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

January 1, 2022 - December 31, 2023

# **Franklin 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.)

The Franklin County Department of Social Services (FCDSS) Employment & Training (E&T) Unit is responsible for providing all employment preparation for TANF and Safety Net recipients and applicants and individuals eligible for 200% TANF Services, as well as SNAP Employment & Training Program participants. Employment services include, but are not limited to: employability determinations, orientation, assessment, employment planning, assignment to work activities, monitoring of participation, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self sufficiency, coordination and provision of supportive services, employment placement and retention services, conciliations, sanctions and dispute resolutions.

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.

FCDSS contracts with Community Connections to provide job readiness training and job search assistance in coordination with the E&T Staff on a part time basis, on site at FCDSS. FCDSS E & T Unit also coordinates Education Resource programming with Franklin-Essex-Hamilton BOCES, located at the Comprehensive Career Center, Malone ONEWORKSOURCE.

# 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
Community Connections	\$15,000	□ FFFS     □ SNAP E&T     □ Local     □ Other		Provides job readiness training and job search assistance in coordination with FCDSS Employment & Training Unit Staff in the northern end of Franklin County.
Industrial Medicine Associates	\$1,500	☐ FFFS ☐ SNAP E&T ☑ Local ☐ Other	<ul> <li>☒ FA</li> <li>☒ SNA Family</li> <li>☒ SNA Individual</li> <li>☒ SNAP</li> <li>☒ TANF 200%</li> </ul>	Provides comprehensive medical and/or psychological evaluations to determine an individual's disabilities and/or work limitations.

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	Categories of	Programs, Services or Activities
	Source(s)	Clients Served	Provided
ETS Staffing	Others: Private Staffing Agency	<ul><li></li></ul>	Provides on-site Employer recruitment with agency staff for employment opportunities.
Franklin-Essex- Hamilton BOCES for WIOA Adult and Youth	Others: NYSDOL	□ FA     □ SNA Family     □ SNA Individual     □ SNAP     □ TANF 200%	Provides training and tuition; case management; job placement and job development programming through the local OneStop (Franklin County ONEWORKSOURCE Career Center).
Franklin-Essex- Hamilton BOCES for Adult Education	Others: F-E-H BOCES	<ul> <li>✓ FA</li> <li>✓ SNA Family</li> <li>✓ SNA Individual</li> <li>✓ SNAP</li> <li>✓ TANF 200%</li> </ul>	Provides Adult Basic Education, High School Equivalency, Employment Placement and Post Employment Services.
Franklin-Essex- Hamilton BOCES for Career Pathways & SNAP Venture IV	Others: OTDA	<ul> <li>□ FA</li> <li>□ SNA Family</li> <li>□ SNA Individual</li> <li>□ SNAP</li> <li>□ TANF 200%</li> </ul>	Provides education and training services.

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:

All contracts are audited through the class lists that are submitted from the contract agency holding the classes.

# 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).
	N/A Franklin County does not have JOBS staff.
1.4	Access to Services at New York State Career Centers
a.	Described below is how the district provides access to its programs and services with Career Center partners (select all that apply):  ☐ The district has employee(s) physically present at a Career Center  ☐ The district has contract staff physically present at a Career Center  ☑ The district makes available direct access to its program staff via phone or technology at a Career Center  ☑ The district makes available copies of the LDSS-2921 (Common Application) at a Career Center  ☑ Other:
	The FCDSS E&T Unit refers individuals to the Comprehensive Career Center for TABE Testing and adult education with F-E-H BOCES staff and encourages individuals to register with NYSDOL for job search and resume assistance.

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 Director of Financial Services is the liaison between FCDSS and the Comprehensive Career Center, Malone ONEWORKSOURCE. Any referrals to Temporary Assistance, SNAP and Daycare are referred via phone call. Any support service referrals for individuals that obtain employment are referred directly to FCDSS E&T Unit Staff to make an eligibility determination and provide service. Employer recruitments are held by a staffing agency at FCDSS in the morning and at Malone ONEWORKSOURCE in the afternoon. Staff between the Comprehensive Career Center, FCDSS E&T Unit and the Staffing agency communicate to help individuals obtain and retain employment. The Comprehensive Career Center assists each individual with completing their online application and also their tax and insurance paperwork once they are hired.

# 2. Orientation, Assessment and Employment Plan

# 2.1 Orientation (Reference 18 NYCRR 385.5)

	a.	Check	one	of the	following	1
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- ☐ 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:

Explain diversion policies

Employment incentives, including: reporting income from employment, transitional benefits, income disregards and earned income credits

TANF/Safety net time limits and employment/job search responsibilities

Introduction to community resources

Computer Lab Opportunities

Local opportunities for work activities including Employment, Training and Education Supportive Services

Childcare Assistance

Child Support Enforcement

School Attendance requirements for Teen Parents

Consequences of non-compliance with program requirements

Conveying the benefits of work over public assistance

b. Described below is how the district completes the required orientation for all applicants and recipients of TA (e.g. in a group setting, individually, or a combination of both). Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

Orientation is done at application in a group setting or individually by DSS E&T Unit Staff within the Assessment class, followed by individual interviews which are scheduled within a couple weeks of the Assessment, by DSS E&T Unit staff and development of an employment plan. The Orientation procedure is the same for both exempt individuals and non-exempt individuals.

## 2.2 Temporary Assistance (TA) Employment Assessment

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

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

All applicant or recipient adults, including 16 and 17 year old individuals who are not attending secondary school, who reside in households with dependent children, will undergo an employment assessment within 90 days from the date the individual applies for public assistance.

All applicants or recipients adults, who are members of a household without dependent children who are not exempt from assignment to work activities, will undergo an employment assessment within a reasonable period of time, but in any case shall be within one year of the application for assistance.

All applicants or recipient adults who are determined to be exempt from participation in work activities according to medical evidence may require additional evidence in the future to evaluate their ability to work. The district may also require the individual to participate in a treatment program that could restore or improve their ability to work.

This agency will exempt all Safety Net Non-Moe individuals coded 43-incapacitated/disabled (SSI application filed) from all employment activities, including assessment.

All other individuals who are exempt from work activities will be assessed to the minimum requirements set forth in the state OTDA regulation 385.7 (a).

An exempt individual who becomes non-exempt or work-limited will be reassessed and a new employment plan will be developed in a timely fashion.

Individuals are scheduled first for a weekly orientation done either in a group setting or individual, conducted by DSS E&T Unit Staff, followed by individual assessment interviews by DSS E&T Unit Staff and development of an employment plan (for both exempt and non-exempt individuals). The district also offers TABE Testing: Franklin-Essex-Hamilton BOCES administers the Math and Reading level testing and provides a copy of the testing results to FCDSS E&T Staff.

The DSS E&T Unit staff will develop the employment plan with the individual and when making a work activity assignment, the individual's preferences will be taken into consideration to the extent possible and to the extent consistent with the individual's assessment and the need of the district to meet Federal and State work participation requirements.

C.	Which district administrative unit or contractor is responsible for conducting assessments?
	Assessment is the responsibility of the DSS Employment & Training Unit Staff.
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)):
	Civil Service qualified Employment & Training Representatives, Social Welfare Employment Coordinator and Franklin-Essex-Hamilton BOCES Instructor.
e.	Are applicants in households with dependent children required to participate in completion of an employment assessment? $\boxtimes$ Yes $\square$ No
f.	Are applicants in households without dependent children required to participate in completion of an employment assessment?  ☑ Yes ☐ No
g.	Are exempt adults in households without dependent children required to participate in completion of an employment assessment?  ☑ Yes ☐ No
h.	How often and under what circumstances is the employment assessment updated?
	The Assessment is updated either semi-annually or annually depending on employment code. If employable, the assessment is updated semi-annually. If not employable due to a medical, the assessment is updated according to the medical limitation time frame with a minimum of once a year. If other changes to the Assessment are necessary to update according to new regulations or agency policy it is updated immediately.
2.3	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.	<ul> <li>Check one of the following:</li> <li>☑ The same administrative unit or contractor that conducts employment assessments also develops employment plans.</li> <li>☐ A different district administrative unit or contractor develops employment plans, and their qualifications include:</li> </ul>

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

Each applicant for Temporary Assistance will complete an employment plan as a scheduled meeting with their assigned Employment & Training Representative following their completion of their initial Assessment class. These scheduled meetings are generally scheduled within the first two weeks after an applicant attends Assessment. At the employment plan meeting the Employment & Training Representative goes over the LDSS-4980. After reviewing the information contained in the LDSS-4980 and any other supporting documents the agency has received, the Employment & Training Representative determines what activity the applicant will be enrolled in once their Temporary Assistance application is opened. Together, the applicant and Employment & Training Representative set short-term and long-term goals for employability or self-sufficiency. These goals are listed on the LDSS-4978 which the applicant signs to acknowledge agreement with the set goals.

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

The employment plan is updated every six months at recertification for those individuals that are found to be employable, unless circumstances change which require the plan to be updated sooner. The employment plan is updated every year for those individuals that are determined to be unable to work due to medical issues; these individuals are, however, required to submit a medical statement to verify their exemption once every six months to one year depending on what is stated on the medical statement they submit.

# 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:

Franklin County's requirements for "Engaged in Work" involve both paid and unpaid employment activities; activities that will increase an A/R's employability can also be considered employment activities. A applicant/recipient of TA or SNAP are considered "Engaged in Work" if they are participating in the Work Experience program, Job Search Program, Adult Education/High School Equivalency Classes, Secondary School, Job Readiness Training, College, On the Job Training, Subsidized Employment or Paid Employment. Any other activities would be examined and approved at the discretion of the district.

# 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:

Franklin County DSS has a poster in the lobby with all different languages and would first access the language line at 800-305-9673. A request for an interpreter can be made by any worker involved with the client.

### 3.3 Strategies/Procedures for Increasing Program Attendance

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

The DSS E&T Unit staff provides case management services with the clients in overcoming barriers such as childcare, transportation, etc. and counsels clients on the importance to balance work and other needs to reduce time missed from work so they are better prepared to enter and retain employment. The DSS E&T Unit Staff monitors timesheets weekly to closely monitor attendance and/or participation.

## 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 are informed during the conciliation process that if a WE 1 sanction is imposed, (first sanction and until willing to comply) then they have the option to end the TA sanction by signing a willing to comply statement for reengagement to employment activities and demonstrating compliance within 5 days.

Also, effective 5/1/17, the State generates the "Option to end a TA Employment Sanction Notice" (XL313C/XL313D) that reminds Safety Net Assistance (SNA) recipients, who were residing in a household without dependent children at the time a Temporary Assistance (TA) employment sanction was imposed and are still sanctioned at the end of the minimal durational sanction period by demonstrating compliance with work requirements as assigned by district.

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

For applicants who were determined to be a voluntary job quit sanction, we require the individual to re-establish eligibility immediately following the 90 day disqualification period. The Social Welfare Examiner in the Employment Unit keeps track of the of those individuals and 30 days before the disqualification period ends, mails them an agency document request with an application and appointment date and time to come in to reapply. If the individual fails to come in for that appointment within 10 days, the entire TA case is closed.

Also, effective 5/1/17, the State generates the "Option to end a TA Employment Sanction Notice" (XL313C/XL313D) that reminds Safety Net Assistance (SNA) recipients, who were residing in a household without dependent children at the time a Temporary Assistance (TA) employment sanction was imposed and are still sanctioned at the end of the minimal durational sanction period by demonstrating compliance with work requirements as assigned by district.

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

LDSS staff may call in sanctioned individuals to discuss various topics in relation to employment and self-sufficiency. The LDSS E&T Unit staff may be present at these meetings to encourage the sanctioned individuals to engage in appropriate activities.

# 3.5 Strategies for Reducing the Need for TA

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

LDSS E& T Unit assists individuals at risk of needing temporary assistance by identifying immediate needs that may be met in lieu of applying for temporary assistance. Support Services, Transitional Support Services and Extended Support Services may be provided to improve their opportunities for employment or to maintain their employment. Individuals are screened individually, on a case-by-case basis, for eligibility for the appropriate support service as listed in the following sections. (A TANF 200% application may be completed, signed, certified and kept on file.)

DSS E&T Unit has also established in-house employer recruitments with ETS for Temporary Assistance applicants and recipients as well as SNAP applicants and recipients to solicit manufacturing job opportunities with over four private manufacturing companies. And, FCDSS coordinated with Franklin County Public Transportation to create two separate transportation routes to Plattsburgh, NY where the manufacturing positions exist. Recruitments are held every 6-8 weeks and this model has proved to be very successful. During the recruitment, all the manufacturing positions are discussed, the bus routes are handed out and reviewed, bus passes are provided until first pay is issued and work clothes are provided if needed. Many individuals are placed in employment before their temporary assistance case is opened.

During COVID, due to social distancing restrictions, recruitments have not been held with ETS. In lieu of recruitments the agency has been giving the direct phone number of the

ETS Representative that represents the factories with bus routes from Malone to Plattsburgh to the clients. Recruitments will resume once social distancing restrictions have been lifted.

# 4. Work Activities

### 4.1 Allowable Work Activities

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

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

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

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

# **4.2 Job Development**

a.	Does the district conduct or access job development services to expand job opportunities for
	TA and SNAP participants?
	⊠Yes
	□No

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

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

One staff from the DSS E&T Unit makes telephone contacts, followed by a personal visit to a new business or established ones expanding and/or replacing employees and to promote the TEAP Program.

DSS E&T Unit has also established in-house employer recruitments with ETS for Temporary Assistance applicants and recipients to solicit manufacturing job opportunities with over four private manufacturing companies. And, FCDSS coordinated with Franklin County Public Transportation to create two separate transportation routes to Plattsburgh, NY where the manufacturing positions exist. Recruitments are held every 6-8 weeks and this model has proved to be very successful. During the recruitment, all the manufacturing positions are discussed, the bus routes are handed out and reviewed, bus passes are provided until first pay is issued and work clothes are provided if needed. Individuals meet with their

Employment worker to get their start date and a representative from the TA Unit is available for specific information on their case and how wages from employment will affect their current benefits and transitional benefits.

During the COVID19 pandemic recruitments have not been held. In lieu of recruitments the agency has been giving individuals an ETS Representative's direct phone number to obtain employment more quickly. Once social distancing restrictions are lifted recruitments will resume.

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.

N/A- District's Social Welfare Employment Coordinator makes direct contact with local businesses for employment opportunities within Franklin County and surrounding areas.

# 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:
  - F-E-H BOCES, who provides adult basic education programs, is located at the Franklin County ONEWORKSOURCE Career Center. Applicants and or recipients who indicate less than a high school education or HSE attainment and those interested in ABE and those needing ESL are automatically referred to the F-E-H BOCES.
- 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 E&T Unit staff have years of experience and area contacts with SUNY Canton, North Country Community College, in both Malone and Saranac Lake campuses; F-E-H BOCES Adult Education Program; Norwood BOCES; Adirondack Medical Center; along with other providers of training that have a demonstrated record of effectiveness and are a New York State Education approved institution.
- 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:
  - Applicants/Recipients who have not attained a basic literacy of 7.0 and/or have not attained a high school diploma will be referred to ABE classes through F-E-H BOCES.

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:

When making an assignment to an educational activity, the DSS E& T Unit staff will determine the appropriateness of such assignment based on the individual's employment assessment, the district's need to comply with Federal and State work participation rate requirements and other factors taken into consideration when developing the individual's employment plan.

The agency may deny participation in educational activities if the recipient already possesses marketable skills that would preclude the need for further education or training and/or if previous training history contains elements that would indicate a pattern of failure, without sufficient cause, to successfully pursue or complete programs.

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:

Enrollees in vocational education and job skills training programs must have been first assessed then recommended and approved by the DSS E&T Unit. The criteria upon which approvals or disapprovals are based shall be consistently applied to each potential enrollee, regardless of whether the plan is initiated by the recipient or by the agency to include participation in up to four years of post-secondary education. Those factors to be considered for a favorable recommendation are:

- That the recipient demonstrates based on his/her individual assessment and employment plan, that he/she possesses the necessary skills, ability and aptitude to successfully complete the proposed training.
- The E&T Unit staff recommendation is a must in order to enroll any participant in a program.
- The participant must maintain at least a 2.0 or 70% GPA; one semester of academic probation will be allowed; this policy follows NCCC/F-E-H BOCES Academic policy.
- That the participant demonstrates an attitude and commitment to the proposed training that would be conducive to successful completion.
- The participant in Vocational Education or Job Skills Training will meet with E&T Unit Staff at least monthly.
- A participant cannot drop or add a class, or change an area of study without prior approval from the E&T Unit staff; the participant must sign a release so all transcripts can be sent directly to the E&T Unit.
- Regular, punctual attendance is required.
- Timeliness of required paperwork is mandatory.
- If continuing in an approved marketable area of study, a client must have previously maintained: GPA of 2.0 and an attendance record with no more than 3 hours of absences per class.
- That the successful completion of the training would produce a skill that is reasonably marketable within the local economy. The DSS E&T Unit will verify local labor market demand through any of the following sources:
- New York State Department of Labor determination.
- Workforce Investment Board determination that the occupation or occupational area is in demand.

- Placement information from the training institution.
- On-the-Job Training (OJT) history that indicates a consistent employer for the occupational area.
- That any previous training history does not contain elements that would indicate a pattern of failure, without sufficient cause, to successfully pursue or complete programs.
- Participant's cooperative effort, interest, goal oriented outlook, attitude, cooperation and dedication would be considered.
- That the recipient does not already possess marketable skills that would preclude the need for further education or training.

This is done throughout case management and through known providers of training that have a demonstrated record of effectiveness.

When a work activity or training is approved an assignment letter is sent to the recipient notifying them of their work assignment. This notification states the activity site, location, supervisor, start date, number of hours per week and required documentation.

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

The provider of training must have a demonstrated record of effectiveness and be a New York State Education Department approved institution.

The training must be sufficient in itself to significantly enhance the participant's opportunity to secure employment; or when combined with other training, represents part of a comprehensive plan for the participant to secure employment.

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

Participants are informed of training opportunities and providers during group orientation, individual assessment and throughout participation in job search and job readiness training, both verbally and with hand-outs.

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

When a work activity or training is approved an assignment letter is sent to the recipient notifying them of their work activity assignment. This notification states the activity site, location, supervisor, start date, number of hours per week and required documentation.

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

A release of information form is obtained and signed by the client then sent to school districts at time of application and then at recertification (Quarterly and semi-annual). If normal periodic monitoring procedures cause the verification to be due during a summer month when students are not normally in school, the E&T Staff will create a tickler date to follow up so that enrollment can be verified when school reconvenes.

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:

The district notifies the work activity provider, in writing, providing health-related limitations a participant may have. Monitoring is done to make sure limitations are being accommodated.

## 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:

FCSS E&T Unit may approve enrollment in vocational education for up to a four year college program.

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:

Any enrollees in vocational education and job skills training beyond a twelve month(lifetime) period is only approved when it is combined with a minimum of 20 hours averaged weekly of participation in paid employment or other core activities, such as work experience or a community service assignment.

- 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.

Γ	☐ Additiona	l 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).

Newly opened non-exempt cases and individuals whose status changed from exempt to non-exempt are generally engaged in activities within two weeks after the referral has been received by the DSS E&T Unit from LDSS. The district participation standard is up to 40 hours for all active nonexempt adults.

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

Household Type	Number Served
Households with Dependent Children Average Monthly	35
Households without Dependent Children Average Monthly	55

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:

In the last week of the month, the DSS E&T Unit staff reviews COGNOS Universe Case Listing report for cases that will be in the denominator of the participation rate calculation. Based on the information compiled from the COGNOS Current report and a review of WTWCMS, the DSS E&T Unit staff will verify that enrollment is correct and ensure that actual hours are entered appropriately. As soon as the TANF/SN MOE Detail Listing report and the SN NON-MOE Detail Listing report is available on COGNOS, DSS E&T Unit staff reviews information to verify entries made on CMS impacted participation rates as expected. Using the reports compiled from COGNOS as a basis for discussion, participation rates are discussed at monthly DSS E&T Unit staff meetings.

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 Searc	h.
⊠Yes	
□No	

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	3	12	Once a TA applicant has completed the Assessment class as well as Day 1 Job Search Class they are assigned to four consecutive weeks of Supervised Job Search that is offered in the Employment Classroom at the DSS building.
SNA Individuals	3	12	Once a TA applicant has completed the Assessment class as well as Day 1 Job Search Class they are assigned to four consecutive weeks of Supervised Job Search that is offered in the Employment Classroom at the DSS building.

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	IΑ	recipients	to	Job S	Search.

☐ No

Recipient	Min.	Min.	Additional Information
Job Search	Contacts	Hours	
TANF and SNA MOE	3	12	TA recipients are reassessed every six months if they are employable. When they are reassessed by the E&T Rep, if they have not found employment, they may be referred to four additional consecutive weeks of Supervised Job Search.
SNA Individuals	3	12	TA recipients are reassessed every six months if they are employable. When they are reassessed by the E&T Rep, if they have not found employment, they may be referred to four additional consecutive weeks of Supervised Job Search.

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

The district would make a determination on a case by case basis if self-employment is approved as part of an individual's required work activities. In order for self-employment to be approved, there must be documentation indicating the income, work hours and dates of the job and the income would be budgeted in the Temporary Assistance Case.

## **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):

Employment activities and case management services for NTA SNAP work registrants are the responsibility of the E&T Unit. If the client has a question regarding job search services, the Employment & Training Representative will address them. The worker will also assist with other activities including referrals to OneWorkSource. As outlined further in "Section 4 Support Services", Non-TA SNAP applicants and recipients will receive the same support services as TA applicants and recipients including but not limited to: transportation assistance, clothing for work activities, work related tools, and car repairs or car insurance. Case management services are available to all NTA SNAP applicants and recipients. SNAP Employment & Training activities are not mandated.

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.

NTA SNAP applicants and recipients may voluntarily participate in the Supervised Job Search program through Franklin County's E&T Unit. If the NTA SNAP A/R volunteers to participate in the program they would be assigned to an E&T Representative and that E&T Rep would assign them to four consecutive weeks of Job Search. Contracted staff from Community Connections supervises the Job Search in the Employment Training Room at Franklin County DSS. The Employment Classroom at Franklin County DSS has two computers available for the NTA SNAP A/R to utilize for their job search. The contracted staff reviews and suggests any corrections on the Job Search Log to the Job Search participant. Once Job Search Log is acceptable the NTA SNAP A/R Job Search log is submitted to the E&T Representative for review and approval. This process is done weekly the same day that the log is submitted.

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

NTA SNAP applicants and recipients are notified during their interview process at application and recertification of the Employment Activities that are available to them through the E&T Unit, including Supervised Job Search.

# 6. Quality Assurance/Work Verification

# 6.1 Quality Assurance Process - Random Case Sampling

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the

district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly:
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the
  district will review semi-annually. Refer to the Instruction Guide for the minimum number of
  cases per district and guidance regarding review requirements.
   6 cases

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

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

#### **6.2 Use of Outside Providers/Vendors**

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

# 7. Supportive Services

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

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

Transportation assistance, either through public transportation, where available, with bus passes; mileage reimbursement of half the IRS Business Rate; and taxi; or gas cards on a limited basis; Clothing necessary to participate in work activities; Physical/immunizations and work required medical examinations necessary for employment; license and/or fees; Work related tools; Car repairs and car insurance; Direct referral to: Post-employment case management, supportive services for public assistance recipients, preventive services for applicants, and individuals at risk of needing public assistance who have present or near future verified employment may receive one time work-related expenses when accepting employment or are in jeopardy of losing employment or are seeking to improve existing employment up to the following dollar amounts. This is not an entitlement. Eligibility is based on need and appropriateness. In some cases, expense may be shared with the individual: Clothing-uniforms, footwear, etc. for verified entry to employment - dollar limit \$200: Licenses/other work related fees when necessary to accept/retain employment - dollar limit: \$200; Employer required, job related safety equipment, i.e. protective gloves, boots, head gear, etc. - dollar limit \$200; Employer required tools/equipment necessary to accept/retain employment- dollar limit \$200; Automobile repairs necessary to ensure reliable transportation allowing clients to accept/retain employment-Dollar limit \$750; Automobile insurance and registration for legally necessary insurance and car registration for client's vehicle when it is needed for client to accept/maintain employment - dollar limit \$500; Initial liability insurance costs up to a maximum of \$79 per child for temporary assistance recipient when such recipients become daycare providers; Relocation assistance up to \$1000 for clients who have documented employment verified by employer or has recently been hired. This may include transportation, housing deposit, utilities hook-up, etc. Daycare costs will be handled through the Federal TANF Block Grant. Other services to be provided for employment on an as needed, limited basis.

	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 1/1/21is 56 cents/mi) Mileage reimbursement at IRS Medical/Moving rate (effective 1/1/21 is 16 cents/mi) Other mileage rate (please explain methodology used to establish reimbursement rate):
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The district will provide mileage reimbursement rate at \$0.28 per mile, half of the IRS Business Rate (rounded).

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:

Clients will be expected to walk or set up their own transportation if they live one and a half miles or less from the program activity location. Otherwise, if the distance is over one and a half miles, transportation assistance will be available primarily through public transportation with bus passes. If public transportation is not available, mileage reimbursement of half the IRS Business rate will be approved. In extenuating circumstances, a taxi or gas card may be allowed. The district will accommodate transportation needs for clients with limitations.

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

Transportation assistance, either through public transportation, where available, with bus passes; mileage reimbursement of half the IRS Business Rate; and taxi; or gas cards on a limited basis: Clothing necessary to participate in work activities: Physical/immunizations and work required medical examinations necessary for employment; license and/or fees; Work related tools; Car repairs and car insurance; Direct referral to: Post-employment case management; Supportive services for public assistance recipients, Preventive services for applicants, and Individuals at risk of needing public assistance who have present or near future verified employment may receive one time work-related expenses when accepting employment or are in jeopardy of losing employment or are seeking to improve existing employment up to the following dollar amounts. This is not an entitlement. Eligibility is based on need and appropriateness. In some cases, expense may be shared with the individual: Clothing-uniforms, footwear, etc. for verified entry to employment - dollar limit \$200; Licenses/other work related fees when necessary to accept/retain employment dollar limit: \$200; Employer required, job related safety equipment, i.e. protective gloves, boots, head gear, etc. - dollar limit \$200; Employer required tools/equipment necessary to accept/retain employment- dollar limit \$200; Automobile repairs necessary to ensure reliable transportation allowing clients to accept/retain employment-Dollar limit \$750; Automobile insurance and registration for legally necessary insurance and car registration for client's vehicle when it is needed for client to accept/maintain employment - dollar limit \$500; Initial

liability insurance costs up to a maximum of \$79 per child for temporary assistance recipient when such recipients become daycare providers; Relocation assistance up to \$1000 for clients who have documented employment verified by employer or has recently been hired. This may include transportation, housing deposit, utilities hook-up, etc. Daycare costs will be handled through the Federal TANF Block Grant, Other services to be provided for employment on an as needed, limited basis.

## 7.2 Post-Employment/Transitional Supportive Services

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

Transportation assistance, either through public transportation, where available, with bus passes; mileage reimbursement of half the IRS Business Rate; and taxi; or gas cards on a limited basis; Clothing necessary to participate in work activities; Physical/immunizations and work required medical examinations necessary for employment; license and/or fees; Work related tools; Car repairs and car insurance; Direct referral to: Post-employment case management; Supportive services for public assistance recipients, Preventive services for applicants, and Individuals at risk of needing public assistance who have present or near future verified employment may receive one time work-related expenses when accepting employment or are in jeopardy of losing employment or are seeking to improve existing employment up to the following dollar amounts. This is not an entitlement. Eligibility is based on need and appropriateness. In some cases, expense may be shared with the individual: Clothing-uniforms, footwear, etc. for verified entry to employment - dollar limit \$200; Licenses/other work related fees when necessary to accept/retain employment dollar limit: \$200; Employer required, job related safety equipment, i.e. protective gloves, boots, head gear, etc. - dollar limit \$200; Employer required tools/equipment necessary to accept/retain employment- dollar limit \$200; Automobile repairs necessary to ensure reliable transportation allowing clients to accept/retain employment-Dollar limit \$750; Automobile insurance and registration for legally necessary insurance and car registration for client's vehicle when it is needed for client to accept/maintain employment - dollar limit \$500; Initial liability insurance costs up to a maximum of \$79 per child for temporary assistance recipient when such recipients become daycare providers; Relocation assistance up to \$1000 for clients who have documented employment verified by employer or has recently been hired. This may include transportation, housing deposit, utilities hook-up, etc. Daycare costs will be handled through the Federal TANF Block Grant, Other services to be provided for employment on an as needed, limited basis.

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:

Transportation assistance, either through public transportation, where available, with bus passes; mileage reimbursement of half the IRS Business Rate; and taxi; or gas cards on a limited basis; Clothing necessary to participate in work activities; Physical/immunizations and work required medical examinations necessary for employment; license and/or fees; Work related tools; Car repairs and car insurance; Direct referral to: Post-employment case management; Supportive services for public assistance recipients, Preventive services for applicants, and Individuals at risk of needing public assistance who have present or near future verified employment may receive one time work-related expenses when accepting employment or are in jeopardy of losing employment or are seeking to improve existing

employment up to the following dollar amounts. This is not an entitlement. Eligibility is based on need and appropriateness. In some cases, expense may be shared with the individual: Clothing-uniforms, footwear, etc. for verified entry to employment - dollar limit \$200: Licenses/other work related fees when necessary to accept/retain employment dollar limit: \$200; Employer required, job related safety equipment, i.e. protective gloves, boots, head gear, etc. - dollar limit \$200; Employer required tools/equipment necessary to accept/retain employment- dollar limit \$200; Automobile repairs necessary to ensure reliable transportation allowing clients to accept/retain employment-Dollar limit \$750; Automobile insurance and registration for legally necessary insurance and car registration for client's vehicle when it is needed for client to accept/maintain employment - dollar limit \$500; Initial liability insurance costs up to a maximum of \$79 per child for temporary assistance recipient when such recipients become daycare providers; Relocation assistance up to \$1000 for clients who have documented employment verified by employer or has recently been hired. This may include transportation, housing deposit, utilities hook-up, etc. Daycare costs will be handled through the Federal TANF Block Grant, Other services to be provided for employment on an as needed, limited basis.

# 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 assistance, either through public transportation, where available, with bus passes: mileage reimbursement of half the IRS Business Rate: and taxi; or gas cards on a limited basis; Clothing necessary to participate in work activities; Physical/immunizations and work required medical examinations necessary for employment; license and/or fees; Work related tools; Car repairs and car insurance; Direct referral to: Post-employment case management; Supportive services for public assistance recipients, Preventive services for applicants, and Individuals at risk of needing public assistance who have present or near future verified employment may receive one time work-related expenses when accepting employment or are in jeopardy of losing employment or are seeking to improve existing employment up to the following dollar amounts. This is not an entitlement. Eligibility is based on need and appropriateness. In some cases, expense may be shared with the individual: Clothing-uniforms, footwear, etc. for verified entry to employment - dollar limit \$200; Licenses/other work related fees when necessary to accept/retain employment dollar limit: \$200; Employer required, job related safety equipment, i.e. protective gloves, boots, head gear, etc. - dollar limit \$200; Employer required tools/equipment necessary to accept/retain employment- dollar limit \$200; Automobile repairs necessary to ensure reliable transportation allowing clients to accept/retain employment-Dollar limit \$750; Automobile insurance and registration for legally necessary insurance and car registration for client's vehicle when it is needed for client to accept/maintain employment - dollar limit \$500; Initial liability insurance costs up to a maximum of \$79 per child for temporary assistance recipient when such recipients become daycare providers; Relocation assistance up to \$1000 for clients who have documented employment verified by employer or has recently been hired. This may include transportation, housing deposit, utilities hook-up, etc. Daycare costs will be handled through the Federal TANF Block Grant, Other services to be provided for employment on an as needed. limited basis.

# 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
	f a recipient does not comply with an employment activity and does not communicate good cause to the agency, then the DSS E&T Unit staff send a Conciliation Notification to the recipient advising them of the nature of the non-compliance and providing them with a worker name and phone number to contact within 10 days, to explain why they did not comply with work requirements. Whenever possible, LDSS encourages Conciliation Meetings be held in person with the recipient, Employment Worker and Employment SWE. If, after the conciliation process, it is found that an individual willfully and without good cause failed to comply with PA requirements, the appropriate sanction notice will be issued and the sanction imposed. If there is a conflict in the decision to sanction a case, the Supervisor, Social Welfare Employment Coordinator will act as mediator and will make the final determination.
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
	If a SNAP recipient or applicant does not comply with an employment activity willfully and without good cause and does not communicate good cause to the agency, then the DSS E&T Unit staff sends a Conciliation Notification to the recipient advising them of the nature of the non-compliance and providing them with a worker name and phone number to contact within 10 day time period, to explain why they did not comply with work requirements. Whenever possible, LDSS encourages Conciliation Meetings be held in person with the recipient, Employment Worker and Employment SWE.
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:

If a SNAP recipient does not comply with an employment activity but responds to the conciliation notice within the 10 day time frame, they will have an opportunity to document that their non-compliance was not willful or without good cause or document an exemption from participation in SNAP Work activities. If an individual communicates with the agency and provides documentation of information to determine good cause, then the agency will counsel that individual, document the incident and demonstrate compliance by rescheduling the employment activity. If an individual does not demonstrate good cause, they would have the opportunity to demonstrate compliance by assigning them to job search to make three contacts and return the completed "Job Search Log for SNAP conciliation" within an additional 10 day time period. If there is no response to the SNAP conciliation notice, then the SNAP sanction would be imposed. If there is a conflict in the decision to sanction a case, the Supervisor, Social Welfare Employment Coordinator will act as the mediator and will make the final determination.

#### 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:

Individuals who are subject to a durational sanction period must serve the full durational period and demonstrate a willingness to comply to the satisfaction of the district to restore eligibility for Temporary Assistance benefits. An individual who wishes to end their sanction must request, in writing, to be added to the case and signs a local "willing to comply" form. The individual remains sanctioned until willing to comply and must demonstrate compliance by reporting to an assigned work activity and being prepared to engage in the assigned activity. The timeframe for demonstrated compliance will be five days. Temporary assistance benefits are restored retroactive to the date the individual indicated a willingness to comply, but not earlier than the expiration of the minimum durational sanction period.

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:

Individuals who are subject to a durational SNAP sanction period must serve the full durational period unless they can document that he/she has become exempt from SNAP work requirements. If they provide documentation of the exemption from SNAP work requirements, the agency would lift the SNAP sanction effective to the date they became exempt. If there is no exemption claimed during the SNAP sanction period, the individual must serve the full durational SNAP sanction and is encouraged to reapply for SNAP in 30 days. Individuals with a case count of more than 1 are required to sign a willing to comply at the end of the sanction period. In either situation, the individual remains sanctioned until willing to comply and must demonstrate compliance by reporting to an assigned work activity and being prepared to engage in the assigned activity. The timeframe for demonstrated compliance will be five days. SNAP benefits are restored retroactive to the date the

individual indicated a willingness to comply, but not earlier than the expiration of the minimum 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

If an applicant or recipient reports medical and/or psychological issues which affect their ability to participate in work activities and/or which may qualify them for SSI, the district requests documentation of a medical impairment on an agency medical statement within ten calendar days. Once the medical documentation is received, the district will forward it to the medical review team to make a determination if the individual is exempt or non-exempt. The medical team meets weekly to ensure that medical determinations are made in a timely manner. If the team finds that a TA applicant or recipient reasonably appears to be eligible for SSI, the district requires the applicant or recipient to apply for SSI benefits, follow through on the application for such benefits and accept such benefits, if eligible. If any individual is determined to be work limited and is assigned to a work activity the agency notifies the work site in writing of the individual's limitations prior to the first day of work assignment.

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)
	<ul> <li>□ District directs the contracted physician or individual's physician to determine status.</li> <li>□ District review team reviews and determines status (described below).</li> <li>□ Specialized disability/medical staff or unit reviews and determines status (described below).</li> <li>□ Other</li> </ul>
	The district created a medical review team to review all medical documentation to determine if the individual is exempt or non-exempt, followed by notification to the client. Members of the team include the following staff:  1 Social Welfare Employment Coordinator  1 SSI Assistant  1 SWE from Employment unit Employment & Training Representative assigned to case
	The team meets weekly to ensure that medical determinations are made in a timely manner of there is a dispute between the team on a determination, the Supervisor, Social Welfare Employment Coordinator will take the case to the Director of Financial Services, who will make a final determination. The Social Welfare Examiner will initiate the notice to client advising them of their employability determination using the 4005 and 4005A as needed.
9.2	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:
	Mental Health Screenings will be offered to individuals that have a history of multiple sanctions or who are attending a conciliation for failure to comply with employment requirements; adults in households with dependent children who have received assistance for at least 36 months who are not steadily employed or fully engaged in work activities; and adults with a history of evictions/homelessness. This screening will be offered at the time that the individual completes a private employment plan meeting with their assigned Employment & Training Representative.
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.

The cutoff score for individuals screened using the MMS will be 9. All individuals that score a 9 or higher on the screening will be referred for a mental health evaluation.

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

When the screening result warrants a mental health evaluation referral, the client will be notified in person and in writing immediately following scoring of the MMS tool.

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

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

Described below is the district's procedure for determining if an individual, who is unable to work due to mental or physical impairment, has the potential through treatment or other rehabilitative activities to improve the ability to work. This determination is different from the determination of the individual's disability exemption as covered in Section 9.1 of this Plan. Indicate who makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities (e.g., medical practitioner, employment worker, TA worker, local review team, etc.). Also indicate the source and type of information used to make the determination (e.g., information from individual's medical practitioner, district contracted provider, specialist evaluation obtained as result of district referral, etc.).

If an individual claims a disability or work limitation, the agency requests LDSS-4526 or statement on physician's letterhead be completed by the individual's practitioner. Within 10 days of receipt of the medical statement LDSS-4526, the agency's medical review team makes a determination as to the level and duration of the individual's disability. All individuals submitting a medical statement for review will be sent form 4005 or 4005a advising them of their employability determination. If the decision of the team is that the individual is totally and permanently disabled, they are sent a packet and mandated to apply for SSI/SSD. As the presumption is they will not be restored to a level where they could work, the employment unit does not work with them. Their progress toward reaching the goal of SSI is then monitored by the SSI Assistant; the SSI Assistant is also available to assist the individual with applying for SSI including assistance with completion of the phone interview.

For those individuals who are work limited or disabled, but not SSI appropriate, an employability code is assigned by the medical team; and the E&T Unit staff is notified of the decision and is provided with a copy of the medical statement. The E&T Unit staff reviews the LDSS-4526 or statement on letterhead and assigns the individual to rehabilitative activities based on the recommendation of the individual's own doctor. If an individual does

not have a physician, the agency may make a referral for an IMA exam and may require a treatment program based on their recommendations. Medical statements are requested based on the duration of disability/limitations listed on the medical statement, but no less than once every 12 months. If the medical statement expires prior to twelve months, the medical team will initiate an "AFA" anticipated future action code to alert the Social Welfare Examiner to request a new medical.

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

The treatment plan mandated by the E&T Unit staff is based solely on the doctor recommendation. Upon review of the medical statement, the E&T Unit staff notifies the individual, in writing, that the treatment mandated by their physician will now be part of their employment plan. They are provided with attendance sheets which they submit weekly or monthly, depending on the frequency of their appointments for treatment. These attendance sheets must be completed and signed by their physician or counselor. On the first attendance sheet that is completed by the physician or counselor the Employment & Training Representative asks what the recommendation is for frequency of appointments.

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

Individuals have their attendance monitored using in-house forms. E&T Unit staff use either weekly or monthly time sheets based on the frequency of their individual's appointments for treatment. Individuals are responsible to turn in their attendance sheets for verification and are made aware that they may risk losing their temporary assistance benefits if they do not submit their attendance sheets and/or if they do not maintain consistent attendance to comply with physician's treatment recommendations. There are sections on the attendance sheets where the treatment provider can make notations regarding compliance, individual progress, and whether or not there is a change in treatment plan.

## 10. District Certification

#### 10.1 Certification

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

10/23/2021 Michele Mulverhill Commissioner