

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

January 1, 2020 – December 31, 2021

## **Broome County**

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## Section 1- Assurances

As a condition of the receipt of federal and State funds the Broome 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, 2020 through December 31, 2021. As Commissioner of Broome County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

/s/ Commissioner's Initials: \_\_NJW\_\_\_\_ Date: \_1/13/2020\_\_\_\_\_

Nancy J. Williams

, Social Services Commissioner

1/13/2020

, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## **Section 2 Administration**

### **Section 2.1 Administrative Structure**

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.

Following 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. The responsibilities of each office are described below.

The Welfare to Work Unit with the Assistance Programs Division administers the WTW program and is overseen by the Director of Temporary Assistance and Employment. The Welfare to Work Unit is located at 36-42 Main Street Binghamton, NY 13905. The Employment Coordinator oversees the staff that work with the non-exempt population. They are responsible for assisting clients in finding employment, securing training and addressing barriers to employment with the goal of self-sufficiency. The Human Services Coordinator II oversees the staff that work with the medically exempt population. The purpose is to address physical and mental health issues so clients can return to work or training or determine and file for Social Security benefits. The Chemical Dependency Services Unit Human Services Coordinator II oversees the staff that works with the drug/alcohol exempt population. This unit evaluates need for treatment, employability and tracks progress and treatment compliance.

Binghamton City School District administers the TABE test at the orientation for non-exempt Family Assistance cases.

STAR Group contracts with Broome County Department of Social Services to provide employability reviews, Social Security applications and case management services for Temporary Assistance to Needy Families (TANF) applicants and recipients

Broome County Council of Churches - CHOW Job Skills Training is a 12-week program designed to empower, educate, and support individuals in a holistic approach to wellness through employment, financial literacy, wellbeing, and nutrition to empower recipients and provide tools to lead a healthy life..

### **Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies**

#### **Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services**

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 assessments 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 oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Binghamton City School District	\$30,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input checked="" type="checkbox"/> Other TANF	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	TABE testing
Star Group, Inc.	\$450,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input checked="" type="checkbox"/> Other TANF	<input checked="" type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Employability/Disability review-monitor medical cases, determine work limitations, ensure participation in treatment to return to work
Industrial Medicinde Associates (IMA)	\$25,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input checked="" type="checkbox"/> Other TANF & local	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Physical exams, drug testing or work experience or employment, independent medical and psychological exams for SN applicants and recipients to determine employability
BOCES, Family Enrichment Network, VINES	\$471,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input checked="" type="checkbox"/> Other SYEP	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Summer Youth Employment Program
BC Council of Churches CHOW	\$93,000	<input checked="" type="checkbox"/> FFFS <input checked="" type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Job Skills training in Community Hunger Outreach warehouse
Dr. Adam Krantweiss, Ph.D	\$30,000	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input checked="" type="checkbox"/> Other Program Funds	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Independent psychological exams for applicants and recipients to determine employability
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

Provider	Total Contract Cost (per year)	Funding Source(s) (Check all that apply)	Categories of Clients Served (Check all that apply)	Programs, Services or Activities Provided
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

**Table 2 – Other Service Providers**

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.

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Family Enrichment Network	Varies	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Child Care Resource and Referral Agency
ATTAIN	HUD	<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Computer training
BC Transit	DOT and CST	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Bus passes for TANF non-TA eligible for 4 months post employment transportation
Binghamton City School District		<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Family <input checked="" type="checkbox"/> SNA Individual <input checked="" type="checkbox"/> SNAP <input checked="" type="checkbox"/> TANF 200%	Alternative HS, TASC, ESL, Work Experience
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

## Section 2.3 OTDA Jobs Staff Agreement

### OTDA Jobs Program Services – Target Groups

("X" signifies those that apply in this district)

<b>Services</b>		<b>Target Groups</b>	
Assessment/Employment Plan	<input type="checkbox"/>	Applicants	<input type="checkbox"/>
Supervised Job Search	<input type="checkbox"/>	FA & SNA with children	<input type="checkbox"/>
Job Readiness Training	<input type="checkbox"/>	SNA without Children	<input type="checkbox"/>
Job Club	<input type="checkbox"/>	SNAP	<input type="checkbox"/>
Job Placement Services	<input type="checkbox"/>	TANF 200%	<input type="checkbox"/>
Grant Diversion	<input type="checkbox"/>		
Job Development (employer outreach)	<input type="checkbox"/>		
WOTC pre-certifications	<input type="checkbox"/>		

### Other Services Requested

Described below are additional services/duties which will be requested of Jobs staff (e.g. WTWCMS data entry, case conferencing, job fairs)

## Section 2.4 Access to Services at New York State Career Centers

In New York State, TANF is a required WIOA partner and must coordinate access to TANF services with the comprehensive Career Centers.

- a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:
- The district has employee(s) physically present at a Career Center
  - The district has contract staff physically present at a Career Center
  - The district makes available direct access to its program staff via phone or technology at a Career Center
  - The district makes available copies of the LDSS-2921 (Common Application) at a Career Center
  - Other:
- b. Please provide a description of how the district coordinates with Career Center partners with providing 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.

BCDSS staff refer clients to the Resource Room and encourage them to take advantage of services available, i.e computer access, workshops, funding for training, etc

## Section 3 Engagement and Work Preparation

### Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f))

For purposes of satisfying the federal requirement which states 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, 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 3.4. Also included is pursuit of other forms of income such as SSI and SSDI.

Include any additional information regarding the district’s local “engaged in work” requirements:

BCDSS espouses a Work First philosophy, from initial contact through eligibility the benefits of work are discussed. BCDSS offers one time only assistance payments for: rent, energy, transportation, car insurance or repairs, tools, etc. to avoid ongoing assistance.

### Section 3.2 Orientation (Reference 18 NYCRR 385.5)

Check one of the following:

The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.

In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

Transitional Services including TBA, SNAP, WERC, Medicaid

Notification of core and non-core activities

Expectations for non-exempt applicants and recipients

TABE test for TANF applicants/recipients provided by Binghamton City School District

VITA tax return services

Bonding for convicted felons through DOL,

Financial literacy information

Direct job matching through our career center and employment contracts

Access to computers and internet daily at the Career Center

Basic computer training daily at the Career Center

Immediate referrals and access to interview attire through community clothing banks

Working Wardrobe

Described below is the manner in which the district completes the required orientation for all applicants and recipients of TA (e.g. in a group setting, individually, or a combination of both),

including the orientation procedure for exempt individuals and non-exempt individuals, if different:

TANF, SNF and SN exempt and non-exempt participate in a group orientation. Applicants that are employed are given individual appointments that do not interfere with their work schedule. Applicants are given individual appointments as needed.

### **Section 3.3 Assessment and Employment Planning**

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):

- The district enters assessments directly into WTWCMS
- The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
- The district conducts assessments using a local equivalent tool, and later enters information into WTWCMS. Attached is the local equivalent.
- The local equivalent does not contain additional elements other than what is required.
- The local equivalent does contain additional elements beyond what is required, listed below:

b. Describe the district procedure for the completion of an employment assessment:

District refers applicants to meet with Employment Unit Staff prior to case opening. The applicants are given job leads and referrals to appropriate employment and job search services. Assistance with job search and resumes will be given.

Applicants and/or recipients may be assigned to an individual or group appointment. The final assessment is based on an interview and observations of the client by the Caseworker. The applicants or recipients are given an appointment for a formal assessment to be completed. This is generally before the case opens.

c. The district administrative unit or contractor responsible for conducting assessments is:

The BCDSS WTW Caseworkers/Job Developer and the Star Group conduct assessments.

d. The qualifications of the employees conducting the assessment are at minimum: [Refer to requirements listed in 18 NYCRR 385.6(c) and 385.7(c)]

Caseworkers in the WTW Unit must have a bachelor's degree.

Contributors to assessment information will be staff from local school districts, BOCES or other education providers, DSS CASAC's, OET and DOL employment counselors.

The Test of Adult Education Locator Test is administered by the Binghamton City School District

- e. Applicants in households **with** dependent children are required to participate in completion of an assessment:  
 Yes       No
- f. Applicants in households **without** dependent children are required to participate in completion of an assessment:  
 Yes       No
- g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:  
 Yes       No
- h. How often and under what circumstances is the assessment updated?  
Assessments are updated anytime there is a case circumstance change, at a minimum, assessment are updated yearly.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:
  - The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):
  - The district enters employment plans directly into WTWCMS.
  - The district uses the LDSS 4978 (New York State Employment Plan) and later enters information into WTWCMS.
  - The district develops individual employment plans using a local equivalent tool and later enters information into WTWCMS. Attached is the local equivalent.
    - The local equivalent **does not** contain additional elements other than what is required.
    - The local equivalent **does** contain additional elements beyond what is required, listed below:
- b. Check one of the following:
  - The same administrative unit or contractor that conducts employment assessments also develops employment plans.
  - A different district administrative unit or contractor develops employment plans, and their qualifications include
- c. Describe the district procedure for the completion of an individual's employment plan.

Employment plans are completed as part of the initial assessment and anytime that there is a track change. The employment plan is developed with the clients input and lists short term and long term goals.

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

The employment plan is updated whenever there is a change in activity assignment, or a goal is attained. At a minimum, all plans are updated yearly.

**Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)**

- a. Describe below how the district plans to meet federal and State TA participation rate requirements. Included is the weekly hours standard participation requirement 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 who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

Non-exempt individuals, to the extent each is medically able, will be enrolled in 35 hours of activity/week, including, whenever possible, at minimum, the requisite number of hours of countable activity as defined under federal and state legislation. Anyone who is employed less than 35 hours/week will be required to participate in additional activities to total 35 hours/week. Those with children under the age of six may be required to participate in less than 35 hours/week, but always, when possible, in a sufficient number of hours to be countable. The weekly standard of 35 hours is used. Individuals whose employability status changes from exempt to non - exempt are typically engaged in activities within 30 days of notification of status change. Non-exempt SN are engaged in supervised weekly job search as applicants as part of the Front Door Diversion process. Non-exempt TANF and SNF applicants are engaged in countable core and non - core activities as developed with the caseworker at the assessment appointment

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

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	845	1286

- c. Describe below 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:

Workers receive a copy of the monthly detail listing to identify under-engaged and non-participating clients. Supervisors review unassigned cases. Two dedicated TA undercare staff monitor employed. WTW staff monitor reconciliations of earned income report.

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) recipients to participate in

SNAP E&T work activities. If the district is offering Supervised Job Search as an E&T activity component, the district must describe how the job search activity will be supervised and tracked, including the frequency of monitoring the participant’s job search efforts. (Please note: Case management services must be provided to all participants enrolled in an E&T activity):

BCDSS currently does not mandate SNAP E&T assignments for NTA SNAP applicants and recipients.

If the district is not mandating SNAP E&T work activity assignments, please describe 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 make available job search as a SNAP E&T activity to NTA SNAP applicants and recipients):

BCDSS will send all Non-TA-SNAP non-exempt work registrants the BCDSS Employment/Training Opportunities literature at case opening, recertification, or per client request.

- e. Describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also 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:

- 1. The district assigns TA **applicants** to Job Search.  Yes  No

If yes, the process for engaging TA **applicants** is:

Non-Exempt SN, SNF and TA Applicants:

May be required to participate in supervised job search through weekly individual and group appointments with BCDSS staff by participating in active job search, submitting weekly job logs and attending workshops or Job Clubs. The district requires 20 contacts/week for full time job search.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	20	30	
SNA Individuals	20	30	

- 2. The district assigns TA **recipients** to Job Search.  Yes  No

If yes, the process for engaging TA **recipients** is:

Non exempt SN, TA and SNF are required to participate in job search either as a standalone activity or as a non-core, sometimes not countable activity. They may be required to participate in supervised job search through weekly individual and group appointments with BCDSS staff by participating in active job search, submitting weekly job logs and attending workshops or Job Clubs. The district requires 20 contacts/week for full time job search. Part-time job search requirements vary based on number of hours involved in other activities.

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

A recipient who provides unregistered child care is encouraged to register through the Child Care Council to become a legally exempt childcare provider in order to receive payment from the agency and a higher rate of payment. BCDSS will budget this child care income as appropriate. An individual that is self-employed and who receives less than the hourly minimum wage in payment will be required to participate in 35 hours of activity each week, not including the hours of provision of self-employment. BCDSS will allow two months to all self-employed individuals to increase their business income, additional time may be permitted as determined by the district based on case circumstance.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An “X” in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

<b>Activity and Definition</b>	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>

<b>Activity and Definition</b>	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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 workstudy programs at public institutions. Individuals participating in subsidized public sector employment, and workstudy unless otherwise permitted under a federal workstudy 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student's education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<p><b>Community Service</b> - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>

<b>Activity and Definition</b>	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>
<input type="checkbox"/> SNAP	<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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>

<b>Activity and Definition</b>	
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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, 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>
<input checked="" type="checkbox"/> FA <input checked="" type="checkbox"/> SNA Fam <input checked="" type="checkbox"/> SNA Ind <input checked="" type="checkbox"/> SNAP	<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>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> 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>
<input type="checkbox"/> FA <input type="checkbox"/> SNA Fam <input type="checkbox"/> SNA Ind <input type="checkbox"/> SNAP	<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>

### Section 3.5 Job Development

The district conducts or accesses job development services to expand job opportunities for TA and SNAP participants.  Yes  No

If yes, the district participates in job development activities in the following manner:

District staff contacts employers to solicit jobs for TA and SNAP participants.

Below is the description of how this is done, including number of staff, frequency of contacts, etc.:

Broome County Social Services employs one job developer who serves as a member of the Business Services Team in conjunction with DOL. Potential and current employers are contacted by email, telephone and in person on an as-needed basis. Employers are contacted through job fairs and individual employer visits in the One Stop. On-the-job training contracts (OJT) and tax incentives are offered

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Below is the description of how this is done, including number of staff, frequency of contacts.

OTDA Jobs Program staff are charged with job development as indicated in section 2.3. Additional information, if any, is described below:

### Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

a. Describe how the district identifies appropriate education program providers for services of Adult Basic Education, 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:

Services listed are provided through local school districts, BOCES, and the American Civic Association.

b. Describe 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:

BCDSS works in conjunction with the local WIA to refer clients to training facilities and courses that are approved for WIA funding. The program must lead to employment available locally.

c. Describe the process and guideline 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:

Based on information as a result of the assessment and through observation by the Caseworker or disclosure from the client, the want or need for ABE, HSE or ESL is

ascertained. The client is encouraged to engage in these activities and informed of available resources for ABE, HSE and ESL in the community. These classes are incorporated into the employment plan. Every non-exempt TANF client is given the TABE locator test at orientation to determine basic literacy. All clients without a high school diploma are encouraged to participate in ABE and HSE.

- d. Describe the district's process and policy, including the guideline 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 agency would deny participation in educational activities:

Approval is based on the completed assessment and literacy/math testing results. The Employment Development Plan will include the approved activities. If the individual has not obtained their high school diploma or HSE, the client is encouraged and may be required to enroll in an educational program, such as HSE classes, to prepare them to attain a high school diploma or HSE. The education activity would be denied if the participant did not complete their assessment or the literacy testing.

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

TANF and SN recipient's enrollment in education or training programs must be approved by the department's designated staff. The criteria upon which decisions to approve or disapprove shall be consistently applied to each person's circumstances. Program approval will be dependent upon the extent to which the combined classroom activities, allowable study time and other structured activities total required participation mandates.

Those factors to be included are:

**Current Abilities:** The individual's ability to reasonably compete for existing jobs, which would reduce or eliminate dependency, without training/education. The current labor market will be considered, work history and skill level in trades or occupations will also be evaluated.

**Pre-Approval Mandates:** Individuals pursuing approval for training will be required to complete the Career Exploration workshop; arrange and complete an interest inventory test through WFNY and research job outlook; qualification, wages and hours of the prospective field. Individuals are also expected to compare class offerings, cost, debt and certification status in the business community between the BCC and EBI.

**Training Record:** The amount and type of prior training the individual has had will be evaluated in conjunction with his/her performance. Past training is an indicator of:

- a) whether the individual will seriously pursue future training opportunities and
- b) whether there has been sufficient prior training to qualify the individual for existing local job opportunities. Training may not be re-approved after termination without good cause. BCDSS WTW Unit shall be responsible for determining good cause and re-approvals.

**Educational Level:** The individual must possess the prerequisite skills for participation in the program or receive approval to obtain such necessary skills through remedial education as part of the overall plan for self-support. For post-secondary education the individual must have a high school diploma or high school equivalency diploma prior to enrollment and \*reading and math scores based on TABE 11&12 Grade Range Scale Score Guidelines NRS level 6. (\*special consideration will be made for individuals with an IEP)

**Aptitude:** The individual's aptitude and ability to benefit from the program as determined in a consistent and reasonable manner, through an evaluation of past work/training performance, counseling and testing.

**Enrollment Level:** Approval will be dependent upon full time enrollment governed by the vocation training institution. Individuals who are not participating full time or to capacity will not be eligible for continued approval. The department will be responsible for evaluating extenuating circumstances that prohibit full time enrollment, and will make decisions regarding ongoing approval based on such circumstances.

**Academic Progress:** Continued approval will be based upon academic performance. The department will adhere to the institution's policy of standards for academic progress. Academic performance and progress will be evaluated on a semester -to-semester basis.

**Assessment:** For receipt of supportive services while in vocational training, an assessment must be completed prior to the beginning of the training period. For post-secondary institutions, a semester constitutes a training period.

Only programs of study that directly relate to the preparation of individuals for current or emerging occupations will be approved. The individual must be able to qualify for employment in their field of study.

**Self-Initiated Training:** Individuals who are self-initiated may not be entitled to supportive services during their current training period (i.e. semester). Self-initiated individuals in postsecondary education may be reviewed for receipt of supportive services in subsequent semesters. Standards for evaluation will be based upon current abilities, program participation and satisfactory performance. Additional standards for approval will be consistent with agency-initiated training. For self-initiated training other than postsecondary, assessment for supportive services will be considered on a case-by-case basis. Participation in self-initiated training does not exempt individual from participation in other work activities.

- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:

Up to a four year degree may be allowed

- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20

hours in paid employment activities which may include work study, work experience or community service:

If an individual completes 1 year of vocational education, the individual will have to be employed or participate in work experience or community services for at least 20 hours.

h. Education and training providers are evaluated by the following standards:

Broome County will evaluate their education/training providers by their ability to:

- a. Cooperate in the implementation of the Broome County policy with regard to enrollment of Temporary Assistance (TA) recipients.
- b. Notify the Department's designated staff upon the application for admission of any recipient
- c. Provide WTW staff with all available and relevant information upon which to determine individual approval
- d. Demonstrate relevancy and effectiveness of training
- e. Request approval for enrollment of TA clientele for each program offered to such individuals using a form approved by Broome County Department of Social Services (BCDSS)
- f. Consent to a pre-arranged monitoring schedule and provide the WTW staff with necessary information to evaluate continuing support and approval of programs and enrollments on a timely basis
- g. Submit monthly attendance report and quarterly reports for all approved programs on a timely basis

i. The district procedure for advising participants of approved training providers is:

All training providers are approved by Broome Tioga Workforce NY.

j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

Through a detailed letter that clearly outlines requirements that a student must meet in order to remain in their approved course of training.

Students who have not been approved also receive a letter that details the justification for the decision not to approve training. Information in regards to a Fair Hearing request is also included.

k. 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 checked below:

It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.

- 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.
- 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.
- The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
- The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
- 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.
- Additional reasons as stated below:

- l. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:

At TA recertification, DSS Temporary Assistance staff requests verification from the parent to provide attendance documentation. When necessary, staff will send a request for attendance verification directly to the school.

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

Utilizing medical documentation listing limitations from a certified health practitioner in determining work activity assignment and provide information regarding limitations in writing with activity provider supervisor. For SN applicants and recipients, IMA as well as other practitioners will be utilized to determine physical or psychological limitations.

### **Section 3.7 Work Verification**

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, NYCWAY 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 (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

**The District's Quality Assurance Process is as follows:**

The district will perform a random sample of (12) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTWCMS and documentation is in the file to support hours reported on WTWCMS and that the scheduled hours on WTWCMS is consistent with the documentation.

The district will perform a random sample of (12) cases semi-annually for participation in **unpaid work activities** to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTWCMS, excused absences and holiday time are documented in the case file and correctly reported on WTWCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTWCMS by district or provider staff.

The district will perform a random sample of (6) cases semi-annually in which a case member is reported as an employability code **38-needed in the home fulltime or employability code 48-time limit exemption** to care for a disabled household member to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

The district will perform a random sample of (6) cases semi-annually in which a case member is reported as an employability **code 31-caretaker of a child under the age of 12 months** to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. TA records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12-month lifetime limit.

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.

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

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

Yes       No

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

Yes       No

If No, please describe the process used below:

#### **Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency**

Following is a description of how the district accommodates the needs of Non-English-speaking participants in accessing employment activities and services:

Desk guides and posters are provided to staff and displayed in waiting areas to assist with the identification of the individual's primary language.

Broome County contracts with Language Line to provide translation services to assist with assessment process and plan development

### **Section 3.9 Strategies/Procedures for Increasing Program Attendance**

Describe district policies and/or procedures in place to reduce the amount of time participants fail to participate in work activities, including absences that are with good cause:

Broome County involves clients in work activities as applicants and participation continues seamlessly through the eligibility process into case opening. Activities are entered in WTWCMS in order to meet participation. When clients are involved in work activities, staff uses the participation calculator to determine if countable excused absences are appropriate and will make the client meet the participation requirement. We also work with clients to make sure their activities and family obligations (getting special needs children off school bus, complying with court ordered visitations, etc.) do not conflict. WTW staff go into the community to visit sites to address barriers.

### **Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants**

District attempts to engage sanctioned participants as soon as they are sanctioned using the following strategies:

District attempts to engage sanctioned participants when the durational period of the sanction is completed using the following strategies:

District attempts to engage sanctioned participants during different times in the sanction period using the following strategies.

As time and staffing permits, clients are sent letters informing them how they can restore their benefits and/or eligibility reviews are conducted for those who remain sanctioned beyond the durational period.

### **Section 3.11 Strategies for reducing the need for TA**

District's strategies for reducing the need for TA are described below:

Broome County connects clients to job search activities and employment opportunities within two weeks of their application. Broome County emphasizes the importance of employment and the benefits that are associated with employment (transitional childcare, EITC, SNAP benefits, etc.). With very few exceptions, job search is mandated for employable applicants and recipients. BCDSS staff participates in ESPRI anti-poverty initiatives. One time payments for goods or services needed to keep or accept employment are issued.

## **Section 4 Support Services**

(Reference 18 NYCRR 385.4)

### **Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District**

- a. The social services district will provide childcare in accordance with the childcare section of the district's Child and Family County Services Plan. The district will also provide for participants 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:

All Supportive Services listed on attached supportive services desk guide

- b. The district will use the following approach 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.

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/19 is 58 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/19 is 20 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):

- c. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below each way to a work activity or to access public transportation:

One (1) mile

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

To the extent Federal, State and local resources are available BCDSS will provide a one-time diversion payment for services outlined in attached supportive services desk guide.

### **Section 4.2 Transitional Support Services**

The district will provide the following supports and strategies to support job retention:

OJT and TEAP contracts, job development and job coaching with the caseworker will provide early intervention to identify any problems on the job.

The district will provide the following support services, for up to 90 days after case closing, to individuals whose TA cases have closed due to employment:

To the extent Federal, State and Local resources are available, BCDSS will provide supportive services deemed necessary and reasonable to assist employed Temporary Assistance recipients improve their self - sufficiency opportunities. This will be accomplished by referral for separate determination of eligibility for transitional medical/childcare services. Supportive services as outlined in attached supportive services desk guide will be provided as requested.

### **Section 4.3 Extended Support Services**

As long as funding is available (through FFFS, etc.), the district will provide the following supportive services for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines:

Services listed in the supportive services attachment are provided to TANF, SNAP and 200% eligible individuals.

## **Section 5 Conciliation, Sanction and Dispute Resolution Procedures**

(Reference 18 NYCRR 385.11 and 385.12)

### **Section 5.1 Conciliation**

The district's conciliation process for TA applicants and recipients is in accordance with 18 NYCRR 385.11(a). Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

The Department will send a written "Conciliation Notification" to the applicant/recipient which describes the process by which they may dispute a work assignment or explain their reason(s) for failing to comply. Recipients must respond within the required timeframe.

The Temporary Assistance good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

The district's conciliation process for SNAP recipients is in accordance with 18 NYCRR 385.11. Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

The recipient will be instructed to contact BCDSS Staff to schedule a conciliation meeting. This meeting must be held within thirty (30) days of the clients' dispute.

Recipients must respond within the required timeframe.

If the recipient fails to contact BCDSS within the time period designated above, or the department determines at the conciliation meeting that failure to comply with the work assignment was willful and without good cause, a ten (10) day written notice to deny/discontinue benefits and right to a Fair Hearing will be sent.

The SNAP E&T good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

The district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is:

The Department will send a written "Conciliation Notification" to the recipient which describes the process by which they may dispute a work assignment or explain their reason(s) for failing to comply. For SNAP E&T compliance, job logs are mailed with the conciliation and documentation of five (5) job applications is required.

## Section 5.2 Sanctions

- a. 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 is:  
The Employment Caseworker determines that the individual is in compliance with the assigned work activity. The standard criteria for any client to demonstrate compliance prior to ending a durational sanction is a minimum of 5 days in an assigned work activity. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply (but no earlier than the expiration of the minimum duration period).
- b. The district's procedure for determining compliance for those SNAP 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 is:

The standard criteria for any client to demonstrate compliance prior to ending a durational sanction is a minimum of 5 job applications or provide documentation to verify they are exempt. Recipients must request to be added back to the case after the minimum duration has ended and comply with work requirements as assigned by the district. Those who document an exemption may have their SNAP sanction lifted before the end of the durational sanction period.

### Section 5.3 Dispute Resolution

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 is conducted in accordance with 18 NYCRR 385.11.

The grievance is mediated by:

- An agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
- Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

### Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals

(Reference 18 NYCRR 385.2)

#### Section 6.1 Disability Determination Process and Tools

The district's process for determining an individual's disabilities and/or work limitations is in accordance with 18 NYCRR 385.2(d). Check **all** that apply, and describe the process:

- District participates in the OTDA managed contract for independent medical evaluations.
- District contracts directly with a physician to provide independent medical evaluations.
- District accepts physician's statement provided by participant.
- District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
- Other process (please describe):

The local process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited is as follows:

- District directs the contracted physician or individual's physician to determine status.
- District review team reviews and determines status (described below).
- Specialized disability/medical staff or unit reviews and determines status (described below)
- Other:

BCDSS staff and subcontracted Star Group staff review collected/submitted medical documentation, consult with physicians' offices and determine employability status for all TANF recipients claiming a medical/psychiatric disability. All contracted staff assigned to this project have experience as registered nurses or case managers for the mentally/developmentally disabled population. They may also make referrals for Functional Capacity Exams, Mental Health evaluations, or any other follow up necessary to make a solid determination of employability. The goal is always to move the recipient to self-sufficiency, by returning them to employability or assisting them in obtaining Social Security benefits.

Clients are referred for independent exams for mental health and physical issues. Cases are reviewed by the Medical Services Unit.

Once documentation is collected and reviewed, BCDSS staff determines appropriate employment code and issue the LDSS 4005/4005a to the client.

### **Section 6.2 Mental Health Screening and Assessment**

The district is administering a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted, in addition to screening for a disability that occurs as part of the application or disability determination process

Yes       No (*If No, section 6.2 is complete*)

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

TANF cases when they reach the 60-month mark and adults applying for or receiving housing assistance due to multiple evictions.

If yes: Does the district use the LDSS 5009 - Mental Health Screening Tool and/or the computer assisted version of the Modified Mini Screening tool (MMS)?

Yes       No

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

9

If using a screening tool other than the MMS, indicate the screening tool used:

Describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result:

### **Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))**

An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist the individual 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 he/she is participating in the assigned program.

- a. Following 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 6.1 of this plan. Included here is who (e.g., medical practitioner, employment worker, TA worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also included is 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.):

When caseworkers in the Disability/Employability Review Team (D/ERT) receive medical information from a provider that indicates treatment or rehabilitation is necessary to restore the client to self - sufficiency, the worker brings the file to case conference for confirmation of what the next steps will be regarding treatment expectations. An applicant or recipient is referred to IMA or other private providers to determine diagnosis and appropriate treatment recommendations. Client is scheduled an appointment or contacted by phone. D/ERT will monitor treatment. Clients are given a treatment log that their provider must complete. Client is responsible for submitting the log to D/ERT monthly or as determined by staff. D/ERT staff will enter treatment in the WTWCMS system.

- b. Following is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc. Please be specific:

See 6.3 (a)

- c. Following is the district's procedure for tracking the participant's compliance with the 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:

See 6.3 (a)