

# **Montgomery 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.)*

*See Attached.*

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

The Employment Unit is primarily responsible for coordinating the Welfare-to-Work Program. They are responsible for overseeing the conciliation and dispute resolution processes. The Job Training Developer acts as the Conciliator. The Temporary Assistance/SNAP Unit is responsible for imposing any closures or sanctions as related to the Welfare-to-Work Program. Units within Montgomery County's Department of Social Services that work with the employment program may include but are not limited to, the Support Collection Unit, Fraud and the Services Units. The SCU aids clients in filing for child support, if necessary, Fraud investigates information provided by Employment of potential false documentation or information and the Services unit help to provide our clients with both immediate and on-going personal needs.

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

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

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

Funding sources include, FFFS, SNAP E&T, Local or "other". Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent

children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and Temporary Assistance to Needy Families (TANF) 200%.

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

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Catholic Charities of Fulton & Montgomery County	\$49,500	FFFS	FA SNA Family SNA Individual SNAP TANF 200%	Services for Persons of Hispanic Descent. Translation / Interpreter Services for non-English speaking families and individuals.

- 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>
Catholic Charities of Fulton & Montgomery County	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Clothing, child care
Centro Civico	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	English as Second Language (ESL) classes, counseling.
Fulmont community Action Agency	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Assistance with vehicles, licenses, registration, vehicle repair
ACCES-VR	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Counseling services for the disabled, worksite and job placement, job coaching

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
HFM BOCES	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Literacy, High School Equivalency (HSE)
Workforce Solutions	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	High School Equivalency (HSE), Life Skills
Handy Ups & Downs	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Clothing
Super Shoes	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Work related attire. (i.e., steel toe boots and shoes, scrubs, etc.)
Healthy Families Montgomery/Schoharie Counties - HFNY	FFFS SNAP E & T Local	FA	Healthy Families NY pairs expectant and new parents with knowledgeable and caring workers who provide information and ongoing support during pregnancy and early childhood. HFNY focuses on helping babies get off to a healthy and strong start.
Fulton Montgomery Community College	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Fulton Montgomery Community College, as part of the SUNY system offers an affordable way to earn a college degree. Two-Year degree programs are offered in addition to transferring to a four-year school.

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:

N/A

### 1.3 OTDA Jobs Staff Agreement

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

#### Services Provided by Jobs Staff

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

#### Jobs Staff Target Groups

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

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

N/A

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

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

### Programs and Services Provided at Career Centers

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

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

Per the recently completed Fulton, Montgomery, and Schoharie Local Workforce Development Area Service Delivery MOU a standardized interagency referral is used to help the participant access all available partner resources. We collaborate with the following career center partners; Workforce Solutions, Acces-VR, Schenectady Community Action Program (SCAP) and The Literacy Zone. All partners of the MOU agree to help the participant apply for services or help arrange appointments for all appropriate services or programs. The referral system that has been developed is a personal hand off from one agency to the other. There is a direct linkage between the partners. When we refer the client we use the Fulton, Montgomery and Schoharie Counties Workforce Solutions System (Multi-Agency System Partner Referral) form. This is tracked using the Multi-Agency System Partner Referral Tracking Form and needs to be returned by the 10th of each month and is emailed to Mary Hill, Program Director, Private Industry Council.

## 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 or No:	District Orientation:
Yes	<p>In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: The district provides two (2) orientations: The first one is provided by either a Welfare Employment Representative or Job Training Developer from the Montgomery County Employment Unit. This is done either in person one on one or by mail, depending on the client's preference. The other is provided in a group setting at the Workforce Solutions Office. In addition to the required elements the on-site orientation provides information on employable vs. exempt status, a discussion about medical limitations to employment, the difference between core and non-core activities, how criminal history should be addressed when filling out an application or during a job interview, child care in lieu of Temporary Assistance, Home Visiting Services provided by Healthy Families of Montgomery-Schoharie Counties, supportive services available both through the Department of Social Services and other community partners, transportation available, the Wheels to Work program, and the importance of a first impression during a job interview. There is discussion about reporting case changes, including income, in a timely manner. There is also a discussion explaining the consequences of sanctions for not complying as required. Individuals are also asked to complete an employment self-assessment which helps them identify their personal strengths and any potential barriers to employment that they may have. The Workforce Solution orientation goes into more detail about the services available through the One-Stop office. This orientation and informational meetings are held once a week. Clients are invited to sign up to attend various workshops including; Basic Computer Skills, Resume Writing, and Interviewing Skills. They are also given information about High School Equivalency (HSE) classes, the Acces-VR Community Information Orientation, Meet the Employer Events, Job Fairs, Metrix Training, and Veteran Services.</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:

The district provides two (2) orientations:

The first one is provided by either a Welfare Employment Representative or the Job Training Developer from The Employment Unit at Montgomery County and the other is provided at the Workforce Solutions Office. In addition to the required elements the on-site orientation provides information on employable vs. exempt status, a discussion about medical limitations to employment, the difference between core and non-core activities, how criminal history should be addressed when filling out an application or during a job interview, child care in lieu of Temporary Assistance, supportive services available both through the Department of Social Services and other community partners, transportation available, the Wheels to Work program, and the importance of a first impression during a job interview. There is discussion about reporting case changes, including income, in a timely manner. There is also a discussion explaining the consequences of sanctions for not complying as required. Individuals are also asked to complete an employment self-assessment which helps them identify their personal strengths and any potential barriers to employment that they may have.

The Workforce Solution orientation goes into more detail about the services available through the One-Stop office. This orientation and informational meeting is held once a week. Clients are invited to sign up to attend various workshops including; Basic Computer Skills, Resume Writing, and Interviewing Skills. They are also given information about High School Equivalency (HSE) classes, the ACCES- VR Community Information Orientation, Meet the Employer Events, Job Fairs, Metrix Training, and Veteran Services.

## 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:

The individual is given the assessment (LDSS-4980), either in person or by mail. Upon completion, the individual meets with the Welfare Employment Representative in person or via telephone. At that time, they review the information together, making notes pertinent to their conversation, while addressing barriers and limitations.

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

The Employment Unit.

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

The Welfare Employment Representative minimum qualifications are as follows:

- A. Graduation from a regionally accredited or NYS four-year college or university with a Bachelor's Degree in Business Administration, Human Services or a closely related field; or
- B. Graduation from a regionally accredited or NYS two-year college with an Associate's Degree in Business Administration, Human Services or a closely related field and two years of experience in employment interviewing, counseling, or labor or industrial relations.
- C. Graduation from high school or possession of a high school equivalency diploma and four years of experience in employment interviewing, counseling, or labor or industrial relations.

- 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?

The assessment is updated as needed, when information changes or a minimum of every six months.

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

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

#### District Employment Plan Procedures

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

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

#### District Employment Plan Development

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

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

Employment plans are completed within 90 days of the case being open. Upon completion of the employment plan, the Welfare Employment Representative meets in person or over the phone with the individual to finalize the LDSS-4978 at which time the information is entered in to the WTCMS system. A copy of the Employment Plan is given to the client.

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

The employment plan is updated as needed or every six months and a copy given 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:

Engaged in work means participation in any activities that enhance the individuals' chances of self-sufficiency. This includes working with other agencies and programs (i.e., Acces-VR) to overcome barriers.

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

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

The district contracts with a local agency who provide interpreter services that is stationed in our office daily. The Welfare Employment Representative has access to a Language Line that provides interpreter services to its applicants/recipients. The Welfare Employment Representative may also refer participants to local agencies for English as a Second Language (ESL) classes.

### 3.3 Strategies/Procedures for Increasing Program Attendance

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

There is a strong emphasis on the importance of attendance, including during the orientation. It is explained to the individual that the experience and skills that they receive participating in work activities, including experience at Work Experience Program sites, can be used on their resume. In making a work activity assignment the agency considers the appropriateness of the activity. The agency makes regular telephone contact with the worksites to resolve any issues that might arise. The Welfare Employment Representative closely monitors attendance and tracks clients.

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

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

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

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: We make every attempt to uncover any obstacle or barrier that has prevented an individual's compliance prior to imposing a sanction. We give each participant the opportunity to comply and engage in appropriate employment activity. It is our hope that this process will reduce the number of participants that are sanctioned, thereby reducing or eliminating actions required by both the Employment Unit case managers and the Temporary Assistance examiners. The sanctioned participant will be given the opportunity to demonstrate their willingness to comply with employment programming by participating in an employability assessment/evaluation to ensure that any barriers to compliance have been mitigated. The sanctioned participant is afforded the opportunity to demonstrate their willingness to comply by engaging in 10 days of employment programming. This would allow the sanctioned participant to be added to the case and the budget as soon as possible.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: The Welfare Employment Representative calls the individual back into the office to update the assessment and encourages re-engagement by discussing the reasons for the non-compliance. One month prior to the end of the durational period of a TA sanction, the sanctioned participant will be given the opportunity to demonstrate their willingness to comply with employment programming by participating in an employability assessment/evaluation to ensure that any barriers to compliance have been mitigated. The sanctioned participant is afforded the opportunity to demonstrate their willingness to comply by engaging in 10 days of employment programming. This would allow the sanctioned participant to be added to the case and the budget as soon as the day after the durational portion of the sanction expires.

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: All sanctioned participants remain assigned to their Employment Unit case manager who attempts to re-engage the sanctioned individual in employment activities before, during and after the sanction period as indicated above. Periodic call-ins and/or investigative interviews may be completed during a sanction period and the individual is offered additional opportunity to participate in employment activities and discuss issues that may be contributing to the non-compliance.

### 3.5 Strategies for Reducing the Need for TA

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

All employable applicants are referred to a Welfare Employment Representative to conduct a supervised job search. Individuals that may have non-recurring need of assistance are referred to the appropriate case worker and one-time payment for assistance may be provided in order for an applicant to maintain employment.

## 4. Work Activities

### 4.1 Allowable Work Activities

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

#### Allowable Work Activities by Case Type

Activity and Definition	Case Type
<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

Activity and Definition	Case Type
<p><b>Job Search</b> – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>	<p>FA SNAFAM SNA SNAP</p>
<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>

Activity and Definition	Case Type
<p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Readiness Training (JRT) Activities</b> – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Subsidized Private Sector Employment</b> – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA</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</p>



Activity and Definition	Case Type
<p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>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>
<p><b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>	<p>FA SNAFAM SNA SNAP</p>

## 4.2 Job Development

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

No

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
No	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.:
No	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.:

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

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

Montgomery County works with the Board of Cooperative Educational Services (BOCES), Centro Civico and the Literacy Zone to provide Adult Basic Education, English Second Language (ESL), and High School Equivalency (HSE) classes. These programs have a successful track record and are found to be appropriate in helping individuals find work.

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

The NYS Employment Assessment is the primary source used to identify either job skills programs or vocational education programs. Every effort is made to match clients to appropriate vocational and job skills programs. It is explained to them that the successful completion will produce a marketable skill. Referrals are made to providers that are based on the training and/or activity offered as best matched with the client's individual ability and goals.

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

The Welfare Employment Representative reviews the individual's self-assessment when interviewing the individual and develops their Employment Plan. They discuss with the individual their educational needs and what is available for them. If it is determined during the assessment that the applicant/recipient has not attained a basic literacy level and/or has not attained a high school diploma, the Welfare Employment Representative will offer the information to assist them in enrolling in a High School Equivalency class. If the individual participates in the High School Equivalency class, their attendance will be indicated in the Employment Plan. Full-time or part-time attendance will be determined by taking into consideration other activities the client may be participating in. Clients under the age of 18 who are not enrolled in High School are referred to mandatory HSE classes until completed or they choose to re-enter high school.

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

The individual begins by completing an assessment, the Welfare Employment Representative meets with the individual to review the information in the self-assessment and to speak with the individual regarding their situation. The Welfare Employment Representative then makes the determination as to what services the individual needs to help them to obtain self-sufficiency. For individuals with self-initiated education, the Welfare Employment Representative reviews the program and determines whether it is appropriate. Some determinations that would be considered would be attendance, past success in a program, will the services lead to employment, etc. The individual would first have to comply with all other employment requirements prior to being considered. For individuals seeking to enroll, the district makes the appropriate referrals. The information is reviewed together by the Welfare Employment Representative to determine what educational activities are appropriate. Clients under the age of 18 who are not enrolled in High School are referred to mandatory HSE classes until completed or they choose to re-enter high school.

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

The following things are considered:

- A review of the individuals past history is done to make sure they would be eligible/qualified for employment in the field they are seeking.
- Emerging occupations requiring no more than an associate degree may be approved.
- The individual's educational level and abilities are reviewed to determine if the program is appropriate
- Previous program cooperation
- Length of training
- Present marketable skills and work history
- Occupational demand of the curriculum

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

Providers must meet NY State prescribed requirements such as confidentiality, record retention, reporting requirements and performance standards. It is also important that education and training providers offer the individuals knowledge and training that offers usability, accessibility, an updated online course and is accurate and relevant to their needs.

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

The individual is called in to meet with their Welfare Employment Representative, at this time the individuals are notified of approved training providers. The individuals are also sent a letter in the mail notifying them 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.

The individual is called in to meet with their Welfare Employment Representative. They are also sent a letter in the mail.

The districts procedure for advising participants of approved training is: The individual is called in to meet with their Welfare Employment Representative, at this time the individuals are notified of approved training providers. The individuals are also sent a letter in the mail notifying them of approved training providers.

- 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.

The district requests verification of enrollment from the school at the time of application and re-certification.

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

The district will assign an activity that is consistent with the individuals treatment plan as prescribed by a practitioner.

- The assignment will be consistent with an individuals documented mental health and physical limitations
- The district will inform the work activity supervisor in writing regarding an individual's 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):

Associate Degree, two (2) year degree

- 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.

<b>Yes or No:</b>	<b>Conditions for disapproval of work activity</b>
Yes	The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.
Yes	The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
Yes	The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
Yes	The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
No	Additional reasons as stated here:

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

Applicants are engaged in a job search from the date of application and have to meet with and provide the Welfare Employment Representative a job search verification, this is to be done weekly after a case opening. Non-exempt individuals are engaged in appropriate, countable work activities (e.g. Work Experience Programs) for up to 40 hours per week once the TA case opens and the assessment and employment plan are completed - usually within 2 weeks of the case opening.

Exempt individuals are tracked and monitored by the Employment Unit and engaged in countable activities once they become non-exempt. The District tracks participants through the use of various reports available (e.g. COGNOS), maintains timely WTWCMS entries, and engages non-exempt individuals in a timely manner to maximize countable participation.

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

#### Number of Individuals Who Receive Employment Services

<b>Household Type</b>	<b>Number Served</b>
Households with Dependent Children Average Monthly	55
Households without Dependent Children Average Monthly	50

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

The Welfare Employment Representatives receive the COGNOS reports on a regular basis, they review the lists to determine if an individual is meeting the necessary requirements. They then would call any individuals that appear on the list that may not be fully engaged in an activity to their ability.

- 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	10		The job search is monitored by the number of contacts during the required period not by the number of hours spent in the activity. 10 job searches every 10 days. Utilize with Career Center Workforce solutions to help with Job search using their computer and helping them fill applications and update their resume they also provide job search leads. The Fulmont Community Action Agency provides the same service by appointment only.
SNA Individuals	10		The job search is monitored by the number of contacts during the required period not by the number of hours spent in the activity. 10 job searches every 10 days. Utilize with Career Center Workforce solutions to help with Job search using their computer and helping them fill applications and update their resume they also provide job search leads. The Fulmont Community Action Agency provides the same service by appointment only.

- 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	10		The job search is monitored by the number of contacts during the required period not by the number of hours spent in the activity. 10 job searches every 10 days. Utilize with Career Center Workforce solutions to help with Job search using their computer and helping them fill applications and update their resume they also provide job search leads. The Fulmont Community Action Agency provides the same service by appointment only.
SNA Individuals	10		The job search is monitored by the number of contacts during the required period not by the number of hours spent in the activity. 10 job searches every 10 days. Utilize with Career Center Workforce solutions to help with Job search using their computer and helping them fill applications and update their resume they also provide job search leads. The Fulmont Community Action Agency provides the same service by appointment only.

- 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:

Montgomery County has developed a local form that the applicant/recipient fills out when they claim self-employment. The Social Welfare Examiner reviews the information on the form and determines if all of the deductions claimed are allowable. The Social Welfare Examiner looks at the allowable net monthly income and divides it by the current federal minimum wage to determine the number of hours of participation. The individual may be required to participate in additional employment activities to meet participation requirements. The agency will ask for a statement from individuals for whom the self-employed individual provides services. Document provided - see attached.

## 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.

Eligibility staff reads from the LDSS-5193 in an effort to provide a comprehensive explanation to TA/NTA SNAP households of their work requirements. This explanation is provided by eligibility staff at certification, recertification, and when a previously exempt household member or new household member becomes subject to work requirements. This is also documented in the case record.

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

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

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



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

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

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

**5.3 Meeting SNAP Work Requirements**

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

MCDSS does not mandate NTA SNAP recipients to participate in SNAP E & T work activities.

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

MCDSS does not mandate NTA SNAP recipients to participate in SNAP E & T work activities.

- 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):

The district verbally informs applicants and recipients of the availability of job search assistance at time of application and recertification.

## 5.4 Advising Households of Employment and Training Services

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

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

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

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

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

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

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

## 5.5 Provider Determinations

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

The Welfare Employment Representative uses the NYS Employment Assessment (LDSS-4980) to help determine what skills and strengths the client has. With this information it can be determined what activity or provider would best assist an individual in meeting his/her goals. The providers requirements are reviewed with each individual to ensure that they

are aware of what is required and that these are met. Providers have 10 days from the date of a provider determination to notify the district that a participant is not a good fit for a program or an activity component. The district will notify the SNAP E&T participant of a provider determination within 10 calendar days of receiving the notification from the provider. This information is documented in the case record.

- 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.

A Work Experience Program Agreement is completed by the contractor/sponsor and signed by both the contractor/sponsor and the agency. The contractor/sponsor completes a justification form indicating the type of tasks to be performed. The Welfare Employment Reps are in regular contact with both the contractor/sponsor and all other providers to ensure both parties are compliant with the agreement and the individual is an appropriate fit for the work site.

- 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.

Our Work Experience Program contracts specifically state the Contractor agrees that neither it nor its county-approved subcontractors shall, by reason of age, race, creed, color, national origin, sexual orientation, military status, sex, disability, predisposing genetic characteristics, familial status or domestic violence victim status, to refuse to hire or employ or to bar or to discharge from employment such individual or to discriminate against such individual in compensation in term, conditions or privileges or employment or make any inquiry into prospective employment which expresses, indirectly or directly any limitation specification or discrimination based on the foregoing characteristics.

Employment Reps are in regular contact with worksites and all other providers on a regular basis to observe participation and address any challenges presented. If a participant at a WEP site or with another provider should claim unfair or discriminatory treatment, the assignment would be reviewed in an effort to address issues and if necessary, relocate the participant to different activity or workplace.

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

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

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

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

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

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

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

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

6

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

6

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

3

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

3

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

## **6.2 Use of Outside Providers/Vendors**

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

No

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

No

- 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:

The Welfare Employment Representative will provide the following as needed:

- One time clothing allowance including required uniforms and shoes up to a maximum of

\$250 per work activity

- Job related safety equipment up to a maximum of \$175 per work activity
- Tools and equipment up to a maximum of \$300 per calendar year
- Transportation assistance as required and determined by the district

The district provide information for Workforce Solutions and Fulmont Community Services for the client to go and use computer service and internet.

If the TA -No Ta Snap applicant can be referred for Wheels to Work if they have maintained a job with at least working a minimum of 25 hours

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

**Transportation Services Provided to Clients**

<b>Yes or No:</b>	<b>Transportation Assistance Provided</b>
Yes	Bus pass/token
Yes	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
Yes	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
Yes	Other mileage rate (the methodology used to establish reimbursement rate is described here): The Welfare Employment Representative will also provide the following as it determines appropriate (all requests are subject to the availability of funds and program approval): - reasonable and necessary car repairs to a maximum of \$350. Such approval will be contingent upon the value and condition of the car - Car insurance up to 3 months with estimates provided from 2 insurance carriers or verification that the client is in jeopardy of losing their car insurance due to non-payment. NOTE: High risk drivers or excessive premiums will not be considered.

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

Individuals are required to walk to a work activity assignment or to access public transportation as long as it does not exceed 2 miles. Consideration is given to individuals with disabilities, have young children, inclement weather, safety of route or difficult terrain. The agency may be able to transport or assist with access to the CDTA bus.

- 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:

The district will work with individuals to assist in removing barriers to obtain and maintain employment, such as clothing, job skills training, transportation, childcare, emergency housing, etc.

## 7.2 Post-Employment/Transitional Supportive Services

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

Transitional supportive services, including childcare, SNAP and transportation are provided to eligible households.

- 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:

Transitional supportive services, including childcare, SNAP and transportation are provided to eligible households.

## 7.3 Extended Support Services

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

The district will refer individuals to the necessary community agency according to the need. Potential referrals include the Fulmont Community Action Center for job search related services, churches with monthly clothing giveaways and local food pantry's.

# 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
No	By mail

The districts process for conduction TA conciliations is described below:

The conciliation notice is processed on WTWCMS and mailed to the individual by the Welfare Employment Representative. Recipients must respond within the required timeframe (10 days). The conciliation is then held in person. The conciliation is attended by the individual, the Welfare Employment Representative and is conducted by a supervisor. If the result is favorable to the individual, the individual is referred to the Welfare Employment Representative and assigned to an activity.

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

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

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

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

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

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

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

A SNAP recipient who has failed to comply with employment requirements will be sent a Conciliation Notice through WTWCMS. The individual is given the opportunity to comply providing a medical statement or completing a job search. The individual is given ten (10) days to respond and provide proper documentation and/or the reason for non-compliance.



- 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:

A SNAP recipient who has failed to comply with employment requirements will be sent a Conciliation Notice through WTWCMS advising him/her that he/she can avoid a SNAP sanction by completing 10 job searches within the ten (10) days. A SNAP job search log will be sent with the Conciliation Notice.

**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:

All individuals who remain sanctioned past their duration are asked at re-certification whether they wish to comply. If they wish to comply, they will then meet with their Welfare Employment Representative who would then update the individual's assessment and Employment Plan. At that point, the individual must show they are ready to comply by completing an assigned supervised job search (making the required number of contacts and returning the documentation on time - usually within 5 business days) or if the individual is assigned to an activity (e.g., Work Experience Program), they must demonstrate compliance for 5 consecutive business days before the employment sanction is ended. With a satisfactory report from the activity supervisor TA benefits are restored to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period).

If after the durational period has ended and the client claims to be exempt, the client will be given the opportunity to submit medical documentation to verify the exemption from work requirements and will be added back into the case in the same time frame as a non-exempt individual who has complied.

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

Individuals who are sanctioned or remain sanctioned past their duration are asked at re-certification whether they wish to comply. If they wish to comply, they will then meet with their Welfare Employment Representative. At that point, the individual must show they are ready to comply by completing an assigned supervised job search (making the required number of contacts and returning the documentation on time - usually within 5 business days) than the expiration of the minimum duration period).

If after the durational period has ended and the client claims to be exempt, the client will be given the opportunity to submit medical documentation to verify the exemption from work requirements and will be added back into the case in the same time frame as a non-exempt individual who has complied.

### 8.3 Dispute Resolution

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

#### Grievance Mediation

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

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

## 9.1 Disability Determination Process and Tools

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

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

Yes or No:	How the district determines an individual's disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician's statement provided by participant.
Yes	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: The Welfare Employment Representative meets with the individual and gives them the LDSS-2642 (documentation requirements) followed by the LDSS-4526 (medical examination for employability assessment, disability screening, and alcoholism/drug addiction determination) to be completed and returned to the Welfare Employment Representative within 10 business days. The district has contracted with St. Mary's Hospital for physical, mental health and drug/alcohol evaluations. Individuals are generally referred to the contracted provider for an evaluation when they do not already have a treating practitioner. The Welfare Employment Representative can also accept medical documentation from the individual's practitioner. Individuals are notified of their exempt status within 10 days of determination.

- 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 Intake Worker makes the initial employability determination during the application process. At this time, it is determined as to whether the individual is employable or needs medical documentation. The Intake worker will make the appropriate referrals at that time (drug and alcohol evaluation, etc.). The Welfare Employment Representative reviews the appropriate referrals as well as the medical documentation and determines whether the individual is exempt, non-exempt, or work limited based on the evidence provided and in accordance with NYCRR guidelines. Once the determination is made the Welfare Employment Representative will notify the individual of the determination in writing with the LDSS-4005 or LDSS-4005A. Notification of Temporary Assistance Work Requirements Determination (Exempt/Non-Exempt) is made within ten days of receipt of the documentation.

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

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

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

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

**Process for Reviewing Medical Documentation**

<b>Yes or No:</b>	<b>District’s process for reviewing medical documentation</b>
Yes	District directs the contracted physician or individual’s physician to determine status.
Yes	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: The Intake Worker makes the initial employability determination during the application process. At this time, it is determined as to whether the individual is employable or needs medical documentation. The Intake worker will make the appropriate referrals at that time (drug and alcohol evaluation, etc.). The Welfare Employment Representative reviews the appropriate referrals as well as the medical documentation and determines whether the individual is exempt, non-exempt, or work limited based on the evidence provided and in accordance with NYCRR guidelines. Once the determination is made the Welfare Employment Representative will notify the individual of the determination in writing with the LDSS-4005 and 4005a, Notification of Temporary Assistance Work Requirements Determination (Exempt/Non-Exempt).

**9.2 Mental Health Screening and Assessment**

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

No

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

N/A

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

**Screening Tools the District Uses**

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

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

N/A

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

N/A

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

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

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

If an individual declares that he or she has a physical or mental impairment, the Welfare Employment Representative will request that the individual has the LDSS-4526 completed and returned to the district within 10 business days. The Welfare Employment Representative will review the medical information (LDSS-4526, drug prescriptions, reports from the treating health care practitioner etc.) Based on the information provided the representative will determine the restoration of the individual's self-sufficiency.

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

The treatment plan is based on the recommendation of the health care provider. The Welfare Employment Representative reviews the medical information received, calling the doctor if necessary, and then refers the individual to the recommended treatment provider.

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

The Welfare Employment Representative requires updated medical reports and evidence of compliance with treatment periodically as determined appropriate based on the medical evidence, and at a minimum, at re-certification. The Welfare Employment Representative assists individuals to obtain verification as needed. The district also tracks, monitors, and provides case management for potentially employable individuals. Monthly hours of treatment attendance will be collected as determined appropriate.

Once an individual is determined to be employable the Welfare Employment Representative will assign an activity that is consistent with the individuals documented mental health and physical limitation. The Welfare Employment Representative will inform the work activity supervisor in writing regarding an individual's limitations.

## **10. District Certification**

### **10.1 Certification**

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

1/10/2024  
Matthew Beck  
Commissioner