# **Yates County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

#### 1.1 Administrative Structure

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

See attachment

b. Below is a description of the office(s) in and/or outside of the Department of Social Services that are involved in the operation of the district's employment program and include the responsibilities of each office.

The Deputy Commissioner of Social Services is responsible for the direct supervision of the employment unit supervisor. The unit supervisor is responsible for the direct supervision of the unit staff and the day to day operation. Employment unit staff is responsible for the day to day services, to include: program activity development and referral, support service delivery to DSS applicants and recipients, dispute resolution, maintenance of the data record and conciliation / sanctions in conjunction with designated TA staff. There are no outside operators.

Applicants and recipients of cash assistance begin the process of eligibility with the Yates County DSS Employment Unit. The Unit, a sub-division of DSS, is comprised of workforce and temporary assistance professionals with a focus on employment. The employment Unit is located on the second floor of the Yates County Complex in Penn Yan, New York. The unit is comprised of the following staff:

7 FTE Social Services Program Examiners (3 TA only/TA&SNAP mixed; 5 NTA-SNAP) who process applications, interview applicants, determine eligibility and determine employability status.

1FTE Sr. Social Services Program Examiner (.5 TA only/TA&SNAP mixed; .5 NTA-SNAP) who conducts interviews, determines eligibility, and work to provide case supervision and monitoring for staff. This includes oversight of assessments, case management activities, compliance and file maintenance.

2 FTE Principal Social Services Program Examiners (1 TA only/TA&SNAP mixed; 1 NTA-SNAP and HEAP) who provide supervision and monitoring including oversight of assessments and case management.

The Employment Unit staff performs all aspects of intake and eligibility determination for all TA/SNAP applicant/recipients. Employment Development Specialists provide orientation and assessment for TA and SNAP applicants. All applicant/recipients that are determined to be non-exempt are immediately referred for employment activities.

2 FTE Employment and Training Counselors provide youth employment and training services and youth services, and work experience opportunities and assessments. These

positions works with applicants/recipients determined to be non-exempt/work limited to complete employment assessments and plans, address barriers to self-sufficiency, supervised job search, match and development, refer to appropriate partner services, and to provide post-employment support for up to 90 days. These positions works with applicants/recipients determined to be exempt from work activities to complete employment assessments and plans, monitor and document treatment plans/ restoration to employability, and refer clients to appropriate partner services. They assign and monitor work experience opportunities, provide and monitor Job Readiness Training and Job Skills Training activities and provide ongoing case management for applicants/recipients.

- 1 PTE Employment and Training Assistant provides support and assistance to E&T Counselors in the provision of employment services.
- 2 FTE Account Clerk Typists provides information on services and programs available to applicants/recipients, as well as supports clients with basic employment activity questions.
- 2 FTE Senior Employment and Training Counselor. One provides case supervision and monitoring for the Employment Unit staff including oversight of assessments, case management activities, compliance and file maintenance. One works with businesses and clients to provide adult/dislocated worker services, employment and training services, and work experience opportunities and assessments, on the Job Trainings and Individual Training Accounts.

# 1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies

a. Table 1 lists the local contracts or agreements with agencies to provide employment services to TA and SNAP clients. These activities and services may include, but are not limited to: employability determinations; development of assessment and employment plans; conciliation and grievance activities; provision of work activities such as job readiness training; education and job skills training; monitoring and support for compliance with treatment plans for exempt individuals with the potential for restoration to self-sufficiency; job development; job placement and retention services; and other employment related activities.

Each contract listed in Table 1 contains an assurance that the activities are not otherwise available from that provider on a non-reimbursable basis, and, if not a performance-based contract, a statement regarding use of a cost allocation methodology that satisfies Generally Accepted Accounting Principles, as well as the requirements of U.S. Office of Management and Budget Circulars A-122 for nonprofit organizations, A-21 for educational institutions, or A-87 for State and local governments. Districts must maintain proper monitoring and oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

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

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

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Cornell Cooperative Extension	\$35,918	FFFS Local	FA SNA Family SNA Individual SNAP	Provide Job Skills Training, Life Skill Services as well as one- to-one TANF budgeting services.
Finger Lakes Workforce Investment Board	\$154,726	Others: WIOA	FA SNA Family SNA Individual SNAP TANF 200%	Provide career guidance, counseling, work experience, and job search planning. Provides funding for Youth, ITA, and OJT services.

b. Table 2 includes agencies/providers that offer services to participants and to which the district expects to refer participants, but which have no direct financial agreement with the district.

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

## Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Wayne Finger Lakes BOCES	Others: OTDA	FA SNA Family SNA Individual SNAP TANF 200%	Adult Basic Education, TASC, and vocational training.
Access VR	Others: Educational Resource Grant	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Rehabilitation Services
Finger Lakes Community College	Others: State Education	FA SNA Family SNA Individual SNAP TANF 200%	Literacy training, vocational training, High School Equivalency

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
FLACRA	Others: NYS OASAS	FA SNA Family SNA Individual SNAP TANF 200%	Drug screening, inpatient and outpatient treatment, mental health counseling, community supports
Yates County Veterans Affairs	Local	FA SNA Family SNA Individual SNAP TANF 200%	Veteran Services outreach and support for Veterans and their families
Commission for the Blind	Others: Educational Resource Grant	FA SNA Family SNA Individual SNAP TANF 200%	Vocational and educational services for individuals who are blind
Yates County Public Health	Local	FA SNA Family SNA Individual SNAP TANF 200%	Health and Wellness Information
HHUNY	Others: Department of Health	FA SNA Family SNA Individual SNAP TANF 200%	Provide case management and service coordination for clients
Workforce Development	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP TANF 200%	Offer all employment programs and services to TA/SNAP applicants/recipients including assessments, tracking job search, job skills training, assigning activities, etc.
Child and Family Resource, Inc	Others: Funding through HFNY	FA SNA Family SNAP TANF 200%	Home Visiting Services during pregnancy and for children up until aged 5

# c. Monitoring and Oversight of TANF and SNAP E&T Funded Contracts/Agreements

Described below is the process used to monitor district held contracts/agreements with providers that use TANF and SNAP E&T funds for employment services:

The Department receives updates from providers monthly regarding TANF and SNAP E&T funds. This is monitored by the Accounting Unit Supervisor.

# 1.3 OTDA Jobs Staff Agreement

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

## Services Provided by Jobs Staff

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

## **Jobs Staff Target Groups**

Yes or No:	Target Groups:
No	Applicants
No	FA & SNA with children
No	SNA without children
No	SNAP
No	TANF 200%

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

N/A

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

a. Described below is how the district provides access to its programs and services with Career Center partners (reply yes or no to the options as they apply):

#### **Programs and Services Provided at Career Centers**

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

Yes or No:	Programs and Services Provided:	
Yes	The district has contract staff physically present at a Career Center	
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center	
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center	
Yes	Other (described here): Yates County provides access to partner programs and service virtually via https://www.yatescounty.org/284/Workforce-Development and https://fingerlakesworks.com/. This includes access to contact information for partner agencies and programs, as well as weekly updates on Workshops, Job Fairs, Job Leads, etc.	

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 Yates One Stop Career Center has a duel identity as the Yates County Workforce Development Office with Employment Unit staff providing services for both entities to the districts clients. The Yates One Stop Career Center provides access and referral services to all required WIOA Career Center Partners in our region including: Title V Older Americans Act, Jobs for Veterans, Local Offices for the Aging, Local Housing Authorities, JobCorps, Migrant/Seasonal Farmworkers Program, PathStone Corporation, Local Community Action Agencies, Trade Act Adjustment (TAA) Wagner-Peyser, Unemployment Insurance (UI) and Temporary Assistance for Needy Families (TANF).

Yates County utilizes a NYDOL approved digital referral form to refer and track referrals made to and between WIOA mandated partner agencies. Information is shared at quarterly One Stop meetings, through OSOS (One Stop Operating System) and through direct referrals.

# 2. Orientation, Assessment and Employment Plan

# 2.1 Orientation (Reference 18 NYCRR 385.5)

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

#### **District Orientation Procedures**

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: An overview of district's work activities, employment programs and services.  Employment Assessment and creation of an employment plan. As well as consequences of failing to participate in assigned work activities.  A review the district's code of conduct.  Identify and address barriers to employment Local Home Visiting Services

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

Orientation & Assessment is offered in a group setting two days a week by employment unit staff. If applicant/recipient cannot attend day/time assigned due to good cause, they must call the district prior to their scheduled appointment to reschedule their appointment for no later than seven days after the application date. (Under extreme circumstances/emergency, this seven day limit may be extended by the district or orientation & assessment may be waived with supporting medical documentation.) Applicant/Recipient can request an individual appointment if needed for accommodation in accordance with a medical need. During orientation & assessment, each applicant/recipient develops a preliminary employment plan with an Employment and Training Counselor to schedule assessments and assign work activities. The Orientation & Assessment procedure is the same for both exempt and non-exempt individuals. Orientation & Assessment is offered virtually when necessary.

# 2.2 Temporary Assistance (TA) Employment Assessment

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

#### **District Assessment Procedures**

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

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

During orientation & assessment Employment and Training Counselors meet with applicant/recipient to complete a preliminary assessment utilizing LDSS-4978 (New York State Employment Plan) as a guide to identify prior work experience, employment goals, barriers to employment, supportive services available, and assign appropriate work activities. Employment and Training Counselor will schedule, complete, and document in WTWCMS the LDSS 4980 and LDSS 4978 no later than 90 days from eligibility determination for households with dependent children and no later than 12 months for households without dependent children. The Employment and Training Counselor will utilize WTWCMS report system to identify upcoming employment assessments that are due.

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

Yates County Employment Unit

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)):

Employment and Training Counselors are designated trained staff with demonstrated effectiveness in assessment and employability development to prepare the assessments and plans. Employment and Training Counselors have been trained through the PDP and the OTDA to complete effective assessments/plans and employability development.

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

Yes

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

Yes

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

Yes

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

Assessments are updated; At application, at recertification, whenever there is reason to believe that an individual has a physical or mental impairment that would limit their ability to participate in work activities, and whenever changes in an individual's circumstances or activity assignments warrant reassessment.

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

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

#### **District Employment Plan Procedures**

Yes or No:	How the district develops employment plans	
No	The district enters employment plans directly into WTWCMS.	
Yes	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTWCMS.	
No	The district develops individual employment plans using a local equivalent tool. If applicable, the local equivalent contains the following additional elements beyond what is required:	

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

#### **District Employment Plan Development**

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

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

During orientation & assessment the Employment and Training Counselor meets with applicant/recipient to complete a preliminary assessment utilizing LDSS-4978 (New York State Employment Plan) as a guide to identify prior work experience, employment goals, barriers to employment, supportive services available, and assign appropriate work activities. The Employment and Training Counselor will schedule, complete, and document in WTWCMS the LDSS 4980 and LDSS 4978 no later than 90 days from eligibility determination for households with dependent children and no later than 12 months for households without dependent children. The Employment and Training Counselor will utilize WTWCMS report system to identify upcoming employment assessments that are due.

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

Employment plans are updated; At application, at recertification, whenever there is reason to believe that an individual has a physical or mental impairment that would limit their ability to participate in work activities, and whenever changes in an individual's circumstances or activity assignments warrant reassessment.

# 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:
  - a. Activities and programs to which the client may be referred during assessment for determining specific exempt status or disability limitations
  - b. Any activity that may be tailored to the requirements of special needs or at risk individuals; particularly as applicable to persons evaluated under section 385.2 having to do with physical and mental disabilities and work limitations
  - c. Any activity not mentioned herein that may be deemed suitable within the scope, purpose and philosophy of the plan, Yates County and the laws and regulations pertaining thereto

Exempt determined individuals, although not required to actively participate in work activities, are offered the same range of services/activities as non-exempt individuals. This may include selected work activities on a limited basis as well as referral for therapy, counseling, rehabilitation, training, etc. Additionally, participants are expected to follow recommended treatment plans, (i.e. physical therapy or mental health treatment), drug & alcohol treatment plans, and/or medical treatment.

# 3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

The district utilizes language line solutions to provide interpretation services. Additionally Yates County partners with Literacy Volunteers of Ontario-Yates County to provide JRT and HSE programming to ESL individuals.

# 3.3 Strategies/Procedures for Increasing Program Attendance

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

Participants are provided information or work activity requirements and expectations at orientation and assessment. Employment and Training Counselors meet with non exempt clients on a weekly basis to assign guided job search and to monitor client participation and activity. All assigned activities are tracked on a daily and/or weekly basis.

Employment and Training Counselors also identify and address barriers to participating work activities (transportation, child care, etc.) with the use of appropriate referrals, supportive services, and accommodations. Additionally the district attempts to reduce absences with good cause by identifying barriers to participation early and providing off site activity accommodation (remote job search, virtual workshops, etc.)

Applicant/recipients who fail to participate in assigned work activities will be subject to district action as outlined in 14-ADM-06. This attempts to conciliate with applicate/recipients and return them to participating in work activities or denies the case to remove applicant/participant from the program.

# 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

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

#### Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: Employment and Training Counselors provide the opportunity for sanctioned participants to update their employment assessment and plan to re engage in work activities. This is done as soon as the participant is sanctioned.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Employment and Training Counselors provide the opportunity for sanctioned participants to update their employment assessment and plan to re engage participants in the last month of the durational sanction period if participant is not currently engaged in work activities. This is completed to allow 10 days of compliance before the durational period of the sanction is completed to reestablish benefits as soon as possible.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Employment and Training Counselors provide the opportunity for sanctioned participants to update their employment assessment and plan to re-engage participants throughout their durational sanction period. Staff outreached to clients via phone to attempt to re-engage clients.

# 3.5 Strategies for Reducing the Need for TA

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

The district offers supportive services, diversion payments, and emergency services to support self-sufficiency and assist potential applicants in maintaining employment and avoiding the need for ongoing Temporary Assistance. The district offers a Rental Supplement plan to assist in the cost of housing. The district can assist clients in applying for Unemployment and Social Security Benefits when necessary.

# 4. Work Activities

# 4.1 Allowable Work Activities

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

## **Allowable Work Activities by Case Type**

Activity and Definition	Case Type
Unsubsidized Employment – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.	FA SNAFAM SNA 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 SNAFAM SNA 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 SNAFAM SNA SNAP
Vocational Education – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
Secondary School – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.	FA SNAFAM SNA 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 SNAFAM SNA 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 (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.	FA SNAFAM SNA 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 SNAFAM SNA SNAP

Activity and Definition	Case Type
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 SNAFAM SNA SNAP
Subsidized Public Sector Employment – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.	FA SNAFAM SNA 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 SNAFAM SNA 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 SNAFAM SNA SNAP
<b>SNAP E&amp;T Supervised Job Search</b> – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.	N/A
On-the-Job-Training (OJT) – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
Other – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.	N/A

## 4.2 Job Development

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

Yes

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

## **How the District Participates in Job Development Activities**

Yes or No:	How the district participates in job development activities				
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: The Employment Unit has one Business Service Representative who communicates with local businesses weekly to offer services including On-The-Job Training, job matching, and supportive services. One Employment Development Specialist identifies businesses with opportunities to develop work experiences when we have applicants/participants that fit their need and/or will acquire employment skills from the experience. Employment Unit Staff networks at local Business After Hours events, Tier 1&2 community service meetings, and through the Yates Chamber of Commerce.				
Yes	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.:N/A				

# 4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include providers the district partners with for the provision of ABE, HSE, and English language instruction in Table 1 or Table 2 under section 1.2 of this Plan.

The District partners with Wayne FL BOCES and Finger Lakes Community College to provide HSE programs to applicants/recipients. The districts also uses Literacy Volunteers of Ontario and Yates to provide more intensive HSE preparation and ESL services.

- b. Described below is how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.
  - Some program providers are identified from the Eligible Training Provider List (ETPL) established by the local Workforce Investment Board under WIOA. Job Skills Training programs can be provided in the district through Skillup Finger Lakes and Coursera; online programs endorsed by the NYSDOL and Finger Lakes WIB, that allow applicants/recipients to complete certification tracks to improve employability and ensure basic skill competencies.
- c. Described below are the district's process and guidelines workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.
  - Applicant/recipient that identifies a literacy barrier to employment and self-sufficiency are assigned the following activities at orientation & assessment: High School or Equivalent, Education Training (literacy classes and/or ESL classes).
- 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.
  - Determinations are made based on the ability of an individual to obtain employment upon completion of a program without their high school diploma/high school equivalency. The agency would deny participation in education activities when these activities do not support obtainment of employment. We will deny non-certified HSE programs and online learning programs that are not recognized by NYS Department of Education.
- 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.
  - Consideration is given to applicant/recipient's interests and is based on assessments, tests, personal background, medical limitations, education and work experience when approving/assigning participation in job skills and/or vocational education activities.

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

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 not does generally include basic or remedial Education in 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. 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 accredited educational or training organization.

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

A complete list of approved training providers is available in the Employment Unit and available on the Finger Lakes Works website. The list of approved and appropriate providers is discussed with the applicant/recipient at the time of assessment and plan development and upon request.

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

The district notifies applicant/recipients of approval for training or enrollment in work activities through individual meetings with applicant/recipients and developing/updating their employment assessment/plan.

 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.

On a quarterly basis, the Employment and Training Counselor sends an attendance verification form to the school district to verify school attendance of 16-18 year old students.

j. Described below is the district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity.

All individuals declaring limitations are required to submit a completed state approved local equivalent to LDSS-4526 (Medical Examination for Employability Assessment, Disability screening and Alcoholism/Drug Addiction) and an employability determination of medical work-limited is made by the district. A corresponding LDSS-4005(a) is sent via mail stating applicant/recipient is medically work-limited and provides the limitations provided to the district by the medical provider. When assigning work activities, Employment and Training Counselor will utilize the LDSS 4005(a) to make accommodations for medical barriers in assigning work activities and update the applicant/recipients' employment assessment and plan accordingly. Participants limitations will be provided in writing to the work activity provider agency.

# 4.4 Post-Secondary Education Approval and Enrollment Policies

a. Described below is the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program (please ensure to include the current providers the districts partners with for the provision of post-secondary education programs in Table 1 or Table 2 under Section 1.2 of this plan):

The district will approve up to a four-year college program as long as the client is within 24 months of completion of a state recognized degree or WIOA approved high demand occupational skills training.

b. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as described below (reply yes or no to options as they apply):

## Conditions For Disapproval of Work Activities For Individuals Enrolled in College

Yes or No:	Conditions for disapproval of work activity						
Yes	It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.						
Yes	A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.						
Yes	The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.						
Yes	The institution or student fails to monitor and report information regarding the student's attendance and performance as required.						
Yes	The student fails to progress toward the completion of a course of study without good cause, as determined by the district.						
Yes	The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.						
No	Additional reasons as stated here:						

# 5. Work Requirements

# **5.1 Meeting TA Work Requirements**

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

The district engages non-exempt individuals in work activities at orientation and assessment. The district engages individuals whose status changed from exempt to non-exempt by referring for an update to their employment assessment and plan. The individual is given at least 10 days notice from the day the referral is made before the appointment to update their employment assessment and plan. Once the assessment and plan have been updated during that meeting, the individual will be engaged in work activities immediately. When SNAP plus TA grant amount allows, the districts standard participation requirement for household with no children under age six is to assign 40 hours (The district realizes that there cannot be a SNAP non-compliance after 30 hours). For those households with a single caretaker with a child under six, the assignment is 35 hours, with all determinations made on an individual case basis. The district assigns all other case types up to 40 hours of work activities. An effort is made to assign enough hours to allow for cases of illness or other absences. Participation and engagement rates are monitored using COGNOS reports monthly.

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

#### **Number of Individuals Who Receive Employment Services**

Household Type	Number Served
Households with Dependent Children Average Monthly	10
Households without Dependent Children Average Monthly	15

c. Described below is how the district uses work participation management reports available through COGNOS or other reports and activities to monitor district progress toward meeting work participation requirements and ensuring full engagement by adults in work or work preparation activities:

COGNOS reports are reviewed weekly at the district's TA case review by employment unit staff to monitor employment code durations, employment status, and enrollment activities. They are reviewed monthly to evaluate participation and engagement rates.

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:

Yes

#### **Applicant Job Search**

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	10	Applicants are required to have five job search contacts per week with a minimum of 10 hours of job search per week. Recipients are required to log their completed applications and employer contacts on the "Yates County Job Search Log" and report to Workforce Development weekly to review "Yates County Job Search Log". Case management services are offered by Employment and Training Counselors to evaluate, assign, and review job applications with clients on a weekly basis.
SNA Individuals	5	10	Applicants are required to have five job search contacts per week with a minimum of 10 hours of job search per week. Recipients are required to log their completed applications and employer contacts on the "Yates County Job Search Log" and report to Workforce Development weekly to review "Yates County Job Search Log". Case management services are offered by Employment and Training Counselors to evaluate, assign, and review job applications with clients on a weekly basis.

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. Include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected using the "Additional Information" column.

Yes

#### **TA Recipient Job Search**

Recipient Job	Min.	Min.	Additional Information
Search	Contacts	Hours	
TANF and SNA MOE	5	10	Applicants are required to have five job search contacts per week with a minimum of 10 hours of job search per week. Recipients are required to log their completed applications and employer contacts on the "Yates County Job Search Log" and report to Workforce Development weekly to

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			review "Yates County Job Search Log". Case management services are offered by Employment and Training Counselors to evaluate, assign, and review job applications with clients on a weekly basis.
SNA Individuals	5	10	Applicants are required to have five job search contacts per week with a minimum of 10 hours of job search per week. Recipients are required to log their completed applications and employer contacts on the "Yates County Job Search Log" and report to Workforce Development weekly to review "Yates County Job Search Log". Case management services are offered by Employment and Training Counselors to evaluate, assign, and review job applications with clients on a weekly basis.

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 only recognizes taxable self-employment as acceptable and individuals must provide proof by submitting pay stubs within 5 days of receipt.

# 5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

#### Written Information Provided to SNAP Applicants and Recipients

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

- b. Described below is the process eligibility staff follow to provide a comprehensive oral explanation to SNAP households of work requirements, including General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules which pertain to non-exempt individuals in the household.
  - Staff utilize that LDSS-5193 and LDSS5193A to provide this information to individuals.
- c. Described below is how the district documents in the case record how the written information about SNAP work requirements was provided to the household (reply yes or no to options as they apply).

#### How the District Documents the Written Requirement in the Case Record

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

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

#### How the District Documents the Oral Requirement in the Case Record

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

# **5.3 Meeting SNAP Work Requirements**

a. Described below is the extent to which the district requires NTA SNAP recipients to participate in SNAP E&T work activities. (Please note: Case management services must be provided to all participants enrolled in SNAP E&T activity):

N/A

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

N/A

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

Clients are provided a SNAP Orientation letter along with a guide of services available within the County and the Counties Workforce Development Offices.

# 5.4 Advising Households of Employment and Training Services

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

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

#### Who the District Provides Employment and Training Services Information to

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

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

#### **How the District Provides Employment and Training Services Information**

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
Yes	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website: Yates County provides access to partner programs and service virtually via https://www.yatescounty.org/284/Workforce-Development and https://fingerlakesworks.com/. This includes access to contact information for partner agencies and programs, as well as weekly updates on Workshops, Job Fairs, Job Leads, etc.
No	Material and information provided via email.

#### 5.5 Provider Determinations

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

When meeting with clients for the employment assessment, Employment and Training Counselors assess the individual's ability to effectively communicate and work with providers. Staff talk with providers in correlation with making a referral for services regarding the strengths and any barriers to working with the client. Staff obtains regular updates for providers and remain in contact throughout the process through phone or email. Staff communicate with clients regarding expectations, and this is included in their ILP's. The provider has 10 days from the date of a provider determination to notify the district that a participant is not a good fit for a program or an activity component, and the district must notify the client of a provider determination within 10 calendar days of receiving the notification from the provider. All communication is documented in WTWCMS and written documentation is scanned into IEDR.

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

The Employment and Training Counselors have regular contact and communication with service providers regarding the services offered and our requirements. If a provider has concerns with the clients ability to participate in the program they notify the Employment and Training Counselor.

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

The Employment and Training Counselor has regular contact with providers regarding services offered. The Senior Employment and Training Counselor has regular supervision with the Employment and Training Counselor. The Employment and Training Counselor will review all provider determinations to ensure they are not unfair or used to discriminate.

# 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, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

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

d. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 31 – "Parent or caretaker relative of a child under 12 months of age". Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

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

#### 6.2 Use of Outside Providers/Vendors

a. Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?

No

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

N/A

c. If No, describe below the process used:

N/A

# 7. Supportive Services

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

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

Based on individual assessment and as approved by the district, individuals may be eligible for the following service related expenses:

Training incidentals (books, uniforms, fees as required)

One time related allowance, such as payment of car registration, car insurance, essential clothing and safety equipment as deemed necessary based on an individual assessment as approved by the district

One time car repair, which is necessary to accept employment, as determined and approved by the district.

Transportation reimbursement @\$.25/mile (change may occur based on fuel price fluctuations but will not fall below the IRS Medical/Moving rate.)

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

#### **Transportation Services Provided to Clients**

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
Yes	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
Yes	Other mileage rate (the methodology used to establish reimbursement rate is described here): The district's mileage reimbursement rate is \$.25/mile and may be subject to change based on fluctuations in fuel prices but will not fall below the IRS Medical moving rate.

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

The maximum distance a participant is expected to walk is 2 miles, and is developed with consideration of the distance between local housing complexes and the local employer base. The district will provide accommodations on a case-by-case basis for individuals with limitations enabling them to access work activities. This may include assisting the client in moving to closer proximity to prospective employment. The worker and Supervisor will determine if factors such as the weather condition, terrain, or safety of the route impact the clients access to work activities.

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:

Based on individual assessment and as approved by the district, individuals may be eligible for the following service related expenses:

Transportation reimbursement @\$.25/mile (change may occur based on fuel price fluctuations but will not fall below the IRS Medical/Moving rate.)

Training incidentals (books, uniforms, fees as required)

One time related allowance, such as payment of car registration, car insurance, essential clothing and safety equipment as deemed necessary based on an individual assessment as approved by the district

One time car repair, which is necessary to accept employment, as determined and approved by the district.

# 7.2 Post-Employment/Transitional Supportive Services

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

The district offers supportive services, diversion payments, and emergency services to support self-sufficiency and assist potential clients in maintaining employment. Based on individual assessment and as approved by the district, individuals may be eligible for the following service related expenses:

Transportation reimbursement @\$.25/mile (change may occur based on fuel price fluctuations but will not fall below the IRS Medical/Moving rate.)

Training incidentals (books, uniforms, fees as required)

One time related allowance, such as payment of car registration, car insurance, essential clothing and safety equipment as deemed necessary based on an individual assessment as approved by the district

One time car repair, which is necessary to accept employment, as determined and approved by the district.

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:

Employment related clothing
License and other work related fees
Job related safety equipment
Automobile repairs/towing
Automobile insurance
Transportation- gas card or bus passes
Other payments on a case by case 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.):

Employment related clothing
License and other work related fees
Job related safety equipment
Automobile repairs/towing
Automobile insurance
Transportation- gas card or bus passes
Other payments on a case by case 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 (reply yes or no to the options as they apply).

## How the District Conducts Conciliation for TA Applicants and Recipients

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

The districts process for conduction TA conciliations is described below:

The district will use the conciliation process as outlined in 18 NYCRR 385.11. The district will issue LDSS-4230 (Conciliation Notification) to a TA applicant/recipient who fails to comply with an employment requirement. LDSS-4230 will indicate that a failure or refusal to participate has occurred, indicate the individual has a right to provide reasons for failure to participate and indicate that the individual has 10 days to respond to provide reason(s) why they failed to comply and request a conciliation. The individual must provide a verbal

statement or a written statement on the state approved local conciliation response letter (provided with LDSS-4230 and a return envelope with postage) describing their reason(s) for failing to comply with the employment requirement with all supporting documentation attached. The individual may provide the conciliation response letter and supporting to the district directly at the Department of Social Services, Workforce Development, or via mail (using return envelope with postage provided) (See district's mailing procedure below.)

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

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

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

c. The district's conciliation process for SNAP applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(d). Indicate below how conciliations are conducted (reply yes or not to the options as they apply).

#### How the District Conducts Conciliation for SNAP Applicants and Recipients

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

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

The district will use the conciliation process as outlined in 18 NYCRR 385.11. The district will issue LDSS-4230 (Conciliation Notification) to a SNAP recipient who fails to comply with an employment requirement. LDSS-4230 will indicate that a failure or refusal to participate has occurred, indicate the individual has a right to provide reasons for failure to participate, indicate that the individual has 10 days to respond to provide reason(s) why they failed to comply and request a conciliation, and indicate that the individual has a right to avoid a reduction or discontinuance in SNAP benefits by timely demonstrating compliance with SNAP work requirements. The individual may provide a verbal or written statement on the state approved local conciliation response letter (provided with LDSS-4230 and a return envelope with postage) describing their reason(s) for failing to comply with the employment requirement with all supporting documentation attached. The individual may provide the conciliation response letter and supporting to the district directly at the Department of Social Services, Workforce Development, or via mail (using return envelope with postage provided) (See district mailing procedure below.) Alternately, the individual may demonstrate compliance with SNAP work requirements by completing one of the activities listed in the procedure for engaging SNAP recipients to demonstrate compliance below.

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

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

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

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

SNAP recipients will be given the opportunity to demonstrate compliance by:

- -Completing 5 job search contacts within a 7 calendar day period and turning in a completed
- "Job Search Verification Log" with supporting job search documentation.

#### 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 must state to the district that they wish to end their employment sanction, update their employment assessment and plan with an Employment and Training Counselor and must follow their updated plan for a 10 calendar day period beginning the day after the perspective compliance plan is developed.

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 must state to the district that they wish to end their employment sanction, update their employment assessment and plan with an Employment and Training Counselor and must follow their updated plan for a 10 calendar day period beginning the day after the perspective compliance plan is developed. Individuals may reestablish SNAP eligibility during the sanction period if the household requests the individual be included back in the household and the individual is determined by the district to be exempt from participation in SNAP work requirements.

# 8.3 Dispute Resolution

a. The district's procedure for individuals who wish to dispute their work activity assignments, including individuals who dispute the district's response to their request for health-related accommodations must be conducted in accordance with 18 NYCRR 385.11(c). Indicate below who mediates the grievance (reply yes or no to the options as they apply).

#### **Grievance Mediation**

Yes or No:	Who makes the TA good cause/willfulness determination?
No	An independent entity which has an agreement with the district.
No	Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case.
Yes	Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation.

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

# 9.1 Disability Determination Process and Tools

a. The district's process for determining an individual's disabilities and/or work limitations must be in accordance with 18 NYCRR 385.2(d). Indicate below what the district's process is for determining an individual's disabilities and/or work limitations (reply yes or no to the options as they apply).

#### **Process for Determining Disabilities and/or Work Limitations**

Yes or No:	How the district determines an individual's disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: If an applicant/recipient indicates that they believe they should be exempt we supply a blank medical to them to give to their provider(s). We will also, fax a copy of the form and a release directly to their provider in an attempt to obtain the necessary documentation. We give clients ten days to provide this information and will call and follow up with provider. Clients have ten days to provide medical documentation, or they will be scheduled as a non-exempt individual.

- b. Described below is the district's procedure for notifying an individual of their exempt or nonexempt determination whenever an individual alleges to be unable to participate, or the individual otherwise participates in the employability disability review, including when an individual is notified that their status changes from exempt to non-exempt:
  - The TA worker notifies the client using the LDSS-4005/LDSS-4005(a) to notify an individual of their status as exempt or non exempt.
- c. Described below is how the district notifies an individual of their exempt or non-exempt determination (reply yes or not to the options as they apply):

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

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

d. Indicated below is the process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited and describe the process by which the determination is made (reply yes or no to the options as they apply).

#### **Process for Reviewing Medical Documentation**

Yes or No:	District's process for reviewing medical documentation
No	District directs the contracted physician or individual's physician to determine status.
Yes	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: Employment unit staff including Employment and Training Counselor and Temporary Assistance SSPE's review medical documentation and determine medical status at a weekly case review.

# 9.2 Mental Health Screening and Assessment

a. In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?

No

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

N/A

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

## **Screening Tools the District Uses**

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

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

N/A

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

N/A

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

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

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

The district makes the determination if a disabled individual has the potential to be restored to self-sufficiency based on current medical documentation and physician's recommendation. The Employment Unit discusses the documentation to make determinations at weekly TA case reviews.

- b. Described below is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc.
  - If there is supporting medical documentation stating that there is potential to be restored to self-sufficiency, a treatment plan is developed based on the physician's recommendations. Employment and Training Counselors then update the individual's employment assessment and plan with a focus on treatment activity assignments. These assignments align with the physician's recommendations. If appropriate, participants may be referred to FLACRA, ACCES VR, ARC of Yates and John D. Kelly Mental Health Clinic or other providers as appropriate or indicated.
- 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.

Participants are mandated to follow the employment plan and are monitored for compliance by Employment and Training Counselors using the local "Medical Appointment Log". Participants will turn in the "Medical Appointment Log" completed with signatures of medical/treatment providers seen and signed by the participant. This documentation is due to the district monthly to monitor participation and progress. The treatment plan is updated when there are changes in employment status (exempt to non-exempt) or no later than 6 months at recertification.

# 10. District Certification

## 10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Yates County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2024 through December 31, 2025. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations, and provisions of this Plan.

Amy Miller 1/17/2024 Commissioner