or another language is needed, Interpreter Talk, a telephone service that can provide access to interpretive services in over 70 languages is also available. These individuals will also be enrolled into an ESL workplace literacy training program offered by educational partners in the community.

### 3.3 Strategies/Procedures for Increasing Program Attendance

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

Participants are counseled by CWD staff about the importance of punctual time and attendance when failing to participate in work activities with and without good cause. During counseling by CWD staff underlying issues may be revealed such as mental health barriers, substance abuse, and daycare or transportation issues. Referral to other services will take place and monitoring for improvement by CWD and local district staff will begin. Those individuals who fail to comply with staff recommendations may be referred for conciliation and an employment sanction including a possible reduction or loss of Public Assistance and/or SNAP benefits.

### 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:

Individuals sanctioned until compliance are referred back to CWD and given the opportunity to comply with employment requirements which will end the sanction.

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

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

During sanction an individual may be required to meet with DFS Employment Coordinator to reassess their situation and to discuss possible employment opportunities and their means of living. Also discuss other resources that may reduce or eliminate the need for public assistance.

This is based on Regulation NYCRR351.2 and 351.21. The district may use the Eligibility Call-In Process outlined in 09-ADM-20 and/or 08-INF-12 Pathways and Similar Case Management Manuals.

### 3.5 Strategies for Reducing the Need for TA

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

The district assesses each case for possible diversion from continued public assistance. The district will provide as diversion payments including, but not limited to:

- Auto insurance payments
- Auto repairs / fuel
- One time rental, fuel, electric payment
- Clothing / shoes assistance to maintain or obtain employment
- Public transportation / Bus vouchers

## 4. Work Activities

### 4.1 Allowable Work Activities

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

Case Type	Activity and Definition
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Unsubsidized Employment</b> – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Work Experience</b> – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<b>Job Search</b> – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.

Case Type	Activity and Definition
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Vocational Education</b> – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Secondary School</b> – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Job Skills Training</b> – Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA FAM <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Job Readiness Training (JRT) Activities</b> – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>

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

## 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.

N/A

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.

TA recipient job search is contracted to the Center for Workforce Development (CWD) at the Career Center. The Business Service Team, which consists of one E&T Specialist, the Special Projects Coordinator and the Employment Center Coordinator, work closely together to plan Job Fairs, that are held approximately four times a year. The Business Service Team also develops the "Hot Jobs Listing" that is mailed out and posted on the Center for Workforces website.

## 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:

The CWD Employment Supervisor maintains contacts throughout the county to identify vocational educational programs and Job Skills training programs that are or become available to our clients. When a new program is identified, the CWD supervisor makes contact with the provider, gathers relevant information about the program and identifies the appropriate target population. Programs are reviewed with the LDSS Employment Coordinator as well as CWD employment staff. During assessment, reassessment and IEP all options are discussed with the client regarding such programs.

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

The CWD Assistant Director maintains contacts throughout the county to identify vocational educational programs and Job Skills training programs that are or become available to our clients. When a new program is identified, the CWD supervisor makes contact with the provider, gathers relevant information about the program and identifies the appropriate target population. Programs are reviewed with the LDSS Employment Coordinator as well as CWD employment staff. During assessment, reassessment and IEP all options are discussed with the client regarding such programs.

- 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:

When the IEP is being developed a participant who lacks basic skills and/or does not have a Test Assessing Secondary Completion (TASC) or High School Diploma is enrolled in either Adult Basic Education (ABE) or TASC classes. Additional support is provided through the ATTAIN Lab at SUNY Sullivan.

- 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:

If a participant has not yet attained a high school education and they identify that as a goal, they are enrolled in a TASC class at Literacy Volunteers. If a participant's reading and math levels are too low to enter a TASC class right away they are enrolled in ABE thru the ATTAIN Lab.

- 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:

In order to be assigned to education/training activities participants must meet the following requirements:

- a. Assessment results must meet the requirements for the education/training program.
- b. Chosen program must enhance the achievement of goals set forth in the IEP.
- c. Participant must be determined suitable for the training activity.
- d. Chosen activity must be in a demand occupation.
- e. Participant must not be in default with a student loan if referred for financial aid eligible programs.
- f. Only programs of study, not exceeding one year post secondary level will be approved. i.e certificate programs, vocational education.



- f. Described below are the standards by which education and training providers are evaluated:
  - a). Provider must submit bi-weekly attendance reports to the CWD worker.
  - b). Program offerings being provided for in demand occupations or providing a credential or certification.
  - c). Progress reports/scores must be submitted to CWD worker for review to determine effectiveness of training programs.
  - d) CWD will review successful completion rates which lead to gainful employment or temporary placement in a WEP site until employment can be obtained. Historical success of the program will be reviewed. In addition, the number of graduates achieving employment as well as, the number able to maintain jobs will be reviewed.
  - e). Providers must consent to a pre-arranged monitoring schedule and provide WTW staff with necessary information to evaluate continuing support and approval of programs/ enrollments on a timely basis.
  - f). All providers must meet New York State Education Department standards.

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

Sullivan County is a rural area with two training providers; the community college and SC BOCES. Upcoming training and job opportunities are made available at orientation.

More detailed information about approved training providers and programs is discussed during the development of the IEP. Participants can access brochures and flyers and can schedule an appointment to meet with representatives from the training providers through the Career Center.

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

Approval of work or training activities is primarily done at the one on one meeting with the CWD staff. The participant and staff develop the IEP and when a training or educational program is identified, a referral form is completed. The training program must lead to skill development for a demand occupation. The referral form lists the following information:

- Name of Service Provider
- Length of training
- Course of study
- Length of training
- Hours and days per week
- Supportive services
- Tuition, books, fees and supplies needed

The CWD staff and participant meet periodically to update the IEP any changes are noted. Participants sign off on all documents and receive copies. Changes may also be made through phone contact when necessary.

- 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:

Agency requires the head of household to provide school verification every six months, during recertification for Temporary Assistance, to ensure satisfactory participation in high school. If the student is not participating the worker does follow a up and if necessary makes referral for educational activities.

- 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:

Medical documentation is requested and based on the information received; the agency determines the participant's ability to perform their work activity. This information is shared with the CWD staff which ensures the participant's limitations are accommodated. Any limitations or restrictions that the participant has are relayed to the work assignment supervisor and /or training provider 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:

Post-secondary level not to exceed one year for a certificate program in an in demand occupation will be an allowable work activity.

- b. Described below is how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:

N/A

- c. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below (Select all that apply):

- It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
- A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
- The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
- The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
- The student fails to progress toward the completion of a course of study without good cause, as determined by the district.

- The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
- Additional reasons as stated below:

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

Participants with non-exempt status are sent to the Center for Workforce Development for orientation and assessment and placed immediately into an activity. The time frame for referral to orientation is approximately one to two weeks. Once the orientation process is completed, a non-exempt participant is placed in a countable activity as soon as possible. The time period is governed by their goals and activities identified in their IEP. The CWD Assistant Director and Employment Services Coordinator monitors participation and engagement via COGNOS and WTCMS reports and listings.

If a participant has an open case and the status changes from exempt to non-exempt, they are referred to CWD within one week of the status change so they can be placed into appropriate activities. Although, at times child care, transportation or medical limitations can increase this timeframe.

Unless work limited, individuals may be required to participate up to 40 hours weekly. The district's weekly standard participation requirement for the various case and household types is as follows:

- Households with no children under six years of age: up to 40 hours
- Single caretaker with a child under one year of age: a minimum of 20 hours
- Single caretaker with a child under six years of age: 35 hours
- Two parent households: up to 40 hours for each parent
- Households without dependent children: 40 hours

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

Household Type	Number Served
Households with Dependent Children Average Monthly	87
Households without Dependent Children Average Monthly	50

- 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:

District employment contractor (CWD) reviews reports from COGNOS and utilizes WTCMS to determine who is participating in work activities and/or employment. Those who are not participating or fully engaged are called in by CWD for an interview. At interview participation requirements are reviewed with the participant and new or additional hours are assigned if allowable.

Additionally, CWD will review the duration of employment codes that have been present in WMS. In particular, staff will review any employment code that may no longer be applicable or whether the time period has ended. If an employment code is no longer appropriate, a change is made and the individual will be called in for work activity assignment. During the review of employment coding some individuals may be required to submit additional documentation to continue an exempt status, if appropriate.

WTCMS is utilized by CWD to determine when sanction periods are concluding. When identified, individuals are called in so they have the opportunity to comply and count toward participation. Those individuals who are sanctioned until compliance may be contacted immediately in the attempt to end the sanction and engage in work activities as soon as possible.

It should be noted the Local District Employment Coordinator utilizes the same reports as CWD which acts as a checks and balance system between the district and contractor. Employment codes are reviewed by the Coordinator as well to determine if the current code is appropriate. If updated documentation is required due to an exempt status the Coordinator will collaborate with CWD and the Social Welfare Examiner to obtain. Referrals will be made to CWD for work activity assignment as deemed appropriate once documentation is received or the exemption may continue if necessary. Local district Examiners utilize Anticipated Future Action Codes (AFA) as a reminder when an individual needs to be re-evaluated for work activity participation. Referral will be made to CWD as appropriate to engage individuals in work activities by the Examiner. In some instances updated medical documentation is needed prior to referral to determine limitations, if any.

- 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

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	12	20	Job searches can be a combination of face to face and online. Confirmation must be submitted weekly.
SNA Individuals	12	20	Job searches can be a combination of face to face and online. Confirmation must be submitted weekly.

- e. Does the district assign TA recipients to Job Search? If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

The district assigns TA recipients to Job Search.

- Yes  
 No

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	12	20	Job searches can be a combination of face to face and online. Confirmation must be submitted weekly.
SNA Individuals	12	20	Job searches can be a combination of face to face and online. Confirmation must be submitted weekly.

- 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.

Self-employment is approved as part of an individual's required work activities if the self-employment is anticipated to lead towards the individual's self-sufficiency and the individual is earning at least the federal minimum wage. A questionnaire is completed and the district determines the number of hours that may be reported as self-employment by dividing the individual's net income by the minimum wage. The individual may have to participate in additional employment activities to maintain their hourly participation requirement.

## 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):

Sullivan County does not mandate Non-Temporary Assistance SNAP E&T work activity assignments.

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

N/A

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

SNAP applicants and recipients are informed of Job Search availability at application and recertification, also at any point of contact ,through a face-to-face or telephone interview.

## **6. Quality Assurance/Work Verification**

### **6.1 Quality Assurance Process - Random Case Sampling**

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;

- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
  - Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
  - Assess that the data entered into either WTWCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
  - Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.  
6 cases
  - b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.  
6 cases
  - c. Below is the number of random sample cases in which a case member is reported as an TA employability code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA employability code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.  
3 cases
  - d. Below is the number of random sample cases in which a case member is reported as an employability code 31 – “Parent or caretaker relative of a child under 12 months of age”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.  
3 cases

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

## 6.2 Use of Outside Providers/Vendors

- a. Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?
  - Yes
  - No

b. If Yes, does the district's provider/vendor documentation collection, data entry and management of WTWCMS follow the same process that would be used by the district worker?

Yes

No

c. If No, describe below the process used:

## 7. Supportive Services

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

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

Transportation is provided as needed using the most cost effective mode to ensure that applicants/recipients attend orientation, assessment and work activities. This may include: Travel allowance for work related activities mileage reimbursement at IRS medical/moving rate, consistent with the information in item b. of this section.

Purchase of bus tickets/ bus vouchers

Van transportation

Taxi cab

Towing to repair shop not to exceed \$250 for disabled motor vehicle

\$100 fee for vehicle repair estimate

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

Bus pass/token

Gas card/voucher

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

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

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



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

Sullivan County is a rural county and many of the participants do not have any form of public transportation available to them. As stated above the agency will provide the necessary means to get participants to assigned work activity. In some instances it is necessary for the participant to walk to meet public transportation. Should this occur and no child care is needed, the district would set a 2 mile maximum to meet the transportation. In all instances road conditions, hours of travel and individuals with limitations would 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:

1. Fees related to employment and/or vocational certification.
2. Day care registration fees
3. Car seats, up to \$150
4. Bikes if viable transportation to employment, up to \$250.
5. Driver training to improve employability.
6. Uniforms and safety equipment as required.
7. Appropriate clothing for job interviews, on the job when required specifically by employer or worksite supervisor, up to \$200
8. Vehicle repairs up to \$1,500 when costs do not exceed value of the vehicle. Vehicle must be titled to participant or other household member.
9. Towing to repair shop not to exceed \$250 for disabled motor vehicle
10. Vehicle insurance for a six month policy not to exceed \$1500 when costs do not exceed value of the vehicle. Vehicle must be titled to participant or other household member.
11. Vehicle registration fees to improve employability.
12. Equipment needed to start or perform a job, up to \$500.

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

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

The district can provide transportation to and from employment for up to 90 days. However, participants are counseled by the CWD worker to establish a plan to provide their own transportation before their second paycheck.

Childcare is also provided and participant is counseled to always have a back up plan for childcare.

The district can provide transportation to and from employment for up to 90 days. However, participants are counseled by the CWD worker to establish a plan to provide their own transportation before their second paycheck.

Childcare is also provided and participant is counseled to always have a back up plan for childcare.

Car insurance not to exceed \$1500.  
Vehicle repair not to exceed \$1500.  
Towing not to exceed \$250.  
Vehicle repair estimate not to exceed \$100.  
Purchase of necessary clothes or tools  
Any other reasonable request will be considered.

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

The district can provide transportation to and from employment for up to 90 days. However, participants are counseled by the CWD worker to establish a plan to provide their own transportation before their second paycheck.

Childcare is also provided and participant is counseled to always have a back up plan for childcare.

Car insurance not to exceed \$1500.  
Vehicle repair not to exceed \$1500.  
Towing not to exceed \$250.  
Vehicle repair estimate not to exceed \$100.  
Purchase of necessary clothes or tools  
Any other reasonable request will be considered

### **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.):

The district can provide transportation to and from employment for up to 90 days. However, participants are counseled by the CWD worker to establish a plan to provide their own transportation before their second paycheck.

Childcare is also provided and participant is counseled to always have a back up plan for childcare.

Car insurance not to exceed \$1500.  
Vehicle repair not to exceed \$1500.  
Towing not to exceed \$250.  
Vehicle repair estimate not to exceed \$100.  
Purchase of necessary clothes or tools  
Any other reasonable request will be considered

## 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 Conciliation notice is generated utilizing Welfare to Work Caseload Management System (WTWCMS) and mailed by the Center for Workforce Development (CWD). Copy of conciliation notice is sent to the Department of Family Services, Employment Services Coordinator.

Recipients must respond within ten calendar days to the Employment Coordinator.

If recipient does not respond within the required timeframe a ten (10) day notice for Discontinuance or Reduction of Benefits Notice is sent.

If a recipient contacts the agency within the respective timeframes a discussion takes place regarding reason for noncompliance. The DFS Employment Services Coordinator works with the conciliation and then issues a determination whether failure to comply was willful and without good cause.

If issues are resolved at this point subsequent to good cause being established the recipient is referred back to CWD. The recipient must comply with employment requirements.

If there is no resolution to the noncompliance issue subsequent to good cause not being established and failure to comply was willful and without good cause a Discontinuation or Reduction of Benefits Notice is sent. Subsequent to appropriate timeframes the sanction occurs. The recipient then has the option to request a fair hearing.

- b. Who makes the TA good cause/willfulness determination? (Select all that apply)

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

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

- In person
- By phone
- By mail

The client is notified in writing of the non-compliance issue and is given 10 days to respond to the conciliation notice. When the conciliation notice is mailed to client, included is a Job Search Log along with the Option to Avoid notice that explains the required amount of job searches that need to be submitted to avoid the pending sanction in lieu of a conciliation hearing. If the client feels there is good cause for the noncompliance they are instructed to get in touch with the Employment Coordinator so a determination can be made. If the Employment Coordinator determines that the client did not to have good cause for their non-compliance, the client can still avoid a SNAP sanction demonstrating compliance by making five (5) employer job search contacts within ten (10) days and submitting the verification of these contacts.

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

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

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

The recipient will receive an Option to Avoid notice explaining the procedure to avoid their SNAP E&T sanction. In that notice five (5) job searches will be required.

## 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:

The client would request reinstatement. As part of this request, the client would agree to comply and demonstrate compliance in an employment activity for a minimum of 10 days. The department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended and the client has demonstrated compliance for 10 days.

For TA individuals who have become exempt after the noncompliance, and, who have provided documentation of the exemption the department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended.

- 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:

When the durational time period is up on the SNAP sanction, a client may request to be added back to the case. They must submit five (5) job searches completed within five day period of their request to be added back into the case. Those who document an exemption may have their SNAP sanction lifted before the end of the durational sanction period.

### 8.3 Dispute Resolution

- a. The district's procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district's response to their request for health-related accommodations must be conducted in accordance with 18 NYCRR 385.11(c). Indicate below who mediates the grievance.
- An independent entity which has an agreement with the district
  - Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
  - Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

## 9. Disability Determinations, Documentation and Requirements of Exempt Individuals

### 9.1 Disability Determination Process and Tools

- a. The district's process for determining an individual's disabilities and/or work limitations must be in accordance with 18 NYCRR 385.2(d). Indicate below what the district's process is for determining an individual's disabilities and/or work limitations. (Select all that apply, and describe the process)
- District participates in the OTDA managed contract for independent medical evaluations.
  - District contracts directly with a physician to provide independent medical evaluations.
  - District accepts physician's statement provided by participant.
  - District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary
  - Other process

Steps on how determination is made:

1. A specific diagnosis
2. Any specific work limitations caused by this diagnosis
3. The expected duration of these work limitations/prognosis
4. The duration of the disability

The local district has sole discretion in determining if the documentation provided is sufficient to make a determination of medical impairment. Submitting the required documentation is described above to determine the initial claim of impairment by an applicant, or in evaluating the continuing claim of a recipient who has been previously

determined exempt from participation in work activities, shall be a condition of initial or ongoing eligibility for Temporary Assistance. For SNAP, failure to document a disability causes the individual to lose exempt status.

- 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

DFS or Center for Workforce issues a Medical Evaluation form that is requested to be returned to DFS worker within 10 days, unless more time is needed due to individual's circumstances. District's Employment Services Coordinator reviews information obtained from the participant, participant's medical providers, drug and alcohol providers, independent medical evaluations, and any other information deemed pertinent to determine the status of the individual's disability as well as the individual's potential to be restored to self-sufficiency.

Local district staff use this information to determine if the individual is exempt, nonexempt, or work limited. The individual is notified in writing of the district's disability determination via the LDSS-4005/4005a.

## 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.).

The District Employment Services Coordinator would review the provided medical information to determine if the individual has the potential to be restored (or improved employability) through treatment or other rehabilitative activities to self-sufficiency. If Employment Coordinator has any questions or concerns regarding the determination, the Employment Coordinator would review the information with the Head Social Welfare Examiner and Director of Temporary Assistance/Deputy Commissioner.

Our district has a district managed contract to provide independent medical evaluations through IMA (Industrial Medicine Associates) If there are discrepancies in the medical determination, participant will be scheduled for the appropriate evaluation with IMA.

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

All individuals with an indicated need for treatment are referred to the appropriate provider. The indicated need can be determined via medical information provided by the client, assessment, employability plan and case management. The treatment provider is required to provide a copy of the treatment plan. Attendance for treatment will be monitored by Employment and Training Specialist at Center for Workforce Development.

- 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.

District staff and CWD will monitor attendance at rehabilitation programs monthly. We will require the individual to provide proof of attendance at the end of every month. Employment Plans which spell out the treatment plan requirements are updated yearly or when a change in treatment is indicated whichever is earlier. CWD will monitor attendance at rehabilitation programs monthly.

## **10. District Certification**

### **10.1 Certification**

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

1/3/2022  
John Liddle  
Commissioner