

# **Oswego 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.)*

Attachment A provides an organizational chart for Oswego County Department of Social Services highlighting the units responsible for the district's employment programs. Included are Assistance Programs and Employment and Training Units.

Administrative oversight is provided through a DSS Managers Group comprised of:  
Commissioner of Social Services  
Deputy Commissioner of Social Services  
Director of Assistance Programs  
Director of Employment & Training  
Coordinator of Child Support  
Coordinator of Community Services  
Director of Fiscal Management  
Director of Social Services

- 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.

While Employment Staff take the lead in delivering employment services, an integrated approach comprised of staff across different units deliver services to clients. Employment functions include, but are not limited to assessment, employment plan development, assignment and monitoring compliance with work activities, job development, job placement and job retention activities, job readiness training, education and job skills training, conciliation/dispute resolution, accommodation of needs as they relate to employment activities and monitoring medical treatment plans for exempt populations. Staff also coordinate with contracted, on-site, OASAS providers with monitoring ongoing compliance with substance use disorder recommendations and treatment programs. Coordination of service referrals across the integrated team provides opportunity for households to progress on their road to self-independence.

## 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
Farnham Family Services	\$180,795	FFFS Local	FA SNA Family SNA Individual TANF 200%	Completed on-site Drug and Alcohol screenings and assessments, employability determinations, tracks attendance and monitors compliance of drug and alcohol treatment requirements.
Oswego County Opportunities	\$155,472	FFFS	FA SNA Family TANF 200%	Case Management Services to assist individuals subject to work requirements with identifying and overcoming barriers to participation.

- 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>
Child Care and Development Council of Oswego County	Others: OCFS Division of Child Care Services Memorandum of Understanding	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist families with childcare needs Services to assist individuals to become registered and legally exempt childcare providers
Oswego County Workforce NY (OCWNY)	FFFS Others: WIOA, NYESS	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals to prepare for, obtain and retain employment
Oswego County Opportunities	Others: OCO Funding Streams	FA SNA Family SNA Individual SNAP TANF 200%	Services to begin early childhood education (Head Start) Services to assist with nutritional needs (WIC) Services to assist with Domestic Violence Needs (SAF) Services to assist with Homeless/Housing Needs Community Outreach sites/space to provide group workshops and information on community resources (Literacy Zone) Services to help pregnant women and infants live healthier lives (Options)
A4TD	Others: Other	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals ages 55 and over with job readiness training and internship
HHUNY	Others: DOH Funding	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals with home health care management services

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Food Bank of CNY	Local Others: OTDA SNAP State Plan Funding	FA SNA Family SNA Individual SNAP TANF 200%	Outreach and Education Services for SNAP Services to assist individuals apply for SNAP and follow-through with eligibility requirements
Oswego County Food Banks	Others: Various	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals with food/nutrition needs
HUD Housing Offices in Oswego County	Others: Various	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals with financial assistance for housing needs
The Salvation Army	Others: Various	FA SNA Family SNAP TANF 200%	Pathways of Hope Program provides services to assist individuals with case management, goal setting and connections to resources
Catholic Charities	Others: Various	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals and families in crisis with things such as rental assistance, heat/utility assistance, clothing, household items, furniture
Farnham Family Services	Others: Various	FA SNA Family SNA Individual SNAP TANF 200%	Services and peer advocacy to assist individual in recovery from substance abuse issues
ACCES-VR	Others: NYSED	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals with disabilities to obtain training and prepare for obtain and retain employment
ARISE	Others: Various	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals with disabilities
CiTi	Others: NYSED	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist individuals to remediate basic skills, address English language barriers, prepare for High School Equivalency exam and to obtain work readiness skill.

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Cornell Cooperative Extension	Others: Various	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist families with financial literacy, budgeting, and food/nutrition needs (ie. Food Smart workshops, budgeting food money, nutrition and meal preparation)
Reach CNY	Others: NYS DOH	FA SNA Family SNAP TANF 200%	Lead agency for PICHHC (NYSDOH Perinatal and Infant Community Health Collaborative) who subcontracts with Options program to provide Community Health Worker and home visiting services to pregnant and parenting individuals
Oswego County Health Department	Others: OCFS, NYSDOH, Cornell Cooperative Extension	FA SNA Family SNAP TANF 200%	Healthy Families of Oswego County provides evidence-based home visiting program that provides free services to pregnant and new parents
SUNY Oswego VITA	Others: Various	FA SNA Family SNA Individual SNAP TANF 200%	Services to assist families with income tax preparation

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:

Oswego County Opportunities (OCO) Case management Assistant Services Program is monitored through monthly submission of case notes by OCO along with a report showing a compilation of contacts between the Case Manager Assistants and clients which includes attempts to contact, services provided and outcomes. Participants in the CMA program are identified by OCDSS staff while determining their employment plan. Eligibility for TANF or 200% program funding is determined prior to referrals being made. OCO also submits an annual Single Audit for OCDSS to review. Regular communication between OCDSS and OCO Management staff occurs to assist in assessing and monitoring ongoing progress or need for changes.

Farnham Family Services provides Drug & Alcohol Screening, Assessment and ongoing monitoring of compliance with recommended substance use disorder treatment. Each screening sheet completed by an applicant/recipient for Temporary Assistance is logged into an internal database for tracking and monitoring. Contracted staff regularly obtain and monitor timesheets for participation and communicate compliance and/or non-compliance with OCDSS staff as needed. Monthly data is compiled by the Director of Assistance Programs to report out for FFFS funding and regular communication between Farnham and OCDSS management staff occurs to discuss ongoing need.



Attendance, participation and outcomes of both programs are reviewed at monthly OCDSS meetings to discuss any identified concerns or modifications to process that may need to be implemented.

### 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).

Not Applicable - OCDSS has no OTDA Jobs Staff

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

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

### Programs and Services Provided at Career Centers

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

OCDSS currently has Employment & Training Staff located in the Oswego County Workforce NY (OCWNY) Career Center in Fulton. Employment staff providing mandatory services for Temporary Assistance/SNAP populations are located in the Mexico office under the supervision of the Director of Assistance Programs. Location of staff in OCWNY has provided the opportunity to develop working relationships with staff from other agencies at OCWNY. This includes an informal referral process with NYSDOL, the NYS Veteran's Program, ACCESS-VR and A4TD. In addition, information is shared on job postings/job leads, on-site employer recruitments, open interview sessions, upcoming education and vocational training opportunities along with on-site vocational/college recruitments.

OCDSS also has an established process for referring individuals with a criminal history to a NYSDOL staff member that works with this population and provides information, resources and job referrals.

## 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:</p> <p>OCDSS has an up-front Applicant Orientation for all adult individuals applying for Temporary Assistance. The Applicant Orientation includes the following information:</p> <ul style="list-style-type: none"> <li>- Information regarding the temporary nature of public assistance with emphasis on time limits</li> <li>- Alternatives to Temporary Assistance</li> <li>- Information for one-time payments</li> <li>- Available tax credits</li> <li>- Drug and Alcohol Requirements</li> <li>- Medical review process for those claiming and exemption or work-limited</li> <li>- Domestic Violence and abuse information and referral services</li> <li>- Employment Requirements</li> <li>- Work requirements for applicants and recipients</li> <li>- Career Center services</li> <li>- Home Visiting Information</li> <li>- Other community resource information</li> <li>- Transitional Benefits</li> </ul>

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

Orientation is conducted by staff within the Assistance Programs Division at the Oswego County Department of Social Services in Mexico, NY. Orientations are currently being conducted individually with applicants at the time of the Employment Assessment due to changes made during the PHE. Group orientations may be provided again when the district determines it is appropriate. Orientation information is provided verbally as well as in writing at that time. At recertification, orientation information is mailed to the individuals in writing (orientation brochure and handout attached).

## 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 WTCMS.
Yes	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.

Yes or No:	How the district conducts assessments
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:

Households with dependent children as well as individuals who are 16 and 17 years of age, who are not in school, receive assessments within 90 days of eligibility. Households without dependent children are completed within 1 year of application date. When an individual attends their face-to-face interview with Temporary Assistance Unit, the applicant is provided the option to complete their Employment Assessment face-to-face on the same day while they are in the agency. Face-to-Face Employment Assessments are conducted by staff primarily in the Mexico office, but accommodations can be made to complete these off-site at a shared community site if needed.

If the individual chooses, they can be scheduled for a phone Employment Assessment for a future date. If the applicant chooses to complete the Employment Assessment by phone, they are provided a scheduled date and time within 10 days of their TA interview and written notification of this appointment is provided the same day.

OCDSS Staff utilize the NYS Assessment form (LDSS-4980), and the NYS Employment Plan (LDSS-4978) to assess an individual's current circumstances. Each assessment is done with a person-centered approach to assess the person's education level, including literacy and English language proficiency, basic skills proficiency, childcare and other supportive service needs, skills and prior work experience, prior participation in education and training, training and vocational interests as well as any family circumstances such as the special needs of a child to identify current level of work readiness.

Non-exempt individuals who are work-ready are assigned to job search and work readiness workshops as appropriate. Individuals who are non-exempt but not immediately work ready are assigned to workshops and/or referred to other services to address their needs. At the point the individual is determined work-ready, they are assigned to job search and/or appropriate workshop activities. Available community resources as well as work activities that may be assigned at a later date, such as educational training, vocational training and work experience, are also discussed with the individual at that time.

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

Employment Staff within the Assistance Programs Division are responsible for conducting employment assessments.

- 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)):

Initial Employment Assessments are conducted by Employment Specialists only and both Employment Specialists and Employment Specialist Assistants conduct Employment Assessment updates. Both Employment Specialists and Employment Specialist Assistants are required, at minimum, to have 2 years of study (60 credit hours) at a regionally accredited or NYS registered college, university or business school or 2 years of experience supporting social service, employment or other closely related program. Both Employment Specialists and Employment Specialist Assistants are also required to attend all OTDA approved training in conducting employment assessments and employment plan development and receive supervisory oversight of their work during their probationary period.

- 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?

An initial employment assessment is conducted at application for Temporary Assistance as outlined in Section 2.2(b) and at a minimum of every 12 months. Any time an individual contacts the agency with noted changes in their employability status or assessment information, an updated employment assessment is completed.

OCDSS utilizes the alert system on WTW to determine when assessments are due for update as well as assessments that are past due. The Assessment Status Report is also run quarterly and provided to each Employment Specialist to assist with monitoring of assessment dates.

### 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.

<b>Yes or No:</b>	<b>How the district develops employment plans</b>
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**

<b>Yes or No:</b>	<b>Who develops the districts employment plans</b>
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:

An Employment Plan is completed with the individual at the same time as the Employment Assessment while reviewing the LDSS-4980.

Employment Specialists complete the initial Employment Plan as appropriate utilizing the NYS Employment Plan (LDSS-4978) to establish a plan of service to move the individual towards self-independence. The plan is developed with each individual and outlines/defines the activities an individual will be assigned to reach his/her employment goal. The employment plan also addresses any barriers faced by the individual and the supportive services necessary for the individual to participate in employment activities.

The Employment Plan is person-center based and developed with each individual based on required activities, desired goals, interest, needs and preferences. If preferences cannot be accommodated it is noted in the plan. Upon completion, a copy of the individual Employment Plan is provided to the individual.

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

An individuals employment plan is updated when there are changes to any of the elements of the plan. This can include changes to employment goals, supportive services provided and outcomes including work activity assignments. Each individual signs and receives a copy of their plan. If the individual is conducting a face-to-face assessment/reassessment and update to their plan, they are provided a copy at that time. If the changes are discussed and updated over the phone, this information is noted in the plan and in the case record and a copy of the updates plan is sent to the individual for review.

### **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:

Oswego County will utilize the state definition above for "Engaged In Work".

#### **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:

Oswego County DSS has the following accommodations in place to address the needs of non-English speaking participants in accessing services:  
OCDSS Lobby displays Language Identification Desktop Display to help individuals identify spoken language  
Contracted Language Services are provided by OCDSS  
On-Site bilingual staff to assist as needed with non-English speaking interactions  
Community partnership with CiTi to provide information regarding ESOL classes being offered  
Adaptive technology computer is available to communicate with hearing/speech impaired individuals

#### **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:

OCDSS policies to reduce the amount of time participants fail to participate in work activities include the following:

OCDSS requires all applicants for Temporary Assistance to conduct an Employment Assessment. During the assessment, individuals are educated on the benefits of full participation in work activities and any barriers to participation are addressed.

Each employment plan is individually developed with the individual taking into consideration

their employment goals, education needs, interests, skills, and any barriers to employment prior to work assignment to work activities.

Meetings are held with participants to review progress and concerns. During these meetings participants are also reminded of the importance of full engagement in activities and how this can be used to help them in securing employment as well as negative impact to their case for non-compliance.

OCDSS may refer participants to a contracted Oswego County Opportunities Case Management Assistant (CMA) when eligible and appropriate. CMAs are able to work 1:1 with the participant to overcome barriers encountered in maintaining work activity attendance.

### 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	<p>Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: OCDSS utilizes the Adults in Sanction Status report to assist with monitoring individuals in sanction status. OCDSS works with sanctioned participants by requiring they attend Case Eligibility Review meetings as part of their determination for ongoing eligibility for Temporary Assistance. These meetings provide the participant the opportunity to discuss with an Employment Specialist the reason(s) for non-compliance with work activities and what is needed to engage the individual to end their sanction. This may include discussion of issues such as barriers to employment and ways to overcome these barriers, the negative impact of sanctions on their family and Temporary Assistance funding, child care needs health concerns, financial obstacles and short and long-term goals to self-independence.</p> <p>The Employment Specialist may also request documentation to show how the participant is meeting current financial responsibilities (i.e. rent, utilities) with a reduction in their Temporary Assistance grant. Resources (i.e. child support, employment) to assist the participant to meet their responsibilities are also explored. Failure of the individual to participate in these meetings without good cause may result in a case closing.</p>
Yes	<p>Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: As outlined above, Oswego County’s strategy to engage sanctioned participants involves immediate engagement of sanctioned participants through case eligibility review meetings. These meetings may continue through the duration of the sanction. If it is identified at recertification interview that the participants sanction will be completed prior to the beginning of their new certification period, Assistance Programs staff include this as part of their recertification interview and provide the participant with information on how to contact their Employment worker to end their sanction.</p>



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: As outlined above, Oswego County's strategy to engage sanctioned participants involves immediate engagement of sanctioned participants through case eligibility review meetings. These meetings continue through the duration of the sanction and participants are informed when they are able to re-engage in work activities to end their sanction. Should a participant contact a worker regarding a change to their case, the worker will assess the status of the sanction and inform/educate the participant on opportunities to re-engage if applicable.

### 3.5 Strategies for Reducing the Need for TA

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

To reduce the need for TA, OCDSS staff completes Employment Assessments with participants within 10 days of their eligibility interview. During the assessment barriers are addressed and job readiness and job search activities are started. OCDSS also focuses on preparing clients for job retention. Work readiness is an integral part of job search prep to ensure clients retain their jobs through good attendance, reliability, skill building and fulfillment of basic needs.

Incentive cards and supportive services are offered to qualified participants to assist with obtaining and maintaining employment. Information regarding transitional benefits as well as other beneficial supports such as WIC, Head Start, Childcare Assistance Program, HUD, Child Support, National Grid budget plans, HEAP, free cell phone programs and free tax preparation is provided.

Should a participant's Temporary Assistance case close due to earned income, participants are immediately determined eligible for our FFFS funded TANF 200% programs for the first 12 months following their closing. During the initial 12 months, monthly questionnaires are mailed to the participants to allow them the opportunity to identify any concerns they may be experiencing that the agency could assist with before they reach crisis status or impact their employment. Should a questionnaire be returned with concerns, a staff person reaches out to discuss possible resources to assist them. Each participant who returns their questionnaire and meets eligibility criteria is provided an incentive card to promote continued connection with the agency during this transition period. The goal of this ongoing case management service is to provide support for ongoing employment and reduce the need for Temporary Assistance.

## 4. Work Activities

### 4.1 Allowable Work Activities

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

## Allowable Work Activities by Case Type

Activity and Definition	Case Type
<p><b>Unsubsidized Employment</b> – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Work Experience</b> – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p>	<p>FA SNAFAM SNA SNAP</p>
<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>

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

Activity and Definition	Case Type
<p><b>Subsidized Public Sector Employment</b> – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<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>FA SNAFAM SNA</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>FA SNAFAM SNA</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</p>

## 4.2 Job Development

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

Yes.

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

### How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	<p>District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: OCDSS operates a Subsidized Employment program funded through Flexible Fund for Family Services (FFFS) and administered by Employment and Training staff. Staff identify job openings for Temporary Assistance applicants and recipients based on the individuals' interests and needs. Employers in the public, private and non-profit sectors are provided an opportunity to interview candidates for available job openings. Should an employer select a participant, a training period is established taking into consideration the background and skill set of the individual. The employer is reimbursed the trainees wages during the designated training period to offset the employer's cost of training. Full-time, permanent positions are targeted for the Subsidized Employment program, however, part-time positions can be considered if appropriate. Once an individual is placed with an employer, Employment and Training staff contact employers on an ongoing basis and maintain contact with the trainee and employer as needed, or at minimum of once each month.</p> <p>Employment and Training staff also coordinate with other workforce programs and serve as a business service representative on the OCWNY Business Service Team. This participation helps to ensure all job leads are shared between respective workforce programs so all appropriate candidates can be considered.</p> <p>OCDSS staff provide information and participate in job fairs coordinated by OCWNY and other organizations. TA and SNAP participants are provided information and encouraged to attend the fairs.</p>
Yes	<p>District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: OCDSS has an informal agreement with the OCWNY Career Center located in Fulton to share information on job development activities. The Job Development staff at OCWNY utilize electronic means (i.e. email, NYS Job Bank, Social Media) to share information on job leads and employer recruitments. As OCWNY staff develop/learn of job openings and/or employer recruitments, information is shared with local district employment staff to make them aware of the openings, requirements and process for referring individuals. Employer recruitments are held on-site at the OCWNY Career Center and at the Career Center located at the Department of Social Services. Staff provide outreach to individuals inviting them to attend the recruitments.</p>

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

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

Through affiliation with the Oswego County Workforce Development Board, OCDSS works with partner agencies to identify appropriate education programs available in Oswego County. OCDSS has access to ABE, HSE and ESOL programs through CiTi as identified in Table 2 under Section 1.2 of this plan. OCDSS staff assess the educational skill level of Temporary Assistance applicants/recipients and may refer individuals who lack a high school diploma, HSE, identified as basic skill deficient or those in need of ESOL to mandated participation in educational programs.

- 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.

OCDSS coordinates with OCWNY Career Center and utilizes Local Workforce Development Boards approved demand occupation list to identify jobs in demand in our local/regional labor market which could be approved for a training program. Training providers used must be an approved provider on the New York State Eligible Training Provider List (NYS ETPL). Training providers can apply for approval on the NYS ETPL at any time. An individual requesting training in an occupation not currently identified on the Demand Occupation List may make a case for approval if they can show there are three or more verifiable job openings using a bona fide job search engine, or by providing a commitment to hire letter from a local employer.

- 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.

OCDSS assesses the educational skill level of Temporary Assistance applicants/recipients. All non-exempt participants who lack a high school diploma, HSE, are basic skills deficient or in need of ESOL classes are made aware of the educational services available to meet their needs. Individuals may be mandated to participate in these programs as part of their employment plan.

- 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.

OCDSS' policy is to approve all non-exempt individuals without a GED for educational programs. In addition, non-exempt individuals would be required to participate in other mandated work activities based on their employment assessment and/or plan. There would be no instances when OCDSS would deny an individual's mandatory or voluntary participation in an educational activity.

- 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.

OCDSS will approve educational and/or vocational trainings programs, which include, but is not limited to, post-secondary education, as a work activity where the client's assessment and employment plan indicate that such activity would help them achieve their employment goals and likely lead to the attainment of a degree or certification, to the extent that such approval does not jeopardize the State's ability to comply with federal work participation rates. Post-secondary education providers may include community, public, and private colleges, and business, technical, trade or vocational schools.

Non-exempt Temporary Assistance applicants/recipients interested in participating in job skills or vocational education activities meet with an Employment Specialist to determine if the work activity is the most effective method for achieving self-independence. Factors considered in approving this work activity may include: cost of training, ability to meet federally mandated participation rates, past history of work activities/training assignments and success/non-success in completing these activities, the need for training current skill levels, an individual's ability to find gainful employment with their current skill level, the individual's aptitude for a particular occupation and local demand of businesses/employers.

Before an individual is approved for training, the individual must complete a training approval process. This process may include market research to show they understand the job opportunities available, working conditions, work shifts, job expectations and expected earning capacity for their chosen field of training. The individual should also have a history of follow-through on employment/work requirements. Those accepted for training must commit to finding and accepting employment as a result of the training. This commitment is established by reviewing their history in regard to successful completion of past requirements, quality of their market research, and their response to questions asked during the interview process. OCDSS staff determine final approval or disapproval of job skills or vocational educational activities.

Individuals claiming a work exemption must receive clearance from their provider (i.e. Drug/Alcohol, medical, mental/behavioral health) in order to be considered for job skills or vocational training activities.

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

OCDSS uses a variety of methods to evaluate training providers. These include but are not limited to:

Work Experience Program Worksite Agreement: Used to evaluate public and community work experience sites

OJT Proposal/Contract: Evaluates OJT and other subsidized employment programs

Utilization of the New York State Eligible Training Providers Listing (NYS ETPL) and the Oswego County Demand Occupation List for Job Skills training and Vocational Training approvals.

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

OCDSS assesses each individual based on their needs, appropriateness for and ability to benefit from training and local labor market conditions. Participants seeking training are generally required to perform market research exploring local job market and training providers who offer what the applicant is looking for. Oswego County does not direct participants to specific training providers, rather, the NYS ETPL is used as a guide for the applicant to select the provider that best meets their needs. Individuals are allowed to make a case for training if they can show there are three verifiable job openings in the local labor market for a training in an occupation that is not on the demand occupation list, or with an employer commitment to hire letter. Once determined eligible, OCDSS notifies the individual in writing of their acceptance an approved training.

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

Individuals are notified of approval for training enrollment in a work activity through meeting with a OCDSS staff person. Individuals are notified verbally and/or in writing of all assignments and appointments.

- 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.

OCDSS adopts each Oswego County school district's enrollment policy in support of their effort to get teen students to attend and graduate from high school in accordance with NYS Education Law. District staff request verification of school enrollment at each application and recertification for individuals 16-18 years of age. Each quarter, a school enrollment verification form is mailed to each school district to verify status and information is provided to an Employment worker to follow up with as appropriate.

- 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.

During a face-to-face Temporary Assistance eligibility interview, and prior to any assignment of work activities, applicants are required to complete the Screening for Participation in or Exemption From Work Activities Form (attached).

If the applicant indicates that they are able to work but have a verifiable mental or medical limitation which may impair their ability to perform work related functions, the eligibility worker requests medical documentation regarding their limitations. The submitted documentation is used to identify limitations and accommodations needed prior to



assignment to work activities. If an accommodation is needed for an individual to participate in a work activity such as work experience, the Employment worker provides the work site with written notification of the work limitations and required accommodation. Should the work site indicate that they are unable to meet the accommodation, the Employment staff will work with the site to see if there is any assistance we can provide or reassign the individual as appropriate.

Applicants/Recipients who declare limitations outside of the interview process are immediately removed from any assigned work activities until documentation can be requested and submitted of their limitations and needed accommodations. Once verification is received, all limitations and accommodations are considered prior to re-assignment to another work activity.

Applicants stating they are able to work without limitations, and those who decline to answer, are considered non-exempt from work activities and assigned accordingly. Employment staff assess and determine work readiness and assign individuals to appropriate work activities. Once the applicant becomes a recipient, the Employment staff continue to work with the individual and assigns them to additional activities as appropriate.

#### 4.4 Post-Secondary Education Approval and Enrollment Policies

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

The highest level allowed is a two year degree program, or the last two years of a bachelors degree program if the individual has already completed two years of college prior to applying for approval for job skills or vocational training and meets all other requirements under section 4.3(e) of this plan.

- 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 or No:	Conditions for disapproval of work activity
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).

OCDSS strives for a weekly participation requirement of up to 40 hours per week for each non-exempt individual. While this is the established standard, each case is reviewed, and individuals are ultimately assigned based on the circumstances of their case. Work hours assigned may vary due to work exemptions, work limitations and/or other case circumstances.

Applicants participate in an Employment Assessment generally within 10 days of their face-to-face Temporary Assistance eligibility interview. The assignment to work activities begins at the Employment Assessment. Non-exempt individuals determined work ready are assigned to job search and job readiness trainings. Failure to participate may result in a negative action on their case.

At the Employment Assessment, work experience and other appropriate work activities are reviewed. At the point the Temporary Assistance case opens, the individual is assigned to Work Experience and/or other appropriate work activities based on the circumstances of each case.

Upon notification of an individual's status change from exempt to non-exempt, the individual is scheduled for a case eligibility review meeting to complete a re-assessment of their circumstances. Meetings are generally scheduled within one week of the notice of change in status. OCDSS staff meet with the individual to complete a NYS Employment Plan, address barriers and supportive services and assign the individual to Job Search. The individual is provided the job search contract record which is used for individuals to record their job search contacts and is given a job search follow-up appointment at a later date. The individual is also assigned to other appropriate work activities based on their needs, program requirements and employment goals. Activities may include, but are not limited to, educational training, voc ed, job readiness training, job skills training and work experience. Oswego County utilizes WTWCMS and COGNOS reports to monitor participation rates.

- 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	178
Households without Dependent Children Average Monthly	139

- 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:

OCDSS uses the current and monthly COGNOS reports to monitor the district's progress toward meeting work participation requirements. Staff are provided with both the preliminary countable and non-countable report and the participation and engagement report specific to their caseload each month. The COGNOS Earned Income Reports and Adults in Sanction status report are also shared with staff monthly. These reports are used to ensure information in the system is accurate and complete, and to identify cases needing to be engaged or assigned to additional work activities. Supervisory and management staff also use reports to review progress (for individual staff and in aggregate) and identify areas needing further attention.

- 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**

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	5	Job search contacts are recorded on a job search log. Non-exempt applicants are assigned to job search at the time of the employment assessment. Applicants are scheduled to attend their first Job Search appointment within 2 weeks of the Employment Assessment and scheduled to attend appointments at a minimum of every 30 days. Case Management by Employment Specialists is available on a daily basis to ensure continued assistance with job search and supportive services. Applicants are also assigned to district offered job readiness training as appropriate such as interviewing skills, resume writing, intro to computers, internet job search, career exploration and Keys to Success. Individuals claiming work limitations are

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
			assigned following the receipt of medical documentation that has determined them work limited and outlined their limitations.
SNA Individuals	5	5	Job search contacts are recorded on a job search log. Non-exempt applicants are assigned to job search at the time of their employment assessment. Applicants are scheduled to attend their first job search appointment within 2 weeks of the Employment Assessment and scheduled for ongoing appointments at a minimum of every 30 days. Case Management by Employment Specialists is available on a daily basis to ensure continued assistance with job search and supportive services. Applicants are also assigned to the district offered job readiness trainings as appropriate such as interviewing skills, resume writing, intro to computers, internet job search, career exploration and Keys to Success. Individuals declaring work limitations are assigned following the receipt of medical documentation that has determined they are work limited and outlined their limitations.

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

Yes.

#### **TA Recipient Job Search**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	5	5	All job search contacts are recorded on a job search log. Job Search appointments are scheduled at a minimum of every 30 days and Employment Specialists are available on a daily basis to ensure continued assistance with job search and supportive services. Recipients are also assigned to further activities such as work experience, vocational education, educational activities, and job skills and job readiness training.
SNA Individuals	5	5	All job search contacts are recorded on a job search log. Job Search appointments are scheduled at a minimum of every 30 days and Employment Specialists are available on a daily basis to ensure continued assistance with job search and supportive services. Recipients are also assigned to further activities such as work experience, vocational education, educational activities, and job skills and job readiness training.

- 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:

OCDSS approves self-employment as part of the individual's required work activities when the number of hours of paid employment can be verified. Agency self-employment and/or independent contractor agency forms are provided to the individual and are considered acceptable verification of state date, earnings and number of hours of 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.

All OCDSS Eligibility staff are trained to provide a comprehensive oral explanation to all adults of TA/SNAP and NTA/SNAP of SNAP work requirements and ABAWD rules at application, recertification and any time an individual has a change to their employment status as outlined in the desk guide. All staff are trained and provided with a desk guide which includes required information to provide during discussions with clients either face-to-face or over the phone. Staff inform adult individuals that they meet the criteria of an employable individual and then inform them of the general SNAP work rules and requirements along with the mandatory SNAP E&T rules and ABAWD requirements when applicable.

- 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**

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

While job search assistance is offered, OCDSS does not mandate NTA SNAP recipients to participate in SNAP E&T work activities, however, NTA SNAP applicants and recipients are provided written information regarding services available to assist with employment needs.

- 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):

OCDSS Eligibility staff inform NTA SNAP work registrants of services available at the time of application and recertification. The information is contained on the SNAP Intake Appointment letter and a mass mailing is done at recertification to households including work registrants.

## 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):

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.

All non-exempt individuals complete an assessment which is done with person-centered approach to assess the persons education level, including literacy and English language proficiency, basic skills proficiency, childcare and other supportive service needs, skills and prior work experience, prior participation in education and training, training and vocational interests as well as any individual or family circumstances such as the special needs of a child to help identify appropriate assignment of activities.

OCDSS Work Experience Assignment contract informs all providers of the requirement to notify the agency if a participant is not a good fit. Should a provider determine that a participant is not a good fit, they would contact the agency within 10 days to notify them of their concerns. The Senior Employment Specialist will have a discussion with the provider around their concerns and determine if there are any accommodations, we could assist with that would make the assignment more appropriate. If no accommodations could be made, the Senior ES would discuss with the Employment worker and arrangements would be made to reassign the individual to a different activity and document in the case record. If appropriate, within 10 days of the determination, the Employment worker would notify and discuss with the individual the reason for reassignment and work with them on any barriers that may need to be addressed.

- 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.

OCDSS Senior staff will verbally discuss appropriate placement of individuals with a provider. Should it be determined that an individual is not a good fit for a particular activity or program, written notification of reassignment will be provided.

- 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.

An ES goes out to the sites biweekly to obtain timesheets, get info on progress of each participant and address any issues. The supervisor also calls immediately with any immediate concerns.

Senior Employment staff will provide oversight and have discussion with providers regarding any concerns that should arise regarding placement of individuals.



## 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.

12

- 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.

12

- 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.

6

- 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.

6

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:

OCDSS will provide supportive services that may include, but are not limited to, transportation assistance such as automotive insurance, automotive repairs and costs associated with a driver's license, driver's permit and automotive registration fees. In addition, supportive services may also include certification/licensing fees, childcare, clothing/uniform costs, educational related activities, gasoline allowances, job related safety equipment, license/work related fees and incentive cards.

Requests for supportive services are reviewed on a case-by-case basis with consideration given to need, availability of funds, and the availability of services from other resources and/or community programs. Each request is reviewed to determine if it is reasonable and cost effective. Maximum allowable costs are established for each service (see below)

Supportive Service:	Dollar Limit:
Automobile Insurance	Actual cost for six month policy (NYS legal minimum unless collision is required)
Automobile Repairs	\$4500
Fees for Drivers License/Permit	Actual Cost
Fees for Automobile Title/Registration	Actual Cost
Books, Fees, Supplies	Actual verified cost if required for an approved training program
Childcare	Applicable District Market Rate
Clothing	\$200.00
Drivers Education/Defensive Driving	\$820.00
Educational Fees	Actual verified cost if required for an approved training program
License and Other Work-Related Fees	\$250.00
Tires	\$1000.00 (\$250.00 per tire)
Tools & Equipment	\$500.00
Transportation	IRS medical/moving rate
Gas Card	\$75.00
Incentive Card(s)	\$150.00
Tuition	Actual cost less federal and state financial aid up to a maximum of \$6,000.00

Supportive services may be provided to enable an eligible individual to participate in an employment activity or to accept or retain employment. Supportive services are issued in

accordance with agency policy up to the dollar caps listed. Exceptions to both the supportive service available and the caps can be made by the Commissioner and/or their designee. Oswego County Department of Social Services retains the final say regarding approval of supportive service requests. The established OCDSS TANF 200% Transportation Guidelines are attached.

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

**Transportation Services Provided to Clients**

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

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

Due to the rural nature of Oswego County and adverse winter conditions, OCDSS establishes a distance not to exceed one (1) mile as the maximum distance the district will require a participant to walk to a work activity assignment or access to public transportation. Oswego County will not allocate transportation supportive services for participants that reside within a one (1) mile radius of the work activity site. Exceptions to this policy can be made by the district on a case-by-case basis due to extenuating circumstances, such as transporting children to/from childcare or a participant's verified limitation.

- 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:

OCDSS may provide supportive services to individuals at risk of needing Temporary Assistance, provided the service is needed to obtain and/or maintain employment. Supportive services may include, but are not limited to, automotive insurance, automotive repairs, fees associated with driver's license, driver's permit, automotive registrations, tires,

and clothing/uniform costs. Requests for supportive services are reviewed on a case-by-case basis with consideration given to need, availability of funds and availability of services through other resources or community programs. Requests are approved if they meet the criteria and fall within the maximum allowable costs. Exceptions can be made by the Commissioner or their designee. Requests for supportive services not listed above are reviewed on a case-by-case basis using this criteria.

OCDSS may provide up front mileage costs for a participant to accept employment with a verified job offer. The maximum allowable cost will be determined by multiplying the IRS rate for medical/moving by the number of miles to get to/from the employer for each scheduled day of work until which time the participant receives their first pay check, up to a maximum of \$75.00

OCDSS has the following arrangements in place to address the needs of non-English speaking participants in accessing supportive services:

The district employees Spanish speaking staff (our main alternative language), Access to Interpretalk, a language interpretation service, Informal agreement with Oswego County Citi for ESOL.

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

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

OCDSS may provide individuals eligible for TANF 200% services the supportive services outlined in section 7.1 to maintain employment. Requests for supportive services are reviewed on a case-by-case basis, with consideration given to need, availability of funds and availability of services through other resources and/or community programs. Requests may be approved if they meet these criteria and fall within the maximum allowable costs. Exceptions can be made by the Commissioner or their designee. Requests for supportive services not listed above are reviewed case-by-case. The district retains the final say regarding approval of supportive service requests.

OCDSS may provide incentive cards for TANF 200% eligible individuals that are active on a Temporary Assistance case who obtain employment at a minimum of 20 hours per week, obtain their TASC or a Vocational Education license/certificate. The incentive cards are also offered at established benchmarks if the participant remains active on Temporary Assistance.

OCDSS maintains regular contact with their TANF 200% eligible participants that close Temporary Assistance due to earned income for up to one year after case closing. Monthly questionnaires are mailed to participants to identify any barriers or obstacles they may be experiencing that may prevent them from maintaining employment (childcare, transportation). If any concerns are noted on the returned questionnaire, OCDSS reach out to the individual to identify ways we can assist. The district may provide incentive cards to individuals who return their questionnaire and are maintaining employment at a minimum of 20 hours weekly. These are reviewed monthly and issued with consideration given to need and availability of funds.

- 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:

OCDSS may provide supportive services as outlined in section 7.1 available to an individual who has closed their Temporary Assistance case due to employment provided the service is needed for the individual to retain their employment. Requests for supportive services are reviewed on a case-by-case basis with consideration given to need, availability of funds and availability of services and other resources within the community. Requests may be approved if they meet the outlined criteria and are within the maximum allowable costs per section 7.1. Exceptions can be made by the Commissioner or their designee. Requests for supportive services not listed above are reviewed on a case-by-case basis using these criteria. OCDSS retains the final say regarding approval of supportive service requests.

### 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.):

OCDSS may provide individuals eligible for TANF 200% services the following supportive services to obtain and/or maintain employment: automotive insurance, automotive repairs, costs associated with: driver’s license, drivers permit, automotive registration; as well as tires, incentive or gas cards, tools and equipment, clothing or uniform costs and other work-related expenses as approved. Requests for supportive services are reviewed on a case-by-case basis with consideration given to need, availability of funds and availability of services and other resources within the community. Requests may be approved if they meet the outlined criteria and are within the maximum allowable costs per section 7.1. Exceptions can be made by the Commissioner or their designee. Requests for supportive services not listed above are reviewed on a case-by-case basis using these criteria. OCDSS retains the final say regarding approval of supportive service requests.

## 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:

OCDSS applicants/recipients who fail to comply with employment program requirements receive a written conciliation notification providing an opportunity for conciliation. The conciliation notification advises the client to contact the agency within 10 days to explain their reason(s) for failing to comply with the work activity and to establish good cause. If the individual fails to contact OCDSS within the allowed timeframe, all information available to the district will be considered in determining if the client's non-compliance was both 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
Yes	A separate entity (described here): Through an integrated approach across the team, OCDSS staff renders a decision regarding willfulness and good cause. Those determined not willful or have good cause, are rescheduled. Good cause may include reasons such as employment, court appearance or illness. Those determined willful and without good cause are referred to the Temporary Assistance team to take action and issue a timely written notice. OCDSS staff can agree to a positive resolution on a case-by-case basis.

- 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:

OCDSS applicants/recipients who fail to comply with SNAP work activity requirements receive written conciliation notification providing an opportunity for conciliation. The conciliation notification advises the individual to contact the agency within 10 days to provide a good cause reason for failing to comply with the work activity. Good cause reasons may include things such as employment, court appearance or illness. The notification also explains how to avoid a SNAP sanction by demonstrating compliance with an assigned work activity. If the individual fails to contact OCDSS within the allowable timeframe or does not

complete the assigned work activity as an option, all information available to the district will be considered in determining the individual's non-compliance. If the individual demonstrates compliance by completing the assigned work activity, the individual is not referred for sanction.

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

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

Yes or No:	Who makes the TA good cause/willfulness determination?
Yes	The client's employment worker
Yes	A supervisor in the district
Yes	A separate entity (described here): Through an integrated approach across the team, OCDSS staff renders a decision regarding willfulness and good cause. Those determined not willful or have good cause, are rescheduled. Good cause may include reasons such as employment, court appearance or illness. Those determined willful and without good cause who have not demonstrated compliance with the assigned SNAP work requirement are referred to the Temporary Assistance/SNAP team to take action and issue a timely written notice. OCDSS staff can agree to a positive resolution on a case-by-case basis.

- 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:

To demonstrate compliance, SNAP recipients must comply with the requirement to look for work. Recipients need to complete 5 verifiable job applications and properly complete the Job Search Contract Record and return the record with the completed contacts within the conciliation timeframe (10 days). If the recipient contacts their Employment Specialist within the conciliation timeframe, an extension may be granted on a case-by-case basis. (see attached form (Option to Avoid A SNAP Sanction)).

**8.2 Sanction**

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

At the completion of a durational sanction, individuals who wish to end their employment sanction need to agree to comply with work activities and demonstrate compliance by participating in the work activity that the sanction was imposed for (or an appropriate work activity as determined by OCDSS) for five (5) consecutive business days. If the participant does not participate for five (5) or more consecutive business days, the participant is determined not to be in compliance with work requirements and the sanction continues.

If the individual agrees to comply and has demonstrated compliance, a referral is completed to the Temporary Assistance team requesting the sanction be lifted effective the date the individual agreed to comply, but no earlier than the expiration date of the sanction.



If the individual has documented an exemption from TA work requirements, a referral is completed to the Temporary Assistance team requesting the sanction be lifted effective the date the exemption is verified, but not earlier than the expiration of the sanction period.

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

At the completion of a durational sanction, individuals who wish to end their employment sanction need to agree to comply with work activities and demonstrate compliance by participating in the work activity that the sanction was imposed for (or an appropriate work activity as determined by OCDSS) for five (5) consecutive business days. If the participant does not participate for five (5) or more consecutive business days, the participant is determined not to be in compliance with work requirements and the sanction continues.

If the individual agrees to comply and has demonstrated compliance, a referral is completed to the Temporary Assistance/SNAP team requesting the sanction be lifted effective the date the individual agreed to comply, but no earlier than the expiration date of the sanction.

An individual may be eligible for SNAP benefits before the end of the durational sanction period if the individual documents that they are exempt from SNAP work requirements and is otherwise eligible for SNAP benefits.

### 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.
No	District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	<p>Other process: If an applicant/recipient declares a disability or work limitation, the individual is given a Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to their practitioner to complete. The individual is required to return the completed form within 10 days.</p> <p>If an individual is currently receiving services from Oswego County Behavioral Health Services (OHBS) and states that they are unable to work or have a work limitation based on a mental or behavioral health issues, the individual is required to sign a release of information and agency staff send the ROI along with determination forms to OHBS on their behalf with a request that the practitioner return within 10 days. If OHBS does not return the completed form, the individual is then given a Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to the practitioner to return.</p> <p>OCDSS may allow a written statement from a practitioner if the statement contains the necessary requirements to determine disability, length of disability and limitations if appropriate. If an individual states that they are unable to obtain medical documentation and requests assistance, OCDSS will assist the individual with obtaining documentation.</p> <p>If an applicant/recipient does not submit the required information within the necessary timeframe and does not request an extension, this could result in either a denial of their Temporary Assistance application or a closing of their Temporary Assistance case.</p> <p>OCDSS staff, are responsible to review medical documentation, monitor the recommended treatment plan, determine ongoing employment status, and review</p>

Yes or No:	How the district determines an individual's disabilities and/or work limitation
	<p>progress no less than every three months unless otherwise indicated on the completed Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form and no greater than 12 months.</p> <p>OCDSS reserves the right to contract with an independent medical exam provider to conduct physical, mental and IQ evaluations. In addition, should an individual be referred to an independent medical examination, Oswego County may use this information, along with any other documentation to determine the status of the individual's disability and potential to restore to self-independence.</p> <p>The mandated Alcohol and Substance Abuse Screening and Assessments are conducted on-site by a contracted Office of Alcohol and Substance Abuse Services (OASAS) licensed provider. Individuals identified through the screening process in need of assessment are required to complete an on-site assessment with the contracted staff unless they are already established in a treatment program and can provide a current recommended treatment plan.</p> <p>If the individual is recommended for treatment by the contracted OASAS provider, the individual is provided the opportunity to select their provider and an appointment is scheduled with the off-site treatment provider. At the time of the assessment, the individual is notified in writing of their scheduled appointment, their employability determination as determined by the on-site OASAS staff and the requirement to comply with any treatment recommendations.</p> <p>The on-site OASAS provider obtains the individuals attendance at a minimum monthly and progress reports minimally every three months. The on-site OASAS provider, in partnership with OCDSS staff, provide case management to monitor treatment requirements and progress. If the individual is determined non-exempt around treatment, the treatment is included as part of the individual's Employment Plan and attendance and progress are monitored.</p> <p>See attached agency forms (Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form).</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:

OCDSS reviews information obtained from the individual, individual's medical providers, drug/alcohol providers, on-site OASAS providers and any other information deemed pertinent by OCDSS staff to determine an individual's employability status. Local districts use this information to determine if the individual is considered exempt, non-exempt or work limited. The individual is notified in writing of the districts determination with the LDSS-4005/4005(a).

- 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>
No	District directs the contracted physician or individual’s physician to determine status.
No	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	Other process: OCDSS reviews information obtained from the individual, individual's medical providers, drug/alcohol providers, on-site OASAS providers and any other information deemed pertinent by OCDSS staff to determine an individual's employability status. Local districts use this information to determine if the individual is considered exempt, non-exempt or work limited. The individual is notified in writing of the districts determination with the LDSS-4005/4005(a).

**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
No	LDSS 5009 - Mental Health Screening Tool
No	The computer assisted version of the Modified Mini Screening tool (MMS)
No	Other Screening tool (described here):

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

N/A

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

N/A

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

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

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

In an Integrated Team approach, OCDSS staff review information obtained from the participant, the participant's medical providers, drug/alcohol treatment providers and any other information deemed pertinent by OCDSS to determine the individual's disability status and potential to be restored to self-sufficiency through identified treatment or rehabilitative activities.

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

In an Integrated Team approach, OCDSS staff review information obtained from the participant, the participant's medical providers, drug/alcohol treatment providers and any other information deemed pertinent by OCDSS to determine the individual's disability status and potential to be restored to self-sufficiency through identified treatment or rehabilitative activities.

Based on information gathered, a treatment plan is determined and referrals to appropriate treatment provider(s) are made by the practitioner/provider. The Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination Form outlines suggested ongoing treatment plans to assist in an individual's progress to self-sufficiency. If a provider will not complete the form as the client has not had enough visits with the provider (per their policy) the provider informs OCDSS of a timeframe in which the form will be completed. Once a treatment plan is established, the same form is utilized to monitor progress and identify any potential changes in ongoing treatment recommendations.

- 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.

OCDSS Integrated Staff review medical documentation, monitor recommended treatment plans, determine employability status and review progress no less than every three months unless otherwise indicated on the medical form and no greater than every 12 months.

OCDSS maintain a database to track follow-up due dates for medical statement for all individuals claiming a medical exemption or limitation. Prior to the expiration of the medical date on file, the client is sent a document requirement form along with the OCMed Form for their practitioner to complete. The completed form must be returned within 10 days.

If an individual is currently receiving services from Oswego County Behavioral Health Services (OHBS) and states that they are unable to work or have a work limitation based on a mental or behavioral health issues, the individual is required to sign a release of information and agency staff send the ROI along with determination forms to OHBS on their behalf with a request that the practitioner return within 10 days. If OHBS does not return the completed form, the individual is then given a Medical Examination for Employability Assessment, Disability Screening and Alcoholism/Drug Addiction Determination form to bring to the practitioner to return.

To monitor compliance with D/A Treatment requirements, the on-site OASAS providers obtain clients attendance reports/timesheets from the D/A treatment providers at a minimum of monthly and progress reports at a minimum of 3 months. The on-site OASAS partner with OCDSS staff to provide case management to the individuals to monitor treatment requirements and progress. If a client is determined able to work around treatment, the treatment may be entered in the client's employment plan and attendance and progress are monitored in the same manner.

Exempt clients are informed at orientation that they are required to comply with treatment plans, including medical treatment plans as established by their providers. Once a treatment plan is established, the the OCMed form is utilized to monitor progress and update treatment plans. If a provider indicates on a submitted form that the individual did not comply with their treatment plan, it is reviewed by OCDSS staff for possible sanction. Updates are requested based on the duration timeframe as indicated by the provider on the form.

## **10. District Certification**

### **10.1 Certification**

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

1/12/2024  
Stacy Alvord  
Commissioner