

# **Delaware County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

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

Please see attached Organizational Chart.

- 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.

Since we are a generic County, all Program Specialists are responsible for employment functions. The Delaware County Department of Social Services Temporary Assistance employees are responsible to provide the Welfare-To-Work services. These Department employees are responsible for: orientation/job search, assessment, employability determinations, employability 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, conciliation, sanction, dispute resolution referrals for child care and coordination of supportive services provided to individuals to enable them to participate in WTW activities including employment and retention services. The Principal Program Specialist coordinates and consults with other partner units/agencies including: the Child Support Coordinator, the Delaware County Attorney's Office, the Resource Coordinator, Fraud Unit, the Director of Services, Delaware Opportunities, the Office of Temporary and Disability Assistance, the Office of Employment and Training, BOCES, Afton Consortium of Schools, and SUNY Delhi. Delaware Opportunities (a Not-for-Profit Community Service Agency) is responsible for the following: 1) Develop work sites and secure work experience at not-for-profit organizations and/or municipalities. In addition, provide two work experience crew supervisors and operate two work experience crews. 2) Assuring the availability of child care services and providing payment toward such expenses to eligible clients. 3) Post employment services 4) Job Development/Job Retention. The CDO Workforce assists with job placement and participates in job readiness training, and case management. The OTDA Jobs Program Specialist assists with employment referrals, job placement orientation/job search and job readiness training.

## 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
Delaware Opportunities	\$256,586	FFFS SNAP E & T Local	FA SNA Family SNA Individual SNAP TANF 200%	Work Experience Program, Job Counseling and Job Coaching

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

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

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

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Oneonta Community Education Center	Others: State Education	FA SNA Family SNA Individual SNAP TANF 200%	Adult Basic Education, High School Equivalency, and (ESL) English as a Second Language
Afton Consortium of Schools	Others: State Education	FA SNA Family SNA Individual SNAP TANF 200%	Adult Basic Education and High School Equivalency
Mothers & Babies Perinatal Network	Others: Funding Source Unknown	FA SNAP TANF 200%	Pregnancy & Parenting Support and Education; Assist parents in finding health care services, community resources, and other services as needed.
Public Health Department	Others: Funding Source Unknown	FA SNAP TANF 200%	Nurse visits for pregnant or newly parenting women; Education/Information on Pregnancy, Nutrition, Labor & Delivery, Family Planning, Infant Care, Breastfeeding, and Parenting.
Healthy Families of Delaware Opportunities	Others: Funding Source Unknown	FA SNAP TANF 200%	Enroll expectant parents or those with an infant under 3 months old. Provide information on Prenatal Care, Parenting, Infant/Child Development, Bonding, Milestones, and Connecting to Community Resources.
SUNY Delhi	Others: State Education	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Training Post-Secondary Education (Associate's, Bachelor's and Master's Program)
SUNY Oneonta	Others: State Education	FA SNA Family SNA Individual SNAP TANF 200%	Post Secondary Education (Bachelor's & Master's Programs)
BOCES	Others: State Education	FA SNA Family SNA Individual SNAP TANF 200%	High School Equivalency Program Vocational Training

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Delaware County Literacy Council - Literacy Volunteers	Others: State Education	FA SNA Family SNA Individual SNAP TANF 200%	Volunteer tutors work one on one with an adult student, helping him or her to learn basic reading and writing or to speak English as a second language. Volunteer tutors provide instruction and encouragement that help adult students widen their horizons, exercise more control over their lives, and enhance their workplace skills.

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:

Contracts are reviewed and monitored by the Commissioner. The Commissioner meets with Directors to ensure funds are utilized appropriately for employment functions. The Principal Program Specialist confers with Delaware Opportunities to discuss Work Experience Program, participant progress and to address issues as needed.

### 1.3 OTDA Jobs Staff Agreement

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

**Services Provided by Jobs Staff**

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

**Jobs Staff Target Groups**

<b>Yes or No:</b>	<b>Target Groups:</b>
Yes	Applicants

<b>Yes or No:</b>	<b>Target Groups:</b>
Yes	FA & SNA with children
Yes	SNA without children
Yes	SNAP
Yes	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).

|  
OTDA Jobs Program Specialist meets weekly with applicants/recipients during Orientation/Job Search Class and provides Job Referrals. In order to assist a greater number of individuals seeking employment services, the Jobs Program Specialist works out of two locations: Sidney (WIOA Satellite Office) and Delhi (DSS).

## **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**

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

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

Applications for Temporary Assistance and SNAP are located at the Career Center in Delhi and Sidney. Department of Social Services provides ongoing referrals to clients during Application and Recertification to the Career Centers by means of an Employment Services Turnaround Document. Career Center staff will contact a Principal Program Specialist if they have an individual that needs District Services. Clients are provided with an overview of the CDO Workforce Services during the Orientation/Job Search Class and Program Specialists will provide each applicant/recipient with information on resources available through CDO Workforce. CDO Workforce provides information regarding their services at our (WIP) Work

in Progress Program. Department of Social Services apprises CDO Workforce of the services available at our District to assist clients in attaining or maintaining employment.

## 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	<p>In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:</p> <p>Delaware County Department of Social Services combines Orientation and Job Search Class. In conjunction with our Employment Services staff and OTDA Jobs Program Specialist, we provide the following information: Diversion Payments, Temporary Assistance Budgeting, Subsidized Childcare and Transitional Benefits; alternatives to Temporary Assistance, as well as other resources available through CDO Workforce, OTDA Jobs Program, and Delaware Opportunities.</p> <p>Applicants/Recipients are also apprised of Barriers to Employment and resources with potential solutions; sanction information, where to look for work, application completion, resume development, requirement to engage in work, attend school if a teen parent, explanation of rights and responsibilities of applicants and recipients and of the benefits and obligations of participation in employment activities, time limits, supportive services, vocational training options, availability of High School Equivalency, Adult Basic Education and English as a Second Language classes. Emphasis is placed on the temporary nature of assistance.</p>

- 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:

As a "generic county" our Temporary Assistance staff conducts the Orientation/Job Search Class. DSS Employment Services Unit conducts the Job Application completion and Interviewing Skills portion of the class. OTDA JOBS Programs Specialist provides Job Referrals and Resume Development. Applicant Orientation/Job Search is conducted in a group setting every Thursday from 9:00 to 1:00pm. Applicants are advised to attend one of the next two Orientation/Job Search groups following the Eligibility Employment Assessment Interview. On a case-by-case basis, we will conduct one on one Orientation/Job Search Information. At recertification, the Program Specialist assigned to the case would advise the recipient to attend one of the next two Orientation/Job Search groups following the Recertification Interview.

## 2.2 Temporary Assistance (TA) Employment Assessment

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

### District Assessment Procedures

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

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

At the interview for Temporary Assistance Benefits, the Program Specialists will conduct Employment Assessment. During the Eligibility Interview, any household with dependent children ages 16 and 17 and not in school are advised that the 16- and 17-year-old will be called in for an Assessment within 30 days. Applicant households with a 16- or 17-year-old will also be advised of the requirements to verify school attendance. Applicant/Recipient Assessments are reviewed to ascertain each client's strengths and potential barriers. Recipient Assessments are reevaluated at Recertification and updated on an as needed basis or when case or individual's circumstances change including participants' work status and activity assignment.

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

The District's Temporary Assistance Program Specialists conduct Assessments for applicant households with children and households without children. The Senior Program Specialists review completed assessment for new workers. If a Senior Program Specialist has any questions regarding the Assessments, a Principal Program Specialist would provide guidance and supervision.

- 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)):

Minimum Qualifications: Either: Graduation from High School or possession of a High School Equivalency Diploma and either:

a. One year of experience in a New York State Social Services Department in a position involving duties and training comparable to those required of a Social Services Program Specialist.

b. Two years' experience in examining, investigating, or evaluating claims for assistance, veterans or unemployment benefits, insurance, or a similar program operating under

established criteria for eligibility or:

c. Three years' experience in interviewing, collecting, and compiling data, account keeping, or related work or:

d. An equivalent combination of training and experience as defined by the limits of A, B, or Note: Study in a college, university, or business school may be substituted for the experience on a year for year basis. Study must have been conducted at 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 study was conducted at an educational institution outside the United States and its territories, the applicant must provide independent verification of equivalency.

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

Yes

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

Yes

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

Yes

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

Program Specialists update individual TA & TA/SNAP Employment Assessments every 6 months at Recertification.

### **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**

<b>Yes or No:</b>	<b>How the district develops employment plans</b>
No	The district enters employment plans directly into WTCMS.
Yes	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:

Program Specialists complete the Employment Plan with the client at the interview for Temporary Assistance. A copy of the Employment Plan is provided to client.

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

Our Program Specialists and Principal Program Specialists in conjunction with the client's and partner agencies routinely update plans on an as needed basis when case or individual circumstances change. A copy of the Employment Plan is provided to the client.

### 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:

N/A

### 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:

Our district employs Bi-lingual employees who are proficient in Spanish. Language Identification Signs are posted at Reception as well as available to workers to assist clients in identifying their primary language. In addition, we can utilize the Language Line services and an interpreter will be available to assist the applicant/recipient by means of a phone conference.

### 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:

During our Application/Orientation/Job Search Class, our District underline the importance of attendance in work activities. When individuals attend Work in Progress, the facilitator and employers stress the importance of attendance and its relevance to employment retention. When assigned to the Work Experience Program (Work Crew), the crew chiefs encourage attendance and assist with problem-solving skills to facilitate increased attendance in work activities. All agencies counsel clients on the importance of having alternative childcare and transportation arrangements in place. During Orientation/Job Search and Work in Progress, the Employment Services Facilitator discusses barriers to employment and potential solution. WIP participants partake in presentations focused on addressing barriers to employment and resources to potential solutions as well as supportive services necessary to address the barriers to employment.

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

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

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

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: Delaware County Department of Social Services' Temporary Assistance sanctioned individuals are limited in number. When a sanction has been processed, service providers involved with the person (Services, OTDA, Mental Health, Delaware Opportunities, etc.) are apprised to determine how we can facilitate to assist the individual to compliance. We also engage sanctioned clients during recertification to encourage compliance with work activities and participation.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Program Specialist set up appointments with the sanctioned participant to discuss compliance and reinstatement. At recertification, Program Specialists will discuss

<b>Yes or No:</b>	<b>Strategies and Procedures for Engaging Sanctioned TA Participants</b>
	the benefits of compliance to the work activities and potentially the increase of benefits once an individual is in compliance. Additionally, the Employment Services Unit will send out invitation letters to the Work in Progress Program to encourage participation in work activities to attain compliance.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Same as above.

### 3.5 Strategies for Reducing the Need for TA

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

The Department provides information regarding subsidized housing, subsidized daycare, income disregards, child support, earned income tax credits, WIC, and supportive services are discussed at Orientation/Job Search and at Recertification.

## 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

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

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

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

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

## 4.2 Job Development

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

Yes

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

### How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: District Program Specialists staff have the capability to contact employers to solicit jobs for applicants and participants.
Yes	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: Delaware Opportunities has two crew chiefs on staff that also perform job development/job retention for our recipients. They meet with our participants and contact employers on their behalf. The crew chiefs participate in the Work in Progress (job readiness training program) and provide transportation to job interviews.

## 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.

Based on the applicant/recipient reading scores, the individual would be assigned to participate in ABE/HSE/English language instruction. The providers of these services are limited to Afton Consortium of School, Oneonta Community Education Center, Delaware County Literacy Council (Literacy Volunteers) and BOCES. We have a long-standing

cooperative relationship with each of these education providers. We would assign the client to the class closest to their home. Delaware County DSS Program Specialist would discuss at assessment and recertification the availability of classes and provide phone number of appropriate provider.

- 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.

Our Vocational Education and Job Skills Training Programs are provided by SUNY Delhi and BOCES. They provide a range of training and have training resources to meet our needs. We have frequent contact with both and would inform clients of the vocational programs offered (both training providers participate in our Work In Progress Program). As we are aware of Job Skills programs, we refer our clients.

- 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.

As part of our assessment, we offer applicants information on the availability of educational activities in their area.

- 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.

We would discuss the educational opportunities for all individuals without a high school diploma or HSE and would approve as appropriate. It is unlikely that the Agency would deny participation in educational activities since we encourage/mandate attendance in ABE/HSE.

- 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.

Participants must meet the following requirements: Training must be for a specific skill or occupation relevant to the local labor market and must be sufficient to enhance the recipient's opportunity to secure unsubsidized employment. Training is approved if it can be determined that the individual's current skills are obsolete or the individual lacks sufficient skills to find gainful employment. At the interview for Temporary Assistance/SNAP, the Program Specialists discuss vocational, educational and job skills training opportunities as part of the Employment Assessment. In addition, The Department discusses at Orientation/ Job Search, the Vocational, Educational and Job Skills Training opportunities in Delaware County and the contact information for these. At recertification, the Program Specialists, again discuss the benefits of Vocational Education, and Job Skills Training to increase and maintain enrollments.

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

Progress reports are required. Outcomes will be reviewed on a semi-annual basis to be evaluated for contributions to job readiness and job placement of a participant. Approved training providers will prepare customers to qualify for local job opportunities.

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

Training approval is determined by an assessment of the client's current job skills and employment goals as they relate to the local labor market conditions. Each recipient, on request, will receive a list of approved training providers.

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

Clients are enrolled in training or assigned to work activities after completing an assessment with a Program Specialist. Each client is given a letter via WTCMS providing the following information: the enrollment date of the specific activity, the number of hours available per month, and the interview date, if appropriate. If work experience, the participant will be given an assignment letter via WTCMS that includes enrollment date, hours available, worksite and address of worksite, information regarding daycare and transportation is discussed at employment assessment.

- 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 policy for 16 through 18 year old students is the same as the local school district policy. Attendance is monitored by the school district with notification of attendance issues and copies of report cards to the local district. Program Specialists track attendance at Application and Recertification; they directly request attendance information from the school.

- 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.

Following the initial interview and at recertification, both applicants and recipients who identify as incapable of participating in employment or job preparation services will be given a Physical Assessment for Determination of Employability or a Psychological Assessment for Determination of Employability and asked to make a medical appointment with their physician to complete the form. If there are medical records that the applicant wishes to submit the eligibility worker will assist, if asked, in gathering more information. If an applicant does not identify as incapable of participating in employment or job preparation services in any capacity the examiner will review the Waiver of New York State Welfare-to-Work Medical Review Procedure (from Chapter 15, Model Documents, NYS TA and SNAP Employment Policy Manual) with the client. The participant medical form is reviewed by a program specialist prior to the participant being assigned to a work activity. The medical can be reviewed by a Principal Program Specialist and, if necessary, our A.D. person if the Program Specialist has a question regarding the medical information. The worksites are informed in writing of any/all work limitations.

## 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):

For the provision of post-secondary educational programs, individuals are referred to SUNY Delhi, SUNY Oneonta, and other local educational institutions. The highest level of post-secondary level of education that the district will approve is a 2-year degree program.

- 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 Program Specialists are required to enroll clients in activities immediately after case opening. At the beginning of each month, a Principal Program Specialist reviews each Temporary Assistance case with a non-exempt recipient to ensure they are engaged in a work activity. Non-exempt applicants are referred to the OTDA Jobs Program Specialist for job referrals immediately after the eligibility interview. Recipients are referred to Delaware Opportunities for worksite placement immediately after the case is opened. Delaware Opportunities is responsible to conduct a worksite placement assessment for each individual. At case opening, the client is assigned to participate in a work activity. Program Specialists are required to monitor worksite participation by means of time sheets. If an individual's status changes from exempt to nonexempt, the Program Specialist would refer the non-exempt client to engage in a work activity. The district's participation standard is 40 hours per week for households without children under age six in a countable work activity. Single parent caretakers of a child under 6 may be required to participate up to 40 hours weekly as long as all necessary supportive services are available and authorized.

- 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	5
Households without Dependent Children Average Monthly	7

- 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:

A Principal Program Specialist monitors the activity status of non-exempt and exempt individuals no less than bimonthly to monitor progress toward meeting the work participation requirements and to ensure full engagement by recipients in work and/or work preparation activities. The TANF Adult Cases Receiving Assistance in the Current Month is also monitored bimonthly. Other COGNOS reports are reviewed bi-monthly. WTW/CMS is also utilized.

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

Yes

**Applicant Job Search**

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	5	5	Households with dependent children are assigned to complete a minimum number of 5 verifiable job search contacts and a minimum number of 5 hours per week. Households without dependent children are assigned to a minimum number of 5 verifiable job search contacts and minimum number of 5 hours per week. Applicants are required to submit the Job Search Handbook to the Program Specialist that has the Application/Recertification. The Program Specialist will review the Job Search Handbook to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply, and interview for a job as well as time spent preparing and sending follow-up materials to an employer. We are using a modified Job Search Booklet LDSS-3696 (11/17). All participation in job search is documented, reviewed, monitored and tracked on a weekly basis by the Program Specialist. During the Application interval, applicants are expected to meet with the OTDA Jobs Program Specialist for job referrals. The Jobs Program Specialist has weekly contact with the applicants to follow up on their job referrals. Applicants are also expected to meet with Delaware Opportunities for their worksite interview and job referrals.
SNA Individuals	5	5	Same as above.

- 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	5	5	When a Job Search Activity is assigned to non-exempt individuals, the district uses the same process mentioned in 5d. TANF/SNA MOE individuals are assigned to complete a minimum number of 5 verifiable job search contacts and a minimum number of 5 hours per week for a total of 2 weeks of job search at Application and Recertification for a maximum of 12 weeks of job search in a rolling 12-month period. In addition, Delaware Opportunity crew chiefs will transport individuals to employers to apply for job openings with their work abilities and interests.
SNA Individuals	5	5	When a Job Search Activity is assigned to non-exempt individuals, the district uses the same process mentioned in 5d. TANF/SNA MOE individuals are assigned to complete a minimum number of 5 verifiable job search contacts and a minimum number of 5 hours per week for a total of 2 weeks of job search at Application and Recertification for a maximum of 12 weeks of job search in a rolling 12-month period. In addition, Delaware Opportunity crew chiefs will transport individuals to employers to apply for job openings with their work abilities and interests.

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

The number of employment hours for self-employed individuals is determined by dividing the individual's self-employment income (gross income less documented business expenses) by the federal minimum wage. Self-employed individuals working less than 40 hours per week may be assigned additional work activities, in addition to their self-employment hours so that they are engaged in up to 40 hours of work activities per week. Delaware Social Services will allow 2 months to all self-employed individuals earning less than minimum wage to increase their business income, additional time may be permitted based on case circumstances. After this time, a recipient who is self-employed and earning less than the state hourly minimum wage in earnings may be assigned to participate in up to 40 hours of activity each week, not including hours of self-employment.

## 5.2 Informing SNAP Applicants and Recipients of Work Requirements

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

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

### Written Information Provided to SNAP Applicants and Recipients

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

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

For households with at least one member who is subject to the General SNAP Work Rules, Program Specialists will provide a comprehensive oral explanation at Certification, Recertification, and when a previously exempt household member or new household member becomes subject to work requirements. All Program Specialists will utilize the LDSS-5193 and/or LDSS-4826C as a guide to provide the comprehensive oral explanation to all households subject to the work requirements.

- 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**

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

Our district does not require Non-Temporary Assistance Supplemental Nutrition Assistance (NTA SNAP) applicants and recipients to participate in SNAP Employment and Training activities.

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

N/A

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

Our district does not mandate SNAP E&T work activities. NTA SNAP work registrants are informed of the employment services available to them upon their request, for assistance with job search activities during Certification and Recertification. Program Specialists will inform the individual(s) of the work activities available to them. Along with a copy of the LDSS-5193A, an Employment Services flyer will be mailed to the applicant/recipient detailing that job search assistance is available to them upon request. At the time that an individual voluntarily opts in to participate in a SNAP E&T work activity the individual(s) will be assigned a Supervised Job Search activity. Program Specialists will monitor the client's progress weekly usually 5 contacts per week for a period of two weeks. In addition to the (JRT) Job Readiness Training 3-Day Session, individuals will participate in a Supervised Job Search with the assistance of the Employment Unit Senior Program Specialist.

## 5.4 Advising Households of Employment and Training Services

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

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

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

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

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

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

Yes or No:	How the district provides employment and training services information
Yes	Materials and information provided in print form
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.

Prior to referring an individual to an appropriate SNAP E&T activity, Program Specialists will conduct an assessment, offer case management to identify any barriers & set employment/educational goals with the individual to ascertain that the appropriate work activity is suitable for the applicant/recipient. Providers are informed of an individual's

medical limitations and necessary accommodations by means of a (OTDA Approved) Referral Turnaround Document.

Providers have 10 days from the date of a provider determination to notify the district in writing that a participant is not a good fit for their program or an activity component. All communication from the provider to the district is documented in a Referral Turnaround Document.

The district will notify the SNAP E&T participant of a provider determination within 10 calendar days after receiving notification from the provider. The district will explain the provider determination to the SNAP E&T participant. The district will also notify the client what the district's next steps will be as a result of the provider determination and provide the client with the district's contact information. The individual will also be notified that a sanction will not be imposed due to the provider determination.

When the district receives a provider determination, the SNAP E&T participant will be notified either verbally or in writing. All provider determinations are documented with a case note in the client's case file at the time a client is informed of a provider determination.

- 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.

The district informs service providers collaborating with the Employment Services Unit that they have authority and a responsibility to make a provider determination if an individual is not a good fit for the work assignment. When a service provider contracts with the district to provide employment services, they are informed of their responsibility to report a determination in writing by means of a Referral Turnaround Document.

- 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.

The district confers regularly with service providers and clients to ascertain that provider determinations are fair and do not discriminate against individuals assigned to a work activity. Upon receipt of a Referral Turnaround Document with a provider determination, the district will engage in a discussion with the service provider and the individual to confirm details for said determination. If there are discrepancies, the district may request to meet with a service provider to further discuss questions and concerns. This process is documented in a case note and kept in the client's case file.

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

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

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported

exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
  - Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
  - Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
  - Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences, and holidays; and is based on documentation in the case record; and
  - Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

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

6

- c. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA Employability Code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

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

3

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

## 6.2 Use of Outside Providers/Vendors

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

No

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

N/A

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

N/A

## 7. Supportive Services

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

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

Support Services based on an individual's need include the following: 1) Clothing allowance for training, work experience, unsubsidized and subsidized employment, 2) Professional license fees and other work-related fees necessary for participation in training and to accept/retain employment, 3) Moving expenses to another community if it deems such service is appropriate. 4) Jobs related safety equipment, protective gloves, boots, and etc. needed to accept/maintain employment. 5) Tools and equipment necessary to participate in training and to accept/retain employment. 6) Transportation for activities, including the cost of transporting children of TANF participants to/from daycare, car registration fees, car insurance, 5-hour course, car repairs, permit/driver's license, gasoline vouchers, mileage reimbursement rate of 65.5 cents/mi. (same rate for mileage reimbursement for County Employees). The district will consider other needs for supportive services necessary to enable an applicant/recipient to participate in an employment activity or retain employment. The need must be documented and approved by a Principal Program Specialist based on the availability of funds. Support Services in excess of \$500.00 needs to be approved by the Deputy Commissioner.

- 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
No	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 or No:	Transportation Assistance Provided
Yes	<p>Other mileage rate (the methodology used to establish reimbursement rate is described here):</p> <p>Delaware County attempts to provide whatever is necessary for the client to participate in activities. The Department develops with the applicant/recipient a transportation plan. The Department may contract with Delaware Opportunities to transport a recipient to and from full-time work for a limited time in order for the recipient to complete a transportation plan. The Department has two work crew vans that provide transportation to work activity sites. Clients can be assigned to the mobile work crews that provide transportation or assigned to work sites that provide transportation. Also, the Department provides: gasoline cards and mileage reimbursement rate of 65.5 cents/mi. (the same rate for mileage reimbursement for County employees). In addition, the Department makes a reasonable effort to assign participants to appropriate work activities at a site as close as possible to a participant's home.</p>

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

The Department's policy is to require a participant to walk to a work activity assignment if the distance is no greater than 1.5 miles. There are several factors determining if an individual would be required to walk. For instance, a client's general health, if there are children that need day care, weather conditions, etc. The distance is the same as our local school districts require of middle school children.

- 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:

Supported Services based on an individual's need will be issued to assist individuals at risk of needing Temporary Assistance to improve their opportunities for employment or to maintain their employment as outlined in Section 7.1.

## 7.2 Post-Employment/Transitional Supportive Services

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

In addition to Case Management, the district will make any Supportive Services (as outlined in Section 4.1) needed, available to an individual whose case has closed due to employment, provided the supportive services is necessary for the individual to retain employment. The need for the Supportive Services must be documented. The Supportive Services will be provided pending the available funds. Supportive childcare and transitional Medicaid will be provided, if eligible.

- 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:

Same as 7.1

### 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.):

Same as 7.1

## 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:

Program Specialists will mail Conciliation Notification LDSS-4230 to the recipient. Recipients must respond within the required timeframe. If the client fails to respond to the Conciliation notice within the respective time frame or if the district determined from the conciliation that the individual's refusal to comply or failure to comply was willful and without good cause, the district will issue a ten-day notice to impose an employment sanction consistent with 385.12. If client responds, the client will be given an opportunity to explain why he/she did not comply. Client will be requested to provide the reason for refusal or failure to comply. If client does not wish to state reasons, worker will record case notes on WTWCMS or I/EDR. The client will receive written notification of the Conciliation whether the determination was with or without good cause regardless of whether format is telephone or face-to-face. Conciliation is conducted by agency staff trained in the process to be followed. If there is no response to the conciliation, the worker reviews the information available and if it is determined that the individual willfully and without good cause, refused or failed to comply with employment requirements a timely notice will be sent regarding the appropriate sanction. If there is a response, a conference is held with the client and Employment Unit Principal Program Specialist or the Senior Program Specialist. The employment staff and if necessary, the supervisor, will make the determination that noncompliance was or was not willful and without good cause.

- 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:

Program Specialists will mail a Conciliation Notification LDSS-4230 to the SNAP recipient. SNAP Recipients must respond within the required timeframe. If the client's failure to comply was willful and without good cause, and the client failed to demonstrate compliance to avoid a SNAP sanction, the district will issue a 10-day notice.

If client responds, the client will be given an opportunity to explain why he/she did not comply. Client will be requested to provide the reason for refusal or failure to comply.

If client does not wish to state reasons, worker will record case notes on WTWCMS or I/EDR. If the client's failure to comply was willful and without good cause, and the client failed to demonstrate compliance to avoid a SNAP sanction, the district will issue a 10-day notice.

The client will receive written notification of the Conciliation whether the determination was with or without good cause regardless of whether format is telephone or face-to-face. Conciliation is conducted by agency staff trained in the process to be followed. If there is no response to the Conciliation, the worker reviews the information available and if it is determined that the individual willfully and without good cause, refused or failed to comply with employment requirements a timely notice will be sent regarding the appropriate sanction. If there is a response, a conference is held with the client and Employment Unit Principal Program Specialist or Senior Program Specialist. The employment staff and if necessary, the supervisor, will make the determination that noncompliance was or was not willful and without good cause.

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

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

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
Yes	The client’s employment worker
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:

Along with the conciliation notice, the worker will provide the client with a job search handbook. The client will be informed of the process to avoid their SNAP sanction in order to demonstrate compliance. Individuals are assigned to a job search with a minimum number of 5 verifiable job search contacts and a minimum number of 5 hours per week for 10 days.

**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:

The client would request reinstatement. As part of this request, the client would agree to comply and demonstrate compliance in an employment activity for a minimum of 5 days. The department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended, and the client has demonstrated compliance for 5 days. For TA individuals who have become exempt after the noncompliance, and who have provided documentation of the exemption, the district will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended.

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

The client would request reinstatement. As part of this request, the client would agree to comply and demonstrate compliance in an employment activity for 5 days. The department will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction as long as the minimum durational period has ended, and the client has demonstrated compliance for 5 days.

For SNAP individuals who have become exempt after the noncompliance, and who have provided documentation of the exemption the district will end the sanction retroactively to the date that the individual expressed an interest in ending the sanction. SNAP benefits are

restored effective the first of the month following the month of compliance, but no earlier than the expiration of the minimum duration period.

### 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.
Yes	Supervisory staff who are trained in mediation and who have no direct responsibility for the individual’s case.
No	Designated supervisory staff who have no direct responsibility for the individual’s case and who are not trained in mediation.

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

### 9.1 Disability Determination Process and Tools

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

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

Yes or No:	How the district determines an individual’s disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician’s statement provided by participant.
No	District accepts physician’s statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: When an applicant or recipient declares a medical impairment, the local district issues a Physical/Psychological Assessment for Determination of Employability. This form also states that the following information is required: 1. A specific diagnosis 2. Any specific work limitations caused by this diagnosis 3. The expected duration of these work limitations/prognosis 4. The duration of the disability The

Yes or No:	How the district determines an individual's disabilities and/or work limitation
	<p>local district has sole discretion in determining if the documentation provided is sufficient to make a determination of medical impairment. Submitting the required documentation is described above to determine the initial claim of impairment by an applicant, or in evaluating the continuing claim of a recipient who has been previously determined exempt from participation in work activities, shall be a condition of initial or ongoing eligibility for Temporary Assistance.</p> <p>For SNAP, failure to document a disability causes the individual to lose exempt status. Additional documentation may be required of the individual's health care practitioner to evaluate an individual's ongoing claim of a mental or physical impairment. In these circumstances, such individual remains exempt until a final employability determination is made by the local district. If an individual has demonstrated an inability to successfully participate in work activities or employment and the local district has reason to believe this is due to a disability or work limitation, the local district shall require the individual to participate in a disability related screening and/or evaluation. Additionally, if an individual has demonstrated an inability to successfully function in a work setting and is determined through an evaluation or assessment to be exempt and in need of treatment, the individual shall be required to participate in necessary treatment as a condition of eligibility for temporary assistance.</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:

The district's procedure for notifying an individual of their exempt/non-exempt determination is conducted in writing utilizing the LDSS-4005(a) for those non-exempt and LDSS-4005 for individuals determined to be exempt. A copy of the LDSS-4005/4005(a) is placed in the individual's case file and a case note documents the exemption/non-exemption determination.

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

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

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

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

**Process for Reviewing Medical Documentation**

Yes or No:	District’s process for reviewing medical documentation
Yes	District directs the contracted physician or individual’s physician to determine status.
Yes	District review team reviews and determines status (described here):
Yes	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	<p>Other process:</p> <p>The local district shall deem an individual work limited if the verification received shows medical impairment that would limit the individual's ability to engage in work activities in accordance with Department Regulation. Each applicant and/or recipient for Temporary Assistance that states a medical issue/limitation is requested to have a medical form DSS-4526 completed by his/her physician. When this medical is received, the Program Specialist and/or the Senior Program Specialist and/or a Principal Program Specialist will review the available medical information. The district will notify the individual of this determination in writing with the LDSS- 4005/a Notification of Temporary Assistance Work Requirements Determination (Exempt/Non-Exempt). The local district assigns individuals through close and recurring written collaboration with work experience sites. Any work offered at a site is developed in accordance with each individual's documented abilities. The individual's limitations are provided to the worksite supervisor in writing. For each individual where employment limitations are cited, the Program Specialist coordinates work activities to accommodate the limitations and involvement in a rehabilitation plan to return the individual to self-sufficiency. The treatment plan and progress are/may be monitored. In addition, if program specialists have any questions, our agency Director and/or A.D. Program coordinator will review the information and provide input. Our procedure follows the process of the regulation 18 NYCRR 385.2(d).</p>

**9.2 Mental Health Screening and Assessment**

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

No

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

N/A

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

**Screening Tools the District Uses**

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

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

N/A

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

N/A

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

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

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

The Program Specialist and Senior Program Specialist review the medical statements, reports, evaluations, or forms provided by the individual's medical provider to determine if the individual has the potential to be restored (or improved employability) through treatment or other rehabilitative activities to self-sufficiency. If they have any questions or concerns regarding their determination, they review the information with the Principal Program Specialist and Director of Temporary Assistance, or our A.D. person.

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

All individuals with an indicated need for treatment are referred to the appropriate provider. The indicated need can be determined by means of medical information provided by the client, an assessment, employability plan and case management. The treatment provider is required to provide a copy of the 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.

Providers are required to notify the Department if an individual is not complying with his/her treatment plan. We require monthly attendance verification. The Director of Programs currently monitors all in-house rehabilitation clients utilizing progress reports and direct communication. Treatment plans are to be updated every 3 months.

## **10. District Certification**

### **10.1 Certification**

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

1/29/2024  
Sylvia Armanno  
Commissioner