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

January 1, 2022 - December 31, 2023

# **Schuyler County**

# Table of Contents

1. Administration	1
1.1 Administrative Structure	1
1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies	1
1.3 OTDA Jobs Staff Agreement	3
1.4 Access to Services at New York State Career Centers	3
2. Orientation, Assessment and Employment Plan	4
2.1 Orientation (Reference 18 NYCRR 385.5)	4
2.2 Temporary Assistance (TA) Employment Assessment	
2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)	
3. Engagement	6
3.1 Federal "Engaged in Work" Requirement (Reference 18 NYCRR 385.2 (f))	6
3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency	7
3.3 Strategies/Procedures for Increasing Program Attendance	7
3.4 Strategies/Procedures for Engaging Sanctioned TA Participants	7
3.5 Strategies for Reducing the Need for TA	8
4. Work Activities	8
4.1 Allowable Work Activities	8
4.2 Job Development	10
4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)	11
4.4 Post-Secondary Education Approval and Enrollment Policies	12
5. Work Requirements	13
5.1 Meeting TA Work Requirements	13
5.2 Meeting SNAP Work Requirements	15
6. Quality Assurance/Work Verification	16
6.1 Quality Assurance Process - Random Case Sampling	16
6.2 Use of Outside Providers/Vendors	17
7. Supportive Services	18
7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District	18
7.2 Post-Employment/Transitional Supportive Services	19
7.3 Extended Support Services	19
8. Conciliation, Sanction and Dispute Resolution Procedures	19
8.1 Conciliation	19
8.2 Sanction	20
8.3 Dispute Resolution	21
9. Disability Determinations. Documentation and Requirements of Exempt Individuals	21

9.1 Disability Determination Process and Tools	21
9.2 Mental Health Screening and Assessment	22
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))	23
10. District Certification	24
10.1 Certification	24

## 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.)

Updated organizational chart has been 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.

Schuyler County Youth Bureau- TEAP Program and Soft Skills Class Fraud Unit - Fair Hearings
Employment and Temporary Assistance Supervisor
Temporary Assistance Principal Social Welfare Examiner
Employment Social Welfare Examiner
Disability and Employment Examiner

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

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

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

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
SCT BOCES	\$10,000	☐ FFFS ☐ SNAP E&T ☑ Local ☐ Other	<ul> <li>□ FA</li> <li>□ SNA Family</li> <li>□ SNA Individual</li> <li>□ SNAP</li> <li>□ TANF 200%</li> </ul>	TABE Testing
Language Line	\$2,000	☐ FFFS ☐ SNAP E&T ☐ Local ☐ Other	<ul><li></li></ul>	Interpreter Services

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

Provider	Funding	Categories of	Programs, Services or Activities Provided
	Source(s)	Clients Served	
CSS Workforce NY	Other: WIOA	□ FA     □ SNA Family     □ SNA Individual     □ SNAP     □ TANF 200%	Resume assistance, interviewing skills, job leads
SCT BOCES	Others: State Ed	<ul> <li></li></ul>	TASC/GED prep
Literacy Volunteers	Others: Economic Opportunity Grant	<ul> <li>⋈ FA</li> <li>⋈ SNA Family</li> <li>⋈ SNA Individual</li> <li>⋈ SNAP</li> <li>⋈ TANF 200%</li> </ul>	Literacy Training
ProAction of Steuben and Yates	Others: WIOA	□ FA     □ SNA Family     □ SNA Individual     □ SNAP     □ TANF 200%	Youth Employment

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:

Monitoring and Oversight of TANF and SNAP E&T Funded Contracts/Agreements is carried out by the Coordinator of Fiscal Operations and Computer Services.

# 1.3 OTDA Jobs Staff Agreement

a.	OTDA Jobs Program Services - Target Groups. Check all services and target groups that apply:
	Services:  Assessment/Employment Plan  Supervised Job Search  Job Readiness Training  Job Club  Job Placement Services  Grant Diversion  Job Development (employer outreach)  WOTC pre-certifications
	Target Groups:  Applicants  FA & SNA with children  SNA without children  SNAP  TANF 200%
b.	Described below are the additional services/duties Jobs staff will be requested to perform (e.g. WTWCMS data entry, case conferencing, job fairs).
	Schuyler does not have a Jobs Program staff
1.4	4 Access to Services at New York State Career Centers
a.	Described below is how the district provides access to its programs and services with Career Center partners (select all that apply):  ☐ The district has employee(s) physically present at a Career Center  ☐ The district has contract staff physically present at a Career Center  ☐ The district makes available direct access to its program staff via phone or technology at a Career Center  ☐ The district makes available copies of the LDSS-2921 (Common Application) at a Career Center  ☐ Other:
	The Career Center is co- located directly across the hall in the same building as DSS. Career Center staff are invited to participate in Orientation and are introduced to clients and then inform them of training sessions and other career activities.

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.

Clients are referred to the Career center for specific services- resume prep, career exploration, etc. on their individual plans with a deadline specified for contacting the career center. The client is responsible for and encouraged to take their individual employment plan with them to the Career Center. For programs with financial eligibility component, clients are provided with a written statement of their benefit amount which they can then provide to the program operator as proof of eligibility.

# 2. Orientation, Assessment and Employment Plan

## 2.1 Orientation (Reference 18 NYCRR 385.5)

a.	Check one of the following:
	☐ The district provides orientation in accordance with 18 NYCRR 385.5 and no additional
	information is provided at orientation

☑ In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:

An introduction to the Workforce NY as well as Cornell Cooperative Extension SMART Energy Choices Program as available.

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

The District's Employment staff will provide orientations twice a month in a group setting for both exempt and non-exempt populations. Individual orientation will be provided on an as needed basis.

# 2.2 Temporary Assistance (TA) Employment Assessment

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

b	<ul> <li>Described below is the district procedure for the completion of an employment assessment</li> </ul>
	Recipients are mailed a referral letter with the date and time of the required assessment. They are also mailed a blank assessment to complete prior to the appointment. The assessment is then completed during the interview and entered directly into WTWCMS at the time of the assessment.
C	c. Which district administrative unit or contractor is responsible for conducting assessments?
	The Districts Employment unit
C	d. Described below are the minimum qualifications of the employees conducting the assessment (refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)):
	Civil Service Social Welfare Examiner or higher pay grade.
e	e. Are applicants in households with dependent children required to participate in completion of an employment assessment?  ☑ Yes ☐ No
f	<ul> <li>Are applicants in households without dependent children required to participate in completion of an employment assessment?</li> <li>☑ Yes</li> <li>☐ No</li> </ul>
ç	g. Are exempt adults in households without dependent children required to participate in completion of an employment assessment?  ☑ Yes ☐ No
r	n. How often and under what circumstances is the employment assessment updated?
	Annually, upon new case openings and whenever an exemption change occur or wheneve circumstances change.
2.	3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)
a.	The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:  ☐ The district enters employment plans directly into WTWCMS.  ☐ The district uses the LDSS-4978 (New York State Employment Plan) and later enters information into WTWCMS.  ☐ The district develops individual employment plans using a local equivalent tool and later enters information into WTWCMS. Attached is the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them below:

- b. Check one of the following:

  - ☐ A different district administrative unit or contractor develops employment plans, and their qualifications include:
- c. Described below is the district procedure for the completion of an individual's employment plan:

Recipients are mailed a referral letter with the date and time of required Employment Plan appointment. The Employment Plan is completed with the client and information is directly entered in WTWCMS at the time of the Employment Plan.

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

Annually, upon new opening and/or when employment goals need to be 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:

The district plans to meet participation rate requirements by assigning clients to core activities appropriate to their needs and taking available resources into consideration. Currently the primary resource for the district to meet participation rate requirements is the assignment to Work Experience, either with the Work Experience Program (WEP) or at an alternate site accessible to the client. Additional hours of participation may be assigned to TASC classes through the local BOCES operating out of the Career Center, Literacy training through Literacy Volunteers and short term computer and job readiness training available through the CSS Workforce NY America's Job Center, referrals to FLACRA and Mental Health or other treatment and rehabilitation. The weekly standard hours are 30 (TANF) and the district typically engages individuals within 30 days of case openings or changes in status from exempt to non-exempt. Safety Net individuals are assigned to work-experience for the maximum number of hours available by dividing their grant by minimum wage and the addition of whatever training options that are suitable and available to the individual.

#### 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:

Schuyler County utilizes Language Line, non-English speaking forms and mailings and English Language Instruction (ESL).

#### 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:

The District reviews the attendance expectations at Orientation and links them to the expectations of unsubsidized employment, encouraging participants to make the connection between attendance and self-sufficiency. Back up transportation and childcare plans are emphasized along with the recommendation that routine appointment be scheduled so as not to conflict with activity assignments whenever possible. Participants who are identified as having a pattern of not keeping scheduled hours of attendance are referred to the Employment Supervisor for a pre-conciliation meeting to investigate any underlying causes for the poor attendance and an attempt to find solutions before the individual is referred tor non-compliance.

# 3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

a.

S	elect all that apply:
$\boxtimes$	Described below are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
	Non-exempt individuals are referred to CSS Workforce NY
$\boxtimes$	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
	Sanctioned participants may cure a first FA sanction or establish compliance at the end of durational sanction by participating satisfactorily for 10 consecutive working days in the activity in which they originally failed to comply or a comparable activity as determined by the district if the original activity is no longer available or appropriate.
	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

of

# 3.5 Strategies for Reducing the Need for TA

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

Schuyler County encourages self-sufficiency and reducing the need for TA by requiring job searches, referrals to Workforce NY, education and training through BOCES, and offering transitional support services for non-exempt individuals. Exempt individuals with a long term medical or mental health diagnosis or those that have aged out are required to apply for SSI or SSD.

#### 4. Work Activities

#### 4.1 Allowable Work Activities

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

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

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

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

# **4.2 Job Development**

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

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

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

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Describe below how this is done, including number of staff, frequency of contacts, etc.

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

a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education, High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment:

The District utilizes BOCES and Literacy Volunteers

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

The District uses the approved providers of CSS Workforce NY

c. Described below are the process and guidelines workers follow to ensure that individuals who have not attained a basic literacy level and/or have not attained a high school diploma are offered the opportunity to participate in an educational activity:

After an individual's TABE test results are received, they are offered the opportunity to participate in educational activities through the local BOCES providing the score meets the minimum criteria. BOCES provides programs for basic literacy as well as obtainment of high school diploma/TASC.

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:

The District would approve participation when in the opinion of the District the educational activity would support the attainment of self sufficiency and conversely would not approve participation when in the opinion of the District the educational activity would not lead to self-sufficiency. The District however would encourage the client to pursue such opportunities.

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

The District requires that any individual to be approved for vocational training demonstrate a minimum 3 months satisfactory participation in either work-experience or paid employment and that the training activity reflect local labor market demand as specified by CSS Workforce NY and NYSDOL.

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

CSS Workforce NY Approved Training Providers

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

Referral to CSS Workforce NY

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

Face to face meeting and an amended Employment Plan signed by the participant.

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

School attendance is requested at the time of application and at recertification thereafter.

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

The Supervisor of the Work Experience Program is advised in writing of any limitations or restrictions on an individuals ability to work.

## 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:

Four year degree in any emerging occupation

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

Enrollees in post-secondary education are strongly encouraged to work with the institutions work study program to find a paid employment placement at the institution. If they are unable to do so the district will arrange a work-experience placement for them.

- c. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below (Select all that apply):
  - ☑ It has been determined that the student voluntarily quit their job or reduced earnings to qualify for initial or increased TA.
  - ☐ A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.
  - ☑ The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
  - ☑ The institution or student fails to monitor and report information regarding the student's attendance and performance as required.

	toward the completion of a course of study without good
cause, as determined by the	district.

$\boxtimes$	The student has previously enrolled in work-study, internship, or other work placement
	and failed to complete the work placement without good cause as determined by the
	district.

☐ Additional reasons as stated below:

# 5. Work Requirements

## **5.1 Meeting TA Work Requirements**

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

The District plans to meet participation rate requirements by assigning clients to core activities appropriate to their needs and taking available resources into consideration. Currently the primary resource for the District to meet participation rate requirements is the assignment to work-experience, either with the District's Work Experience Program (WEP) or at an alternate site accessible to the client. Additional hours of participation may be assigned to TASC classes through the local BOCES operating out of the Career Center, Literacy training through Literacy Volunteers and short-term computer and job readiness training available through the CSS Workforce NY America's Job Center referrals to FLACRA and Mental Health or other treatment and rehabilitation. The weekly standard hours are thirty (30) (TANF) and the district typically engages individuals within 30 days of case openings or changes in status from exempt to non-exempt. Safety Net individuals are assigned to work-experience for the maximum number of hours available by dividing their grant by minimum wage and the addition of whatever training options that are suitable and available to the individual.

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

Household Type	Number Served
Households with Dependent Children Average Monthly	22
Households without Dependent Children Average Monthly	15

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

The District uses the COGNOS Employment Code Duration report at least monthly to flag individuals who appear to require a coding change based on exceeding the expected time limits in exempt status and a referral to appropriate employment activities (WEP/job search) or disability determination services. The Earned Income/Employment report is used to

reduce discrepancies in cases which have reported entries to employment but are not showing budgeted earned income, and the WTWCMS alerts to assist with timely assessments and noncompliance action requirements. In addition, we review the possibly Miscoded Non-Legal union Families with Children in Common, Participation and Engagement status report and Preliminary SNA Non-Moe Countable/Not Countable report. The LDSS is exploring some new reports like the criminal activity in assessment report and the Job Skills report. Lastly, COGNOS is used for a monthly statistics report that will update the Commissioner as well as Legislature with Employment Activity numbers.

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

The district assigns TA applicants to Job Search.
⊠Yes
□No

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	7	Must be verifiable
SNA Individuals	5	7	Must be verifiable

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

Th	e district assigns	TA recipients t	o Job Search
$\boxtimes$	Yes	•	
П	No		

Recipient	Min.	Min.	Additional Information
Job Search	Contacts	Hours	
TANF and SNA MOE	10	12	Non-exempt recipients will be assigned to job search dependent upon the number of hours and types of other activities the individual is engaged in. It is anticipated that this will be a minimum of no less that 10 contacts per week. TA recipients will report their job search weekly to an appropriate staff. Individuals may utilize the NY Workforce site located in the same building to complete their job searches.

Recipient	Min.	Min.	Additional Information
Job Search	Contacts	Hours	
SNA Individuals	10	12	Non-exempt recipients will be assigned to job search dependent upon the number of hours and types of other activities the individual is engaged in. It is anticipated that this will be a minimum of no less that 10 contacts per week. TA recipients will report their job search weekly to an appropriate staff. Individuals may utilize the NY Workforce site located in the same building to complete their job searches.

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

Self-employment would be approved when the client could demonstrate they are making at least the equivalent of minimum wage and/or in the opinion of the work their self-employment is likely to lead to self-sufficiency.

## **5.2 Meeting SNAP Work Requirements**

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

Schuyler County is not mandating NTA SNAP applicants/recipients to participate in 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.
  - Schuyler County does not offer Supervised Job Search
- 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):

Job Search assistance is available to NTA applicants/recipients. All applicants are informed of the availability of Job Search assistance as well as other activities countable for meeting requirements when making application for SNAP via the SNAP interview.

# 6. Quality Assurance/Work Verification

## 6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

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

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

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

#### 6.2 Use of Outside Providers/Vendors

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

# 7. Supportive Services

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

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

When determined necessary to enable participation the District may provide gas vouchers, bus tickets for the local transit system, and work attire. On a case by case basis the District may cover vehicle repairs up to \$1000.00 with the receipt of two repair estimates. Additionally, on a case by case basis the District may pay fees for driver's license renewals.

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

  Bus pass/token
  - Bus pass/token

  - ☐ Other mileage rate (please explain methodology used to establish reimbursement rate):
- c. OTDA policy establishes a distance not to exceed two miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. Describe below the distance an individual may be required to walk, each way, to a work activity or to access public transportation:

Up to two miles.

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:

Referral to the Career Center, referral to the one on one computer and resume classes offered through the Southern Tier Library System and, in the case of returning Veterans, a referral to our local Veteran's Service Agency as well as the Veteran Representative from NYSDOL.

## 7.2 Post-Employment/Transitional Supportive Services

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

On a case by case basis the District will provide assistance with gas vouchers, bus tickets, car repairs (not to exceed \$1000.00), car insurance payments (not to exceed \$150.00 in a year) and work related clothing, (not to exceed \$150.00) and equipment (not to exceed \$100.00). Additionally, on a case by case basis the District may pay fees for driver's license renewals.

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:

On a case by case, as needed basis, the District will provide assistance with gas vouchers, bus tickets, emergency car repairs (not to exceed \$1000.00), car insurance payments and work related clothing (not to exceed \$150.00 in a year) and equipment (not to exceed \$100.00). Additionally, on a case by case basis, the District may pay fees for driver's license renewals.

## 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.):

On a case by case, as needed basis, the District will provide assistance with gas vouchers, bus tickets, emergency car repairs (not to exceed \$1000.00), car insurance payments and work related clothing (not to exceed \$150.00 in a year), and equipment (not to exceed \$100.00). Additionally, on a case by case basis the District may pay for fees for driver's license renewals.

# 8. Conciliation, Sanction and Dispute Resolution Procedures

#### 8.1 Conciliation

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

  - By mail

The client is notified via the Conciliation Notice (LDSS-4230) and given ten (10) days to respond. Included with the conciliation notice are the instruction on how the client may demonstrate compliance in lieu of the conciliation hearing. If the client wants a conciliation hearing and the District determines the client did not have good cause tor their non-compliance, they can still avoid a SNAP sanction by demonstrating the compliance.

b.	Who makes the TA good cause/willfulness determination? (Select all that apply)  ☐ The client's employment worker  ☐ A supervisor in the district  ☐ A separate entity (describe below):
C.	The district's conciliation process for SNAP applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(d). Indicate below how conciliations are conducted. (Select all that apply and describe the procedure below)  ☑ In person ☑ By phone ☑ By mail
	The client is notified via the Conciliation Notice (LDSS-4230) and given ten (10) days to respond. Included with the conciliation notice are the instruction on how the client may demonstrate compliance in lieu of the conciliation hearing. If the client wants a conciliation hearing and the District determines the client did not have good cause tor their non-compliance, they can still avoid a SNAP sanction by demonstrating the compliance. Conciliation can be addressed in person or by mail
d.	Who makes the SNAP E&T good cause/willfulness determination? (Select all that apply)  ☐ The client's employment worker  ☐ A supervisor in the district  ☐ A separate entity (describe below):
e.	Described below is the district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction:
	The client must resume or complete the activity they were non-compliant with (for example, the Employment Assessment). If it is not feasible or appropriate for the client to resume the activity they were non-compliant with, they must complete ten (10) employer job search

#### 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:

contacts within ten (10) days and submit verification of those contacts.

Recipients who are sanctioned for failing to comply with work assignments are or voluntarily quitting a job will become compliant upon: completion of the applicable sanction duration period; signing compliance papers; and participating in and completing two (2) weeks or ten (10) consecutive working days in the activity in which they were originally non-compliant or an equivalent activity as determined by the District if the original activity is no longer available or no longer appropriate.

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:

Recipients who are sanctioned for failing to comply with work assignments and or voluntarily quitting a job will become compliant upon: completion of the applicable sanction duration period; signing compliance papers; and participating in and completing two (2) weeks or ten (10) consecutive working days in the activity in which they were originally non-compliant or an equivalent activity as determined by the District if the original activity is no longer available or no longer appropriate.

## 8.3 Dispute Resolution

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

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

# 9.1 Disability Determination Process and Tools

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

The District utilizes the LDSS-4526 that has been completed by an individuals physician or therapist to determine disabilities and or work limitations. The District also contracts with IMA and utilizes submissions from exams they have performed.

b.	Indicated below is the process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited and describe the process by which the determination is made. (Select all that apply)  ☑ District directs the contracted physician or individual's physician to determine status.  ☐ District review team reviews and determines status (described below).  ☐ Specialized disability/medical staff or unit reviews and determines status (described below).  ☑ Other
	In June of 2021 the District created and filled the position of an Disability and Employment Examiner who reviews the medical statements of recipients with a medical for a disability expected to last twelve (12) months or more. The Disability and Employment Examiner works with the clients to determine if they may be eligible for SSI and helps them navigate that process or makes other referrals as appropriate i.e. Access-VR, IMA for second opinions on disability.
9.2 Mental Health Screening and Assessment	
a.	In addition to screening for a disability as part of the application or disability determination process, does the district administer a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted?  ☑ Yes ☐ No
b.	Describe the district's policy for determining when a program participant is offered a mental health screen:
	All adults applying for temporary housing assistance.
C.	What screening tools does the district use? (Select all that apply)  ☑ LDSS 5009 - Mental Health Screening Tool  ☐ The computer assisted version of the Modified Mini Screening tool (MMS)  ☐ Other Screening tool (describe below)
d.	If using the MMS, indicate below the district's cutoff score (7, 8 or 9) for referral to a mental health evaluation.
	7
e.	Describe below the procedure the district uses if the screening tool warrants a mental health evaluation referral
	Client will sign Mental Health releases, a written referral will be sent to MH and will be included in the individuals ILP.

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

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

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

If an individual claims s/he has a disabling condition, the individual shall be require to secure a physical (utilizing LDSS 4526) and provide the results thereof to the District within ten (10) days. If the results indicate that the individual is disable and the physician recommends rehabilitation, the individual shall be required in writing to provide documentation of the steps taken to secure rehabilitation and regular written reports regarding actual rehabilitation engaged in, as well as the progress being made toward restoration to self-sufficiency. If the District believes the individual may benefit from rehabilitation even though the physician has not recommended same, the District may request that an independent medical examination or case review be conducted by a qualified physician in and effort to 10 gain a second opinion regarding the extent of a client's disability and if appropriate, 2) help establish a course of rehabilitation which will help restore the client's self-sufficiency.

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

The District develops treatment plans in accordance with the recommendations from a client's physical or record or independent medical examiner as outlined above. This would pertain to the clients with physical limitations. Regarding the mental health and alcohol/substance abuse related issues, treatment plans are developed in accordance with Schuyler County Mental Health and/or FLACRA's recommendations. Individuals may be referred tor physical therapy, occupational therapy, mental health counseling, substance abuse counseling and other services thereto for the development of an employment plan with recommendations for treatment being part thereof.

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

Individuals who have developed a treatment plan for physical ailments, mental health or alcohol/substance abuse issues are required to maintain monthly contact with the Employment Unit as appropriate. Attendance reports are sent from the provider via email, male or facsimile.

#### 10. District Certification

#### 10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Schuyler County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2022 through December 31, 2023. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

12/2/2021 JoAnn S. Fratarcangelo Commissioner