

# **Tompkins County**

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

January 01, 2024 - December 31, 2025

# Table of Contents

1. Administration .....	1
1.1 Administrative Structure .....	1
1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies.....	2
1.3 OTDA Jobs Staff Agreement.....	4
1.4 Access to Services at New York State Career Centers .....	5
2. Orientation, Assessment and Employment Plan .....	6
2.1 Orientation (Reference 18 NYCRR 385.5) .....	6
2.2 Temporary Assistance (TA) Employment Assessment.....	6
2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7) .....	8
3. Engagement .....	9
3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)).....	9
3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency .....	10
3.3 Strategies/Procedures for Increasing Program Attendance .....	10
3.4 Strategies/Procedures for Engaging Sanctioned TA Participants .....	10
3.5 Strategies for Reducing the Need for TA.....	11
4. Work Activities .....	11
4.1 Allowable Work Activities .....	11
4.2 Job Development .....	14
4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) .....	15
4.4 Post-Secondary Education Approval and Enrollment Policies .....	18
5. Work Requirements .....	18
5.1 Meeting TA Work Requirements .....	18
5.2 Informing SNAP Applicants and Recipients of Work Requirements.....	21
5.3 Meeting SNAP Work Requirements .....	22
5.4 Advising Households of Employment and Training Services .....	23
5.5 Provider Determinations.....	24
6. Quality Assurance/Work Verification .....	25
6.1 Quality Assurance Process - Random Case Sampling.....	25
6.2 Use of Outside Providers/Vendors .....	27
7. Supportive Services.....	27
7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District.....	27
7.2 Post-Employment/Transitional Supportive Services .....	29
7.3 Extended Support Services.....	29
8. Conciliation, Sanction and Dispute Resolution Procedures .....	29

8.1 Conciliation .....	29
8.2 Sanction.....	31
8.3 Dispute Resolution .....	32
9. Disability Determinations, Documentation and Requirements of Exempt Individuals.....	32
9.1 Disability Determination Process and Tools .....	32
9.2 Mental Health Screening and Assessment.....	34
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	34
10. District Certification .....	36
10.1 Certification.....	36

# 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.)*

District Organizational Chart attached.

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

The Eligibility Division at the Tompkins County Department of Social Services is comprised of Temporary Assistance, Emergency Services, Employment, Child Care, SNAP, HEAP and Medicaid units.

Temporary Assistance Eligibility Staff request medical documentation from clients who indicate a possible employment exemption at application and recertification or refer to IMA for evaluation when necessary. They assign employment codes to exempt and non-exempt populations based on documentation received from the client and/or medical professional. Eligibility staff explain employment requirements and encourage a path to self-sufficiency. TA Eligibility staff impose sanctions and notify clients of available services such as Transitional Child Care, Emergency Services, SNAP, and Medicaid.

Employment Unit staff administer the Temporary Assistance & SNAP Employment program. Staff are responsible for explaining employment requirements, identifying barriers to employment, and assisting clients with finding employment. They administer Employment Assessments, create Employment Plans, and refer clients to appropriate work activities. Staff monitor participation using WTWCMS and COGNOS. Employment staff work with the medically exempt population by addressing physical and emotional health issues that are identified as barriers to employment and monitoring participation in treatment. An agency CASAC is responsible administers "Back to Work" alcohol/substance abuse assessments, referrals to substance abuse/alcohol treatment and follow up. Employment staff track and monitor substance abuse treatment progress. Employment staff are also responsible for the conciliation process and sanction referrals to TA eligibility. SNAP Senior staff are responsible for SNAP conciliation and sanction referrals to SNAP eligibility staff. A Medicaid Resources Administrative Assistant is responsible for assisting clients in applying for/appealing Supplemental Security Income (SSI) and/or Social Security Disability Income (SSDI). Employment staff inform clients of available supportive services that could help them in their plan for self-sufficiency such as child care, transitional child care and transportation services.

Tompkins-Seneca-Tioga (TST) BOCES: Educational Resources  
Services Include:

English As A Second Language (ESL) Instruction  
High School Equivalency (HSE) Diploma Program  
Employment Preparation Classes including career planning and connection with  
employment opportunities  
SNAP Employment & Training (FSET) Venture Partner

Tompkins Workforce New York Career Center:

Access to area Job Seeker Events  
One-Stop Career Services:  
Assistance with Finding In-Demand Employment  
Career Counseling  
Job Search & Placement  
Interview Preparation  
Local labor market information  
Mock Interviews  
Referrals to other employment programs and opportunities  
Resume Assistance  
Youth Employment Program (ages 14-24)

Women's Opportunity Center:

Job Readiness Training  
On-The-Job Training  
Monthly Workshops to include personal skill identification, goal setting, communication,  
resume writing, mock interviewing, financial literacy, healthy relationships, continuing  
education, and other employment-related trainings.  
One-on-One Job Search Assistance

## **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**

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Tompkins County Probation	\$42,618.00	SNAP E & T Local	FA SNA Family SNA Individual	Community Work Experience Program (CWEP)
IMA - Industrial Medical Associates	\$13,000	Others: Local Revenue Intercept Authorization	FA SNA Family SNA Individual	Consultative exams for employment: medical, psychological, and cognitive

- 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**

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Tompkins-Seneca-Tioga BOCES	Others: NYS Department of Education	FA SNA Family SNA Individual SNAP	English As A Second Language Instruction (ESI/ESL) / High School Equivalency (HSE) Program
Tompkins Workforce New York Career Center	Others: NYS Department of Labor	FA SNA Family SNA Individual SNAP	Comprehensive Career Center
Women's Opportunity Center	Others: Not-For-Profit	FA SNA Family SNA Individual	On-The-Job Training (Retail Clothing Store) Monthly Workshops: personal skill identification, goal setting, communication, resume writing, mock interviewing, financial literacy, healthy relationships, continuing education, and other

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
			employment-related trainings. One-on-One Job Search Assistance
Tompkins-Cortland Community College	Others: NYS Department of Education	FA SNA Family SNA Individual SNAP	Vocational Education Job Skills Training
Open Doors English	Others: Not-For-Profit	FA SNA Family SNA Individual SNAP	English As A Second Language Instruction (ESI/ESL)
Moms Plus+	Local	FA SNA Family SNA Individual	Home Visiting Nurse Program Free of Cost Maternal Child Health Supportive Services Designed to improve equitable access to quality maternal child health care, increase support for parents choosing to breast and chest feed and enhance the coordination of care with other community partners.

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:

Tompkins County contracts and/or agreements are performance based and the activities funded are not otherwise available from the provider(s) on a non-reimbursable basis. All invoices are viewed prior to being paid. Bi-monthly monitoring procedures are in place to maintain the appropriate oversight of the employment services provided. The district uses a locally developed evaluation tool to ensure that the quality of the service is maintained. Feedback is being provided to the contractor to remedy any issues that are identified.

### 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**

<b>Yes or No:</b>	<b>Services Provided:</b>
N/A	Assessment/Employment Plan
N/A	Supervised job search
N/A	Job readiness training
N/A	Job club
N/A	Job placement services

<b>Yes or No:</b>	<b>Services Provided:</b>
N/A	Grant diversion
N/A	Job development (employer outreach)
N/A	WOTC pre-certification

**Jobs Staff Target Groups**

<b>Yes or No:</b>	<b>Target Groups:</b>
N/A	Applicants
N/A	FA & SNA with children
NA/	SNA without children
N/A	SNAP
N/A	TANF 200%

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

N/A

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

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

N/A

**Programs and Services Provided at Career Centers**

<b>Yes or No:</b>	<b>Programs and Services Provided:</b>
No	The district has employee(s) physically present at a Career Center
No	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
N/A	Other (described here):



- b. Described below is how the district coordinates with Career Center partners to provide services to the district's clients, including referral and information sharing mechanisms, or other collaboration such as participation on the local WIOA Business Services Team, etc.

Based on the Tompkins County Service Delivery Memorandum of Understanding, supervisory staff coordinate with career center staff to obtain information about available opportunities for clients to participate in as well as create and monitor a referral system to best serve the needs of these clients.

## 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: Information regarding community resources is provided.

- 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 Handouts are part of the TA application packet. When applications are mailed out, or picked up in-person, the applicant has been provided with the Orientation Handout. At TA intake interview and TA recertification interview, the applicant/recipient is asked by the worker if they have been provided with the Orientation Handout and documents their response on the Client Affidavit form. If the A/R replies no or cannot recall if they were provided with the Orientation Handout, the worker provides one to the A/R either by handing them one, or in the instances of a phone interview, mailing one out, and documents the date provided on the Client Affidavit form.

### 2.2 Temporary Assistance (TA) Employment Assessment

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

#### District Assessment Procedures

Yes or No:	How the district conducts assessments
Yes	The district enters assessments directly into WTWCMS.

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

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

Households With Dependent Children: All adults and sixteen (16) and seventeen (17) year olds not in school will complete assessments within ninety (90) days of case opening and receiving Temporary Assistance. Employment Assessments will be done on all individuals in these households. These individuals are seen in-person for completion of their Employment Assessment by Employment staff at the local district.

For Households Without Dependent Children: All adults who are not exempt from assignment to work activities will complete Assessments within one year following case opening and receiving Temporary Assistance. These individuals are referred to Employment Unit staff for assessment either in person, or over the phone on a case-by case basis.

For households with or without dependent children, the district understands that individual self-assessment alone does not meet the requirements for conducting assessments.

The local district conducts Employment Assessments on recipients only (upon case opening). The district does not conduct Employment Assessments on applicants.

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

Employment Unit staff from the local district are responsible for conducting Employment Assessments.

- 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 Unit staff at the local district are trained in conducting Employment Assessments and creating Employment Plans via NYS OTDA offerings. They have attended the Employment Services & Training Institute (ESTI). Staff have completed either two years (60 college credit hours) of study in a regionally accredited or New York State registered college or university or have graduated from high school or possess a GED and have two years of experience in examining, investigating, or evaluating claims for assistance, veterans or unemployment benefits, insurance or a similar program operating under established criteria for eligibility.

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

No

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

No

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

No

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

Employment Assessments are completed upon case opening and receiving Temporary Assistance and updated at recertification. Assessments are updated when there is reason to believe that an individual has a physical or mental impairment that would limit their ability to participate in Work Activities or when there is a change in the individual's circumstances, or when activity assignments warrant reassessment. While Employment Assessments can be updated every six months, the district plans to update them once per year.

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

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

#### District Employment Plan Procedures

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

Employment staff create Employment Plans as part of the Employment Assessment process. Client input and information from the Assessment is used to create both short-term and long-term goals as part of the client's individual Plan.

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

Employment Plans are completed upon case opening and receiving Temporary Assistance. Plans are updated at recertification, when there is reason to believe that an individual has a physical or mental impairment that would limit their ability to participate in work activities, or when changes in an individual's circumstances or activity assignment warrants reassessment. Employment Plans are updated at a minimum of once per year. Clients are provided with a copy of their Employment Plan whenever a Plan is created or updated.

**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:

No additional information.

### 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:

Individual attention is given as an alternative to group settings. Clients have the option of bringing an interpreter, from an organization or a family member, with them for assistance. The agency utilizes the Language Line or Empire Telephonic Services when meeting one-on-one with clients either in person or over the phone.

Open Doors English is a not-for-profit organization who empower adult English language learners in Ithaca, Tompkins, and surrounding counties to live fuller lives through affordable, comprehensive English (ESL) classes.

### 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:

Applicants and recipients are scheduled up to 35 hours of work activities per week to allow flexibility in their participation hours and to limit the amount of excused and unexcused absences. District staff discusses with individuals the importance of having childcare and transportation available so they may participate satisfactorily in the work activities they are assigned to. The local district offers assistance with both of these services.

### 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

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

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

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: Employment and Eligibility staff at the local district attempt to engage sanctioned participants at every client contact (telephone call, recertification appointment, etc.). The benefits of complying with work rules are discussed and sanctioned clients are offered the opportunity to engage in work related activities.
No	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
No	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

### 3.5 Strategies for Reducing the Need for TA

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

Tompkins County provides applicants with information about employment opportunities and skill development community resources. A Job Board located in the DSS lobby is updated regularly. Staff are proactive in discussing the benefits of employment and the eligibility programs that are associated with gaining employment (transitional childcare, Earned Income Tax Credits, SNAP benefits, Medicaid). Job search is mandated for employable applicants and recipients. Nonrecurring diversion payments are issued based on Chapter 31, Section E of the Temporary Assistance Sourcebook to reduce the need for Temporary Assistance.

## 4. Work Activities

### 4.1 Allowable Work Activities

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

#### Allowable Work Activities by Case Type

Activity and Definition	Case Type
<p><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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Work Experience</b> – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Search</b> – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p><b>Vocational Education</b> – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Secondary School</b> – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Skills Training</b> – Training or education in job skills to improve a participant's employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor's or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client's assessment that such instruction is needed to improve the participant's employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p><b>Job Readiness Training (JRT) Activities</b> – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Subsidized Private Sector Employment</b> – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Subsidized Public Sector Employment</b> – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>FA SNAFAM</p>



Activity and Definition	Case Type
<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
<b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.	FA SNAFAM SNA
<b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.	SNA

## 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 Principal SWE in Employment reaches out to area employment agencies to obtain job listings for clients looking for employment. The Employment Unit staff at the local district have created a Job Board in the lobby of the local district that is updated weekly with applicable job listings, job fairs and educational opportunities. These opportunities are also posted in high visibility areas where clients are most likely to see them: near client phones, bathrooms and in interview rooms.
No	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.:

### **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 Principal SWE in Employment is responsible for community outreach to identify educational programs that are available for clients to participate in. When a new program is identified, the PSWE reaches out to the provider to gather the information about their program, services offered and target population. They then disseminate the information to Employment staff so that they can discuss all possible options with their clients at Assessment, Reassessment and at any other time a client may indicate a possible interest in such a program. Recipients will be referred to available services based on information obtained during an assessment and during the development of their Employment Plan. The providers that the district partners with for the provisions of ABE, HSE and English Language Instruction are:

Open Doors English  
T-S-T BOCES  
Tompkins Workforce New York

- b. Described below is how the district identifies appropriate program providers of Vocational Education and Job Skills Training programs that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include the current providers the district partners with for the provision of Vocational Education and Job Skills Training in Table 1 or Table 2 under section 1.2 of this Plan.

The Principal SWE in Employment is responsible for community outreach to identify vocational educational programs and Job Skills Trainings programs that are available for client participation. When a new program is identified, the PSWE reaches out to the provider to gather the information about their program, services offered and target population. They then disseminate the information to Employment staff so that they can discuss all possible options with their clients at Assessment, Reassessment and at any other time a client may indicate an interest in such a program. The current providers the district plans to partner with for the provision of Vocational Education and Job Skills Training are:

Direct To Work / Ithaca Area Economic Development  
Tompkins-Cortland Community College  
Tompkins Workforce New York

- c. Described below are the district's process and guidelines workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity. This includes individuals who are 18 and older and individuals aged 16 or 17 who are not attending secondary school or its equivalent.

The need for clients to obtain basic literary and/or a high school diploma is identified through the Employment Assessment and should be identified in the client's Employment Plan. The

local district also provides information about these opportunities in our Orientation packet. Employment staff communicate with their clients about the benefits to pursue these resources in their search for self-sufficiency. Open Doors English, T-S-T BOCES and Tompkins Workforce NY each provide opportunities for non-exempt Temporary Assistance recipients to enroll in English Language Instruction (ELI) or High School Equivalency (HSE) diploma preparation classes as well as develop longer-term employment goals.

- 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.

Local district staff will approve, in a manner consistent with the district's training policy, educational programs which are determined to be appropriate for Adult Basic Education (ABE), HSE and ESI, or high school participation. In addition, recipients may also be assigned to core work activities such as work experience for an appropriate number of hours based upon category of assistance and family circumstances, in recognition of participation rate requirements. Applicants that do not have a high school diploma or equivalent, or TABE below a ninth (9th) grade level are strongly encouraged to participate in remediation as part of their Employment Plan.

- e. Described below is the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities.

Employment staff at the local district identify the Vocational Education and Job Skills training programs that would assist the client with meeting both their long and short term goals and refer the identified clients to the trainings as they occur. A variety of career assessments tools are utilized to determine appropriateness of training for the individual. Participation in vocational education may count up to twelve (12) months and may be counted as Job Skills beyond the 12-month timeframe. Participation may be denied if the individual has failed to make satisfactory progress in their current program or has failed to meet program specific attendance requirements.

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

- Activities must be countable for participation purposes.

- Projected outcomes must assist participants in overcoming barriers to employment, job retention, and self-sufficiency.

- The number of entries to employment must meet requirements as outlined in the provider's contract with the local district.

- The retention rate of persons obtaining employment must meet outcome measures outlined in the provider's contract with the local district.

- The cost per participant must not exceed costs as outlined in the provider's contract with the local district.

- Provider must offer employer support available as outlined in the provider's contract with the local district. The provider must demonstrate collaboration and cooperation with other services providers as well as the local district.

- Providers must be willing to provide the local district with necessary information i.e., attendance and progress reports.

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

A list of the local district's approved training providers is available as part of the orientation packet. A review of those providers and the programs they offer are addressed during the assessment process prior to program enrollment. Client's previous work history and personal interests are taken into consideration as the Employment Plan is developed. Applicants and recipients with limited English comprehension, verbal and/or written, will be assisted by the local district Employment staff to assure full understanding of all parties' responsibilities.

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

Participants are notified of an approved training or enrollment in a work activity by phone and followed up with a letter that outlines the requirements they must meet in order to remain enrolled in the training or activity.

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

Eligibility staff request verification from the high school that the student is still attending and in good standing at application and recertification. The local district can also assist in obtaining this documentation from the school district.

- 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.

Employment staff will inform the worksite and/or training provider in writing at the time of the activity assignment of any health-related limitations and/or special accommodations provided that the participant's certified health provider has confirmed and supported them on current medical documentation. The information included on the LDSS-4562 and/or a detailed physician's statement is utilized to determine an individual's limitations to work activities and is not shared with a worksite or 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):

Up to a four-year college program can be approved as a work activity.

- 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.
N/A	Additional reasons as stated here:

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

Single parent families with a child under the age of six (6) years of age are assigned to participate for a minimum of twenty (20) hours per week.

Single parent families with a child over the age of 6 are assigned to participate for a minimum of thirty (30) hours per week.

Two parent families in which neither parent is disabled are assigned to participate for a minimum of thirty-five (35) hours per week for each parent.

Two parent families in which one parent is disabled are assigned to participate a minimum of thirty (30) hours per week.

Non-exempt Individual Safety Net non-MOE's are required to participate for a minimum of thirty-five (35) hours per week.

Non-exempt individuals are typically referred within fifteen (15) days of their Temporary Assistance case opening for an Employment Assessment to determine appropriate referrals for work activities. Individuals whose status changes from exempt to non-exempt can be referred to work activities within 15 days upon submitting appropriate documentation to verify they are no longer exempt from participating.

- 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	75
Households without Dependent Children Average Monthly	180

- 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:

The Employment Senior SWE reviews COGNOS reports and distributes applicable reports among Employment staff to identify clients who are under-engaged and/or not participating:

Earned Income/Employment Report

Possibly Miscoded Non-Legal Union Families with Children in Common Report

Participation & Engagement Status Report

Preliminary Federal Countable/Not Countable Report & Preliminary SNA Non-MOE

Countable/Not Countable Report

TANF & SN-MOE Worker Participation/Engagement Summary Report & SN-MOE Worker Participation/Engagement Summary Report

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

Yes

If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Use the "Additional Information" column in the chart below to describe how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected:

**Applicant Job Search**

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	0	0	Not applicable to this population
SNA Individuals	10	20	TA Eligibility staff explain requirements at application and refer client to contact Job Search Specialist(s) in the Employment Unit. Upon contact, the JSS schedules a face to face appointment with the client to provide them with a packet of information to assist them with their job search. This includes area employers, career centers and the need for supportive services is discussed. Clients are provided with a Job Search log and another appointment is scheduled for the client to come back in weekly with completed logs.

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

Yes

If yes, describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Include a description of how often individuals are generally required to report job search outcomes and if activities other than job search are routinely expected using the “Additional Information” column.

**TA Recipient Job Search**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	10	20	Once TA case is opened, Employment staff send out referral to complete an Employment Assessment face to face. At the Employment Assessment, Employment staff explain requirements and schedule a face to face appointment with the client to provide them with a packet of information that will assist them with their job search. This includes area employers, career centers and the need for supportive services is discussed. Clients are provided with a Job Search log and another appointment is scheduled for the client to come back in weekly with completed logs. Clients are typically assigned to Job Search for a maximum of twelve (12) weeks.
SNA Individuals	10	20	Once TA case is opened, Employment staff send out referral to complete an Employment Assessment face to face. At the Employment Assessment, Employment staff explain requirements and schedule a face to face appointment with the client to provide them with a packet of information that will assist them with their job search. This includes area employers, career centers and the need for supportive services is discussed. Clients are provided with a Job Search log and another appointment is scheduled for the client to come back in weekly with completed logs. Clients are

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			typically assigned to Job Search for a maximum of twelve (12) weeks.

- 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 local district supports self-employment as part of an individual's required work activities. If a recipient who is self-employed is earning an hourly wage below federal minimum wage, that individual would also be required to participate in work activities up to the maximum amount of hours required for their category. In these instances, the local district will allow for a self-employed recipient to increase their earnings to at least federal minimum wage within six months. Further time allowed may be granted on a case by case basis. Self-employed recipients can be required to submit their self-employment income vs. expenses every three months.

## 5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

### Written Information Provided to SNAP Applicants and Recipients

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



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

While Tompkins County does not currently mandate SNAP E&T assignments for NTA-SNAP recipients to participate in SNAP Employment & Training work activities, oral explanations are given by eligibility staff at application, recertification and when a previously exempt household member or new household member becomes subject to work requirements using the LDSS-4862C "Employment Requirements for SNAP Applicants and Recipients - Script for Eligibility Workers" and the LDSS-5193 or LDSS-5193A are utilized depending on the household circumstances.

- 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**

<b>Yes or No:</b>	<b>How written information is provided to SNAP applicants and recipients</b>
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**

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

**5.3 Meeting SNAP Work Requirements**

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

Tompkins County does not currently mandate SNAP E&T assignments for NTA-SNAP recipients to participate in SNAP Employment & Training work activities.

- 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):

Applicants and recipients of SNAP are provided with a list of employment supports available in the community at application and recertification to assist with their job search. They are also given a list of services the agency may be able to provide to help them seek, obtain, and maintain employment.

### 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:
No	Required population only
Yes	Other groups described here: Information about employment and training services is provided to all NTA-SNAP applicants and recipients.

- 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
No	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: Staff in Employment and SNAP advise clients to refer to the department website or the Department of Labor website to for information on available employment and

Yes or No:	How the district provides employment and training services information
	training services. They are also referred to visit the Job Board located in the lobby of the local district to see any available opportunities such as job openings, job fairs and training opportunities.
No	Material and information provided via email.

## 5.5 Provider Determinations

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

The district screens individuals at assessment as well as each client contact to determine referrals to appropriate providers based on their education/employment history, skills and the goals set forth in their Employment Plan. The district gathers information from providers regarding their target populations and information regarding any potential restrictions before making a referral. Providers have screening processes that determine whether an individual is appropriate for their site and communicate with the local district within ten (10) days of making the determinations via telephone and/or email. Clients are informed by the district of the determination within 10 days of the provider notifying the district of the determination via telephone, US Mail and/or face to face. Information regarding provider determinations is documented in the individual's case file and WTWCMS.

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

Providers are informed at initial contact by telephone, email, US Mail, or face to face contact. The local district develops a referral process with its providers and maintains an open line of communication in the event that an individual is found not to be a good fit for a particular activity or program.

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

District staff meet with providers to ascertain the parameters of their agency/program and what situations/circumstances may be a poor fit or are beyond the scope of what they can accommodate. The district makes every effort to avoid referring a participant who screen outside the parameters (for example, registered sex offenders would not be assigned a work activity at a school). If a provider reports that they are not willing to accept or continue as an assigned activity for any referred individual, district staff would review the documented reasons as to why and follow up with the provider as needed to ensure that all determinations are fair and not used to discriminate against protected classes.

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

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

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

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

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

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

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

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

- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
  - Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
  - Assess that the data entered into either WTWCMS, 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 WTCMS?

No

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

N/A

- c. If No, describe below the process used:

N/A

## 7. Supportive Services

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

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

Clothing: Information and referrals to free clothing resources and low-cost thrift stores are given. Specific uniforms or footwear up to \$150.00

Licenses and Other Work-Related fees necessary for participation in assigned work activity or training to accept and retain verified employment: Up to \$200.00

Job-Related Safety Equipment: Protective gloves, boots, headgear, etc. needed to accept and maintain verified employment: Up to \$200.00

Tools & Equipment: Necessary for assigned training or to accept and retain verified employment: \$500.00. This is a one-time issuance.

Automobile Repairs: Documented repairs up to lesser of \$2,500.00 or the retail value of the vehicle necessary to accept/retain verified employment

Automobile Insurance: Legally necessary insurance for a participant/recipient's vehicle necessary to accept and/or retain verified employment. Payment continues only as long as necessary i.e., the duration of an assigned activity or up to 90 days after entry to employment: Up to \$1,000.

- 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 will issue 44 cents (\$0.44) per mile. This is double the amount of the IRS Medical/Moving Rate for 2023. In light of increased fuel costs and limited funds, the district doubled the rate. This amount is less than the IRS Business rate for 2023.

- 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:

One mile each way. Factors such as weather conditions, terrain, safety of the walking route, physical and/or health limitations will be considered when determining when it is appropriate to require a client to walk the one-mile maximum distance to a work activity or to access public transportation.

- 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:

To the extent that funds are available, the local district will provide a nonrecurrent diversion payment for services that are outlined in 7.1(a) and the attached Supportive Services Desk Guide.

## 7.2 Post-Employment/Transitional Supportive Services

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

Employment staff will send a letter to the client prior to the case closing notifying them of supportive services that may be available to them.

The district provides Transitional Child Care and Transitional Medicaid if clients meet the criteria and are eligible.

Refer to the local district's supportive services desk guide for available services.

- 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:

Clothing: Information and referrals to free clothing resources and low-cost thrift stores are given. Specific uniforms or footwear up to \$150.00

Licenses and Other Work-Related fees necessary for participation in assigned work activity or training to accept and retain verified employment: Up to \$200.00

Job-Related Safety Equipment: Protective gloves, boots, headgear, etc. needed to accept and maintain verified employment: Up to \$200.00

Tools & Equipment: Necessary for assigned training or to accept and retain verified employment: \$500.00. This is a one-time issuance.

Automobile Repairs: Documented repairs up to lesser of \$2,500.00 or the retail value of the vehicle necessary to accept/retain verified employment

Automobile Insurance: Legally necessary insurance for a participant/recipient's vehicle necessary to accept and/or retain verified employment. Payment continues only as long as necessary i.e., the duration of an assigned activity or up to 90 days after entry to employment: Up to \$1,000.

## 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.):

N/A

## 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



<b>Yes or No:</b>	<b>How conciliation is conducted</b>
Yes	By phone
Yes	By mail

The districts process for conduction TA conciliations is described below:

The local district sends a Conciliation Notice via WTCMS to the applicant/recipient. The notice instructs them how they may dispute the conciliation or explain their reasons for non-compliance. Clients are given ten (10) days to respond to a conciliation notice. When the client makes contact, the reason for non-compliance is discussed. The originating worker reviews all applicable information regarding the non-compliance and determines whether the client had a "good cause" reason for not complying. If there is good cause, no further action is taken. If there is not good cause, the originating worker refers the client for sanction. If the individual does not respond, the originating worker makes the decision based on the information they have available and refers for sanction if appropriate.

- 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**

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

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

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

<b>Yes or No:</b>	<b>How conciliation is conducted</b>
Yes	In person
Yes	By phone
Yes	By mail

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

A conciliation notice is mailed to the client notifying them of the non-compliance. The client is given ten (10) days to respond to the conciliation and provide reasons for the non-compliance issue, including any reasons for good cause they may have. The notice provides the client an opportunity to avoid a reduction or discontinuance in their SNAP benefits by demonstrating compliance as determined by the district. Typically, a client may be asked to

provide verification of five (5) employer contacts made in 5 days and submit verification of these contacts in order to avoid a sanction.

- 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**

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
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:

The district provides all SNAP households with a handout listing available E&T services in the area including contact information. The client will demonstrate compliance by making five (5) employer job search contacts in 5 working days and submitting verification of these contacts.

**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:

Employment staff determine that the individual is in compliance with the assigned work activity. The district requires that an individual who wishes to end their employment sanction comply with the work activity they were originally sanctioned for. If this is not possible, the district will assign the client to another work activity and require that the client demonstrate compliance for 5 working days. The standard criteria for any client to demonstrate compliance prior to ending a durational sanction is a minimum of five (5) working days in an assigned work activity. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply, but no earlier than the expiration of the minimum durational 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:

The district requires that an individual who wishes to end their employment sanction comply with the work activity they were originally sanctioned for. If this is not possible, the district will assign the client to another work activity and require that the client demonstrate compliance for 5 working days or an amount of time to be determined by the district depending on the

activity itself. The standard criteria for any client to demonstrate compliance prior to ending a durational sanction is a minimum of five (5) working days in an assigned work activity.

### 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**

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
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**

<b>Yes or No:</b>	<b>How the district determines an individual’s disabilities and/or work limitation</b>
Yes	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: TA Eligibility & Employment staff determine an individual's limitations or disabilities based on documentation provided by the individual or in some cases by the local district. Such determinations can be made at application, recertification, or any time there is reason to believe that an applicant/recipient may have a limitation or disability. If the individual is not able to obtain the information (i.e., does not have a

<b>Yes or No:</b>	<b>How the district determines an individual's disabilities and/or work limitation</b>
	physician), or the information is incomplete, non-existent, or contradictory, they will be referred for a medical evaluation through IMA, when deemed necessary.

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

The local district notifies the individual using the LDSS-4005 and the LDSS-4005(a) after the worker determines the individual's exempt or non-exempt status. This includes information about the client's right to a Fair Hearing to contest the determination.

- 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**

<b>Yes or No:</b>	<b>District's process for reviewing medical documentation</b>
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**

<b>Yes or No:</b>	<b>District's process for reviewing medical documentation</b>
Yes	District directs the contracted physician or individual's physician to determine status.
Yes	District review team reviews and determines status (described here):
Yes	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: Employment staff review medical documentation and determine the individual's employment status. The medical documentation is closely reviewed to determine whether the individual is exempt or non-exempt. Staff ask for more information when a determination is not immediately clear. This information can be obtained by requesting further documentation from the client or contacting the physician directly. Once all information is obtained, an employment code is determined. When necessary, staff contact the district's Social Security liaison to obtain information regarding SSI application and/or appeal status to determine the appropriate code.

## 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)?

N/A

### 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 local district will obtain a medical/psychiatric evaluation from the individual's primary physician or IMA. Employment staff will review the diagnosis, prognosis, and recommended treatment plan to determine the potential for the client to make progress towards self-sufficiency. Specific recommendations by a physician for treatment and/or rehabilitation will be followed. The recipient will be notified of their responsibility to participate in an appropriate medical care or treatment program. Participation is monitored by Employment staff. Individuals who are indicated to be permanently disabled with a recommendation for Supplemental Security Income (SSI) will be referred to Medicaid Resources to apply for SSI.

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

Treatment for disabilities and/or limitations to employment is guided by the documentation from professional medical practitioners. If a practitioner identifies a disability and/or limitation, the recipient is required to seek the appropriate treatment or service within a reasonable amount of time depending on the particular disability/limitation and given the circumstances of the case.

- 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.

Employment staff track compliance utilizing quarterly progress reports and can collect monthly attendance documentation for accurate reporting in WTWCMS. Calendar-controlled medical statements are requested identifying any limitations and prognosis.

## **10. District Certification**

### **10.1 Certification**

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

01/4/2024  
Kit Kephart  
Commissioner