

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

**January 01, 2024 - December 31, 2025**

**Erie**

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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.)

Please see (attachment #1) Organizational Chart

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 Comprehensive Employment Program is comprised of multiple units that enroll Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) applicants and recipients in job search, work experience and other work activities designed to enable individuals to enter employment and to increase hours and earnings of those already employed. Please see (attachment #2) Description of responsibility for each unit.

## 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.

Provider	Total Contract Cost/Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Buffalo Public Schools Adult Education Program	286600	FFFS	FA SNA Family	Work Experience, HSE and ESL Educational Services, Workplace Literacy, Job Readiness Training, Career/Vocational Training, Job Placement and Retention Services, Case Management Services.
Erie Community College-CAST	375000	FFFS	FA SNA Family	Work Experience, Jobs Skills Training, Vocational Training, Job Readiness Training, Job Placement and Retention Services, Case Management Services.
Goodwill Industries - Worksite Management	200000	FFFS	FA SNA Family	Work Experience, Job Skills Training, Job Placement and Retention Services, Case Management Services.
Goodwill Industries - SET Program	250000	FFFS	FA SNA Family	Workforce Development, Upskill Training, Case Management, Job Placement and Retention Services, Supportive Services.
Our Lady Victory	200000	FFFS	FA SNA Family	Work Experience, Job Placement, Vocational Training, Job Readiness Training.

WNY Independent Living - Mental Health Peer Connection	200000	FFFS	FA SNA Family	Work Experience, Job Placement and Retention Services, Case Management, Services for Individuals with Drug/Alcohol or Mental Health Diagnosis.
Salvation Army	200000	FFFS	FA SNA Family	Work Experience, Job Skills Training, Vocational Training, Job Readiness Training, HSE, Job Placement and Retention Services, Case Management Services.
United Way Work	1430400	FFFS	FA SNA Family	Work Experience, Job Skills Training, HSE, ESL, Computer Literacy, Financial Literacy Provided at Community HUB Sites  Hub Sites Include: Belmont Shelter Corp, The Belle Center, Gloria J. Parks, Lt. Col Matt Urban Ctr., Northwest Buffalo Community Center, Seneca Babcock Community Center, BPS-Adult Ed, Providence Farm.
Erie County Medical Center (ECMC) CASAC Services	397493	Others: State	FA SNA Family SNA Individual	Certified Alcohol and Substance Abuse Counselors (CASAC) determine need for treatment, level of care and employability status.
Placing Individuals in Vital Opportunity Training Wage Subsidy Program	2283286	FFFS	FA SNA Family TANF 200%	6 Month Wage reimbursement program with Erie County Employers.
Prevention Council of Erie County- Strengthening Families	176400	FFFS	FA SNA Family	Prevention and Employment Services for adults who are actively involved in substance abuse treatment/services and are the parents of children aged 5 to 15 years old.
Summer Youth Employment Program	2042029	FFFS	FA SNA Family TANF 200%	Youth Employment Services.
Live Well Erie	4367259	Local	TANF 200%	Workforce Development

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.

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
Trocaire College	Others: N/A	FA SNA Family SNA Individual SNAP	Vocational Training
Buffalo Center for the Art and Technology (BCATS)	Others: N/A	FA SNA Family SNA Individual SNAP	Vocational Training

Northland Workforce Training Center	Others: N/A	FA SNA Family SNA Individual SNAP	Vocational Training
The Service Collaborative	Others: N/A	FA SNA Family SNA Individual SNAP	Vocational Training
Industrial Medicine Associates	Others: Revenue Intercept	FA SNA Family SNA Individual	Consultative Medical and Psychiatric Examinations
NYS Department Of Labor	Others: N/A	FA SNA Family SNA Individual SNAP	Job Placement Services, Employment Workshops, Job Fairs
Buffalo Employment Training Center	Others: WIOA	FA SNA Family SNA Individual SNAP	Job Placement Services, Employment Workshops
Erie Community College One Stop	Others: WIOA	FA SNA Family SNA Individual SNAP	Job Placement Services, Employment Workshops
ACCES VR	Others: N/A	FA SNA Family SNA Individual	Vocational Training for Individuals with Disabilities
Cornell Cooperative Extension	Others: N/A	FA SNA Family SNA Individual SNAP	Nutrition Education
Center for Employment Opportunities	Others: N/A	FA SNA Family SNA Individual	Re-Entry Employment Services
WIB Health Professionals Opportunity Grant	Others: N/A	FA SNA Family SNA Individual	Vocational Training
Jewish Family Services	Others: N/A	FA SNA Family SNA Individual	ESL, Career Counseling
Buffalo & Erie County Botanical Gardens	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
Buffalo City Mission/Cornerstone Manor	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
Buffalo Olmsted Parks Conservancy	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor

Friend's of the Night People	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
Gerard Place	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
EC Parks	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
Hispanics United Of Buffalo	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
New Life Residential	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
Buffalo Federation Of Neighborhood Centers	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor/Skills training
Educational Opportunity Center	Others: N/A	FA SNA Family SNA Individual	Vocational and Educational Training
Catholic Charities of Buffalo	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor/HSE/ESL
Erie 1 Boces	Others: N/A	FA SNA Family SNA Individual	Vocational Training
Journey's End Refugee Services	Others: N/A	FA SNA Family SNA Individual	HSE/ESL/Vocational Training (MAC)
Restoration Society	Others: N/A	FA SNA Family SNA Individual	Job Placement Services, Career Counseling
Child Care Resource Network (CCRN)	Others: N/A	FA SNA Family SNA Individual	Child Care Resource & Referral Agency
Buffalo Urban League	Others: N/A	FA SNA Family SNA Individual TANF 200%	Youth Services
Beacon Center	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider
Erie County Medical Center/Out Patient Clinics	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider

Endeavor	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider
Evergreen Health	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider
Cazenovia Recovery Systems	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider
Best Self Behavioral Health Services	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
Horizon Health Services	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
Spectrum Health Services	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
BryLin Hospitals	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider, Mental Health Treatment Provider
Veterans Hospital	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider
Catholic Health System	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider
CAO/DART	Others: N/A	FA SNA Family SNA Individual	Drug and Alcohol Treatment Provider
Buffalo & Erie County Public Library	Others: N/A	FA SNA Family SNA Individual	Worksite Sponsor
Ken-Ton	Others: N/A	SNAP	Venture V Program

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

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

The district uses an outcome performance-based payment model. The district has written into the agreements of contracted agencies/services providers that use TANF and SNAP E&T funds that they are required to monthly submit time and attendance reports (attachment #3), worksite monitoring reports and supporting documentation for each benchmark for which reimbursement is requested with the monthly invoice. Additionally, agencies/providers must submit quarterly fiscal budget reports.

Performance reviews, contract reviews and budget proposals are conducted annually on all contracted agencies/service providers that use TANF and SNAP E&T funds to evaluate their performance and delivery of services. Changes are made based on performance and availability of funds.

The district has also established means to ensure ongoing communication between the district and agency/service provider to ensure successful implementation and completion of services to be performed pursuant to the program agreement and achievement of outcomes.

**1.3 OTDA Jobs Staff Agreement**

a. OTDA Jobs Program Services - Target Groups. Check all services and target groups that apply:

Selected	Services
	Assessment/Employment Plan
	Supervised Job Search
	Job Readiness Training
	Job Club
	Job Placement Services
	Grant Diversion
	Job Development (employer outreach)
	WOTC pre-certifications

Selected	Target Groups
	Applicants
	FA & SNA with children
	SNA without children
	SNAP
	TANF 200%

b. Described below are the additional services/duties Jobs staff will be requested to perform (e.g. WTCMS data entry, case conferencing, job fairs).

**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 (select 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. 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 district and Career Center partners have an agreement to participate in a customer-focused referral system that will assist job seekers and business customers to access resources. Each partner offers information on services provided, program eligibility guidelines and how to apply for program services and/or arrange an appointment for the customer. A referral liaison is available for each system partner and protocols developed for making referrals between partners. Additionally, a release of information form is utilized to obtain participant consent to share and discuss information about the shared participant. Regular communication occurs with system partners to ensure positive outcomes.



## 2. Orientation, Assessment and Employment Plan

### 2.1 Orientation (Reference 18 NYCRR 385.5)

a. Check one of the following:

- The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
- In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following:

The district's orientation also reviews the B-5683 (8/2022) Employment Orientation (attachment # 4) and the Work Support Resource Guide (attachment # 5).

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 or virtually over the phone. In-person and virtual orientation can be in a group setting individually, or a combination of both. Please include the orientation procedure for exempt individuals and non-exempt individuals, if different:

Orientation is delivered by Employment staff either in a group setting or individually for applicants. Recipient orientation is conducted individually. Orientation may be conducted in person or via telephone. The procedure is the same for exempt and non-exempt individuals.

### 2.2 Temporary Assistance (TA) Employment Assessment

a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:

- The district enters assessments directly into WTCMS
- The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.
- The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Please attach the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them below:

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, by phone or a combination of both):

All adults in households with dependent children, and 16 and 17 year old's who are not in school, are assessed by Employment Counselors within 90 days of case opening. Adults applying for Temporary Assistance and residing in households without dependent children are assessed within a year of the date of application. Employment Counselors, through the use of WTCMS "Search Folders with Alerts" monitor to ensure that all applicants are assessed within the specified time frame.

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

Assessments are conducted by Employment Counselors.

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)):

Qualifications:

Graduation from a regionally accredited or New York State registered college or university with a Bachelor's Degree, and one year of experience in either educational or vocational guidance or employment interviewing, employment counseling or employment placement work; and either:

a. One additional year of experience as described above;

OR

b. Completion of 30 graduate semester credit hours with specialization in guidance counseling;

OR

c. An equivalent combination of training and experience as defined by the limits of (a) and (b).

e. Are applicants in households with dependent children required to participate in completion of an employment assessment?

Yes  No

f. Are applicants in households without dependent children required to participate in completion of an employment assessment?

Yes  No

g. Are exempt adults in households without dependent children required to participate in completion of an employment assessment?

Yes  No

h. How often and under what circumstances is the employment assessment updated?

Assessments are conducted every 6 to 12 months as circumstances warrant. They are also conducted at:

-Application;

-Recertification;

-Whenever there is a reason to believe that an individual has a physical or mental impairment that would limit their ability to participate in work activities;

-Whenever changes in individuals circumstances or activity warrant reassessment;

-Aged 60 and older are only assessed if determined to be in need of treatment for drug and alcohol abuse.

-When a case has reached their time limit threshold.

A face-to-face interview is conducted unless extenuating circumstances warrant a phone interview. Extenuating circumstances include employed individuals, out of county college students, individuals with medical documentation confirming inability to report for an in-person assessment, individuals receiving in-patient drug and alcohol services during the conciliation process, and during times when emergency executive orders direct that interviews may not be conducted face-to-face. The case notes will clearly document why a phone interview is necessary.

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

a. The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a). Check one of the following:

The district enters employment plans directly into WTCMS.

The district uses the LDSS-4978 (New York State Employment Plan) and later enters information into WTCMS.

The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent tool. If the local equivalent contains additional elements beyond what is required, list them below:

[Empty text box]

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:

[Empty text box]

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

Employment Plans are developed at assessment, reassessment and as changes in circumstances warrant. Individuals are given a copy of the completed Employment Plan. All of the information collected during the employment assessment process is considered when developing an individual's Employment Plan. A face-to-face interview is conducted unless extenuating circumstances warrant a phone interview. Extenuating circumstances include employed individuals, out of county college students, individuals with medical documentation confirming inability to report for an in-person assessment, individuals receiving in-patient drug and alcohol services during the conciliation process, and during times when emergency executive orders direct that activities may not be conducted face-to-face. The case notes will clearly document why a phone interview is necessary.

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

The employment plan is updated when:

- The employment assessment information warrants;
- The individual's goals change;
- The individual's circumstances change.

### 3. Engagement

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

a. Federal requirements state that parents or caretakers must be engaged in work as soon as the district determines they are ready, but no later than within 24 months of receiving federally funded assistance. The district’s definition of “Engaged in Work” is:

Compliance with assessment, employment planning, all activities included in the individual’s Employment/Self-Sufficiency plan, including any need to attend treatment/rehabilitation programs, or any of the work activities listed in Section 4.1. Also included is pursuit of other forms of income such as SSI and SSDI.

b. Described below is additional information regarding the district’s “Engaged in Work” requirements:

N/A

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

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

The district has adopted a Compliance Program that reflects a commitment to providing Language Assistance Services to individuals with Limited English Proficiency (LEP). Staff determine the primary language of each individual with LEP at the first point of contact. If an individual with LEP requests a qualified interpreter, or if the Employment Counselor determines that there is a language barrier, one will be provided. The Language Identification Tool is posted in district offices advising clients that an interpreter in their language will be provided at no cost to them. Bilingual staff and contracted interpreters are available to assist staff with non-English speaking clients. The district utilizes Journey's End Interpretation and Translating Services as well as the International Institute's IMSS (Interpreter Management Scheduling Software) system to arrange for interpreters. Walk-ins, quick questions, or short interviews, staff has access to the Language Line telephonic interpretation service, which allows communication through a third-party interpreter via a 3-way call. Contracted service providers offer a wide range of services to LEP individuals and accommodate non-English speaking participants with work activities while simultaneously providing on site ESL instruction. A language access services B-5817 (attachment #6) tagline sheet is included in all outgoing mailings. A tagline sheet is an informational flier instructing LEP individuals of their rights to language access services.

#### 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:

One week prior to an individual's work activity start date, ECDSS staff contacts the individual to remind them of the scheduled start date and to address any potential concerns. If individuals fail to report within 3 days to the assigned activity or have excessive absences, a case manager attempts to contact the individual to resolve any obstacles preventing the individual's attendance. Individuals are encouraged to schedule personal appointments around their work activity schedule. If appointments are scheduled during work time, individuals are afforded the opportunity to make up the hours. A case manager regularly visits worksites acting as a liaison, providing resources and strategies to improve individual participation. During the conciliation process staff focus on barriers that prevented the work activity engagement, assist the individual in complying with the work activity and promote re-engagement to avoid sanction.

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

a. Select all that apply:

- Described below are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:

TANF and SN-FAM individuals serving initial sanctions are immediately scheduled for an appointment with their Employment Counselor in an effort to address any barriers and re-engage the individual in a work activity. Sanction is lifted, and if deemed appropriate, the individual may be referred to our Job Development Unit for assistance with a Job Search.

- Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:

TANF and SN-FAM individuals who have served their durational sanctions are scheduled for an appointment with their Employment Counselor in an effort to address any barriers, lift the sanction, and engage participant in a work activity.

- Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

A FAST track appointment may be made with the individual for a review of their eligibility and barriers. FAST track is an eligibility review and case management appointment. At the eligibility review meeting, individuals are required to explain how their household is meeting expenses since they are sanctioned. Staff may inquire about household circumstances, including their income and resources. The self-sufficiency plan will be updated and any barriers to participation in work activities will be discussed. Staff work together with the individual to resolve the issues that resulted in sanction and assist them in returning to employment, work related activities, and complying with Temporary Assistance Employment Requirements.

### **3.5 Strategies for Reducing the Need for TA**

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

Employment Counselors provide information on employment service providers resources and address barriers to employment during the application process. Additionally, jobs leads are provided. Applicants that present verification of employment or the promise of employment are provided supportive services that assist them in obtaining and/or maintaining employment. Additionally a Work Support Resource Guide is provided.

## 4. Work Activities

### 4.1 Allowable Work Activities

a. Please select all the 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.

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

FA SNAFAM SNA 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>
FA SNAFAM SNA 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>
FA SNAFAM SNA 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>
FA SNAFAM SNA 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 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>
FA SNAFAM SNA 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>
FA SNAFAM SNA 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>
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>
FA SNAFAM SNA 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>

**Other** - 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.

## 4.2 Job Development

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

Yes  No

If Yes, select how the district participates in job development activities.

District staff contacts employers to solicit jobs for TA and SNAP Participants. Describe below how this is done, including number of staff, frequency of contacts, etc.

The Job Development Unit consists of Employment Counselors, Sr. Employment Counselors and an Employer Relations Coordinator. Employment Counselors will identify job opportunities in the community that match the education, skill level and work interests of each individual. Employment Counselors work with a database of employers which is used to match individuals with job openings in the community. The Job Development Unit may conduct Job Fairs at the district office. This involves contacting various companies that have job openings in various occupational areas and are in need of employees. Employers come to the Job Fair and hold interviews onsite which enables the employers to screen individuals and recruit employees for available openings. Job Development also partners with One Stop Career Centers and the NYS Department of Labor. The Job Development Unit utilizes the Placing Individuals in Vital Opportunity Training (PIVOT) Subsidized Employment Program. This employment subsidy program enables the Employment Counselor to offer employers a wage subsidy. In addition, the Job Development Unit provides job coaching, interviewing tips, job readiness skills training, and case management to help prepare individuals for a successful transition into full time, permanent employment.

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Describe below 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 districts partners with for the provision of ABE, HSE, and English Language Instruction in Table 1 or Table 2 under Section 1.2 of this plan):

The district has developed relationships with community educational institutions and refugee resettlement agencies that provide ABE, HSE or ESL and has entered into a contractual agreement with adult educational providers. The district has developed worksites referred to as "Dual Enrollment Worksites". These worksites offer a combination of work activities and classroom instruction including Adult Basic Education, High School Equivalency, ESL and/or Computer Skills training.

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 district consults with other government agencies, training/vocational providers, the local WIB, Department of Labor and organizations that provide vocational education and skills training. A vocational database has been developed, that includes trainings across a wide sector of occupations. The current database is monitored and updated to provide current vocational offerings and ensure all participants are given the opportunity to participate.



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

During the Assessment process, the Employment Counselor reviews and discusses educational options. The district encourages all individuals to participate in educational activities if a high school diploma or basic literacy level has not been attained. Individuals referred for education activities are TABE tested by the education providers to determine grade level. Educational service providers include, but not limited to: The Adult Learning Center, Catholic Charities, Journey's End, Educational Opportunity Center, BOCES, and SUNY Erie Community College.

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

The assessment process will determine if it is appropriate to approve an individual for an educational activity. The district will consider various factors in the determination process. Approval consideration will be given based on the individual's history of compliance, educational needs, and aptitude. Other factors would include the feasibility of approving a particular program, the districts need to comply with federal and State work participation rate requirements, and individual circumstances in the development of the Individualized Employment Plan. Individuals are encouraged to attend educational activities to increase their employability and enhance skill levels.

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:

During the Assessment process, the Employment Counselor: evaluates the education, skills, and interest of the individual, and reviews and discusses vocational education options. They determine whether the vocational training is preparing the individual for employment in an occupational field in which they can reasonably expect to obtain employment. The Employment Counselor assesses whether the individual's education levels, and aptitude meet the criteria needed to attend the vocational training and considers the individual's history of compliance. They review the list of approved vocational education programs and contact the Employer Relations Coordinator regarding any program not on the approved list.

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

1. Licensed, certified, or accredited training providers that have demonstrated successful placement of individuals into jobs
  2. Ratio of individuals successfully completing the training programs
  3. Programs that are "in demand" occupational sectors
- Training programs are approved on a case by case basis.

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

The district maintains a list of approved training programs. During the assessment process and development of the employment plan, vocational opportunities are reviewed and discussed.

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

Obtain completed Vocational Education Records (B-1383)(Attachment #7) and official program schedule. Provide a copy of the completed Employment Plan and issue a notice of program approval/denial [Program Approval (B-3854) ](Attachment #8) as appropriate.

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

The district maintains a Youth Holding Pool. The Youth Holding Pool is a caseload comprised of youth 16-18 years old who are in High School (code 35). These cases are monitored for the completion of High School and/or attainment of age 19. Upon completion of High School, or if no longer attending High School, or the attainment of age 19, the case is assigned to an Employment Counselor to complete an assessment, employment plan and determine the correct coding. At application and recertification, the TA eligibility worker obtains documentation verifying enrollment/attendance in school.

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

When health-related limitations/restrictions are identified, the district will make all accommodations to comply with requirements of the Americans with Disabilities Act, including assigning individuals to a worksite that will accommodate the work limitations/restrictions. All providers and worksites are notified in writing of an individual's work limitations/restrictions. The district may make unscheduled visits to worksites to monitor compliance with the accommodation.

#### 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. Include in this section. (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.)

Four-year colleges provided that the course of instruction for which an individual is enrolled is limited to a two-year degree granting program. Licensed trade schools and/or registered business schools.

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 checked below (Select all that apply):

- It has been determined that the student voluntarily quit their 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:

## 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. Include in this description 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 district utilizes a proactive strategy to ensure that participation rate requirements are maximized. Non-exempt applicants are assessed and referred to an appropriate work activity within 30 days of case opening as schedule permits. Cases pending certification are placed in a WTWCMS holding pool and monitored regularly for case openings. Active cases are monitored monthly. The typical timeframe between the referral to an activity and the actual start date varies from 1 to 10 business days depending on the activity and household circumstances. The participation maximization calendar is referenced to ensure a timely enrollment for monthly participation credit. Compliance for all referrals is monitored through regular communication with worksites via telephone, email, fax, or site visits. Based on case circumstances, appropriate hours of activity are determined on a case-by-case basis. The standard assignment of hours for the non-exempt participants is up to 40 hours per week with WEP being limited to the hours determined by dividing the household's TA grant plus SNAP allotment by the Federal or State minimum wage, whichever is higher. An assignment of up to 15 hours of an additional activity (HSE, ESL, or JST) will be made based on the individual's needs. In no instance will the individual be assigned to more than 40 hours of combined activities. Supervisory staff make use of the Cognos reporting system to monitor the participation rate. Cognos reports provide staff with timely data to aid in monitoring and maximizing participation of non-exempt adults and status changes.

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

Households with Dependent Children Average Monthly	2694
Households without Dependent Children Average Monthly	3779

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 district utilizes WTWCMS reports, COGNOS reports and District reports to monitor progress and client participation. The following reports are reviewed monthly:

- Employability Code Duration Report
- Possibly Miscalculated Non-Legal Union Families with Children in Common Report
- PA Clients with Schedules Associated with FS Case Numbers
- TANF and SN Moe Detail Report
- Preliminary Federal Countable Not Countable Report
- Earned Income/Employment Reports
- Adults with Budgeted Earned Income and No Current Employment Schedule
- Adults with No Budgeted Earned Income and Current Employment Schedule
- Participation and Engagement Status Reports
- Adults in Vocational Education 9 months or More
- Exempted Caretaker of Child < 1 Exceeding 12 Month Limit
- Adults with No Activity Status > 3 Months
- ABAWD Enhanced Caseload Listings

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:

The district assigns TA applicants to Job Search.

Yes  No

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE		20	All time spent looking for work, including activities such as researching available jobs (online, newspaper, other), completing and submitting job applications (online or at employer), preparing for interviews, participating in an interview, participating in a job search workshop, job fair or working with a job placement specialist are included for up to 40 hours/week. Number of required contacts are warranted by the circumstances. Individuals must report efforts weekly or monthly. (B-5727B)(attachment #9). Individuals that reside in the City of Buffalo are referred to Buffalo Employment and Training Center (One Stop Career Centers) for assistance with their job search efforts.
SNA Individuals		20	All time spent looking for work, including activities such as researching available jobs (online, newspaper, other), completing and submitting job applications (online or at employer), preparing for interviews, participating in an interview, participating in a job search workshop, job fair or working with a job placement specialist are included for up to 40 hours/week. Number of required contacts are warranted by the circumstances. Individuals must report efforts weekly or monthly. (B-5727B)(attachment #10)

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. 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:

The district assigns TA recipients to Job Search.

Yes  No

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	24	20	All time spent looking for work, including activities such as researching available jobs (online, newspaper, other), completing and submitting job applications (online or at employer), preparing for interviews, participating in an interview, participating in a job search workshop, job fair or working with a job placement specialist are included for up to 40 hours/week. Number of required contacts are warranted by the circumstances. Individuals must report efforts weekly or monthly.
SNA Individuals	24	20	All time spent looking for work, including activities such as researching available jobs (online, newspaper, other), completing and submitting job applications (online or at employer), preparing for interviews, participating in an interview, participating in a job search workshop, job fair or working with a job placement specialist are included for up to 40 hours/week. Number of required contacts are warranted by the circumstances. Individuals must report efforts weekly or monthly.

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.

Individuals are assessed on a case by case basis to determine if appropriate to approve self-employment as an approved activity. Clients that meet the hour requirement, that do not meet the minimum wage requirement will be assessed in three months to determine if this is an acceptable path to self-sufficiency or if supplemental, countable work activities are needed to meet participation rates. Additional time may be permitted as determined by district staff based on case circumstances.

## 5.2 Informing SNAP Applicants and Recipients of Work Requirements

a. Written information is provided as follows. Please select one of the following:

- Eligibility staff use the LDSS-5193 *Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD)* and the LDSS-5193A *Important Information about SNAP Work Rules (General and Mandatory E&T)* as appropriate.
- 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 (General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules) pertaining to individuals in the household

At application, recertification, any time a previously exempt household member becomes non-exempt or when a new non-exempt person joins the household, the eligibility worker informs a SNAP household of the work rules when at least one member is non-exempt and subject to work requirements. The eligibility worker reviews the LDSS-5193 and the LDSS-5193A with applicant/recipient and will answer any questions they may have regarding the work requirements

c. Described below is the district's process for documenting the provision of written information about work requirements (General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules) to SNAP households. Check one of the following:

- The district retains copies of all LDSS-5193/LDSS-5193A in the case record.
- 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 the provision of an oral explanation of work requirements (General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules) to SNAP households. Check all that apply:

- Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
- Eligibility staff use a locally developed oral explanation tool and retains a copy in the case record.
- Eligibility staff document the case record through case notes/comments.

## 5.3 Meeting SNAP Work Requirements

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

The district does not mandate SNAP E&T work activity assignments to NTA SNAP work registrants. TA-SNAP recipients are provided case management services.

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.

The district does not offer Supervised Job Search for NTA SNAP recipients.

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):

During the certification and recertification interview the NTA SNAP eligibility worker informs the individual of the availability of job search assistance and provides a job search information sheet with contact information for the Comprehensive Employment Division (CED).

#### 5.4 Advising Households of Employment and Training Services

a. The district provides information about employment and training services to:

The required population only

Other groups (please describe below)

b. Described below is the method the district uses to advise SNAP recipients of available employment and training services at recertification (select all that apply and describe the procedure below):

Materials/information provided in printed form

Materials/information provided on a website (describe below how individuals are made aware the information is available on a website):

During the interview the client is directed to the website and provided the website address as needed

Materials/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. Please describe the district process below. Include in the description the district process for screening individuals prior to referral to a provider, the procedures providers follow to communicate information related to provider determinations with the district, the procedures workers follow to communicate information related to provider determinations with the client, and the procedures for documenting provider determinations.

During the assessment interview, education, skills and interest of an individual are evaluated to determine if the individual is appropriate to participate in a particular activity or program. A Referral is sent to the provider indicating required work activity and participants demographics. If individual is determined to not be a good fit by the provider, the provider contacts the work compliance unit who reviews and accesses the circumstances and and notifies the client of the need to be reassessed/reassigned to an activity.

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:

The Work Compliance Unit maintains regular communication with providers. Bi-weekly district staff communicate with the provider to discuss the participants progress in the activity to ensure a continued good fit.

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:

Yearly, the department executes a Worksite Agreement to ensure each provider acts in accordance with all provisions of applicable law and regulations. This agreement ensures that no provider will discriminate and provides adequate supervision to ensure the safety and fair treatment of all participants. District staff conduct site visits to ensure compliance.

## 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, 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.

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.

24
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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.



24

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.

12

d. Below is the number of random sample cases in which a case member is reported as an 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.

12

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?

Yes

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?

Yes

No

c. If No, describe below the process used:

## 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. (This includes both in-person and virtual activities):

The district will provide payments for transportation (as described below), work related clothing, licensing fees, required safety equipment and tools. Allowances are determined on a case by case basis for the specific work activity with supporting documentation and justification of need, and to the cost of the required expense.

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. (Select all that apply)

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate (effective 1/1/2023 is 65.5 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate (effective 1/1/2023 is 22 cents/mi)
- Other mileage rate (please explain methodology used to establish reimbursement rate):

The district authorizes a seventy-five (\$75.00) monthly transportation allowance equivalent to the cost of a monthly bus pass, to each participant in an approved work activity whose mode of transportation is a private vehicle. NFTA Day Passes are approved on a case by case basis.

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

Individuals are not expected to walk more than one (1) mile to a work activity or to access public transportation.

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:

Applicants will be provided diversion services that include information regarding services and resources for nutrition, health, housing, utilities, child care assistance and transportation. Applicants are evaluated for possible payment for work related clothing, licensing fees and required safety equipment to assist them in obtaining and/or maintaining employment.

### 7.2 Post-Employment/Transitional Supportive Services

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

a) When individuals cases are closed due to excess income, a letter is mailed that outlines all available transitional services. This includes a Work Support Resource Guide that outlines services and resources available to ensure that they receive support needed to remain in the workforce and improve their financial well-being. Transitional child care may be guaranteed up to 12 months after case closing if the working family earns 85% of the state median income. Individuals are eligible to receive a bus pass for 6 months if they are engaged in Subsidized Employment. Caseworkers and Employment Counselors are available for case management services as needed.

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:

A TANF recipient may be eligible to receive a bus pass for up to 3 months if their Temporary Assistance closes due to excess income. Clients are also provided case management and job retention services.

### **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.):

At the end of the 12 month guarantee transitional child care program, clients are certified for eligibility for low income subsidy child care. Other support services include providing job coaching services to ensure the individual successfully maintains the job.

## 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. (Select all that apply and describe the procedure below).

In person

By phone

By mail

A notice of conciliation is sent to those who fail to comply with employment requirements. The individual must respond within 10 days from the date of the conciliation notice to request conciliation. A third party is not required for conciliation; however, a supervisor will be available to mediate a client dispute if the need arises. If an individual fails to respond to the conciliation notice or if we determine from the conciliation that the individual's refusal or failure was both willful and without good cause, a notice of denial or intent to discontinue or reduction in assistance will be issued.

b. Who makes the TA good cause/willfulness determination? (Select all that apply)

The client's employment worker

A supervisor in the district

A separate entity (describe below):

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. (Select all that apply and describe the procedure below)

In person

By phone

By mail

A notice of conciliation is sent to those who fail to comply with employment requirements. The individual must respond within 10 days from the date of the conciliation notice to request conciliation. A third party is not required for conciliation; however, a supervisor will be available to mediate a client dispute if the need arises. If an individual fails to respond to the conciliation notice or if we determine from the conciliation that the individual's refusal or failure was both willful and without good cause, a notice of denial or intent to discontinue or reduction in assistance will be issued.

d. Who makes the SNAP E&T good cause/willfulness determination? (Select all that apply)

The client's employment worker

A supervisor in the district

A separate entity (describe below):

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:

If an individual fails to respond to the conciliation notice or if it is determined from the conciliation that the individual's refusal or failure to comply was both willful and without good cause, a ten-day notice of intent to discontinue or reduce SNAP is issued.

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 notice of conciliation will offer the client the opportunity to avoid the SNAP sanction. Demonstration of compliance will be accomplished by the individual completing a job search. Job Search Record B-5701 (Attachment #\_\_) will be issued with each SNAP conciliation notice. Individuals may demonstrate compliance to avoid a SNAP sanction simultaneous to the conciliation process. The due dates are indicated on the conciliation notice and are the same for completion of the Job Search log and to respond to the conciliation. Individuals will be required to provide the log with at least 5 job contacts. If the individual provides the job search log by the due date, with the required minimum 5 valid job contacts, the district will not impose a SNAP sanction. Failure to comply with job search requirements to avoid SNAP sanction by the due date will result in SNAP sanction if the non-compliance is determined to be willful and without good cause.

If the individual does not provide the log and instead, claims to have good cause or claims to be exempt, but the district subsequently determines that the individual did not have or failed to document good cause/exemption, the individual is given an additional 5 calendar days beyond the conciliation due date to complete and submit the job search log to prevent a SNAP sanction.

## 8.2 Sanction

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

A durational sanction, which has been served, may be lifted when a non-exempt individual has agreed to comply. An assessment and Employment Plan will be developed, to determine the most appropriate work activity. If the individual demonstrates compliance and accepts the work activity referral, the sanction will be immediately lifted. TA benefits will be restored retroactive to the date the individual demonstrated a willingness to comply, but not before the durational sanction period has been served.

A durational sanction, which has been served, may be lifted for an individual that documents an exemption. The assessment will determine barriers to employment and the sanction will be lifted immediately.

A durational sanction will be lifted for employed clients who are meeting participation requirements upon receipt of employment verification, but not before the durational sanction period has been served.

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:

A durational SNAP sanction, which has been served, may be lifted when a non-exempt individual has agreed to comply. An assessment and Employment Plan will be developed, to determine the most appropriate work activity. If the individual demonstrates compliance and accepts the work activity referral, the sanction will be immediately lifted and SNAP benefits will be restored retroactive to the date the individual demonstrated a willingness to comply, but not before the durational sanction period has been served.

A durational sanction, may be lifted for an individual that documents an exemption. The assessment will determine barriers to employment and the sanction will be lifted immediately.

A durational sanction will be lifted for employed clients who are meeting participation requirements upon receipt of employment verification, but not before the durational sanction period has been served.

## 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.

- An independent entity which has an agreement with the district
- 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

## 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. (Select 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

If an individual claims or the worker has reason to believe, that an individual is unable to participate in work activities due to a disability, the Employment Counselor notifies the individual that they must provide medical documentation from their physician to the district within ten calendar days. There may be instances when the worker determines that 10 days is insufficient and it may extend the time allowed for the submission of documentation. This may include, but is not limited to, instances where an individual is unable, through no fault of his or her own, to obtain an appointment with his or her health care provider within the 10- day period. If the individual does not have their own health care provider for a medical exam, the individual is scheduled for an appointment with Industrial Medicine Associates (IMA) to provide a medical evaluation. Individuals may also be referred to IMA when the medical evaluation from the individual's personal physician does not identify a diagnosis and/or is vague/non-descript in documenting their limitations; when they have a history of chronic medical conditions and have failed to follow prescribed treatment plans; in instances where application for SSI that has been denied and medical documentation supports referral to Social Security; or when the medical from a personal physician is contradicted by other evidence. The WTWCMS case notes are updated to document the reasons for extension or referral to IMA.

b. Described below is the district's procedure for notifying an individual of their exempt/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.

Employment Division staff are responsible for monitoring the medically exempt population and reviewing the medical documentation to determine if the individual is exempt, nonexempt or work limited. Based on the information received by the individual's physician and/or contracted physician, the Employment staff reviews the provided documentation to determine employability and notifies the individual of exempt/non-exempt status. If the individual is determined to be temporarily exempt from employment requirements, the exempt period may range from 30 to 180 days. Incapacitated/disabled individuals with medical documentation indicating that an application for SSI is appropriate may be referred to the Legal Advocacy for the Disabled (LAD) Unit to pursue SSI or SSD. When individuals are determined to be non-exempt from employment activity requirements based on medical documentation, the individual is assessed and employability plans are developed, taking into consideration each individual's limitations and need for accommodations. Individuals are notified via LDSS-4005 or LDSS-4005(a) of the results of the employability determination and the right to a fair hearing to contest the determination. The individual is not assigned to a work activity during the medical disability review process. Individuals who are determined to be exempt are contacted 30 days prior to the expiration of the exemption to obtain updated information regarding their medical condition.

c. Described below is how the district notifies an individual of their exempt/nonexempt determination. Check one of the following:

The district sends the LDSS-4005/LDSS-4005(a) and retains a copy in the case record.

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. (Select all that apply)

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

District assigned staff reviews and determines status. Supervisory staff are available to assist in the determinations process if necessary.

## 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?

Yes  No

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

c. What screening tools does the district use? (Select all that apply)

LDSS 5009 - Mental Health Screening Tool

The computer assisted version of the Modified Mini Screening tool (MMS)

Other Screening tool (describe below)

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

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

## 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.).

Restoration to self-sufficiency of an individual who has been determined to be exempt from participation in work activities, and who has the potential to be restored to self-sufficiency through rehabilitation is determined by the Employment Counselor assigned to the case. Information from the individual's medical practitioner and/or district contracted provider (IMA) is used to make the determination.

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

The treatment plan is developed based on the recommendation of the medical provider regarding the need for treatment or rehabilitative activities. When determined appropriate, an individual is referred to and enrolled in a program of vocational rehabilitation, training and other essential rehabilitation designed to restore an individual to self-sufficiency.

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.

Monitoring compliance with the treatment plan is the responsibility of the Employment Counselor assigned to the case. Individuals are reassessed in accordance with the exemption period. At each review the individual is required to provide updated medical and treatment plan documentation which is used to determine compliance and employability status.

**10. District Certification**

**10.1 Certification**

As a condition of the receipt of federal and State funds the Local District Commissioner of Erie 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 01, 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.

10/27/2023 4:03:54 PM

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Marie Cannon

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Commissioner

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