

# **Cortland County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

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

Our organizational chart is 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 DSS Employment Unit operates the employment programs for Cortland County. This Unit coordinates all employment activities with other Cortland County Department of Social Services units through the establishment of joint policies and procedures. The Employment Unit is comprised of: One Social Welfare Manager, two Senior Social Welfare Examiners (Sr. SWE), three Social Welfare Examiners (SWE), and one Case Aide. The Sr. SWEs complete and monitor all comprehensive assessments and employment plans and make referrals to other program units as needed. The Case Aide assists with employment plan development and activity monitoring in addition to providing work experience activities. One Disability Analyst, who performs under contract through J.M. Murray Inc. but is physically stationed at DSS, completes all disability assessment work for the unit by working with doctors to determine employability and any limitations that exist. The Disability Analyst also helps people pursue Supplemental Security Income when appropriate. The Social Welfare Manager supervises all of the positions that comprise the employment unit and that are outlined above.

The Department's Temporary Assistance and SNAP SWEs are responsible to determine initial employability. These SWEs refer all individuals to either employment or a disability evaluation process. They address issues of compliance for exempt individuals who are not considered employable. The Employment Unit staff addresses conciliation and sanction issues for non-exempt individuals.

In addition to the services of a Disability Analyst, the Department contracts directly with J.M. Murray Inc. for additional services as well. J.M. Murray Inc. provides a weeklong Job Search Workshop service for all Temporary Assistance applicants who are considered potentially employable, Temporary Assistance or SNAP recipients who express a desire to attend. Specifically, they provide orientation, assessment, and job search services in coordination with Department staff. The contract services with J.M. Murray Inc. are intended to be in place for the duration of this plan but will be terminated should funds become unavailable.

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

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

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

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

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

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
J.M. Murray, Inc.	\$64,390	FFFS Local	FA SNA Family SNA Individual SNAP	Job Search and Assessment Workshop
J.M. Murray, Inc.	\$66,951	FFFS Local	FA SNA Family SNA Individual SNAP	Disability Assessments and self-sufficiency planning recommendations
Industrial Medicine Association, Inc.	\$2,500	FFFS Local	FA SNA Family SNA Individual	Consultative medical examinations

- 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>
J.M. Murray, Inc.	Others: Federal/State funding	FA SNA Family SNA Individual SNAP TANF 200%	ACCES-VR
OCM Boces	Others: State funding	FA SNA Family SNA Individual SNAP TANF 200%	ESL classes, Vocational Education
CAPCO	Local	FA SNA Family SNA Individual SNAP TANF 200%	High School Equivalency, Healthy Families Home Visiting Program for new and expectant families
Cortland Works Career Center	Others: Federal and State funding	FA SNA Family SNA Individual SNAP TANF 200%	WIOA services

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

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

All contractors provide the district with monthly statistics outlining the number of clients and services provided. In addition to regular staff contact on what is typically a weekly basis, formal meetings between the contractor and district will be held on a quarterly basis to review contract outcomes and progress.

### 1.3 OTDA Jobs Staff Agreement

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

#### Services Provided by Jobs Staff

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

#### Jobs Staff Target Groups

Yes or No:	Target Groups:
N/A	Applicants
N/A	FA & SNA with children
N/A	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):

### Programs and Services Provided at Career Centers

Yes or No:	Programs and Services Provided:
No	The district has employee(s) physically present at a Career Center
Yes	The district has contract staff physically present at a Career Center
Yes	The district makes available direct access to its program staff via phone or technology at a Career Center
Yes	The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
No	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.

Cortland DSS contracts with JM Murray, Inc. to provide a weeklong Job Search Workshop for all potentially employable Temporary Assistance applicants, or Temporary Assistance or SNAP recipients who wish to attend. This Workshop is held at the Cortland Works Career Center, providing staff and clients with access to Career Center services.

Career Center staff have been made aware of the MyBenefits website and have access to the Cortland DSS website, which has updated information on how to apply for all DSS programs. Career Center staff also have a DSS agency phone list and have phone access to all DSS staff.

The Common Application has been provided to Career Center staff, so that they can provide the application to any individual within the community who request one.

As part of the WIOA partnership workgroups in 2017, an Interagency Referral Form was created, providing a generic referral that the Cortland Works Career Center and other community agencies, including DSS, can use to refer any client for needed services within the community.



## 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:
Yes	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
No	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:

- 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:

Temporary Assistance staff provide a face-to-face orientation to all applicants and recipients individually at application and at recertification. If the orientation cannot be completed in-person, a phone interview will be completed, and any paperwork will be mailed to the individual to complete and return.

### 2.2 Temporary Assistance (TA) Employment Assessment

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

#### District Assessment Procedures

Yes or No:	How the district conducts assessments
No	The district enters assessments directly into WTWCMS.
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
Yes	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: The local equivalent does not contain 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:

The one-page Employment Assessment is used at all initial eligibility appointments. The Social Welfare Examiner completes this form individually with the client at the face-to-face eligibility interview, to ensure that all questions are answered fully and to determine initial employability. Completion of this mini assessment allows the worker to make a determination as to the next direction the case needs to go: the Job Search Workshop, Disability Analyst, or for an Alcohol/Drug Assessment. This assessment is reviewed and updated, if necessary, at every subsequent recertification. If there are any adult household members who are not present at the eligibility interview, a separate appointment will be made with them for purposes of completing the assessment. At case opening, the TA Intake Worker sends an email to the Employment Unit. The Employment Senior SWE then schedules the case with an appointment for a full employment assessment/completion of the employment plan. All adults, including 16- and 17-year old's not in school, adults with dependent children, and adults without dependent children, receive an employment assessment within 90 days of eligibility determination.

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

The local district Temporary Assistance/Employment Unit.

- d. Described below are the minimum qualifications of the employees conducting the assessment (refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)):

All staff will receive training in assessment and employability development to prepare assessments and plans. Staff will be trained in the agency by experienced supervisory staff and will be required to attend state training specifically for Temporary Assistance and SNAP employment programs, as it is available. All Social Welfare Examiners completing assessments must meet the following qualifications: Graduation from a regionally accredited or NYS recognized college or university with an Associate's Degree; or Graduation from high school or possession of a high school equivalency diploma and two years full time paid experience or it's part-time equivalent in examining, investigating or evaluation claims for assistance, veterans, or unemployment benefits insurance or a similar program operating under established criteria for eligibility; or an equivalent combination of training and experience as described previously.

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

Yes.

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

Yes.

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

Yes.

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

Every 6 months or when there is a change in employment status.

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

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

### District Employment Plan Development

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

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

At case opening, the TA Intake Worker sends an email to the Employment Unit. The Employment Senior SWE then schedules the case with an appointment for a full employment assessment/completion of the employment plan. All adults, including 16- and 17-year old's not in school, adults with dependent children, and adults without dependent children, receive an employment assessment. While this is typically completed within 1 month of case opening, all assessments and plans are completed within 90 days of eligibility determination. A copy of the completed plan is provided to the client.

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

Every 6 months or when there is a change in employment status.

### **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:

"Engaged in work" is defined as actively participating in any local district approved activity including, but not limited to, services that will assist the individual to become self-sufficient. The Cortland County Department of Social Services reserves the right to assign recipients to up to 40 hours of work activities, in any combination that will increase the recipients' employability. The activities that the Cortland County Department of Social Services will approve to assist participants in becoming self-sufficient include, but are not limited to, physical therapy, mental health counseling, drug and alcohol counseling, psychological testing, rehabilitation treatment, and supported work. These activities may be used to assist individuals in work activities to overcome their barriers.

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

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

The department uses Language Line resources available through our phone service for translation as necessary. We refer participants to English as a Second Language courses offered through OCM BOCES. Work sites that can accommodate non-English speaking individuals are also utilized as necessary.

#### **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 DSS Employment staff will make every effort to examine barriers the individual may be experiencing which cause them to fail to participate in work activities or may cause them to not participate in the future. The Employment Examiner will examine the case record and Employment Plan in identifying possible causes for noncompliance and will assist the individual in identifying and coming up with solutions to resolving problems with

transportation, childcare barriers, work schedule or counseling appointment conflicts, or other correctable factors.

### 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
No	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: When the duration sanction period is over, we then schedule an interview with the individual to have them re-added to the case and, if applicable, to complete an employment assessment.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Sanctioned individuals are called in to the Department on a monthly basis to discuss past non-compliance and ways they can re-engage with employment activities. The Temporary Assistance/Employment worker discusses the effects such engagement would have on their individual benefit situation depending on the type of sanction.

### 3.5 Strategies for Reducing the Need for TA

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

The Department provides local employment resources during orientation. Additionally, all non-exempt individuals are required to attend a five-day job search workshop. This workshop is held at the Cortland Works Career One Stop Center where individuals are exposed to all local employment opportunities. Applicants who are working or obtain employment can receive assistance for transportation with gas cards or bus passes if needed. The agency also provides additional assistance for any work-related costs such as licenses, uniforms, and tools. The Department is applying the childcare in lieu of temporary assistance guarantee rules to applicants and is providing applicants with information regarding this option.

## 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>	FA SNAFAM SNA SNAP
<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>	FA SNAFAM SNA SNAP
<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>	FA SNAFAM SNA SNAP
<p><b>Vocational Education</b> – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>	FA SNAFAM SNA SNAP
<p><b>Secondary School</b> – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school 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.</p>	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
<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>
<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>N/A</p>

Activity and Definition	Case Type
<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>	N/A
<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>	FA SNAFAM SNA SNAP
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	N/A
<p><b>SNAP E&amp;T Supervised Job Search</b> – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>	N/A
<p><b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p>	FA SNAFAM SNA SNAP
<p><b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>	N/A



## 4.2 Job Development

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

Yes.

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

### How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: Our agency does not contact employers to solicit jobs.
Yes	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: The Career Center has a staff of two Employment and Training Specialists. For the Summer Youth Program, they solicit summer employment slots from around 70 local businesses and not-for-profits. For the adult population they post positions with the NYS Department of Labor. They have computers available for the public to use for job search and they also print and provide job seekers a weekly list of available jobs. Staff are available to help customers on a daily basis at the center. They provide ongoing service to those who want and need additional assistance. Cortland County DSS has established very successful partnerships with the agencies at the Cortland Works Career Center, Cayuga-Cortland Workforce Investment Area's Workforce One-Stop. The center in general serves as a resource for TA and SNAP recipients. The Computer and Resource Room lab and library provide computer-based tutorials for skills building, internet access for job searching, copy machines, phones, fax machines and quality resume paper and stamps for job seeking purposes. Effective partnerships are established with Workforce Investment Act staff which facilitates and funds training for many of these participants so that they can get the skills they need to become employed and self-sufficient. Participants are also registered in the One Stop Operating System (OSOS) "talent bank" for matching to job opportunities. DSS staff are emailed the Center calendar and workshop opportunities so that all work ready participants can benefit from these skill building opportunities. Partnering with the Center provides participants with local professionals who are accustomed to connecting individuals with appropriate and available employment opportunities. The Center also offers onsite Adult Literacy classes through BOCES. Cortland County Employment and Training also coordinates the TANF summer youth work experience program.

### **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.

Cortland DSS refers individuals to OCM BOCES to enroll in Adult Basic Education, as they provide TASC (Test Assessing Secondary Education) classroom instruction. OCM BOCES is accredited through the Council on Occupational Education. The Community Action Program of Cortland County (CAPCO), has limited funding to provide HSE preparation for individuals under 21 years of age. Individuals needing this service are referred to CAPCO currently, although in the event of loss of funding those students would need to be referred back to their school districts. Our local BOCES coordinates and runs ESL classes at our local community center, we refer, and track individuals sent to this. CAPCO is a New York State Community Action Agency (NYSCAA) and is a member of the national Community Action Partnership.

- 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.

In addition to the basic educational programming described above, BOCES also offers Vocational Education and Job Skills programs. Job Search staff assess each applicant and recipient for strengths and skills, and how those strengths and skills relate to job searches and goal planning. Job Search classes are held at our local Cortland Works Career Center One-Stop, where clients have access to DOL staff as well. Job Search staff, DOL staff, and local DSS staff refer individuals appropriate for such services to BOCES programming, including such programs and classes as Certified Clinical Health Aide, Medical Assistant, HVAC, Electrical Maintenance Technician, Office Technology, Cosmetology, Licensed Practical Nurse, Mechanical Maintenance Technician, Automotive Technology, and Pharmacy Technician. Many computer, medical, and trade classes are held during evening hours to accommodate working participants. All Vocational Education program participants are able to apply for financial aid such as Federal Pell Grants and Federal Stafford Loans. BOCES provides Financial Aid Counselors to work with students on financing options. BOCES also holds a weekly open house for all interested participants. OCM BOCES is accredited through the Council on Occupational Education.

- 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.

All non-exempt Temporary Assistance applicants attend a weeklong Job Search Workshop, and recipients maintain weekly contact with Job Search staff. This programming is provided through a contract with the J.M. Murray Center, who provides orientation, assessment, reading and math level testing (T.A.B.E.) and job search services. All clients identified as being in need of education programming or language instruction are offered the opportunity to attend BOCES programming, only those who are non-exempt are required to attend. BOCES offers adult HSE preparation and testing at various locations and times to accommodate individual schedules. Individuals under 21 years of age are referred to CAPCO for HSE instruction.

- 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.

All individuals who have not obtained a high school diploma and who are interested in participating in an educational activity are encouraged and supported in their efforts to participate in available educational activities. This information would be gathered through the one-page Employment Assessment at the eligibility interview, at the Job Search Workshop, or at subsequent reassessment and recertification appointments.

- 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.

Requirements include but are not limited to: Recipients are approved by Cortland County Department of Social Services for job skills or vocational education programs only when Cortland County Department of Social Services deems it necessary to enable such recipients to obtain employment or who are currently employed and require training to upgrade their position and earning capacity. Unemployed recipients are not approved if they already possess the skills and knowledge that enable them to obtain entry-level employment in the local job market. Additional requirements are:

1. Recipients must achieve high school or equivalency diplomas before assignment to other job skills or vocational education activities; however, for these individuals as well as those who are unable or uninterested in pursuing a high school diploma/HSE, if such programs are available, recipients may be enrolled in job skills or vocational education programs that enable recipients to learn specific skills while achieving an equivalency diploma at the same time;

2. Recipients must possess the prerequisite skills for a job skills or vocational education program or attend an approved program to achieve such skills;

- f. 3. Recipients must demonstrate the aptitudes and abilities to benefit from job skills or vocational education as determined through evaluation of prior work/ training performance, counseling and/or testing;
  - 4. Those recipients who have previously engaged in approved work activities with DSS must have maintained 100% attendance\* and satisfactory performance in those activities:
  - 5. Recipients enrolled in job skills or vocational education programs must maintain 100% attendance\* and satisfactory performance according to the program's standards.  
\*100% attendance includes program excused absences.

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

Providers must demonstrate effectiveness in their programs; Providers must offer programs that enhance clients abilities to secure unsubsidized employment; Providers must meet contractual goals and milestones; Providers must be willing to adjust their programs to meet the needs of the current client population; Provider's programs must reflect local labor market needs; Providers must be licensed or certified by the appropriate state regulatory agency; Provider's programs must be cost-effective and fiscally accountable. Before contracting with a new provider, the Cortland County Department of Social Services will receive documentation from the provider that will satisfy the above standards. Providers will be evaluated through performance measures established through each contract or agreement with the provider.

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

The Cortland County Department of Social Services notifies recipients of approved training providers during orientations and at individual face-to-face interviews when completing assessments and developing recipient employment plans.

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

Recipients are notified verbally and in writing. When an individual employment plan is being completed with the recipient, notification is accomplished verbally during the interview and in writing through the plan. Changes and updates in an employment plan are made verbally and in writing to the recipient.

- j. 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.

The Temporary Assistance/Employment Unit verifies attendance with schools in writing at every case recertification. If a 16–18-year-old is no longer attending high school, the TA/Employment worker schedules an employment assessment for the individual within two weeks.

- k. 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.

Work limited individuals are assigned to activities that meet the limitations of the individual and which will not compromise their health issues. The limitations of individuals are provided in writing to all work activity site supervisors and work experience site supervisors.

## 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):

Cortland will approve post-secondary level education, up to a Bachelor's Degree, as a work activity up to two years, provided that:

1. Recipients must demonstrate the aptitudes and abilities to benefit from education;
2. Recipients must maintain 100% attendance, including excused absences;
3. Recipients must maintain, at minimum, a 2.0 GPA.

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

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

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

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

The Employment Unit Manager reviews the participation management reports through the COGNOS system monthly with staff to identify individuals that are not enrolled in activities or are not meeting required participation rate hours. The WTWCMS system is also used to identify enrollment of individuals and participation in activities. Non-exempt individuals are engaged in Job Search activities within two weeks of applying for assistance and they are engaged with other employment activities within two weeks of opening a case. The Disability Analyst tracks all exempt individuals. The Disability Analyst receives all verification to document the individuals exempt or non-exempt status. When documentation is received that states a change in status from exempt to non-exempt, individuals are referred immediately to the Temporary Assistance/ Employment worker to schedule an assessment appointment within two weeks. The Temporary Assistance/Employment worker completes the Notice of Temporary Assistance Work Requirements Determination - Non-Exempt (LDSS-4005a). The Employment Case Aide tracks individuals who are exempt due to alcohol/substance abuse issues. Monthly reports are sent to the treatment agencies to report the individuals' participation hours, progress with treatment, and any change from exempt to non-exempt status. When a change from exempt to non-exempt status is reported, the individual is immediately referred to the Temporary Assistance/Employment worker to schedule an assessment appointment within two weeks. The Temporary Assistance/Employment worker completes the Notice of Temporary Assistance Work Requirements Determination - Non-Exempt (LDSS-4005a). If individuals are exempt because they are needed in the home to care for an incapacitated household member, medical documentation is required to determine the continued need for the individual to remain in the home to provide care. The participation standard for households with no children under the age of six is 35 hrs/week, and for single caretakers of a child under the age of six it is a minimum of 20 hrs/week.

- 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	100
Households without Dependent Children Average Monthly	150

- 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:

On a monthly basis a number of COGNOS reports are pulled by the Unit Director and forwarded to the Employment Manager and Senior Social Welfare Examiners. The Examiners use these reports to address individuals who are not participating in work activities, those who are participating but who are lacking the number of hours to meet full engagement, sanctioned individuals who can be assessed for work barriers, and exempt individuals who may need to pursue an SSI application. The monthly reports pulled include: Activity Status of Adults, Employability Code Duration Report, Adults with Earned Income and No Employment Schedule, Sanctioned Adults, and Nonparticipating Adults.

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

Yes.

#### **Applicant Job Search**

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	5	10	All non-exempt TA applicants are assigned to a week-long job search workshop for 35 hours at the Cortland Works Career Center (One-Stop Center) within 2 weeks of the TA application. All individuals receive instruction on how to complete applications, resumes, conduct job interviews and use resources to assist them with their job search. During this week-long job search, individuals are given job referrals to any job openings that are consistent with their work abilities and interests. TA applicants are given a job search log to record the job contacts and are required to make 5 job contacts per week. The job contacts are reviewed by a DSS Case Aide to ensure compliance.
SNA Individuals	5	10	All non-exempt TA applicants are assigned to a week-long job search workshop for 35 hours at the Cortland Works Career Center (One-Stop Center) within 2 weeks of the TA application. All individuals receive instruction on how to complete applications, resumes, conduct job interviews and use resources to assist them with their job search. During this week-long job search, individuals are given job referrals to any job openings that are consistent with their work abilities and interests. TA applicants are given a job search log to record the job contacts and are required to make 5 job contacts per week. The job contacts are reviewed by a DSS Case Aide to ensure compliance.

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

Yes.

**TA Recipient Job Search**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	5	5	Once the recipient completes the Job Search Workshop, the Employment Senior SWE meets with the recipient weekly to verify their job searches and receive referrals for any job openings. Individuals are required to make 5 job contacts per week and spend a minimum of 5 hours per week on job search efforts. Job Searching will be for a limit of 12 weeks per individual per year.
SNA Individuals	5	5	Once the recipient completes the Job Search Workshop, the Employment Senior SWE meets with the recipient weekly to verify their job searches and receive referrals for any job openings. Individuals are required to make 5 job contacts per week and spend a minimum of 5 hours per week on job search efforts. Job Searching will be for a limit of 12 weeks per individual per year.

- 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:

Cortland DSS always approves self-employment as part of an individual's work activities, provided that the individual can provide documentation that proves their income from this employment. Income and expenses need to be proven for Temporary Assistance eligibility. The client can self-attest to the number of hours they participate in self-employment. If hours other than the net income divided by the federal minimum wage are reported as hours of work, then alternate documentation other than self-attestation must be maintained to verify the hours of work reported. Alternate documentation may include statements from individuals for whom the self-employed individual provides services, and time records used to document childcare payments to those serving as childcare providers (OTDA 08-ADM-07).



## 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.

At application, recertification, and when a previously exempt household member or new household member becomes subject to work requirements, the assigned worker reads the LDSS-5193 to the individual. The worker documents this in the case record. If the interview is in person, the form is given directly to the client. If this is a phone interview, after reading the form language to the client, the LDSS-5193 is mailed to the individual.

- c. Described below is how the district documents in the case record how the written information about SNAP work requirements was provided to the household (reply yes or no to options as they apply).

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

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

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

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

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

Cortland County does not require NTA SNAP recipients to participate in E&T 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.

Cortland County does not require NTA SNAP recipients to participate in E&T work activities, so participation in Supervised Job Search would be voluntary only.

- 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):

A letter is sent to all NTA SNAP work registrants upon case opening and recertification. This letter outlines that we can provide job search and employment activities, along with contact information for a Case Aide in our Employment Unit. The letter also states that the Cortland Works Career Center can provide services such as job searching, employment resources, training, and support services. The services available to all work registrants are also posted on the county website under both the TA and SNAP sections.

## 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: All SNAP recipients are sent this information at the time of recertification, regardless of exemption.

- 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: At recertification, every recipient is given a copy of the link to our website, which outlines our employment and training services. All recipients are verbally informed of these services, by reading the narrative provided by OTDA.
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.

Individuals are screened for appropriateness with activity assignment/referral during the employment assessment as well as during the Work Experience orientation. If the provider determines that the individual is not appropriate for their program, they are asked to document this in writing to us within 10 days of this determination. Within 10 days of receipt of this notification, we will bring in the individual to discuss what activity would be more appropriate and we would refer the individual to that program. No negative action would be taken if the individual did not comply with the program which was determined not to be a good fit.

- 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.

When assigning an individual to an activity, a form is provided which they can complete if the individual is not appropriate for their program. This form has been attached.

- 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.

If an individual placed at any work activity provider, such as our Job Search Workshop, the Cortland Works Career Center, or at a Work Experience site, makes a complaint against a site for any reason, it would be addressed by the Department Deputy Commissioner, who handles all complaints formally. The individual would be interviewed regarding the complaint within 10 days and will be informed in writing the outcome of this complaint inquiry. If it is determined that the provider was unfair or discriminatory in their actions toward this individual, a more appropriate work activity would be provided, and no negative program action will be taken with the individual if they did not comply with that program. All of our Work Experience sites are county departments, we have no Work Experience sites with agencies other than ones ran by Cortland County. There are clauses in the contracts with these other county departments that they cannot discriminate on the ground of age, race, color, religion, sexual orientation, national origin, or mental or physical disability.

## 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 WTWCMS?

No.

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

N/A

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

N/A

## **7. Supportive Services**

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

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

To the extent that federal and state resources are available, the Cortland County Department of Social Services provides transportation and work-related expenses essential to obtain employment, case management and medical assistance to applicants and recipients in work activities. Whenever an expense listed below is cited as being once per year, it shall mean one time in any twelve (12) month period of time.

TANF funded supportive services will be provided to those families now receiving Safety Net assistance whenever such services are countable as TANF non-assistance with the exception of transportation services that will only be provided to such families who are employed.

All work-related expenses must be prior approved by the Cortland County Department of Social Services. Expenses must be essential so that the individual would not be able to engage in the work activity without the expense and the individual has no other resources to obtain payment for the expense.

Clothing purchases are approved when the individual does not have the items of clothing that are essential to perform the work activity and has no other resource to obtain the clothing items. The maximum for each item is \$100.00 and the maximum reimbursement per individual per year is \$200.00.

Vehicle expenses may be prior approved when the vehicle is essential to transport the individual to the work activity, when no other resource is available to transport the individual. The cost of any repairs must not exceed the book value of the vehicle and the individual must present two estimates from a NYS licensed automobile repair shop. Vehicle insurance may be reimbursed for one month at a time up to three months. Maximum reimbursement for all vehicle expenses, including insurance, is capped at \$800.00 per year.

Transportation needs for families who have exhausted their TANF lifetime benefits and who are in receipt of Federally Participating Safety Net assistance will be met with TANF funds whenever individuals in such families are employed and to the extent that TANF funds are available. For those Safety Net families who are unemployed, non-TANF funds will be used to meet transportation needs when necessary.

Work related expenses may also include licenses and fees essential to obtain subsidized or unsubsidized employment. A statement from the prospective employer is required. The

maximum reimbursement for such work-related expenses is \$800.00 per year; fees cannot be alcohol, drug or child support related. To the extent federal and state resources are available, case management is provided to applicants and recipients with limited English proficiency and those whose employment plans indicate the need for two or more concurrent work activities. In addition, to the extent federal and state resources are available, case management is provided to families with multiple barriers to employment and case management is provided to potentially employable and work limited individuals.

When appropriate, a childcare subsidy is guaranteed to applicants and recipients whose children are eligible for childcare under 18 NYCRR Section 415 and who need such care to participate in approved activities. Applicants and recipients are responsible, with DSS assistance if needed, for locating appropriate day care.

- 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**

<b>Yes or No:</b>	<b>Transportation Assistance Provided</b>
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)
Yes	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
No	Other mileage rate (the methodology used to establish reimbursement rate is described here):

- 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:

Individuals are primarily responsible for their own transportation planning. Individuals are responsible for their own transportation if they are within two (2) miles of their work assignments or the nearest public transportation bus stop. Individuals may present extenuating circumstances for why they should be exempt from the 2-mile limit policy, either on a temporary or permanent basis, for reasons including but not limited to: physical disability, poor weather conditions, or unsafe walking situations. Upon receipt of a request for exemption of the 2-mile limit policy, the DSS Employment worker will examine the circumstances of this individual situation and will provide a determination to the individual



within 10 days.

When the assignment is over two (2) miles, individuals are pre-approved by the Employment Unit to receive bus vouchers or are pre-approved to receive reimbursement for transportation expenses at the current IRS medical/moving rate per mile up \$30.00 per month. If the actual transportation costs for an individual to travel to an assigned site exceed this amount, the actual cost of transportation will be reimbursed, or the individual will be assigned to another site at the Department's discretion. A reimbursement amounts up to \$45 was selected as this amount covers an unlimited travel bus pass within Cortland County.

- 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:

Individuals would be offered childcare in lieu of Temporary Assistance, bus passes for SNAP individuals to maintain or pursue employment, and/or a referral to the local Cortland Works Career Center for assistance with job searching, resume writing, and other employment assistance.

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

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

Applicants as well as recipients who are working can receive assistance for transportation with gas cards, bus passes, and car repairs if needed. These services are also available for those seeking employment. The agency also provides additional assistance for any work-related costs such as licenses, uniforms, and tools. Individuals who are open Temporary Assistance are eligible for childcare. Our department provides assistance in locating appropriate, accessible providers and covers childcare expenses.

- 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:

In addition to the mandated transitional programs, the Cortland County Department of Social Services will provide case management and work-related expenses when the Department deems such services necessary for the individual to retain employment, and to the extent federal and state resources are available. In some instances, referrals will be made to case management programs provided within the community. Work-related expenses are deemed necessary when the individual would lose employment without the expense, when the individual has no other resource to pay for the expense, and when the individual presents an estimate to the Department for prior approval. Reimbursement for the expense must be necessary for the individual to maintain unsubsidized employment. Reimbursement for transitional supportive services will be limited to the services and monetary amounts outlined previously.

### 7.3 Extended Support Services

- a. Described below are the support services the district will provide for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines. These services can be provided as long as funding is available (FFFS, etc.):

The department will make referrals for individuals to community programs offering services to individuals eligible under the 200% of poverty eligibility guidelines when available. Our local Job Center/One Stop does operate a summer youth employment program utilizing these guidelines, we coordinate with them to facilitate referrals from our current TA caseload and to help verify eligibility.

## 8. Conciliation, Sanction and Dispute Resolution Procedures

### 8.1 Conciliation

- a. The district's conciliation process for TA applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(a). Indicate below how conciliations are conducted (reply yes or no to the options as they apply).

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

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

The districts process for conduction TA conciliations is described below:

Conciliation notices are mailed, or hand delivered to recipients. The notice states specific reasons for the notice and advises the recipient they must respond within the required timeframe. If the recipient fails to respond to the notice, then all available information is used to determine good cause. If they are found to have willfully not complied and no good cause is found, a ten (10) day notice of intent to reduce or discontinue benefits is sent to the recipient. When a recipient responds to a conciliation notice, an Employment Unit worker discusses the issue and the recipient's explanation of failure to comply with the request with the recipient. The Employment Unit worker will make a determination based on the discussion with the recipient whether the noncompliance was willful and if there was good cause for failure to comply. The Employment Unit worker may, when possible, have an immediate discussion with a recipient upon hand delivery of a conciliation notice and make a determination whether or not the compliance was willful and if the individual had good cause for failure to comply. If, after discussion with the Employment Unit worker, the recipient's issue is resolved, the recipient is advised verbally or in writing. If the issue is not resolved and it is determined by the Employment Unit worker that the individual's failure or refusal to comply was willful and without good cause, the recipient is sent a ten (10) day notice of intent to discontinue or reduce benefits. All notices contain advice to the recipient concerning the right to a fair hearing. The conciliation process for Family Assistance cases shall be completed within thirty days (30) from the date the conciliation notice was issued

and the process for Safety Net cases shall be completed within fourteen (14) days from the date on which an individual requested conciliation unless the individual and Department agree to an extension of time frames pursuant to regulatory guidelines.

- 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
No	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:

Conciliation notices are mailed, or hand delivered to recipients. The notice states specific reasons for the notice and advises the recipient they must respond within the required timeframe. If the recipient fails to respond to the notice, then all available information is used to determine good cause. If they are found to have willfully not complied and no good cause is found, a ten (10) day notice of intent to reduce or discontinue benefits is sent to the recipient. When a recipient responds to a conciliation notice, an Employment Unit worker discusses the issue and the recipient's explanation of failure to comply with the request with the recipient. The Employment Unit worker will make a determination based on the discussion with the recipient whether the noncompliance was willful and if there was good cause for failure to comply. The Employment Unit worker may, when possible, have an immediate discussion with a recipient upon hand delivery of a conciliation notice and make a determination whether or not the compliance was willful and if the individual had good cause for failure to comply. If, after discussion with the Employment Unit worker, the recipient's issue is resolved, the recipient is advised verbally or in writing. If the issue is not resolved and it is determined by the Employment Unit worker that the individual's failure or refusal to comply was willful and without good cause, the recipient is sent a ten (10) day notice of intent to discontinue or reduce benefits. The individual will be offered the option to demonstrate compliance during this period. If they do so, then the sanction will not be imposed.

- 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>
Yes	The client's employment worker
No	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:

If a SNAP recipient wishes to engage in a work activity to demonstrate compliance, the Employment worker assigned to their case would assign the recipient to 10 hours over a 10 day period of job searching or applicable employment activities (such as the appropriate number of work experience hours or employment) to enable them to avoid a sanction.

**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:

If an individual who is sanctioned expresses a willingness to comply, specifically by telling us verbally or in writing that they are willing to participate in assigned activities, the assigned worker will schedule a face to face interview with them to complete a current employment assessment. This is all which is required to demonstrate compliance. We discuss with the sanctioned individual the reason why the noncompliance occurred and make adjustments to the employment plan as deemed necessary to try and avoid future noncompliance. If the interview cannot be completed in-person, a phone interview will be scheduled with the individual, then all paperwork will be mailed to them to be completed, signed, and returned. At the end of the sanction duration period, sanctioned individuals will be contacted by their Temporary Assistance/Employment Worker regarding their willingness to comply with the necessary requirements to be added back on to the case. An appointment will be made for the sanctioned individual for a reassessment to be completed and to modify the employment plan. The individual will be added back to the case if they are willing to be compliant and keep a scheduled face to face interview with the worker within 10 days. TA benefits will be restored retroactive to the date when the individual expressed a willingness to comply, but not before the end of the durational sanction period.

- b. Describe below the district's procedure for determining compliance for those SNAP recipients who wish to end their employment sanction (18 NYCRR 385.12, 18 NYCRR 385.13), including the time period established for demonstrating compliance to the satisfaction of the district:

If a SNAP individual wishes to comply, the individual will be added back to the case if they are willing to be compliant and keep a scheduled face to face interview with the worker within 10 days. At that time appropriate work activities can be assigned. The individual may be eligible for SNAP benefits before the end of the durational period if the individual documents their exemption from SNAP work requirements and are otherwise eligible for SNAP benefits. If the interview cannot be completed in-person, a phone interview will be scheduled with the individual, then all paperwork will be mailed to them to be completed, signed, and returned.

### 8.3 Dispute Resolution

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

#### Grievance Mediation

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

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

### 9.1 Disability Determination Process and Tools

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

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

Yes or No:	How the district determines an individual's disabilities and/or work limitation
Yes	District participates in the OTDA managed contract for independent medical evaluations.

<b>Yes or No:</b>	<b>How the district determines an individual's disabilities and/or work limitation</b>
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: The Examiner will schedule an appointment for all clients claiming disability with our contracted Disability Analyst. The Disability Analyst will meet with the client and assist them in obtaining proper medical documentation. If the client does not have a medical provider the Disability Analyst will recommend that the client obtain one or will refer for an independent medical evaluation. The client's physician's statement will be accepted unless information exists which conflicts with this statement, in which case an independent evaluation will be set up.

- 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:

If the individual alleges they are unable to participate, we would immediately schedule an appointment with our Disability Analyst to follow the above process. This appointment is given to the individual in the form of an appointment letter. If the individual participates in the disability review, the agency notifies the individual of any exemption status change by mailing them the LDSS-4005/4005(a) form.

- 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 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>
No	District directs the contracted physician or individual's physician to determine status.
No	District review team reviews and determines status (described here):

<b>Yes or No:</b>	<b>District's process for reviewing medical documentation</b>
Yes	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: The Disability Analyst reviews all medical documentation received by the agency. The medical documentation and recommendations are then forwarded to the TA eligibility worker or employment worker for appropriate action to be taken.

## 9.2 Mental Health Screening and Assessment

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

No

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

N/A

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

### Screening Tools the District Uses

<b>Yes or No:</b>	<b>Screening Tools</b>
No	LDSS 5009 - Mental Health Screening Tool
No	The computer assisted version of the Modified Mini Screening tool (MMS)
No	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.).

If after completing the initial assessment at application the individual states that they are not employable or have a limitation, the assigned Social Welfare Examiner will refer them to our contracted Disability Analyst. The Disability Analyst will then schedule an interview with the individual to determine what their limitations and needs are, referring them to the proper provider if there is not a current one, or obtaining documentation on the limitation from the current provider. The Disability Analyst works with individuals to determine the extent of their disability. Based on documentation received from medical professionals, the Analyst determines whether or not the individual is permanently disabled and could benefit from a SSI application. The recommendations of the Analyst assist Temporary Assistance/Employment workers in determining if an individual should be enrolled in a program to assist them in achieving self-sufficiency. Such recommendations include the expected duration of disabilities.

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

Whenever the Disability Analyst determines an individual is work limited, activities that meet the limitations of the person and which will not compromise health issues are selected. This is done on an individualized basis. We continue to work with medical professionals to engage these individuals in recommended treatment and other employment related activities.

J.M. Murray Inc. also coordinates the ACE program which has assisted DSS with the opportunity to place individuals with mental illness in a volunteer role in the community. Participants meet on a weekly basis to assess their skills and discuss their previous week's volunteer experiences. Individual and group counseling is also provided, as well as skills development training. When participants become employment ready, they are referred for ACCESS VR services.



- 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.

For those individuals working with our on-site Disability Analyst, referrals are provided to the Employment and Temporary Assistance Units whenever someone fails to show for a scheduled appointment or fails to provide required documentation within timeframes provided. Individuals are also referred to the Disability Analyst for updated disability determinations when exemption time periods run out. We currently communicate with our local counseling agencies on a monthly basis to obtain updates and progress in treatment. Our plans for these individuals are updated as their case situations and employment status changes.

## **10. District Certification**

### **10.1 Certification**

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

1/4/2024

Kristen Monroe  
Commissioner