

# **Putnam County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

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

See attachment IB, pages 1 and 2.

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

The Employment Unit within the Putnam County Department of Social Services is fully responsible for the operation of the district's employment program. The staff in the unit performs the following functions: employability determinations, orientation, assessment, employment planning, assignment to work activity, monitoring of participation, conciliation, sanction, dispute resolution, developing and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, coordination and provision of supportive services, and job placement and retention services.

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

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

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

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

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

| <b>Provider</b>                | <b>Total Contract Cost per Year</b> | <b>Funding Source(s)</b> | <b>Categories of Clients Served</b> | <b>Programs, Services or Activities Provided</b>   |
|--------------------------------|-------------------------------------|--------------------------|-------------------------------------|--|
| Industrial Medicine Associates | \$1,544                             | FFFS<br>Local            | FA<br>SNA Family<br>SNA Individual  | Medical employability assessments, fee for service, state negotiated rates, annual estimated at \$1,544 in our annual county budget. |

- 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>   |
|-----------------------------------|--------------------------|---|--|
| CAREERS                           | Others:<br>Unknown       | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Workforce readiness skills<br>Résumé preparation<br>Interviewing skills<br>Job Placement<br>On-the-job training<br>Follow-along services |
| Community Action Program, WestCop | Others:<br>Unknown       | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Transportation Assistance  |
| NYSDOL DEWS staff                 | Others:<br>Unknown       | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Assist clients with their job search efforts, including job placement.   |
| Putnam Northern Westchester BOCES | Others:<br>Unknown       | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | ABE, HSE & ESL programs, Job Skills Training & Vocational education programs.  |

| <b>Provider</b>               | <b>Funding Source(s)</b> | <b>Categories of Clients Served</b>                     | <b>Programs, Services or Activities Provided</b>                                       |
|-------------------------------|--------------------------|---|--|
| Westchester Community College | Others:<br>Unknown       | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | ABE, HSE & ESL programs, Job Skills Training & Vocational education programs.          |
| Mahopac Library               | Others:<br>Unknown       | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Workforce Readiness Skills (Learning Lab)<br>Résumé preparation<br>Interviewing skills |

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

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

The contract allows us to refer clients for employability assessments and the provider, IMA, bills us on a case-by-case basis as assessments are completed and forwarded to us. We contract for a flat rate and the Fiscal Department ensures that we are billed at the contracted rate.

### 1.3 OTDA Jobs Staff Agreement

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

**Services Provided by Jobs Staff**

| <b>Yes or No:</b> | <b>Services Provided:</b>           |
|-------------------|-------------------------------------|
| 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**

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

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

N/A

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

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

**Programs and Services Provided at Career Centers**

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

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

Putnam DSS is the subrecipient of WIOA funding and we have been co-located at this career center with NYSDOL since the inception of WIA, our DSS customers are automatically referred to NYSDOL to avail of the services they provide. Putnam's local Business Services Team is referred to as the Red Carpet Team and we are represented on that team by WIOA staff.

## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

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

#### District Orientation Procedures

| Yes or No: | District Orientation:   |
|------------|---|
| No         | The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.   |
| Yes        | In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:<br>Information regarding public transportation; in lieu of assistance; client's responsibilities; receipt of Books I, II & III. |

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

As part of an applicant/recipient's employment assessment/intake, the Employment Unit staff of Putnam County Department of Social Services handle orientation on an individual basis and it is the same for both exempt and non-exempt individuals.

### 2.2 Temporary Assistance (TA) Employment Assessment

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

#### District Assessment Procedures

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



- 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:

All adults, exempt and nonexempt, in households with dependent children and 16- and 17-year-olds not in school will receive assessments within 90 days of eligibility. Additionally, all adult applicants and recipients of public assistance residing in households without dependent children will receive assessments within a year following their application. The Employment & Training Assistant will meet with a client and complete the aforementioned attachment by discussing each section with the client. Under unique circumstances, an employment assessment transpires over the phone.

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

Employment Unit of Putnam County Department of Social Services.

- 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)):

- a) 60 semester credit hours from a regionally accredited college; or
- b) two years of experience in the employment or personnel field

- 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?

Assessments are updated annually unless a known change transpires in the interim.

## 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.   |
| No         | The district uses the LDSS-4987 (New York State Employment Plan) and later enters information into WTWCMS.   |
| Yes        | 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:<br>Please see attachment III. |

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

### District Employment Plan Development

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

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

With an employable individual, employment plans are most often completed by an Employment Counselor with the client during one of their initial Supervised Job Search appointments. In the case of someone local, who is medically exempted, where treatment tracking is involved, they are given an employment plan appointment to meet with an Employment Counselor. In the case where someone is remote and medically exempted, the Employment Counselor handles the employment plan through the mail or over the phone. Routinely, clients are given copies of their completed employment plans.

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

Employment plans are updated annually and as we become aware that changes have occurred, such as a change in someone's employability status or when a client secures employment or an employment activity assignment changes or there is a treatment related change.

## **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:

1. Addressing drug or alcohol rehabilitation/treatment issues; or
2. Involved with medical rehabilitation; or
3. Caring for an incapacitated household member.

### **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:

Fortunately, we are co-located at the Career center, where we have access to two bilingual staff members, who readily assist us with Spanish/English translation/interpretation. On the rare occasions, where another foreign language is involved, we access remote translation services. Therefore, all customers are fully informed of their rights and responsibilities, and they all have equal access to our employment services. Whenever it is possible, we issue our paperwork to participants in their native language. Lastly, most participants are referred to ESL classes.

### **3.3 Strategies/Procedures for Increasing Program Attendance**

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

Clients are counseled on best practices in the workplace, such as having reliable childcare, with a contingency plan for childcare, in the case of an emergency. Clients are thoroughly advised of their responsibilities and the consequences of potential noncompliance. The district will grant hours of excused absence in those instances where the district determines that the individual's absence was not willful and/or the individual had good cause for not complying with the assigned work activity consistent with OTDA regulations. Noncompliance, without good cause, results in a negative case action, a denial, conciliation, or a sanction. Hopefully, this deters recurring noncompliance.

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

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

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

| Yes or No: | Strategies and Procedures for Engaging Sanctioned TA Participants   |
|------------|---|
| No         | Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:  |
| Yes        | Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:<br>For FA cases, a caseworker makes a home visit to discuss what the individual needs to do in order for his or her sanction to be lifted and offers assistance with that process. |
| Yes        | Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:<br>For FA cases, a caseworker makes a home visit to discuss what the individual needs to do in order for his or her sanction to be lifted and offers assistance with that process.           |

### 3.5 Strategies for Reducing the Need for TA

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

As funding permits, using FFFS, we offer supportive services at the "front door", often for automobile purchase purposes, so that applicants can maintain employment and avoid the need for additional assistance entirely. In order to be eligible for a FFFS funded one-time payment, applicants have to be determined TANF 200% eligible in accordance with 00-LCM-20 by the Temporary Assistance unit. In addition, they must be employed at least 30 hours weekly, earning the minimum wage or greater hourly. All of the itemized supportive services are authorized at the discretion of the Employment & WIOA Coordinator. Individuals under investigation for Intentional Program Violations will not be considered for diversionary services.

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

| Activity and Definition   | Case Type           |
|---|---------------------|
| <p><b>Subsidized Public Sector Employment</b> – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p> | N/A                 |
| <p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>   | FA<br>SNAFAM<br>SNA |
| <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>   | FA<br>SNAFAM<br>SNA |
| <p><b>SNAP E&amp;T Supervised Job Search</b> – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>  | N/A                 |
| <p><b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p>   | FA<br>SNAFAM<br>SNA |
| <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>  | FA<br>SNAFAM<br>SNA |

## 4.2 Job Development

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

Yes

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

### How the District Participates in Job Development Activities

| Yes or No: | How the district participates in job development activities   |
|------------|---|
| Yes        | District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: On a very infrequent basis two members of the Employment staff will do Job Development. We rely more on the expertise of the NYSDOL staff.   |
| Yes        | District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.: All of our clients are referred to the DOL DEWS staff for Job Development/Placement purposes. Usually, there are three full time NYSDOL staff people on site. Most frequently, our clients are placed in existing positions, as opposed to developed positions. The Business Services Representative who handles multiple locations in the Hudson Valley area does Job Development weekly by phone, email and in person. |

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

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

The district makes referrals to Putnam Northern Westchester BOCES and WCC for their ABE, HSE and ESL programs. Unfortunately, the demand, historically, hasn't proven to be cost effective to providers, so there are limited programs available.

- 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.

We utilize programs that are licensed by the New York State Education Department and offer short term training opportunities with strong job placement rates. Typically, the provider of these services is Putnam Northern Westchester BOCES.



- 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.

During the assessment process, questions are asked which solicit information concerning whether or not a participant has a high school diploma or its equivalent and testing is done to ascertain if the participant has a basic literacy level of 9 or higher. If a participant doesn't possess a high school diploma or a HSE or he or she tests lower than 9, then a referral is discussed and made when deemed appropriate and, in those cases, where a referral transpires, the hours are factored into the work activity assignment.

- 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.

Funding permitting, the Employment & WIOA Coordinator will approve HSE instruction for individuals who have not attained a high school diploma and are interested in receiving HSE instruction. In the rare circumstance, where an instructor documents that an individual doesn't have the academic capability to achieve success with HSE pursuit, we would deny participation.

- 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.

As a work first model, job search, SNAP E & T Supervised Job search, employment or work experience are the most typically assigned activities. At the discretion of the Employment & WIOA Coordinator, short term job skills or vocational education assignments may be approved for a Family Assistance or a Safety Net recipient, who requests approval to attend an approved program. Recipients making such requests will be evaluated according to the following standards:

1. Current Abilities - An individual's ability to reasonably compete for jobs in the existing economy, which would reduce or eliminate dependency, without further training or education. An assessment of work history and skill level in trades or occupations shall be made.
2. Training History - The amount and type of previous training an individual has had and his/her performance. Past training is an indicator of whether the individual will seriously pursue future training opportunities and whether previous training qualifies an individual for existing job opportunities.
3. Education Level - The individual must possess the prerequisite skills necessary for participation in a particular program.
4. Aptitude - An individual's talent and motivation shall be evaluated as to ability to succeed and benefit from proposed training. An evaluation shall be made in a consistent and reasonable manner of past work, training, and compliance performance.

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

The program must be licensed by the New York State Education Department.  
The program must be consistent with participation requirements of welfare reform.  
The program must greatly enhance the individual's opportunity to secure unsubsidized employment by offering a sequence of courses, which are directly related to preparation for a current or emerging occupation leading to self-sufficiency.  
Job placement rates and retention will be used as a measure of success of the program.  
Must demonstrate a willingness to comply with qualitative and quantitative progress reports and attendance recording and reporting as required.

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

A list of approved providers will be established annually as individual clients gain training approval, then, those particular providers will be added to our annual list. In the event that a client seeks training approval, he or she will be advised of the status of the provider list. If the client desires a copy of the list, it will be furnished to him or her upon request. This subject is also discussed at orientation.

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

For unsubsidized employment, work experience, on-the-job training, job search, job readiness and certain community service, approval is virtually automatic. Clients are notified of their assignment in writing.

For educational/vocational training requests, clients are mailed a decision letter.

In addition, clients receive a copy of the WTW Employability Plan, Attachment III, which is written jointly.

- 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.

Individuals 16 or 17 years of age who are attending high school are exempt. If the parent or child claims the child is attending a full-time secondary school, vocational, or technical school, attendance documentation from the guidance counselor will be requested at application and recertification.

- 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.

When a health-related limitation is involved in a work activity assignment, staff converse with various worksites to inquire whether or not they can accommodate the specific limitation. If not, an alternate worksite is selected. If so, the assignment proceeds, and a special written notation of the client's limitation(s) are sent to the work site.

## 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):

We operate a work first model, so typically, only short term trainings or educational pursuits that we deem necessary to secure employment are approved. However, we reserve the right to approve up to a four-year college program on the rare occasion that we deem it appropriate. For example, when an individual presents who might be almost finished with their four-year degree.

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

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

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

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

All applicants are engaged immediately, either in documenting their exemption or participating in allowable activities. Clients who are transitioning from exempt to nonexempt status takes an average of a week. Our plan is to meet Federal and state participation rate requirements by assigning clients to activities that will meet the required number of hours, typically between 30-40 hours weekly.

- 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    | 10            |
| Households without Dependent Children Average Monthly | 40            |

- 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:

Reports will be reviewed on a routine basis in an effort to increase local participation rates.

The reports that are used most frequently used for this purpose are as follows:

Employability Code Duration Report

Job Search and Job Readiness Tracking Report

Preliminary Federal Countable Not Countable Report

Preliminary Federal Countable Not Countable Report (Activity Provider)

Preliminary Federal Countable Not Countable Report (Prior Month)

Preliminary SNA Non-MOE Countable Not Countable Report (Prior Month)

Universe Case Listing Report

Budgeted Earned Income Report

TANF and SN MOE Detail Report

SN Non-MOE Detail Report

SN MOE Engagement Report

TANF Engagement Report

d. Does the district assign TA applicants to Job Search?

Yes

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:

**Applicant Job Search**

| <b>Applicant Job Search</b> | <b>Min. Contacts</b> | <b>Min. Hours</b> | <b>Additional Information</b>  |
|-----------------------------|----------------------|-------------------|--|
| TANF and SNA MOE            | 10                   | 20                | <p>TANF Applicant with child under the age of 6: 25 actual hours of job search weekly, with a minimum of 13 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.</p> <p>TANF Applicant with child over the age of 6: 35 actual hours of job search weekly, with a minimum of 18 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.</p> <p>TANF Applicant with child under the age of 6: 25 actual hours of job search weekly, with a minimum of 13 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.</p> <p>TANF Applicant with child over the age of 6: 35 actual hours of job search weekly, with a minimum of 18 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.</p> <p>Work Limited TANF Applicants: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.</p> <p>All Applicants will be expected to complete a Supervised Job Search handbook. Included in hours of job search is travel time between employer/interview sites and time spent on the interview or application process.</p> <p>After each weekly job search date, staff will verify job search details supplied by job searching TANF SN MOE applicants. This verification process will be done randomly, and the outcome will be detailed in the case narrative section of a client's Employment file. If an applicant's job search listing is discovered to be falsely represented, a denial will ensue.</p> <p>Supportive services will be offered to applicants to enhance job search efforts.</p> |

| Applicant Job Search | Min. Contacts | Min. Hours | Additional Information  |
|----------------------|---------------|------------|---|
|                      |               |            | <p>The LDSS employment worker meets weekly with the applicants and recipients to provide assistance and review job search forms and as necessary, issue a new form for upcoming weeks.</p> <p>The worker helps to identify appropriate job openings and supports each individual's search for work. Other activities include, literacy testing, One Stop registration and orientation.</p>  |
| SNA Individuals      | 20            | 40         | <p>Safety Net Applicants/Fully Employable: 40 hours of job search per week, with a minimum of 20 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.</p> <p>Work Limited Safety Net Applicants: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.</p> <p>All Applicants will be expected to complete a Supervised Job Search handbook. Included in hours of job search is travel time between employer/interview sites and time spent on the interview or application process.</p> <p>After each weekly job search date, staff will verify job search details supplied by job searching SN applicants. This verification process will be done randomly, and the outcome will be detailed in the case narrative section of a client's Employment file. If an applicant's job search listing is discovered to be falsely represented, a denial will ensue.</p> <p>Supportive services will be offered to applicants to enhance job search efforts. The LDSS employment worker meets weekly with the applicants and recipients to provide assistance and review job search forms and, as necessary, issue a new form for upcoming weeks. The worker helps to identify appropriate job openings and supports each individual's search for work. Other activities include, literacy testing, One Stop registration and orientation.</p> |

e. Does the district assign TA recipients to Job Search?

Yes

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.

**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            | 10                   | 20                | <p>TANF Recipients with child under the age of 6: 25 actual hours of job search weekly, with a minimum of 13 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.</p> <p>TANF Recipient with child over the age of 6: 35 actual hours of job search weekly, with a minimum of 18 contacts weekly, placing more importance on the actual hours, instead of the number of contacts.</p> <p>Work Limited TANF Recipients: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.</p> <p>Recipients will be expected to complete a Job Search handbook. Included in hours of job search is travel time between employer/interview sites and time spent on the interview or application process.</p> <p>After each weekly job search date, staff will verify job search details supplied by job searching TANF &amp; SNA MOE recipients. This verification process will be done randomly, and the outcome will be detailed in the case narrative section of a client's Employment file. If a recipient's job search listing is discovered to be falsely represented, a conciliation will ensue.</p> <p>Supportive services will be offered to recipients to enhance job search efforts.</p> <p>The LDSS employment worker meets weekly with the applicants and recipients to provide assistance and review job search forms and as necessary, issue a new form for upcoming weeks.</p> <p>The worker helps to identify appropriate job openings and supports each individual's search for work. Other activities include, literacy testing, One Stop registration and orientation.</p> |
| SNA Individuals             | 20                   | 40                | <p>Safety Net Individual Recipients: The total number of assigned work activity hours will be 40, between Work Experience and Supervised Job Search. The number of</p>   |

| Recipient Job Search | Min. Contacts | Min. Hours | Additional Information   |
|----------------------|---------------|------------|--|
|                      |               |            | <p>hours that an individual has to participate in Work Experience is determined by his or her grant, including SNAP allotment, and the balance of 40 will be his or her Supervised Job Search responsibility. The number of contacts weekly will be a minimum of half of the assigned hours, again, placing more importance on the actual hours, instead of the number of contacts.</p> <p>Safety Net Individual Recipients/Work Limited: work activity assignments will be made in accordance with the limitations as specified on the medical documentation submitted by the individual, including but not limited to, an IMA evaluation or an LDSS-4526.</p> <p>SNA Individual Recipients will be expected to complete a Job Search handbook. Included in hours of job search is travel time between employer/interview sites and time spent on the interview or application process.</p> <p>After each weekly job search date, staff will verify job search details supplied by job searching SNA Individual recipients. This verification process will be done randomly, and the outcome will be detailed in the case narrative section of a client's Employment file. If a recipient's job search listing is discovered to be falsely represented, a conciliation will ensue.</p> <p>Supportive services will be offered to recipients to enhance job search efforts.</p> <p>The LDSS employment worker meets weekly with the applicants and recipients to provide assistance and review job search forms and as necessary, issue a new form for upcoming weeks.</p> <p>The worker helps to identify appropriate job openings and supports each individual's search for work. Other activities include, literacy testing, One Stop registration and orientation.</p> |

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

The number of hours for self-employment is determined by dividing the individual's self-employment income (gross income less documented business expenses) by the federal minimum wage, consistent with OTDA guidance provided in 21-ADM-04.



## 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.

While the ABAWD waiver is in effect, through 2/28/25, eligibility staff are issuing the LDSS-5193A *Important Information about SNAP Work Rules (General and Mandatory E&T)* and then providing an oral explanation of the SNAP work requirements to the household representative for each of the household members and subsequently, recording "5193A provided and pertinent work requirements for each household member were verbally addressed" as a case note in IEDR. If the ABAWD waiver is lifted thereafter, eligibility staff will begin to issue the LDSS-5193 *Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD)* as appropriate and revise the case note accordingly.

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

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

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

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

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

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

**5.3 Meeting SNAP Work Requirements**

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

The district is no longer mandating NTA SNAP

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

N/A

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

All NTA-SNAP work registrants will be advised verbally and in writing at application and recertification of the job search assistance available, upon request, to them. See attachment VI.

**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**

| <b>Yes or No:</b> | <b>Who the district provides employment and training services information to:</b> |
|-------------------|---|
| Yes               | Required population only  |
| No                | Other groups described here:  |

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

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

| <b>Yes or No:</b> | <b>How the district provides employment and training services information</b>  |
|-------------------|--|
| 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 referrals made by this district to a provider for services of any type are screened by Employment unit staff before the referral transpires. Attachments VII, VIII & IX were developed to ensure district compliance with federal regulations at 7 CFR 273.7(c)(18). All of these attachments were reviewed and approved at the state level for potential use if this circumstance occurs. Attachment IX is the document that we will send to our client to advise them of the provider's determination.

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

Attachment VII was sent to providers, and it advised them of their authority and responsibility to determine if an individual is not a good fit for one of their programs. They were also sent attachment VIII, for completion and submission, within 10 days of their determination.

- 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.

All provider determinations will be monitored by the Employment unit staff to ensuring equity and fairness standards were applied.

## 6. Quality Assurance/Work Verification

### 6.1 Quality Assurance Process - Random Case Sampling

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

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

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;

- Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
  - Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
- 6
- b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
- 6
- c. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA Employability Code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
- 3
- d. Below is the number of random sample cases in which a case member is reported as an TA Employability Code 31 – “Parent or caretaker relative of a child under 12 months of age”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
- 3

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

## 6.2 Use of Outside Providers/Vendors

- a. Does the district utilize outside providers/vendors to collect documentation and enter data directly into WTWCMS?
- No

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

N/A

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

N/A

## **7. Supportive Services**

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

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

Transportation - at no more than the cost of public transportation if available, or, if not, mileage will be reimbursed at the county's adopted reimbursement rate, as specified in section 7.1(b). This includes transportation of children of participants to child day care or camp or other programs when such camp or program is designed to include activities, which assist the family in achieving self-sufficiency and enable children to avoid welfare dependency in their adult years.

Automobile repairs- reasonable costs of necessary repairs of a participant's automobile, up to a maximum of \$2,000, note the retail value of the automobile must be greater than the cost of the repairs. (Not available to the non-TA SNAP population)

Automobile insurance - up to a maximum of \$2,000. (Not available to the non-TA SNAP population)

Automobile purchase - up to \$4,500 towards the purchase of a used automobile when deemed cost effective by the local district. (Not available to the non-TA SNAP population)

Taxis - Payment for employment related taxi service will be considered on a case-by-case basis, for up to 120 days, as long as there is a long-term transportation plan in development. The 120-day maximum can be extended at the discretion of the WIOA & Employment Coordinator. (Not available to the non-TA SNAP population)

Clothing - up to \$300 for clothing, including, but not limited to, uniforms and footwear. (Not available to the non-TA SNAP population)

Tools/Equipment - up to \$500 for necessary tools and or equipment, including, but not limited to job related safety equipment. (Not available to the non-TA SNAP population)

Fees - up to \$300 for each license or other employment related fee. (Not available to the

non-TA SNAP population)

Hair Cuts - up to \$ 20 for haircuts to obtain or maintain employment. (Not available to the non-TA SNAP population)

Relocation Expenses - Moving, security and realty expenses as defined by Temporary Assistance policy if relocation is due to employment. (Not available to the non-TA SNAP population)

Miscellaneous - up to \$500 per individual for other employment related expenses. (Not available to the non-TA SNAP population)

Assistance with auto repairs, auto insurance and automobile purchases will be limited to once in an individual's lifetime. However, one individual can potentially receive all three supportive services during his or her lifetime. Exceptions to the lifetime limit can be made at the discretion of the Employment & WIOA Coordinator.

Other than child-care or transportation, the above supportive services require prior approval of the Employment & WIOA Coordinator.

All of the itemized supportive services are authorized at the discretion of the Employment & WIOA Coordinator. Individuals under investigation for Intentional Program Violations will not be considered for supportive services, unless the supportive service is necessary for that individual to comply with an assigned employment activity.

In addition to the above expenses, to the extent local resources permit, the local district shall provide case management for pregnant adolescents, adolescent parents and at risk youth under eighteen years of age, persons with limited English proficiency and individuals whose employability plans indicate the need for two or more concurrent work activities.

Medical Assistance will also be provided to recipients of ongoing Temporary Assistance under the comparable Medicaid eligibility categories for low-income families (LIF) and singles/childless couples (S/CC). Transitional Medical Assistance (TMA) will be provided for low-income families who lose eligibility due to earnings to the extent permitted by regulations.

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

## Transportation Services Provided to Clients

| Yes or No: | Transportation Assistance Provided   |
|------------|--|
| Yes        | Bus pass/token   |
| No         | Gas card/voucher   |
| Yes        | Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)     |
| No         | Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)  |
| 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:

Clients will be informed of the expectation of walking a reasonable distance to a work site. Reasonable distance will be defined, in accordance with OTDA policy, as two miles one way for an adult walking by him or herself. For adults with children who need to be accompanied to day care on the way to a work activity reasonable distance is defined locally as one mile walking distance one way. Individuals who provide medical documentation that they are unable to walk these distances, due to mental/physical limitations will be accommodated.

- 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:

As stated in Section 3.5, whenever fiscally possible, we offer diversionary supportive services in an effort to prevent the need for public assistance. Additionally, all unemployed employable applicants are referred to the DOL DEWS staff to explore available employment opportunities.

## 7.2 Post-Employment/Transitional Supportive Services

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

A caseworker remains available to assist FA clients on an as needed basis and the Employment Unit staff remain involved with an employed individuals offering assistance with potential issues as long as the case remains financially eligible to receive Temporary Assistance benefits. Assistance is provided for transportation, uniform expenses, childcare, licensing, and other items, if required to obtain and maintain employment.

- b. Described below are the support services (for up to 90 days after case closing) the district will provide to individuals whose TA cases have closed due to employment:

Consistent with statute and regulations, we will provide transitional SNAP, transitional Medicaid & transitional childcare.



### 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.):

All those supportive services identified in Section 7 consistent with statute and regulations.

## 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:

At the discretion of the Employment & WIOA Coordinator, on a rare occasion, a conciliation may be handled through the mail or over the phone. Applicants and recipients must respond within the required timeframe. In the presence of a mediator, clients are asked to provide an explanation of the circumstances surrounding their noncompliance and provide any supporting documentation. Once the appointment has concluded, the employment worker considers the explanation and documentation presented, determining whether or not the willful and without good cause standard applies, and then advises the mediator and the Temporary Assistance unit of the outcome. The mediator issues a letter advising the client of the decision of the conciliation appointment. If the matter is unresolved, then the agency issues proper notice.

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

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

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

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

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

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

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

At the discretion of the Employment & WIOA Coordinator, on a rare occasion, a conciliation may be handled through the mail or over the phone. Applicants and recipients must respond within the required timeframe for their case type. In the presence of a mediator, clients are asked to provide an explanation of the circumstances surrounding their noncompliance and provide any supporting documentation. Once the appointment has concluded, the employment worker considers the explanation and documentation presented, determining whether or not the willful and without good cause standard applies, and then advises the mediator and the Temporary Assistance unit of the outcome. The mediator issues a letter advising the client of the decision of the conciliation appointment. If the matter is unresolved, then the agency issues proper notice.

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

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

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

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

Clients who wish to demonstrate compliance will be required to comply with a work experience assignment of up to twenty hours weekly based upon the grant involved and if a worksite isn't available, then they will be required to document that they have completed twenty hours of job zone searching within five consecutive business days.

## 8.2 Sanction

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

Sanctioned individuals, who wish to demonstrate compliance, need to contact the employment unit to inquire what they need to do specifically to have their sanction lifted. Typically demonstrating compliance is tied to the activity which prompted the sanction. As follows:

A missed assessment requires the completion of an assessment appointment.  
A missed employment plan appointment requires the completion of an employment plan appointment.

Noncompliance with supervised job search involves reporting into one of the regularly scheduled supervised job search days with the appropriate number of job searches.

Noncompliance with work experience would involve compliance for five consecutive days with work experience for the assigned number of hours.

An employment related sanction can be lifted by finding comparable employment and conveying the details to the Employment unit or in lieu of finding comparable employment, a client can report to a regularly scheduled supervised job search, with 30 documented hours of job search.

Once the client has demonstrated compliance, Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply but, not before the end of the durational sanction period.

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

Sanctioned individuals who wish to end a SNAP employment related sanction, WE1, WE2 or WE3 must first tell the employment unit that they are willing to comply with work activities and demonstrate compliance. Clients will demonstrate compliance by participating in the same assigned work activity for the number of hours assigned within 5 consecutive business days. Once the individual demonstrates compliance, SNAP benefits will be restored for the month following the month when the individual demonstrated compliance but no earlier than the expiration date of the minimum duration period. An individual may be eligible for SNAP benefits before the end of the durational sanction period if the individual documents that he/she is 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.   |
| No         | District accepts physician’s statement provided by participant.  |
| Yes        | District accepts physician’s statement provided by participant but refers for an independent evaluation when deemed necessary.   |
| Yes        | Other process:<br>If at application or recertification, or during the assessment process, a FA client is identified as having a physical or mental impairment, which would limit his or her ability to participate in work activities, the client is referred to Industrial Medicine Associates in Poughkeepsie for a medical evaluation and, if desired, transport is provided. The individual is informed that he or she should bring any medical documentation to the IMA exam that they want considered, or within 4 days following the date of the exam. While taking COVID precautions, FA clients are given the option to provide the district with a medical, LDSS4526, completed by |

| Yes or No: | How the district determines an individual's disabilities and/or work limitation   |
|------------|---|
|            | <p>their practitioner. Both the SN and NTA SNAP population, are given the medical examination form (LDSS 4526) to have their medical practitioner complete and return within ten days, along with the DSS2642, which officially affords them ten days.</p> <p>In the case where a Safety Net client presents a completed medical (LDSS4526), the district will review it and make a determination based on information contained in that medical.</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:

Upon receipt of a fully completed medical or an IMA evaluation, it is reviewed by a member of the employment unit staff, who then, within 48 hours, issue a LDSS4005 or 4005(a), via mail or in person, to notify him or her of the disability determination and the right to request a fair hearing. In complex cases, the review involves two staff members of the employment unit.

If a SNAP recipient fails to supply documentation of a claimed exemption, he/she will be determined to be non-exempt from SNAP work requirements.

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

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

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

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

**Process for Reviewing Medical Documentation**

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

| Yes or No: | District's process for reviewing medical documentation   |
|------------|--|
| Yes        | Other process:<br><br>In cases where IMA is not utilized, Employment workers review and determine status. Upon receipt of a fully completed medical, the client is provided a LDSS4005 or 4005(a), via mail or in person, to notify him or her of the disability determination and the right to request a fair hearing.<br>Each time a determination or re-determination is made of an exempt or non-exempt status the appropriate LDSS-4005 or LDSS 4005(a) notice is sent to the individual. |

## 9.2 Mental Health Screening and Assessment

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

No

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

N/A

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

### Screening Tools the District Uses

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

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

N/A

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

N/A

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

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

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

Employment unit staff review the medical documentation of the exempted individual, either an IMA evaluation or a completed LDSS4526, to determine if the medical professional has prescribed or recommended treatment or other rehabilitative activities, in an effort to restore or improve employability.

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

In the case where a client is deemed exempt or work limited, clients are held accountable to participate in rehabilitative activities as prescribed by the medical practitioner.

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

The Employment Unit is responsible for tracking, on a monthly basis, the individual's participation/attendance in treatment. Clients are notified in writing, see attachment IV, of their obligation to comply with all treatment recommendations. This responsibility is included in Employment plans, which clients are required to sign.

## **10. District Certification**

### **10.1 Certification**

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

01/08/2024  
Michael Piazza  
Commissioner