

# **St. Lawrence County**

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

January 01, 2024 - December 31, 2025

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# 1. Administration

## 1.1 Administrative Structure

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

See attached

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

The Deputy Commissioner of Social Services is responsible for the direct supervision of the employment unit supervisor. The unit supervisor is responsible for the direct supervision of the unit staff and the day-to-day operation. Employment unit staff is responsible for the day to day services, to include: program activity development and referral, support service delivery to DSS applicants and recipients, dispute resolution, maintenance of the data record and conciliation / sanctions in conjunction with designated TA staff. There are no outside operators.

## 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> |
|-----------------|-------------------------------------|--------------------------|-------------------------------------|--|
| IMA             | \$1,000                             | Local                    | FA<br>SNA Family<br>SN Individual   | Physical, Psychological, IQ exams and testing.   |

- 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>   |
|--|--|---|--|
| Access-VR                                | Others: NYSED                                    | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Assessment, Career Planning, Continuing Educational Services, Job Search, Placement, Coaching, Vocational Training, Vocational Rehab, Support Services |
| Cornell University Cooperative Extension | Others: Cornell University                       | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Working Families Workshop and Nutritional Job Readiness Training-to include money management, financial literacy, energy conservation, food management |
| American Job Center                      | Others: Workforce Innovation and Opportunity Act | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Career Planning, Vocational Training, Career Counseling, Youth Programs to include Summer Youth Programs   |
| JOBS                                     | Others: OTDA                                     | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Applicant TA, SNAP and 200% Up Front Job Services, Job Search and Job Readiness for recipients, Job Referrals  |
| Literacy Volunteers                      | Others: New York State Education                 | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Remedial reading and writing in English  |

| <b>Provider</b>          | <b>Funding Source(s)</b>   | <b>Categories of Clients Served</b>                     | <b>Programs, Services or Activities Provided</b>  |
|--------------------------|--|---|---|
| NYSDOL                   | Others: DOL  | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Job Listings, Job Referrals, Resume Help, Job Fairs, JRT workshops, virtual programming                                       |
| SLL BOCES                | Others: BOCES  | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Educational Training, Vocational Training, SNAP Venture program, Purple Briefcase, JRT programming                            |
| Seaway Valley Prevention | Others: New York State Office of Alcoholism and Substance Abuse Services | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Provide programs for prevention, education and training services  |
| Step by Step             | Local  | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | JRT programming, food distribution, assist homeless population, work experience, case management                              |
| Head Start               | Others: NYS Education  | FA<br>SNA Family<br>SNA Individual<br>SNAP<br>TANF 200% | Home visiting program through early Head Start programs, family support, education, connect to community resources, education |

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:

Employment Counselor gives the IMA referral to the Employment Coordinator/ Supervisor/Senior Employment Counselor.

The appointment is scheduled for the client with IMA through WTCMS referral letter and then is monitored for attendance. Medical evaluation is provided to the agency and is distributed for review. An invoice is received after services rendered, it is given to the Account Clerk to make payment.

### 1.3 OTDA Jobs Staff Agreement

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

**Services Provided by Jobs Staff**

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

**Jobs Staff Target Groups**

| Yes or No: | Target Groups:         |
|------------|------------------------|
| Yes        | Applicants             |
| Yes        | FA & SNA with children |
| Yes        | SNA without children   |
| Yes        | SNAP                   |
| Yes        | TANF 200%              |

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

WTWCMS data entry and case conferencing with Counselors.

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

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

**Programs and Services Provided at Career Centers**

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

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

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

The Temporary Assistance Employment Program is a mandated partner for the WIOA programs. The district Employment Unit Supervisor/or Senior Counselor attend monthly partner meetings. Partners are currently engaged in strategies and referral processes for the sharing of information and clients, such as Youth programs. DSS employment unit staff are collocated at the American Job Centers in Canton, and staff interacts together to provide relevant services for individuals. There is an Employment Counselor who meets with WIOA representative monthly to discuss any updates between the two units.

## **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**

| <b>Yes or No:</b> | <b>District Orientation:</b>  |
|-------------------|---|
| 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: Explanation and schedule of local DSS Applicant Job Search requirements. Completion of paperwork is discussed such as timesheets and transportation vouchers. |



- 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:

Applicants and recipients are provided an Orientation within 30 days of application. The Orientation may be completed in a group setting, individually, on-line and by mail based on needs of District and individual. Exempt individuals are provided an Orientation within 60 days of application. If in person or in group, location is considered for the clients convenience.

## 2.2 Temporary Assistance (TA) Employment Assessment

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

### District Assessment Procedures

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

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

The employment assessment is an ongoing process. It starts at application and continues to the day of case closing. Employment assessments are completed every 6 months, or sooner, if client circumstances change, activity assignments that warrant reassessment, and when there is reason to believe that a person has a physical or mental impairment that is undocumented. Employment assessments are completed by the Employment Counselor and the information is entered directly into WTCMS.

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

The St. Lawrence County Department of Social Services Employment Unit.

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

Employment Counselors have been trained in effective assessment techniques on how to administer the Employment assessments. They also meet County Civil Services requirements for Employment Counselor.

- 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?

Every six months or sooner, if client circumstances change, activity assignments that warrant reassessment, and when there is reason to believe that a person has a physical or mental impairment that is undocumented.

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

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

#### District Employment Plan Procedures

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

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

#### District Employment Plan Development

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

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

The procedure follows the same as the Employment Assessment. The Employment Plan is completed at time of Assessment as the detailed Employment Assessment will be used to determine appropriate Plan details. It also is updated based on need due to an individual's circumstances.

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

The Employment Plan is updated at least 6 months or sooner. In addition, it could also be updated as needed based on changes in individual circumstances and activity assignments. A copy of the employment plan is provided to the participant after it is created or updated.

### **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:

Case management is utilized as relevant to assist in successful “engagement in work” requirements.

#### **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:

In St. Lawrence County there is occasion to serve non-English-speaking clients. Language Line posters are available in public areas so the client can point out their language. Arrangements are made to link them with an interpreter. The individual may be also referred to Literacy of Northern New York, which provides remediation in English as a second language. WTWCMS has an option to print letters in either Spanish or English.

### 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:

The Employment Unit staff work closely with clients to facilitate overcoming personal barriers impeding participation. Follow up phone calls may be utilized to discuss issues of noncompliance. Referral to other agencies for more specific intensive services is common. Supportive services are reviewed such as childcare, carpooling and bus travel including first mile, last mile are encouraged when practical. Once in an activity, (except for unsubsidized private/public sector employment and on the job training), we have implemented a weekly time sheet system which allows for monitoring of attendance and quick response to problems. The time sheets also provide the documentation to allow us to pay support services to the client in a timely manner. Clients are counseled on how to work with providers to "make up" lost time within a monthly timeframe. Therefore, when necessary and possible they are allowed to change their daily regularly scheduled hours to achieve attainment of their monthly scheduled hours. The reason for an absence is noted by the provider on the client's timesheet. The Employment Counselor makes final determination of allowing "absence for good cause," e.g. health appointments, legal appointments, and unanticipated illness. The Counselors counsel clients to schedule appointments of any type around their scheduled hours in a work activity.

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

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

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

| Yes or No: | Strategies and Procedures for Engaging Sanctioned TA Participants  |
|------------|--|
| Yes        | Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: The district staff contacts clients via mail primarily and phone if needed that are sanctioned until compliance and allow the client to come into compliance with the sanction. This is based on Counselor discretion via conversation with the client. Compliance may be completed by employment assessment and/or work activities such as Job Search, Job Readiness Training, Work Experience, or Treatment compliance. Once compliance has been demonstrated the information is sent to TA/SNAP and the SWE can add that person to the case. Compliance is defined as attendance and satisfactory participation for designated hours per activity for at least five business days, if applicable. Support services are made available during the effort to comply. |
| Yes        | Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Clients completing a durational limit of a sanction are sent a letter to meet with the Employment Counselor and counseled on how they can show compliance. Clients whose sanction has expired are required to meet with their Employment Counselor on a regular basis until in compliance or their case closes due to failure to attend an ongoing eligibility appointment.   |

|                   |  |
|-------------------|--|
| <b>Yes or No:</b> | <b>Strategies and Procedures for Engaging Sanctioned TA Participants</b>   |
| No                | Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: |

### 3.5 Strategies for Reducing the Need for TA

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

Applicants/Recipients are provided an Orientation. Non-exempt applicants are placed in up front Applicant Job Search/JRT. An OTDA Specialist assists in providing these services. Support services are provided on a case-by-case basis. Referrals are made to appropriate agencies to assist with barriers to include physical, mental health, and chemical dependency. Referrals are made to DCAP to help with SSI/SSDI applications. Counseling is provided to address any needs of the client to increase their employability, such as training, referral to activities to strengthen Job Readiness, Job Fair information and/or referral. Follow up and monitoring progress by the Employment Counselors are key to success and ensuring that clients' needs are met.

## 4. Work Activities

### 4.1 Allowable Work Activities

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

#### Allowable Work Activities by Case Type

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

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

| Activity and Definition   | Case Type                             |
|---|---------------------------------------|
| <p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant's employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant's job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>      | <p>FA<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>                            |
| <p><b>Subsidized Public Sector Employment</b> – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p> | <p>FA<br/>SNAFAM<br/>SNA</p>          |

| Activity and Definition   | Case Type                   |
|---|-----------------------------|
| <p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> | FA<br>SNAFAM<br>SNA<br>SNAP |
| <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>   | N/A                         |
| <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>   | N/A                         |
| <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<br>SNAP |

## 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.: There are 5 Employment Counselors, and the Senior Employment Counselor that are able to job develop. This may be done by referral to job fairs and specific employer outreach events. We also coordinate with local WIOA, OTDA Jobs |



| Yes or No: | How the district participates in job development activities  |
|------------|--|
|            | Specialist, and NYSDOL partner staff to receive job listings and knowledge of referrals of mutual clients.   |
| 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.: N/A |

### 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.

St. Lawrence County has two service providers who offer Adult Basic Education, Test Assessing Secondary Completion (TASC) preparation, or English Language Instruction. Literacy Volunteers of St. Lawrence County provides English as a second language tutoring as well as basic skills instruction for low functioning clients. The St. Lawrence/ Lewis Board of Cooperative Educational Services provides Adult Basic Education instruction and Test Assessing Secondary Completion preparation and testing. Both providers are cooperative partners and accept referrals on a continuous basis

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

The local district is a partner member in the St. Lawrence County American Job Center which maintains a list of New York State eligible providers of vocational and occupational training. Current information on programs including prerequisites and costs are available through the Center. Information regarding Job Skills Training programs that contact the Center or DSS Employment Unit is readily disseminated to staff for client assessment / goal consideration.

- 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.

Employment Counselor observations and utilization of the TABE, (Test of Adult Basic Education), as well as client self-attestation during the assessment process determines the need, desire and ability of clients to participate in educational opportunities. Referrals to the SLLBOCES for TASC or ABE, and Literacy Volunteers of Northern New York for basic literacy instruction or English as a second language tutoring are made as appropriate.

- 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.

Employment Counselor observations and utilization of the TABE, (Test of Adult Basic Education), as well as client self-attestation during the assessment process determines the need, desire and ability of clients to participate in educational opportunities. Referrals to the SLLBOCES for TASC or ABE, and Literacy Volunteers of Northern New York for basic literacy instruction or English as a second language tutoring are made as appropriate.

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

The Employment Counselors through the assessment process identify the vocational education activity and/or job skills training that will assist the client with meeting both the short- and long-term goals set forth in the individual's employment plan. The Employment Counselor makes a recommendation to the Employment Unit Supervisor for approval, enters the enrollment on WTW CMS and provides notification to the client.

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

The district utilizes documented effectiveness of the training either by obtaining a summary of classroom training records or demonstrated effectiveness through positive outcomes such as job placement, enhanced skills for the workplace, obtaining professional certification, or obtaining certificates for successful skills demonstration and completion. Providers are credentialed by New York State Department of Education.

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

Employment Counselors advise participants during assessments, follow up phone calls, and designated paperwork.

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

St Lawrence County utilizes WTWCMS enrollment paperwork.

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

The individual students' attendance and satisfactory participation is verified through contact and/or documentation with the school guidance office.

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

The Employment Counselor notifies the work site / program provider in writing of the client's work limitations. Client feedback and onsite visits by the Employment Counselor are used to monitor site adherence to accommodating the limitations.

## 4.4 Post-Secondary Education Approval and Enrollment Policies

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

The district will approve up to two years of post-secondary education, that culminates with a certificate or degree, as a work activity.

- 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.                                 |
| No         | Additional reasons as stated here:   |

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

The local district engages non-exempt clients in Job Search activities on the day of application. Assessment is on-going and leads to the development and periodic modification of the client's Employment Plan. In cooperation with their Employment Counselor referrals for non-exempt Family Assistance cases to appropriate activities occur during the upfront Job Search / Job Readiness Training, and in coordination with an assessment and the initializing of an employment plan. Clients whose status change from exempt to non-exempt will be reassessed by Counselors within 30 days of the change in their status for Employment Plan modifications and subsequent engagement in work activities. Staff will continuously monitor the performance of clients engaged in activities and will reassess and revisit the employment plans as appropriate, amending or making additional referrals for clients as needed.

The local district will strive to fully engage each client in employment activities. The weekly hour participation standard requirement for Family Assistance cases is up to 40 hours per week. Safety Net Non-MOE will be up to 40 hours per week and work limited individuals will not exceed the hours recommended on their medical evaluation. The maximum assigned hours of countable activities per week will be up to 40 hours for all non-exempt cases.

- 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    | 270           |
| Households without Dependent Children Average Monthly | 346           |

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

The local district monitors performance by utilizing data available to all Employment Unit staff in WMS, WTWCMS and Cognos at both the unit and worker levels as well as by specific providers. Reports are carefully screened for information on client engagement and participation levels and assist in providing a continuous quality review in the determination of the need for activity assessment or referral. Reports utilized include, but are not limited to:

Safety Net Non-MOE and TANF and Safety Net MOE Worker Participation/ Engagement Summary Reports, run after the 18th of the month for the previous month report, to review the month's participation and engagement rates, which clients are in the count, who is nonexempt and not participating and in need of engagement.

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

Yes

**Applicant Job Search**

| <b>Applicant Job Search</b> | <b>Min. Contacts</b> | <b>Min. Hours</b> | <b>Additional Information</b>  |
|-----------------------------|----------------------|-------------------|--|
| TANF and SNA MOE            | 5                    | 10                | A daily applicant listing is sent to the Employment Unit Supervisor the day after application. It is then emailed to Employment Counselors. TA examiners will give non-exempt applicants a letter with a job search log that instructs them to submit the log within 10 days to the Employment Counselor. EC will follow up on noncompliant clients to refer for denial or conciliation if no other documentation is submitted. Upon compliance with submitting the initial request of the job search log through TA the individual is referred to the OTDA Jobs Specialist to continue job search activity. |
| SNA Individuals             | 5                    | 10                | A daily applicant listing is sent to the Employment Unit Supervisor the day after application. It is then emailed to Employment Counselors. TA examiners will give non-exempt applicants a letter with a job search log that instructs them to submit the log within 10 days to the Employment Counselor. EC will follow up on noncompliant clients to refer for denial or conciliation if no other documentation is submitted. Upon compliance with submitting the initial request of the job search log through TA the individual is referred to the OTDA Jobs Specialist to continue job search activity. |

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

Yes

**TA Recipient Job Search**

| <b>Recipient Job Search</b> | <b>Min. Contacts</b> | <b>Min. Hours</b> | <b>Additional Information</b>  |
|-----------------------------|----------------------|-------------------|--|
| TANF and SNA MOE            | 5                    | 10                | TA recipients are required to participate in Job Search and are referred to Job Search activities such as Job Fairs, Job Clubs, Prep Club, Individual Job Search with the Employment Counselors or OTDA, SUNY Attain Lab. Our association with the American Job Center, BOCES, and the partner agencies easily provides us with opportunities for this referral process. Participants are generally required to submit weekly job search logs. |
| SNA Individuals             | 5                    | 10                | TA recipients are required to participate in Job Search and are referred to Job Search activities such as Job Fairs, Job Clubs, Prep Club, Individual Job Search with the Employment Counselors or OTDA, SUNY Attain Lab. Our association with the American Job Center, BOCES, and the partner agencies easily provides us with opportunities for this referral process. Participants are generally required to submit weekly job search logs. |

- 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:

Recipients that report self-employment to their Employment Counselor may have the time count towards their 40 hours per week of participation. The Employment Counselor will review the clients' budget and any documentation, including type of work, rate of pay, and hours per week. The client will need to present self-employment logs or a signed employers' statement. Countable hours will be based on the receipt of federal minimum wage for the occupation.

**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**

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

| <b>Yes or No:</b> | <b>How written information is provided to SNAP applicants and recipients</b>  |
|-------------------|---|
|                   | <i>Important Information about SNAP Work Rules (General and Mandatory E&amp;T) as appropriate.</i>  |
| 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.

The 5193 A is reviewed at application and recertification with SNAP households where at least one household member is subject to a work requirement, and it is documented in the application and case record that it was reviewed and explained orally. The TA examiner has the option to utilize the 4826C.

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

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

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

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

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

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

N/A

- 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):

NTA SNAP work registrants are provided a flier with information to assist them with their job search and give them valuable resource contacts.

### 5.4 Advising Households of Employment and Training Services

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

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

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

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



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

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

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

**5.5 Provider Determinations**

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

Individuals are assessed before referral to programming. SNAP E & T providers are verbally informed that they have 10-days to notify the district if a participant is not a good fit for the program. This can be verbally or in writing. The Employment Counselor discusses the reason with the provider to determine the appropriate next step. Districts will inform the participant within 10 days of receiving this information. The information is documented in the individual's file. The Employment Counselor will explain to the participant what the provider determination indicated, and the next steps needed. The individual is reassessed and physical, mental health and learning ability are reviewed as relevant.

- 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.

This is done verbally when a participant is referred. The employment counselor follows up with the participant and agency within the first week to assist with success and resolve barriers.

- c. Described below is the district process for provider oversight to ensure that provider determinations are not unfair or used to discriminate against protected classes.

The Employment Counselor follows up with the participant and agency within the first week to assist with success and resolve barriers.

## 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:

Support services may include, but are not limited to transportation assistance; nonrecurring payments such as car repair, clothing, tools and equipment; payments to obtain a permit or license; certification/licensing fees, educational fees; etc. The district will not pay fines to obtain driver licenses. These services are reviewed on a case-by-case basis with respect to need for activity participation and/or with the intent to allocate payments when another agency providing an activity is unable to do so. There are lifetime maximum limits of \$1,100 on car repair and \$1,000 on car insurance. Clothing expenses may be paid up to \$150 per activity. Exceptions may be made at the discretion of the Employment Counselor with the Employment Supervisor's review and approval. Employment Counselors discuss the option of virtual programming with participants to ensure appropriateness and verify they have the equipment and the digital literacy skills to participate. This is documented in the case record.

- 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  |
| No         | Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)    |
| No         | Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile) |

| Yes or No: | Transportation Assistance Provided  |
|------------|---|
| Yes        | Other mileage rate (the methodology used to establish reimbursement rate is described here): St. Lawrence County's base mileage reimbursement rate is to use 1/2 of the federal mileage reimbursement rate currently .3275 cents per mile. We encourage carpooling and authorize the use of public transportation when possible. When necessary, the use of a taxi cab is authorized. |

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

The district does not allocate transportation support services for a participant if he/she resides within a two-mile radius of the work activity site. Personal disabling circumstances, weather, and childcare provider location are cause for exceptions to this rule. Other types of exceptions are reviewed as they occur.

- d. Described below are the services the district will provide to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment:

The district may provide individuals the following support services to obtain and/or maintain employment-DMV associated allowable costs, transportation related expenses, and clothing expenses. Requests are reviewed on a case-by-case basis, with respect to need, availability of funds, and availability of services through other resources or community programs.

## 7.2 Post-Employment/Transitional Supportive Services

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

Employed active clients may have the full array of services available to them such as Case Management, as well as the employment related services of their Employment Counselor, i.e. transportation assistance, car repair, clothing, tools, DMV costs. Documentation of attendance may be required.

- 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:

The district may provide the full array of supportive services to post employment individuals as indicated above including Case Management. Childcare reimbursement is provided through the Daycare Unit in the DSS TA/SNAP unit. The mileage reimbursement rate is half of the federal IRS Business mileage reimbursement rate.

### 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.):

Youth and adults that are certified 200% TANF eligible and participating in Workforce Innovation and Opportunities Act programs may be considered for the full array of supportive services as mentioned above. Services will be reviewed on a case-by-case basis with respect to need for activity participation, and/or with the intent to allocate payments when another agency providing an activity is unable to do so.

## 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:

1. The client does not satisfactorily participate in an assigned activity as recorded in their Employment Plan showing referral and supportive services as appropriate.
2. The Employment Counselor gathers together the documentation and records on the CMS the breach in plan, date of occurrence, and action requested.
3. The Employment Counselor refers the conciliation request to the Employment Unit Supervisor for review and approval.
4. Upon approval, a conciliation letter is generated by the Employment Counselor utilizing WTCMS. The conciliation notice letter is then mailed to the client.
5. The letter indicates to the client the reason for the conciliation, who to contact and the timeframe to do so, 10 days for both a Safety Net and Family Assistance case.
6. Once contact is made by the client, the Conciliator reviews the conciliation and may ask for further information from the Employment Counselor or client.

7. The Conciliator makes a decision based on the case presented by the client and available documentation. If the client responds within the time allotted and can demonstrate that the action was not willful and was with good cause the case will not be sent for sanction. If the documentation and information presented indicate a willful cause for non-compliance or if no response is received from the client, the case is reviewed and sanction is recommended. The Conciliator will record on WTWCMS the outcome of the conciliation process. It is then sent to the Employment Unit Supervisor for review.

8. Upon the completion of a supervisory review, the referral for sanction is sent to the TA/SNAP Supervisor to be imposed.

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

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

| <b>Yes or No:</b> | <b>Who makes the TA good cause/willfulness determination?</b>   |
|-------------------|---|
| No                | The client's employment worker  |
| Yes               | A supervisor in the district  |
| Yes               | A separate entity (described here): The Employment Coordinator, who does not have a caseload, has been designated as the Conciliator. All conciliation referrals are sent to the Conciliator first. All outcomes from the conciliation process are then sent to the Unit Supervisor for review and concurrence. |

- 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:

SNAP conciliation process is the same as the TA process. If a SNAP Job Search log is submitted at conciliation to avoid a SNAP sanction, a SNAP sanction referral may not be made.

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

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

| Yes or No: | Who makes the TA good cause/willfulness determination?  |
|------------|---|
| No         | The client's employment worker  |
| Yes        | A supervisor in the district  |
| Yes        | A separate entity (described here): The Employment Coordinator, who does not have a caseload, has been designated as the Conciliator. All conciliation referrals are sent to the Conciliator first. All outcomes from the conciliation process are then sent to the Unit Supervisor for review and concurrence. |

- 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:

Compliance is demonstrated by the satisfactory completion of Job Search log with at least five verifiable employer contacts. Job Search log is requested to be submitted for review prior to the date of sanction.

**8.2 Sanction**

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

Individuals who are on a first non-compliance or whose durations have expired will be mailed a letter by the Employment Counselor requiring them to attend an appointment to determine willingness to comply. If the client indicates they are willing to comply they will be referred for activity enrollment/assessment appointment. The sanction will only be removed upon satisfactory completion. This depends on the reason for sanction and Employment Counselors discussion with client on what constitutes compliance. In the case of Work Experience, compliance shall be defined as reporting to a required assignment, starting and participating satisfactorily for at least 5 business days before the sanction will be lifted. Temporary Assistance benefits are restored retroactive to the date the individual showed a willingness to comply. This cannot be earlier than the expiration of the minimum duration 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:

SNAP applicants and recipients whose sanction has expired will be mailed a Job Search log to record 5 employer contacts. In order to end a SNAP employment sanction the client responds with a minimum of five completed verifiable employer contacts on the log so that they will be deemed as in compliance. SNAP benefits are restored when the individual demonstrates compliance. This cannot be earlier than the expiration date of the minimum duration period.

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

### 8.3 Dispute Resolution

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

#### Grievance Mediation

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

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

### 9.1 Disability Determination Process and Tools

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

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

| Yes or No: | How the district determines an individual's disabilities and/or work limitation  |
|------------|--|
| Yes        | District participates in the OTDA managed contract for independent medical evaluations.  |
| No         | District contracts directly with a physician to provide independent medical evaluations.                                       |
| Yes        | District accepts physician's statement provided by participant.  |
| Yes        | District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary. |
| Yes        | Other process: Referrals to IMA are made for medical, psychological and intellectual evaluations when required or warranted.   |

- 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:

Individuals are mailed the LDSS 4005 to inform them if their code goes to exempt status or if the code remains exempt. The LDSS 4005(a) is mailed to inform them when they go from exempt status to non-exempt status. Clients are informed of their exempt/non-exempt status within 30-days of a determination.

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

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

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

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

**Process for Reviewing Medical Documentation**

| <b>Yes or No:</b> | <b>District’s process for reviewing medical documentation</b>   |
|-------------------|---|
| Yes               | District directs the contracted physician or individual’s physician to determine status.  |
| Yes               | District review team reviews and determines status (described here):  |
| Yes               | Specialized disability/medical staff or unit reviews and determines status (described here):  |
| Yes               | Other process: At eligibility the SWE will give a medical if client states limitations or is contesting employability status. A recipient may also contest employability or state limitations and a medical will be requested from client. Once medical is submitted the Medical Review team determines if exempt, nonexempt, or work limited. If client has trouble with a provider completing the medical evaluation, a referral to IMA may be made by the Employment Counselor. An Employment Counselor will also assist client in submitting medical evaluation if requested by the client. |

**9.2 Mental Health Screening and Assessment**

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

No

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

N/A

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

**Screening Tools the District Uses**

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

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

N/A

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

N/A

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

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

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

The Medical Review team consists of the Employment Supervisor and Senior Employment Counselor. If necessary, an Employment Counselor will participate. The Medical Review team makes a determination based on medical documentation provided by service agencies, Employment Counselors, Social Welfare Examiners, medical specialists or primary health care providers. Based on all available information individuals are referred to appropriate treatment. If determined that the treatment will not lead to employability the individual is referred to the Disabled Client Assistance Program (DCAP).

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

When all available information is gathered, the Employment Counselor meets with the individual to complete an Employment Assessment and Employment Plan. The Employment Counselor counsels the individual as to what the treatment plan entails and what will be required when they are enrolled. The Employment Counselor will then make a referral(s) to the appropriate agency for rehabilitative services.

- 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 has developed a standard attendance form(attached) to monitor the participation of the individual in substance abuse treatment and rehabilitation programs. Client attendance and participation at all treatment programs(mental health, physical impairments, substance use disorder) are mandatory and written into the client's Employment Plan as Treatment. The Employment Counselors, Employment Coordinator, Supervisor as relevant monitor and track compliance on a monthly basis through the use of enrollment on WTCMS and time sheets. The agency has devised a process with treatment agencies to submit attendance verification to a designated contact Counselor. Clients are counseled that it is their responsibility to ensure time sheets are submitted on a timely basis. If time sheets are not submitted timely the Employment Counselor will attempt to contact the client to check their circumstances. If unable to do so, the client may be referred for conciliation or a case closing. Employment Counselors will make contact with clients on a regular basis as a follow up to the referral and engagement of services.

## **10. District Certification**

### **10.1 Certification**

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

12/20/2023  
Joseph Seeber  
Commissioner