

Cattaraugus County

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

January 01, 2024 - December 31, 2025

Table of Contents

1. Administration	1
1.1 Administrative Structure.....	1
1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies.....	2
1.3 OTDA Jobs Staff Agreement	4
1.4 Access to Services at New York State Career Centers	5
2. Orientation, Assessment and Employment Plan	6
2.1 Orientation (Reference 18 NYCRR 385.5)	6
2.2 Temporary Assistance (TA) Employment Assessment	7
2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7)	9
3. Engagement	11
3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)).....	11
3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency	11
3.3 Strategies/Procedures for Increasing Program Attendance	12
3.4 Strategies/Procedures for Engaging Sanctioned TA Participants	12
3.5 Strategies for Reducing the Need for TA.....	13
4. Work Activities	13
4.1 Allowable Work Activities	13
4.2 Job Development.....	16
4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)	17
4.4 Post-Secondary Education Approval and Enrollment Policies.....	20
5. Work Requirements	20
5.1 Meeting TA Work Requirements.....	20
5.2 Informing SNAP Applicants and Recipients of Work Requirements	24
5.3 Meeting SNAP Work Requirements	26
5.4 Advising Households of Employment and Training Services	26
5.5 Provider Determinations	27
6. Quality Assurance/Work Verification	28
6.1 Quality Assurance Process - Random Case Sampling	28
6.2 Use of Outside Providers/Vendors	29
7. Supportive Services.....	30
7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District.....	30
7.2 Post-Employment/Transitional Supportive Services.....	31
7.3 Extended Support Services	32
8. Conciliation, Sanction and Dispute Resolution Procedures.....	32

8.1 Conciliation	32
8.2 Sanction.....	34
8.3 Dispute Resolution.....	35
9. Disability Determinations, Documentation and Requirements of Exempt Individuals	36
9.1 Disability Determination Process and Tools	36
9.2 Mental Health Screening and Assessment.....	37
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))	38
10. District Certification.....	40
10.1 Certification.....	40

1. Administration

1.1 Administrative Structure

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

See attached Employment Org Chart 2024.

- 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 Cattaraugus County Department of Social Services has one (1) office located at One Leo Moss Drive, Olean, NY that provides WTW services to applicants and recipients of benefits under TANF, Safety Net, 200%, and SNAP Employment and Training Program. In addition, Cattaraugus County Department of Social Services is part of the consortium that operates the One Stop Career Center, along with the Workforce Investment Board. The One Stop Career Center offers a variety of educational and training services along with several activities that support the local district's Welfare to Work efforts.

The Employment Unit is comprised of:

- 1 Chief Examiner
- 1 Sr. Examiner
- 4 Employment Specialists (One Stop)
- 2 Examiners (One Stop)
- 1 CASAC Worker
- 1 Clerical Support Staff (One Stop)
- 1 Senior Mobile Work Crew Supervisor
- 2 Mobile Work Crew Supervisors

Together, they provide the following employment services which include, but not limited to, employability determinations, orientations, assessments, employment planning, assignment to work activities, monitoring of participation, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, provision of supportive services, and employment placement and retention services.

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
Greater Olean Chamber of Commerce	\$55,000	FFFS	FA TANF 200%	On-the-Job training program - Job development
Drug & Alcohol CASAC Worker	\$67,579	FFFS Local	FA SNA Family	Case management of Temporary Assistance recipients who are in drug/alcohol treatment

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

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

Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
ACCORD	FFFS Others: Daycare	FA SNA Family	Childcare resources, referral, and approval of daycare providers
ACCESS-VR (Adult Career & Continuing Ed Services - Voc Rehab)	FFFS Local	FA SNA Family SNA Individual TANF 200%	Access/evaluate individuals with disabilities; provide training assistance, education, rehabilitation, and career development; make referrals
CORE - The Learning Center (Literacy West)	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP TANF 200%	Adult literacy, English as a Second Language, HSE, work readiness
STRAWW - Southern Tier Recovery Activities Without Walls	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP TANF 200%	Offers supportive services to individuals 18 years and older with a diagnosed mental illness or disability in recovery. This is a community-based program that assists with personal goal setting, utilizing the community to develop volunteer, educational, and employment opportunities.
Directions in Independent Living	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP TANF 200%	Supportive services for individuals with disabilities, SSI application process assistance.
WIOA / One Stop	FFFS Others: WIOA	FA SNA Family SNA Individual TANF 200%	Employment and training opportunities, job referrals, job placements, workshops, and various other activities
Department of Labor	FFFS Local	FA SNA Family SNA Individual TANF 200%	Employment referrals and business services
C-A BOCES	FFFS Others: WIOA	FA SNA Family SNA Individual	Vocational Education Training

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Jamestown Community College	FFFS Others: WIOA	FA SNA Family SNA Individual TANF 200%	Vocational Education Training
Early Head Start - (Delevan Center, Olean Center, Salamanca Center)	FFFS	FA SNA Family	Enrolls families who are pregnant or with a child up to 3 years old. The type of services the program provides may include comprehensive health/nutrition care for pregnant individuals, infants/toddlers, and their families; weekly 90-minute home visits with a Family Development Specialist; opportunities for parents to learn more about their child's development and learn to plan parent/child activities to enhance their child's growth.
Healthy Families NY	FFFS	FA SNA Family	Enrolls families who are pregnant or with a child less than 3 months old. The Healthy Families New York home visiting program matches parents with knowledgeable and caring workers who provide information and support during pregnancy and early childhood. Services include helping families access community resources and services, educating families.

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:

An annual review of district held contracts/agreements are conducted. In addition, a monthly review of provider invoices is completed to ensure compliance with the terms of the contract.

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

Yes or No:	Services Provided:
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:
Yes	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
N/A	Other (described here):

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

Both LDSS staff and some of our partners are located at the One Stop Career Center. This allows for greater collaboration and communication to better serve our clients. We use a customer focused referral system to assist job seekers in accessing One Stop resources. The Employment Specialist advises individuals of the services available through the One Stop Career Center. Once it is determined that a partner would be a helpful resource for a client the worker will either walk over, call, email, or interoffice a referral to that partner. This includes collaboration/referrals to:

- CORE (literacy, HSE, and English as a second language services, workforce development, education & training).
- Directions in Independent Living (supportive services for individuals with disabilities, SSI application process assistance), client is advised to contact this agency directly, no referral used.
- Department of Labor (employment referrals, business services)
- WIOA (employment/training opportunities, job referrals/placements, workshops and other activities)
- Greater Olean Area Chamber of Commerce (On the Job Training programs, job development)

Information may only be shared by the Vocational Rehabilitation partners with a signed written release from the customer. The time limited release form will specify the information that can be released and to whom the information can be released. Personally identifiable information obtained from customers of specific programs during outreach, intake, system orientation, initial assessment, referral to partner programs, referral to supportive services, or otherwise is confidential and will not be released, disclosed, or re-disclosed without obtaining the proper program specific release. Programs for which program specific releases may be required to ensure customer confidentiality includes but are not limited to TANF, NYSDOL programs, and Vocational Rehabilitation programs.

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

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

District Orientation Procedures

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: Each individual is also provided with information on participants' rights and responsibilities and domestic violence counseling information/availability.

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

Orientation is conducted on an individual basis for applicants and recipients.

During the eligibility interview with the TA Examiner the household is advised of the following:

- SNAP ABAWD requirements
- Their responsibility in establishing paternity and enforcing child support obligations.
- Applicable time limits on public assistance and other pertinent information regarding eligibility requirements.
- Domestic Violence counseling information/availability
- How to contest their employment status and requirements to document work limitations or inability to work
- Reporting requirements if client becomes employed

During the Employment Assessment the Employment Specialist advises the client of the following:

- Supportive services available through the social services district
- **The voluntary TANF 200% application is discussed/offered. If the client chooses to complete, the Specialist would take the client to the TANF 200% Examiner to complete that application process.**
- Child care available for those whose TA is terminated
- Child care assistance for those assigned to work activities
- Education, employment and training opportunities, including partnerships with organizations/programs that may be able to assist the client reach self-sufficiency
- Job Search requirements for employable individuals
- Work activities available through the social services district
- Transitional benefits available if TA closes due to employment
- Responsibilities associated with repayment of student financial aid
- Home Visiting agency information

Within 90-days the client, if non-exempt, is notified in writing regarding assigned work activities.

2.2 Temporary Assistance (TA) Employment Assessment

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

District Assessment Procedures

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

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

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

Employment assessments for all exempt (including Code 63) and non-exempt adults, aged 18 and older residing in households with dependent children, are completed no later than 90 days from when the individual is determined eligible for public assistance. Employment assessments will be completed for all non-exempt adults in households without dependent children no later than a year following the recipient's date of application for Safety Net Assistance.

Employment code 63 (substance abuse - exempt) & 64 (substance abuse-non-exempt) individuals living outside the district, that are the fiscal responsibility of Cattaraugus County, will have an employment assessment completed by phone.

The following explained/reviewed at the assessment:

- Work rule requirements
- Non-compliance consequences
- Job search
- Request medical information, if appropriate
- Childcare resources
- Barriers, strengths, short-term and long-term goals.
- Non-exempt individuals will be assigned to work activities such as, work experience, job search, vocational & educational training, basic educational programs if the individual doesn't have a high school diploma or HSED, job skills training related to employment, On-the-Job training program or a combination of activities. The Employment Specialists will continuously monitor such activities and adjust those activities based on the individual's progress.

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

Cattaraugus County Department of Social Services Employment Specialist.

- 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)):

Graduation from high school or possession of a high school equivalency diploma and either:
 A) Possession of an Associate Degree in Social Science, Human Services or Resources and one (1) year of work experience involving substantial communication with adults involving persuasion, negotiation, explaining, or counseling. This experience must have involved the exercise of judgement in dealing with or responding to another person. (Typical jobs involving this experience may include customer service representatives, people

providing personal services, people providing social services, interviewers, counselors, and similar jobs involving periodic confrontation with a client, customer, member of the public, etc.);

OR

B) Three (3) years of experience as described in A) above.

NOTE: Your degree must have been awarded by a college or university accredited by a regional, national, or specialized agency recognized as an accrediting agency by the U.S. Department of Education/U.S. Secretary of Education. If your degree was awarded by an educational institution outside the United States and its territories, you must provide independent verification of equivalency. A list of acceptable companies who provide this service can be found on the New York State Civil Service website. You must pay the required evaluation fee.

SPECIAL REQUIREMENTS:

Possess and maintain a valid license to operate motor vehicles in New York State.

Availability of a privately owned motor vehicle for reimbursable business-related travel.

Full job descriptions and qualifications can be provided upon request.

- 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?

No

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

Exempt and non-exempt Individuals with dependent children have their assessment updated at least annually and when the individual moves from exempt to non-exempt status. Non-exempt Individuals without dependent children have their assessment updated at least annually and when the individual moves from exempt to non-exempt 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 WTCMS.
No	The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTCMS.
No	The district develops individual employment plans using a local equivalent tool. If applicable, the local equivalent contains the following additional elements beyond what is required:

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

District Employment Plan Development

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

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

Individual employment plans are completed during the assessment process. The client signs the plan and is given a copy if they are present. A copy of the plan is mailed to the client if they are not present. A copy of the employment plan should be scanned in I/EDR.

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

The employment plan is created at initial assessment and updated at reassessment and when the clients non-exempt/exempt status changes. Update is also completed upon referral to a new work activity assignment. A copy of each employment plan should be given to the individual and scanned in I/EDR.

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:

Compliance with appropriate educational programs assigned and included in the individuals Employment/Self-sufficiency plan.

Treatment/rehabilitation programs, as listed above, also include participation in substance abuse or mental health treatment.

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

The district utilizes Language Line to provide interpretation services for non-English speaking clients who are applying for assistance or who are assigned to activities. Interpreter services posters are hanging in the client waiting area. All district workers have been provided the Language Line quick reference guide for accessing interpreting services. Clients have the option to choose to use a relative or friend rather than Language Line, if "A Waiver of Right to Free Oral Interpretation Services" form is signed and kept in the case record. This is in accordance with direction in 06-ADM-05 and 17-INF-14.

The educational institutions in our district have also been valuable resources when needed and they have been very helpful in accepting referral into their ESL classes.

3.3 Strategies/Procedures for Increasing Program Attendance

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

If an individual is assigned to work activities and fails to participate, including absences with good cause, the Employment Specialist will attempt to reach the individual by phone first, and follow up with a letter to discuss the issue. The Specialist will attempt to solicit the circumstances behind the non-compliance and attempt to assist the individual to resolve the problem that occurred that prevented the individual from complying. Childcare and transportation issues are common causes. The specialist will explore supportive services that may be available to resolve the situation.

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:
No	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
Yes	<p>Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Sanctioned individuals on an active TA case will be scheduled for reassessment every 90 days.</p> <p>Sanctioned individuals are encouraged to utilize resources at the One Stop Career Center that are available to the universal population. Individuals are encouraged to look for work, meet with Department of Labor, and attend various workshops that are available to assist individuals to obtain and retain employment. Employment Specialist will make contact with this population by sending a letter to the sanctioned individual. The Specialist may suggest outside providers that could assist while the sanction is in place and make sure that the individual understands the basis for the sanction. The Employment Specialist will attempt to engage the individual to assist with compliance after the durational portion of the sanction has been served.</p>

3.5 Strategies for Reducing the Need for TA

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

The district uses diversion strategies as follows; The Employment Examiner will meet with any/all individuals requesting "emergency" assistance or a diversion payment to enable them to maintain or obtain pending employment. Individuals are required to complete an application, provide necessary documentation to determine the household's eligibility and provide verification of the employment related issue. The individual must also provide verification of employment, verify available resources, and attest to the necessity of such expense. While the ultimate goal is to divert individuals from needing ongoing assistance, the worker will review and document whether there is a reasonable chance that the one-time short term payment will enable the applicant to maintain self-sufficiency and avoid the need for on-going assistance.

4. Work Activities

4.1 Allowable Work Activities

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

Allowable Work Activities by Case Type

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

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

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

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

4.2 Job Development

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

Yes

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

How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	<p>District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: The district utilizes WIOA Employment Specialists, located at the One Stop Career Center, the numerous resources and partner agencies at the One Stop Career Center, and a contracted agency to conduct and implement job development activities.</p> <p>Realizing that job development and OJT's are critical in moving individuals into employment, the LDSS contracts with the Greater Olean Chamber of Commerce and their job developer. District staff and the Chamber are in daily contact with local employers. The Chamber has been serving the Greater Olean Area since 1906 and currently has over 1000 business members.</p> <p>The LDSS also has a working relationship with Cattaraugus County Economic Development and Business Development Corporation.</p> <p>The on-going relationship between the Department of Social Services, the Chamber of Commerce, the One Stop Career Center, and other community agencies combine to make job development activities successful.</p>
Yes	<p>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.: Greater Olean Chamber of Commerce-see above</p>

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

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

The education programs offering HSE, ABE, and English language instruction that accept referrals from our agency must be recognized by the NYS Education Department.

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

The District, as previously stated, is the joint operator of the Cattaraugus One Stop Career Center. Individuals are referred to the One Stop Career Center for assessment of appropriate Vocational Educational programs and Job Skills training. The One Stop Center offers a variety of workshops that address the necessary job skills employers are looking for when hiring. Individuals are also referred to ACCESS-VR if appropriate.

The education programs offering Vocational Education & JST that accept referrals from our agency must be recognized by the NYS Education Department.

AND/OR

- a) Providers must be licensed by the State Department of Education or sponsored by a governmental agency such as; WIOA or Department of Labor
- b) Providers must submit their course curriculum to LDSS for approval and provide course schedules
- c) Providers must develop courses where local demand occupations and job market conditions indicate the likelihood of placement in unsubsidized employment following completions of training/educations courses
- d) Providers must have demonstrated effectiveness in the provision of the proposed training/education courses
- e) Providers must agree to provide attendance and progress reports as required by the local district
- f) Providers must provide the name and phone number of their contact person for consultation and agree to provide final grades in a timely manner.

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

The Employment Specialist, at the assessment, inquire as to the educational status of the applicant. The individual is informed that if they do not have a high school diploma or HSE diploma, they may be assigned to participate in an educational activity to improve basic skills and/or to obtain a HSE diploma. The individual will be referred to a partnering agency that offers HSE and/or literacy classes.

- d. Described below are the district's process and policy, including the guidelines workers follow, when determining whether participation in educational activities is approved for individuals who have not attained a high school diploma who are interested in participating in an educational activity. Include in this section instances when the district would deny participation in educational activities.

Individuals may be denied participation in educational activities if their TABE scores are well below the entrance level of the courses they are requesting. They may also be denied if they are considering a degree program that requires a license without first clearing up a criminal background. Individuals may also be denied if their case history has shown that they have not completed previous courses that they have enrolled in. All individuals are reviewed on a case by case basis.

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

The Employment Unit has established a system of prerequisites in order to determine if the participant is likely to follow through and successfully complete the job skills or vocational activities. The participant may be required to upgrade basic literacy scores, attend a HSE diploma program, attend tutorial upgrades, and/or participate in work experience prior to considering job skills or vocational training activities.

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

- a) Providers must be licensed by the State Department of Education or sponsored by a governmental agency such as; WIOA or Department of Labor

- b) Providers must submit their course curriculum to LDSS for approval and provide course schedules

- c) Providers must develop courses where local demand occupations and job market conditions indicate the likelihood of placement in unsubsidized employment following completions of training/educations courses

- d) Providers must have demonstrated effectiveness in the provision of the proposed training/education courses

- e) Providers must agree to provide attendance and progress reports as required by the local district

f) Providers must provide the name and phone number of their contact person for consultation and agree to provide final grades in a timely manner

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

Upon request to participate in a training/education program, the Employment Specialist will meet with the client to review their request, advise the individual on approved training providers, assess whether curriculum/program fits with their employment plan, evaluate short- and long-term goals, the length of training, and whether there is reasonable expectation that successful completion of the program will result in employment. If approved, the Employment Specialist will advise the individual that the training/education program will be added to their employment plan. The Employment Specialist will advise the participant of their responsibilities, such as providing the name, address, and telephone number of the provider, the contact person, the class schedule, attendance reports, and progress notes. The Specialist will also advise the individual of the supportive services available to assist them throughout their training to ensure success.

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

Recipients are notified in writing that they have been assigned to a specific work activity or that they have been approved for training. The notification includes the site, address, and contact person. The notification will also include the date and time to report, the mandated number of hours required to meet compliance, and the LDSS contact person.

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

School attendance is monitored at application and recertification by the Temporary Assistance Unit for teens 16-18 years of age. Enrollment and attendance are verified by the teen's school district with verification maintained in the Temporary Assistance case record.

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

The Employment Specialist reviews with the client any/all barriers pertaining to health related limitations and/or necessary accommodations. Recipients must give approval, through written consent on approved authorization forms, for the release of information from physicians and mental health providers. Determination of the ability to work is based on documentation provided by the above-mentioned professionals.

If an individual has limitations, the Employment Specialist will notify the work site supervisor by phone and in writing to assure accommodations can be met. The Employment Specialist has the discretion to request the individual be referred to the Agency's contracted physician if a second opinion is warranted.

4.4 Post-Secondary Education Approval and Enrollment Policies

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

The district will approve a two year post-secondary level of education.

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

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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

5. Work Requirements

5.1 Meeting TA Work Requirements

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

The Employment Specialist meets with the individual within 90 days of the eligibility determination date, unless code 63, of the TA eligibility determination date and completes

the assessment for all case types. At that time the individual is:

- Referred for TABE test, if appropriate and one isn't on file.
 - Advised if they do not have a high school diploma or equivalent, they may be assigned to participate in an educational activity to improve their basic skills and/or to obtain a high school equivalency diploma.
 - Informed of all work requirements and expectations.
 - A non-exempt individual is immediately placed on Job Search by the Employment Specialist (unless pended due to living situation as described in section d & e below). An additional appointment is scheduled to review the job search log with the individual.
 - Develop an "Individual Employment Plan".
 - Engagement in activities, other than work experience, begins immediately. Along with job search, an individual may be assigned to a variety of job readiness activities, such as HSED (high school equivalency diploma), resume preparation, career exploration, skills upgrade, workshops, or job club. This time period between case opening and work experience assignment is typically within 100 days.
- Non-exempt individuals, to the extent each is medically able, will be enrolled in 35 hours of activity/week, at minimum, the requisite number of hours of countable activity as defined under federal and state legislation.

Anyone who is employed less than 35 hours/week will be required to participate in additional activity to total 35 hours/week.

Those with children under the age of six may be required to participate in less than 35 hours/week, at minimum a sufficient number of hours to be countable.

The weekly standard of 35 hours is used. Individuals whose employability status changes from exempt to non-exempt are typically engaged in activities within 30 days of notification of status change.

Participation rate and engagement in activities, is monitored by time sheets submitted weekly by the work site supervisors and reviewed by the Employment Specialist.

Participation in "Core" and "Non-Core" activities is assigned by the Employment Specialist based on the needs and concerns addressed in the individual's employment plan.

Activity hours may be determined on a case-by-case basis as appropriate due to work limitations or other case circumstances.

Employment code 63 individuals are tracked/monitored. Monthly reports are gathered from the treatment provider in order to enter the schedule into WTWCMS.

Management reports (available through COGNOS) are monitored on a monthly basis to ensure full engagement by adults in work or work preparation activities.

The agency also distributes a daily report of opening/reopening, and denial/closures to ensure that the Employment Specialists are aware of case status performed by the Temporary Assistance unit.

The process for individuals whose employment status changes from "exempt" to "nonexempt" is the same as above.

Exemptions are monitored on a regular basis and the individual is notified of any change in employment status.

- 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	173
Households without Dependent Children Average Monthly	468

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

In COGNOS, the Universal Case Listing report is used during the month to determine who will be in the denominator and to make sure that clients are assigned to countable activities. Other available COGNOS reports are also used.

Employment Specialists and the Sr. Examiner review the following additional COGNOS reports monthly and compare them with the Universal Case Listing and others to ensure full engagement.

- Employability Code Duration Report
- SN NON-MOE Detail Report
- ABAWD Tracking Report:
- SSI Tracking Report
- Time Limit Tracking Report
- Anticipated Future Action Report
- Participation and Engagement Status Report
- Adults with Budgeted Earned Income and Current Employment Schedule
- Expiring Waivers

- 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:

No

Applicant Job Search

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	N/A	N/A	N/A

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
SNA Individuals	N/A	N/A	N/A

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

Yes

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	3	5	<p>Recipients are expected to conduct on-going job search activities (in person and/or on-line) for up to 12 weeks with the anticipated goal of finding employment that will ultimately lead to self-sufficiency. After 12 weeks, individuals may be re-evaluated and assigned to other appropriate activities in addition to continuing job search.</p> <p>Individuals are generally required to report job search outcomes weekly for four weeks then one week off; repeated until employment is obtained, case closing, or the individual is determined no longer employable.</p> <p>All non-exempt recipients are required to conduct an on-going job search. Required job search hours and required employer contacts per week will vary, depending on whether or not the client is enrolled in other employment activities.</p> <p>When job search is combined with another employment activity, the client may be required to make additional contacts weekly, with the minimum weekly hours determined by the employment case manager. Recipients are required to report weekly with their completed job search logs which will be reviewed by DSS staff.</p> <p>Job searching will be pended for recipients who are currently in a hotel/motel, homeless or DV shelter. This will allow these recipients to focus on obtaining affordable permanent housing. Once permanent housing has been found the client will be scheduled to meet with the Employment Specialist to start the job search process described above.</p>
SNA Individuals	3	5	<p>Recipients are expected to conduct on-going job search activities (in person and/or on-line) for up to 12 weeks with the anticipated goal of finding employment that will ultimately lead to self-sufficiency. After 12 weeks, individuals may be re-evaluated and assigned to other appropriate activities in addition to continuing job search.</p> <p>Individuals are generally required to report job search outcomes weekly for four weeks then one week off; repeated</p>

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			<p>until employment is obtained, case closing, or the individual is determined no longer employable.</p> <p>All non-exempt recipients are required to conduct an on-going job search. Required job search hours and required employer contacts per week will vary, depending on whether or not the client is enrolled in other employment activities. When job search is combined with another employment activity, the client may be required to make additional contacts weekly, with the minimum weekly hours determined by the employment case manager. Recipients are required to report weekly with their completed job search logs which will be reviewed by DSS staff.</p> <p>Job searching will be pended for recipients who are currently in a hotel/motel, homeless or DV shelter. This will allow these recipients to focus on obtaining affordable permanent housing. Once permanent housing has been found the client will be scheduled to meet with the Employment Specialist to start the job search process described above.</p>

- 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:

Individuals are assessed on a case-by-case basis to determine if appropriate to approve self-employment as an approved activity. Clients that meet the hour requirement, that do not meet the minimum wage requirement will be assessed in three (3) months to determine if this is an acceptable path to self-sufficiency or if supplemental, countable work activities are needed. Additional time may be permitted as determined by the district based on case circumstances.

Those clients who are childcare providers will be allowed three (3) months to obtain certification, which allows for higher wages once obtained.

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&T, and ABAWD)</i> and the LDSS-5193A <i>Important Information about SNAP Work Rules (General and Mandatory E&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.

Districts retains copies of all LDSS-5193A notices provided to the household in the case record. District also documents in the case record through case notes/comments, in a timely manner, when the comprehensive oral explanations pertaining to SNAP work requirements occur at certification, recertification, and at any time an exempt household member or new household member becomes subject to work requirements. There has been a field added to the intake & recert comment sheet.

- 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):

The district does not require NTA-SNAP applicants/recipients to participate in mandatory work activities. The district does offer job search programs upon request from applicant/recipient.

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

N/A

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

All NTA-SNAP applications have an insert that advises individuals that the agency will provide assistance at the One Stop Career Center with job search.

5.4 Advising Households of Employment and Training Services

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

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

Who the District Provides Employment and Training Services Information to

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

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

How the District Provides Employment and Training Services Information

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
No	Materials and information provided on a website. Described here is how individuals are made aware the information is available on the website:
No	Material and information provided via email.

5.5 Provider Determinations

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

The Employment Specialist conducts an assessment or reassessment with individuals to determine an appropriate activity, considering the suitability of the individual. Individuals are referred to an appropriate activity component based on the outcome of the assessment. Additionally, all participants receive case management services. If/when a provider determines that an individual is not a good fit for the current placement, the provider notifies the agency either verbally or in writing within 10 days. Cattaraugus County DSS will in turn notify the individual in writing within 10 calendar days of receiving the notification. The individuals case file will be notated to reflect when the client was informed. The DSS Employment Specialist will work with the client to determine another placement.

Should a participant claim unfair or discriminatory treatment our agency would review the assignment, address the issue with the provider, and if necessary, reassign the participant to another activity or provider. For non-contracted providers, if the client alleges discriminatory treatment, we follow a similar investigative process.

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

Providers are advised they have the flexibility to establish criteria used to determine if the individual is a good fit for the program based on their criteria/skills/qualifications they have established. They are advised that notification must be provided to the district within 10 days of their determination date. The district and provider communicate via email, interoffice memos, and in-person communications.

- 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.

Full review of referrals that a provider rejected are completed. The employment specialists, supervisor, and provider discuss the decision to ensure it was fair.

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 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 WTCMS, 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.

4

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

6.2 Use of Outside Providers/Vendors

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

No

- b. If Yes, does the district's provider/vendor documentation collection, data entry and management of 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:

- Clothing - not to exceed \$150.00* in a 12-month period, unless approved by the Chief Examiner (or designee)
- Transportation reimbursement at 30 cents per mile for privately owned vehicles
- Bus fare, bus passes, gas voucher and/or gas cards
- Automobile repair up to \$2000.00* in a 12-month period (contingent on 3 estimates which include a statement that the vehicle is worth repairing)
- Car insurance up to \$1,000.00* per year
- Licensing, including motor vehicle registration
- Drivers Education
- Work-related expenses
- Case management and retention services
- Any other supportive services as approved by the Chief Examiner (or designee)

*Expenditures above the standard allowance require the approval of the Chief Examiner (or designee).

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

Transportation Services Provided to Clients

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
Yes	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
Yes	Other mileage rate (the methodology used to establish reimbursement rate is described here): 30 cents/mile

- 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:

Along with mileage reimbursement and gas cards, the Specialist will make every attempt to find a site within the two (2) mile maximum distance. If necessary, the Specialist will place the individual on the Mobile Work Crew van which provides transportation to work sites and also supervised/structured work activities.

Exceptions would be allowed for the following:

- individuals with documented physical limitations.
- individuals that would be walking with young children
- Cold weather period (November - April)

- 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:

- Car repairs and/or car insurance
- Tools and equipment
- Necessary clothing
- Protective equipment/clothing
- Any other service approved by the Chief Supervisor (or designee)

7.2 Post-Employment/Transitional Supportive Services

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

The Employment Specialist will work directly with individuals who are employed and assist them with these services that will help them maintain employment. The agency finds job retention to be a critical component of the Employment Unit. The district informs the individual that once employment is found, they will be contacted periodically throughout their first 90 days of employment by the Employment Unit.

The Employment Examiner will contact the client by phone 30 days after case closing regarding retention/issues with employment. If they are unable to connect by phone, a letter will be mailed with the contact information for the Employment Examiner and an explanation of why we are attempting to reach them. Any identified problems that the individual may be experiencing that could hinder their job retention will be discussed and available supportive services discussed.

The client is made aware that they can contact their Employment Specialist at any time to seek assistance with problems they may be experiencing. The Specialist may complete a referral for supportive services, job coaching, financial literacy, etc. to assist the individual with maintaining their employment.

- 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:
 - Car repair and insurance to maintain employment
 - Clothing (not to exceed \$150.00 unless approved by the Chief Supervisor (or designee))
 - Any other reasonable request that would result in the continuation of employment and self-sufficiency

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.):
 - Gas cards/voucher
 - Bus passes
 - Vocational Education/training when available depending on training
 - On the Job Training Programs
 - Childcare assistance

8. Conciliation, Sanction and Dispute Resolution Procedures

8.1 Conciliation

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

How the District Conducts Conciliation for TA Applicants and Recipients

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

The districts process for conduction TA conciliations is described below:

The Employment Specialists are assigned to handle the conciliation process and any noncompliance. Upon receipt of a negative incident, the Specialist follows the procedures and requirements as outlined in 18 NYCRR Sections 385.11 and 385.12.

A conciliation notice is mailed for each negative incident. Individuals are informed of the non-compliance issue, that they have a right to provide reasons for such failure or refusal to participate, and that they have 10 days to request a conciliation. The individual is informed of the potential consequences if no response is received.

If the employment specialist determines that the individual's refusal or failure to comply was willful and without good cause, the agency will issue a notice of denial or a 10-day notice of intent to discontinue or reduce public assistance: appropriate sanction imposed.

If it is determined that the individual was not willful or was with good cause, the procedure will terminate: no negative action will be taken.

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

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

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

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

How the District Conducts Conciliation for SNAP Applicants and Recipients

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

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

The Employment Specialists are assigned to handle the conciliation process and any noncompliance. Upon receipt of a negative incident, the Specialist follows the procedures and requirements as outlined in 18 NYCRR Sections 385.11 and 385.12.

A conciliation notice is mailed for each negative incident. Individuals are informed of the

non-compliance issue, that they have a right to provide reasons for such failure or refusal to participate, and that they have 10 days to request a conciliation. The individual is informed of the potential consequences if no response is received.

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

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

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

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

Clients will have ten (10) days from the date of the conciliation notice to either document an exemption from participation or submit a completed job search log with 5 valid job contacts to demonstrate compliance with work requirements to avoid a SNAP sanction. If the individual does not respond nor choose to come into compliance, the individual will be sanctioned and the SNAP grant reduced or case closed accordingly.

8.2 Sanction

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

Individuals are informed at the time of the sanction as to when and how they can "end their sanction" and become compliant.

ABLE TO PARTICIPATE IN WORK ACTIVITIES (non-exempt)

- **CLOSED CASE:** An individual whose TA case has closed must serve the durational period, if any, reapply and must comply with all TA program requirements during the pending period to establish TA eligibility.

- **ACTIVE CASE:** TA benefits for recipients are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period), after demonstrating compliance by meeting with the employment unit for

- A reassessment, creating an updated Employment Plan, being assigned to an appropriate activity, and 10 calendar days of participation from the reassessment date, benefits will be restored.

UNABLE TO PARTICIPATE IN WORK ACTIVITIES (exempt)

- **CLOSED CASE:** An individual whose TA case has closed must serve the durational period, if any, reapply and must comply with all TA program requirements during the pending period to establish TA eligibility.

- ACTIVE CASE: TA benefits must be restored retroactive to the date the individual claimed to be unable to participate (but no earlier than the expiration of the minimum duration period), provided the individual has cooperated with efforts to document the exemption.
- If the timeframes required to document an exemption from work activities takes longer than the timeframe required for an able-bodied individual to demonstrate compliance, the district must initiate benefit restoration even if the employability determination is not complete, so that the timeframe required to initiate grant restoration is no longer than would be required for an able-bodied individual.

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

Individuals are informed at the time of the sanction as to when and how they can "end their sanction" and become compliant. An individual whose case has closed must serve the durational period, if any, reapply and must comply with all program requirements to establish SNAP eligibility, including applicant employment requirements.

Individuals mandated to SNAP E&T requirements (TA/SNAP participants) may reestablish SNAP eligibility during the durational sanction period if the individual documents an exemption from SNAP work requirements.

ABLE TO PARTICIPATE IN WORK ACTIVITIES (non-exempt)

- CLOSED CASE: A non-exempt individual whose SNAP case has closed must serve the durational period, if any, reapply and must comply all other SNAP eligibility requirements.
- ACTIVE CASE: SNAP benefits for TA/SNAP or SNAP Mix recipients non-exempt from TA requirements, will be restored the month after the individual has complied, but not before the end of the durational sanction period after demonstrating compliance by meeting with the employment unit for a reassessment, creating an updated Employment Plan, being assigned to an appropriate activity, and 10 calendar days of participation from the reassessment date.

8.3 Dispute Resolution

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

Grievance Mediation

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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

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

Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual's disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
No	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	<p>Other process:</p> <p>The district relies primarily on the individual's physician report to provide a complete diagnosis of a person's employability status. If the information is incomplete or the doctor is unable to document the status, the Agency can refer the individual for an employment related physical or a second opinion with a physician as deemed necessary.</p> <p>The district will review the medical documentation provided by the contracted physician or the individual's physician. If the documentation is incomplete a more thorough diagnosis is requested, follow up will be made with the PCP or client referred for a second opinion. Once a final determination is made the individual is notified in writing using the LDSS-4005 (exempt notification) or the LDSS-4005 (a) (non-exempt notification).</p>

- 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:

Once a final determination is made the individual is notified in writing using the LDSS-4005 (exempt notification) or the LDSS-4005 (a) (non-exempt notification).

- c. Described below is how the district notifies an individual of their exempt or non-exempt determination (reply yes or not to the options as they apply):

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

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

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

Process for Reviewing Medical Documentation

Yes or No:	District’s process for reviewing medical documentation
Yes	District directs the contracted physician or individual’s physician to determine status.
No	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
N/A	Other process:

9.2 Mental Health Screening and Assessment

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

No

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

N/A

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

Screening Tools the District Uses

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

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

N/A

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

N/A

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

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

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

If an individual claims to have a disability or medical limitation, the Employment worker will obtain the necessary consent forms for all physicians the individual is seeking treatment from.

Medical forms are prepared for all physicians to complete. The physician(s) completes the appropriate sections and returns forms to the Employment Specialist.

The Specialist relies on the physician's evaluation, diagnosis, and recommendations in regard to appropriate work activities and whether the individual has limitations or needs special accommodations.

The physician(s) is also asked on this form if rehabilitation services are being considered. The Employment Specialist will follow up on rehabilitation services if they were recommended by the client's physician(s).

The Employment Specialist will review the individual's disability status at least quarterly unless the initial medical documentation states the illness/incapacity to be of a longer duration. Individuals with a documented illness/incapacity of a longer duration will be reassessed at least annually.

The Employment Specialist may also refer the individual for a "second opinion" if further clarification is needed.

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

The physician(s) will make a recommendation as to the abilities of the individual to participate in employment and/or work activities.

If the medical verification indicates a treatment plan is necessary, the Employment Specialist will:

- refer the individual to the appropriate provider
- make sure the employment code is accurate
- document the findings in WTWCMS
- and follow up with the individual to make sure they are following through with treatment plan.

- 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.

The Employment Specialist reviews the individual's status shortly before the expiration of the medical exemption.

The worker will review health issues, current treatment plans, and upcoming appointments.

If medical documentation shows that an individual may return to work, the Employment Specialist will review any/all limitations.

If an individual was referred for rehabilitation per their physician, the Specialist will secure necessary forms to document and verify attendance and progress.

10. District Certification

10.1 Certification

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

1/24/2024
Erin Whitcomb
Commissioner