

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

January 01, 2024 - December 31, 2025

Lewis

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1. Administration

1.1 Administrative Structure

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

See attachments.

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

The Employment Unit is responsible for providing employment case management services to all TA non-exempt applicants/recipients including assigning & monitoring job search, WEP assignments, job referrals, referrals to appropriate community partners for additional supportive services, assessments and employment plan development. The Employment Unit also provides case management services to exempt TA applicants/recipients as well as job search assistance to any SNAP applicant/recipient who is looking for employment.

The Employment Unit receives new applicant referrals from the TA unit and together both units meet weekly to monitor the cases progression during the eligibility process. The Employment Unit holds the primary responsibility of assigning employment codes for TA applicant/recipients.

The SNAP Units refer ABAWD applicant/recipients to the Employment Unit for job search assistance, job search assignment, WEP assignments and ABAWD orientations. The SNAP units are responsible for assigning non-TA SNAP employment codes.

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
Credo Community Center	0	Local Others: Medicaid pays for the exams and local share is used if the individual is not Medicaid.	FA SNA Family SNA Individual	Substance Abuse Assessment, Employability Assessments, and Mental Health Assessments
Resolution Center of Jefferson & Lewis Counties	1000	Local	FA SNA Family SNA Individual	Mediation Services

Lewis County Health Systems	2500 Local	FA SNA Family SNA Individual	Functional Capacity Exams
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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.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
Lewis County WorkPlace/Dept. of Labor	Local Others: Wagner-Peyser	FA SNA Family SNA Individual SNAP TANF 200%	Employment and Training opportunities such as OJT, CRT, Apprenticeships, Youth Out of School Funding Opportunities, job referrals, job placements, job search assistance, and resume assistance
Lewis County Opportunities	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Financial coaching to TANF recipients, Work Experience Partner agency, Food Pantry services, Thrift Store Services
ACCES-VR	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Vocational Assessment, Career Planning, Job development, Job Coaching Services, Vocational Training, and Supportive Services such job coaches.
Behavioral Health & Wellness Clinic	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Mental Health Treatment Services
Credo Community Center	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Substance and Mental Health Assessments and ongoing treatment services.
TLS-Transitional Living Services	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Psychiatric Rehabilitative Residential Supports, Transitional Housing, Homeless Housing Assistance and Case Management Services
NRCIL	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Disability Rights Advocacy, Job Coaching, Social Security Application Assistance and disability resource information
Lowville Food Pantry	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Food Pantry Services
Literacy Volunteers	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	Literacy services for those clients not ready to engage in GED educational assistance.

Jefferson-Lewis County BOCES	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	BOCES provides both GED assessment and classes, but they also serve as a vocational training location.
Lewis County Jefferson Community College Education Center	Others: Unknown	FA SNA Family SNA Individual SNAP TANF 200%	The Lewis County Jefferson Community center is the host location for GED services and vocational training via partnership with Jeff-Lewis BOCES. Micro credential classes are also held at this center.

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:

Lewis County does not contract with any outside agencies using TANF or SNAP E&T Funds.

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).

This does not apply to Lewis County.

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:

Lewis County DSS Employment & Training Staff are responsible for managing the Career Center (also known as The Lewis County WorkPlace) for Lewis County. Services provided by the Career Center are made available to TANF & SNAP Applicant/Recipients at every visit as the offices for E&T Staff are located within the Career Center.

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.

All E&T Specialists are cross trained in both DSS Employment & WIOA Services. Every effort is made to register TANF & SNAP Applicants/Recipients in the AOSOS system during their initial visits to the employment unit. If a TANF/SNAP Applicant/Recipient is program eligible for WIOA services which include OJT, CRT or Youth Programming, a referral is made via WTCMS to the Business Services Representative at the Lewis County Workplace. When possible, a face to face introduction is also made to the Business Services Representative. The E&T Specialist who functions as the Business Services Representative will engage the TANF/SNAP Applicant/Recipient in a separate series of appointments to determine their eligibility for WIOA programs and coordinate with their partner E&T Specialist on progress with employment, placement services, or classroom training.

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:

Information regarding medical exemptions/limitations and information about ACCES-VR;
Resources and services available at the Lewis County WorkPlace (Career Center);
Intentional program violations and regulations pertaining to non-compliance;
Information on transportation services in Lewis County;
Time limit information;
Availability of child care in lieu of Temporary Assistance;
Appearance and hygiene;
Drug and/or Alcohol treatment as deemed necessary by a licensed OASAS provider for the client.

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:

All non-exempt and exempt applicants of Temporary Assistance are invited into the orientation group within two weeks of assignment to the Employment Unit. Orientation is not required for clients to attend but the district is required to provide an orientation.

A signed copy of the client's rights and responsibilities and job search requirements are provided to all non-exempt applicants during their initial face to face appointment with an E&T Specialist, and all exempt applicants are provided a signed copy of their Rights & Responsibilities if seen in person. All non-exempt & exempt applicants of Temporary Assistance are required to attend group orientation within two weeks of assignment to the Employment Unit. Group orientation is held every Wednesday at DSS. If a non-exempt or exempt client is unable to attend group orientation, then one-on-one orientation is provided by the assigned E&T Specialist and noted in WTCMS. Orientation information may be reviewed during a phone call if COVID or other health reason would temporarily prevent a TA applicant (exempt or non-exempt) from visiting the Department in person.

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 TA applicants/recipients are required to complete an employment assessment with direct data entry into WTCMS during the client's assessment appointment. The assessment process is started while the client is still an applicant and the E&T Specialists will address barriers, strengths, weaknesses, as well as short term and long term goals. The E&T Specialist will continuously monitor the client's activities and progression towards short and long term goals and update the assessment as progress or changes occur for the client. Assessment are typically completed in person but phone assessments are also used if the client is unable to come into the district.

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

The Lewis County Employment & Training Unit.

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

See attachment(s) for "Employment & Training Specialist," "Senior Employment & Training Specialist" and "Staff and Workforce Development Coordinator" job descriptions which include Civil Service qualifications.

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 completed within 30 days of case opening, and updates to the assessment are made when the recipient has a change in circumstances, treatment, new barriers or resolution of a previous barrier, and other circumstances such as housing, transportation or childcare which impacts the client's ability to obtain or maintain employment.

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:

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

Employment Plans are completed with all recipients within 45 days of the case opening for both exempt and non-exempt recipients. Clients are scheduled to come into the office at a specific date and time to complete their employment plan. A copy of the employment plan is printed and signed by the client and a copy is sent to imaging. Clients who reside out of the district complete their employment plan via the telephone and copy is sent to the client for signature. Employment Plans may be completed via the phone if the recipient is unable to temporarily visit the agency in order to complete this activity in person.

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

Employment plans are updated and changed any time that the client's circumstances change, and elements of the employment plan require an update or modification. Employment plans will be updated during the recertification period if no changes or modifications were made in the previous six months.

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:

Obtaining working papers when appropriate.

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 agency maintains a list of local interpreters who are available to provide assistance to our clients. Additional translation and interpreter services are available via Liberty Translations and Interpreters, LLC if needed.

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:

If an individual is assigned to work activities and fails to participate, including absences with good cause, the E&T Specialist will immediately attempt to reach the individual by phone first. The E&T Specialist will attempt to solicit the circumstances behind the non-compliance and attempt to assist the individual to resolve the problem or circumstance that prevented the individual from complying. Often times it may be lack of child care or a problem with transportation. The E&T Specialist will review which supportive services are available to resolve the problem.

Transportation barriers are being addressed by the offering of Birnie bus passes (public transportation).

The district has adopted a stronger Group Orientation presentation that includes a detailed explanation of Work Requirements and Participation requirements; child care options including instructions to find alternate child care that will take their children if they are moderately sick so as not to miss time from work; benefits of Work Experience; non-compliance consequences; and Job Readiness activities including practice applications; resume preparation services; instructions to make appointments before and after their worksite duties just as if they were employed; and opportunities for mock interviewing practice.

E&T Specialists are responsible for the monitoring of worksite attendance and the E&T Specialist initiates the conciliation process reducing the time between non-compliance and conciliation.

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:

Sanctioned participants are encouraged to utilize resources at the Career Center ~ Lewis County WorkPlace that are available to the general population. Individuals are encouraged to look for work, meet with the E&T Specialists (Career Center Designated E&T Specialist) on staff, and attend any workshops that are available to assist individual's in obtaining and retaining employment. The SWE/ Social Services Program Examiner may suggest community non-profit providers that may be to assist while the sanction is in place while educating the individual on why the sanction was enforced. The SWE/ Social Services Program Examiner will attempt to get the individual engaged so that the individual can be in compliance when eligible.

The district tries to engage the sanctioned participants as soon as the sanction is about to expire. Even at conciliation, the benefits of participating and the effect it will have on their grant are explained. The participant is also informed of all the work-related benefits they may be eligible for if they became compliant.

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

Sanctioned participants are encouraged to utilize resources at the Career Center ~ Lewis County WorkPlace that are available to the general population. Individuals are encouraged to look for work, meet with the E&T Specialists (Career Center Designated E&T Specialist) on staff, and attend any workshops that are available to assist individual's in obtaining and retaining employment. The SWE/ Social Services Program Examiner may suggest community non-profit providers that may be to assist while the sanction is in place while educating the individual on why the sanction was enforced. The SWE/ Social Services Program Examiner will attempt to get the individual engaged so that the individual can be in compliance when eligible. The SWE/Social Services Program Examiner is required to make an Eligibility Review appointment for the sanctioned individual to come into the agency when the sanction is about to expire & monthly after the sanction has expired.

During the Eligibility Review meeting, the SWE/Social Services Program Examiner discusses the impact of the sanction on the case & household and inquires how the sanctioned recipient is making ends meet. The E&T Specialist & SWE/Social Services Program Examiner reviews the work-related benefits available should the sanctioned recipient comply.

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

3.5 Strategies for Reducing the Need for TA

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

SWE/Social Services Program Examiner refer to E&T Specialists to provide front-end employment referrals and supportive services for Temporary Assistance applicants not currently employed. This includes a supervised job search component that provides direct linkages with employers and Lewis County WorkPlace Services.

Diversion is explored by the screening performed by TA worker(s) at the intake interview.

Supportive Services based on documented employment or promise of employment

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	Unsubsidized Employment - 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	Work Experience - 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	Job Search - 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	Vocational Education - 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	Secondary School - 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	Job Skills Training - 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	Education Training - 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.
FA SNAFAM SNA SNAP	Job Readiness Training (JRT) Activities - 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.
FA SNAFAM SNA	Subsidized Private Sector Employment - 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.
FA SNAFAM SNA	Subsidized Public Sector Employment - 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.
FA SNAFAM SNA SNAP	Community Service - 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.
FA SNAFAM SNA	Provision of Childcare for Individual Participating in Community Service - Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.
SNAP	SNAP E&T Supervised Job Search - 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.
FA SNAFAM SNA SNAP	On-the-Job-Training (OJT) - 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.

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.

☒ District staff contacts local employers to solicit jobs for TA and SNAP Participants. Both the WIOA Business Services Representative as well as DSS E&T Staff reach out to businesses on behalf of the clients we serve. Supervisory staff who have contact with businesses also discuss employment opportunities. All E&T Specialists, Sr. E&T Specialist and the Staff & Workforce Development Coordinator are responsible for job development activities. It is expected that a minimum of 5 contacts with local employers will be made each month to develop worksites, possible internship situations and subsidized & unsubsidized job opportunities. The local Career Center (Lewis County WorkPlace) is co-located at Lewis County DSS and maintains a current list of job openings to which TA applicants & recipients are referred.
The total staff involved in seeking employment opportunities is 5.

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.

☒ Lewis County does not have district contracts or agreements with partner agencies.

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 only available providers in Lewis County are Jeff-Lewis BOCES Adult Education and Literacy Volunteers of Northern NY. Jeff-Lewis BOCES offers adult education that assists students in obtaining a high school equivalency diploma ~ TASC testing (formerly known as GED). Referrals to adult education at Jeff-Lewis BOCES are made on going. TA applicants & recipients may complete the TABE Locator and TABE testing in the local Career Center. However, mandatory orientation and any classroom education for TASC candidates is located only in Jefferson County. After orientation has been completed, eligible Lewis County candidates can complete independent online education anywhere in Lewis County.
Referrals to Literacy Volunteers are made as needed.

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).

Due to the rural nature of Lewis County, there is no centralized location for providers of Vocational Education and Job Skills Training programs. The limited array of providers is approved by the local Workforce Development Board (WDB) which is the Jefferson-Lewis County WDB. Approved providers include: Jefferson County Community College, Bohlen Technical Center ~ Jefferson County and Howard G. Sackett Technical Center ~ Lewis County. Lewis County now has The Lewis County Jefferson Community College Educational Center located near Lowville, but this center only offers certificate & micro-credential courses.

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.

Educational activities for recipients will be identified during assessments, ongoing during reassessments, and as the individual employment plan is updated. Referrals to Jeff-Lewis BOCES Adult Education or Literacy Volunteers will be made immediately after the need for literacy assistance is identified.

Clients may also be identified as in need of additional training in one or more of the following situations:

Intake appointment

At the Career Center

Job Readiness Training Classroom

Work Experience site

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:

As part of the individual's Employment Plan, all participants are referred to and required to participate in educational activities if they are not in possession of a high school diploma or high school equivalency. Individuals may be denied participation in educational activities if their TABE scores are well below the entrance level of the courses they are looking to take. They may also be denied if they are looking at taking a degree program that requires a license without first clearing up a criminal background.

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:

Appropriate skills and capabilities required for enrollment in the specific training.

Completion of Employment Plan.

History of compliance with prior activity participation.

District approval of training program resulting in sustainable employment.

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

Providers must be licensed by the State Department of Education or sponsored by a governmental agency such as WDB {Workforce Development Board} or DOL (Department of Labor).

Providers must develop courses where local demand occupations and job market conditions indicate the likelihood of placement in unsubsidized employment following completion of training/education.

Providers must have demonstrated effectiveness in the provision of the proposed training/education courses.

Providers must agree to provide attendance and progress reports as required by the local district.

Providers must provide the name and phone number of their program contact.

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

Information on approved training providers is available at the Lewis County WorkPlace, on-line (BOCES and local community colleges) and provided in person to the client during assessment and employment plan updates if educational training is part of the employment plan short & long term goals. A referral via WTCMS to the WorkPlace Business Services Representative would also be made for additional information and potential payment for educational training.

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

Notification of an enrollment in an activity is typically done in person but may be completed via the phone (a signed copy of individual employment plan is provided to the client); via mail when an enrollment letter is sent advising the participant of the location/site address of the training/work activity, the site contact and number, the number of hours assigned, and the E&T Specialists contact number.

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 E&T Assistant and/or E&T Specialist will monitor all students with an employment code of 35, Non head of household in school full time (ages 16 through 18), exempt. Enrollment and attendance will be verified quarterly by the students school district with verification maintained in WTCMS and IEDR.

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:

In the case of an individual with an employment code of 16 (Work Limited/Non-Exempt), the E&T Specialist will assign individuals to work activities consistent with the individual's treatment plan and limitations. The WEP site supervisor and instructor will be provided, in writing, a list of limitations and tasks the client is unable to perform, as well as any special accommodations necessary. The E&T Specialists will monitor compliance of WEP sites by unannounced visits and monitoring appointments with the client. The client is also informed at the time of assignment to WEP the importance of making sure the WEP site is aware of their limitations. The client has the right to dispute their WEP placement.

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.)

Lewis County DSS will approve full-time enrollment in both 2-year and 4-year accredited college programs leading to occupations that are considered in demand in our region and whereas job market conditions indicate the likelihood of placement in unsubsidized employment following completion of education. Full time students will be required to provide proof of passing grades at the completion of each semester and locate employment during the time periods when the college semester is not in session (Summer months and Winter Break for example). Should the recipient not acquire passing grades for one semester, the client will no longer be considered as participating in work activities as related to their educational enrollment at the 2 or 4 year accredited institution. Proof of part time student attendance will be required for any student not engaged in full time study. Part time/half time students (or less) will be required to engage in work activities and the determination of the number of weekly hours will be made on a case-by-case basis.

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 plans to meet participation rates through a process of case-by-case reviews, weekly case conferencing with the Employment & TA units, and reviewing monthly participation reports.

Employment Staff begin working with clients at application and most non-exempt clients are assigned to a supervised applicant job search (AJS). The initial goal is to divert a TANF

case from opening by providing appropriate job referrals & leads during the initial client meetings. During the applicant period the E&T Specialists will work with the client on mitigating barriers, addressing job readiness (including application preparation, resume creation, interviewing skills, etc.), and completing several sections of the assessment prior to the case opening. The E&T Specialists will meet weekly with non-exempt clients to review their applicant Job Search logs (assignment of 6 completed & submitted job applications or interviews) and develop the clients employment plan (The employment plan will include both short- and long-term goals).

Clients may engage in activities, other than work experience, immediately (i.e.: vocational education). The time period between case opening and work experience assignment is typically no more than 2 weeks.

When there is a status change from exempt to non-exempt, the client will be scheduled to meet with an E&T Specialist within one week (typically the client is notified of this change in person but may be told via the phone, introduced to their new E&T Specialist and provided a follow up appointment while at the agency). The nonexempt client may be placed on a job search by the E&T Specialist and scheduled to return in one week to update their assessment, employment plan and review the job search log.

All non-exempt recipients will be engaged in work activities (Core and Non-Core) up to 35 hours per week. The E&T Specialist may assign recipients to less than 35 hours per week based on the client's barriers and individual employment plan goals.

Participation rate and engagement activities are monitored by time sheets submitted bi-weekly by work site & volunteer site supervisors, reviewed and data entered by the E&T Specialists into WTCMS. Treatment progress & attendance reports will be submitted monthly, reviewed and data entered by the E&T Specialists into WTCMS.

Management reports found in COGNOS are monitored on a monthly basis to ensure full engagement by adults in work or work preparation activities.

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

Households with Dependent Children Average Monthly	31
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Households without Dependent Children Average Monthly	28
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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 Employment Unit and TA Unit meet weekly to case conference both exempt and non-exempt cases (this includes TANF and Safety Net cases). Case conferencing, WTCMS and COGNOS reports including the Participation & Engagement Status Report, Employability Code Duration Report, and Earned Income/Employment Report are used to identify cases not meeting maximum participation. Each E&T Specialist has protected time with their supervisor typically two times a month to complete case reviews, check assessments, enrollments, employment plans and maximum participation in activities

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	6		Non-exempt applicants are assigned to Job Search at the time of the initial interview for eligibility and assigned to an E&T Specialist who will monitor and supervise the applicant Job Search weekly. It is expected that new applicants will complete & submit a minimum of 6 applications, resume submissions {in person and/or on-line}, or interviews for a job per week. The E&T Specialists will periodically verify the applicants Job Search log by contacting employers to confirm that applications were submitted. Electronic proof & submission of job searches are accepted by this agency. Electronic proof of job search may be submitted via mobile upload, email, and text message. When copies or pictures of an electronic job search submission cannot be printed, a case comment will be entered in WTWCMS and considered acceptable proof. The case comment must include the specific job search submission that viewed.
SNA Individuals	6		Non-exempt applicants are assigned to Job Search at the time of the initial interview for eligibility and assigned to an E&T Specialist who will monitor and supervise the applicant Job Search weekly. It is expected that new applicants will complete & submit a minimum of 6 applications, resume submissions {in person and/or on-line}, or interviews for a job per week. The E&T Specialists will periodically verify the applicants Job Search log by contacting employers to confirm that applications were submitted. Electronic proof & submission of job searches are accepted by this agency. Electronic proof of job search may be submitted via mobile upload, email, and text message. When copies or pictures of an electronic job search submission cannot be printed, a case comment will be entered in WTWCMS and considered acceptable proof. The case comment must include the specific job search submission that viewed.

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		6	Recipients of TA are expected to engage in an on-going Job Search and job search related activities at all times. It is expected that recipients will complete a minimum of 6 hours of Job Search per week which will include application and/or resume submissions (in person and/or on-line) and interviews for jobs. Additionally, credit will be given for resume preparation, interview preparation, and time spent traveling between prospective employers. Recipients will be required to meet weekly with the E&T Specialist to review the on-going Job Search and job search activities. Although the Job Search is limited by regulation to apply towards the participation rate for no more than 12 weeks per year (no more than 4 weeks consecutively), E&T Specialists will assign and review a recipient's Job Search and job search activities at each monitoring appointment. Electronic proof & submission of job searches are accepted by this agency. Electronic proof of job search may be submitted via mobile upload, email, and text message. When copies or pictures of an electronic job search submission cannot be printed, a case comment will be entered in WTCMS and considered acceptable proof. The case comment must include the specific job search submission that viewed.
SNA Individuals		6	Recipients of TA are expected to engage in an on-going Job Search and job search related activities at all times. It is expected that recipients will complete a minimum of 6 hours of Job Search per week which will include application and/or resume submissions (in person and/or on-line) and interviews for jobs. Additionally, credit will be given for resume preparation, interview preparation, and time spent traveling between prospective employers. Recipients will be required to meet weekly with the E&T Specialist to review the on-going Job Search and job search activities. Although the Job Search is limited by regulation to apply towards the participation rate for no more than 12 weeks per year (no more than 4 weeks consecutively), E&T Specialists will assign and review a recipient's Job Search and job search activities at each monitoring appointment. Electronic proof & submission of job searches are accepted by this agency. Electronic proof of job search may be submitted via mobile upload, email, and text message. When copies or pictures of an electronic job search submission cannot be printed, a case comment will be entered in WTCMS and considered acceptable proof. The case comment must include the specific job search submission that viewed.

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

The District makes a determination on a case-by-case basis for self-employment as an approved work activity. Initially, the District will allow self-employment as a work activity and review at recertification (mail in or face to face) to determine if it is gainful employment. The District uses 30 hours at Federal minimum wage as a guideline for gainful employment. Self-employment net earnings must be equivalent to 30 hours of employment paid at federal minimum wage to be considered exempt from additional work activities. If the individual is working in a position that fails to meet the state minimum wage the individual would be required to pursue additional work activities to meet the minimum requirement.

A recipient who provides unregistered or registered child care is required to collect an amount equal to or more than the current Child Care Market Rates as determined by OCFS for each county. The agency will budget this childcare income as appropriate. An individual that is self-employed and who receives less than the Federal 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. The agency 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.

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

The SNAP worker completes Form #284-SNAP Interview Guide. Part of the interview guide is the section for Employment Requirements for SNAP Applicants and Recipients (see attached). If there is one member that is subject to general SNAP work Rules, the worker is to print and complete LDSS-4826C (Script) with the client.

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):

Lewis County chooses not to engage or mandate Non-TA SNAP recipients in employment activities.

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.

Lewis County does not mandate non-TA SNAP recipients to participate in employment activities.

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):

SNAP applicants and recipients are informed of Job Search assistance and the location of the Career Center, at application and recertification through a face-to-face or telephone interviews. See attached letter and pamphlet that provides information on Job Search assistance, WorkPlace services and major employers in the area as well as contact information should a SNAP applicant/recipient decide to engage in the services offered through the WorkPlace.

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):

All SNAP applicants and recipients are made aware at application and recertification that the Lewis County Dept. of Social Services website has information on job leads.

- ☒ 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.

Individuals are matched to a potential worksite based on the client's limitations, if any, need for a high school diploma/GED, geographic location and number of hours that the worksite can provide. The attendance record used by the district also requests a rating of attendance, performance, attitude & cooperation, and quality of work. If any area is marked needs improvement, the agency will follow up with the worksite for more information. Worksites are notified over the phone when securing a worksite location, to reach out to the district if the client assigned to them is not a good fit or unable to perform the job duties. Should a client be unable to continue at worksite, the reason for the termination/work location change is explained to the client. The district will listen to the client's concerns and take those concerns into consideration when working on the next placement. Every interaction with a client or worksite is documented in the WTWCMS case record.

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:

Lewis County worksites complete a RFP if they are interested in becoming a work site. Once a work site is confirmed as appropriate, the work site is notified of our DSS processes which include a biweekly attendance record with performance information. Work sites are informed that they may use the attendance record to inform the district of problems/issues with a client or they can contact the district directly to voice any concerns or problems.

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:

Due to the limited number of worksites that Lewis County has to work with, the district has visited every worksite in person and worksite issues, concerns or complaints are immediately followed up on. If the district felt a client was being treated unfairly or the worksite was unsafe, the district would immediately remove the client from the worksite. Both client and worksite complaints are looked into.

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 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.

6

b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

c. Below is the number of random sample cases in which a case member is reported as an TA employability code 38 – “Parent needed in the home full time to care for an incapacitated/disabled household member” or TA employability code 48 – “Needed in the home to care for an incapacitated child full time – time limit exemption”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

d. Below is the number of random sample cases in which a case member is reported as an employability code 31 – “Parent or caretaker relative of a child under 12 months of age”. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

3

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

6.2 Use of Outside Providers/Vendors

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

☐

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):

Clothing up to \$150.00 per activity or employment as determined by the Department.

Job Related Safety Equipment - \$400.00 maximum per job.

License and Other Work Related Fees, the amount set by the State of New York for vocational or driver's licenses, and or registrations. Any other license would be up to \$100.00. In no event will the department pay any fines to obtain said licenses. Work related fees necessary for participation in unsubsidized employment {fingerprinting and testing for employment opportunities}.

Tools and Equipment up to \$600.00.

Automobile repairs- up to \$1200.00 yearly for a vehicle that is owned by the participant or the participant's spouse who resides in the same household, and allowing that the value of the vehicle exceeds the amount of the repairs.

Tires may be purchased if the safety {documented in file} of the vehicle is being impacted up to \$400.00 out of the yearly \$1200.00 automobile repair limit.

Automobile Insurance, up to 3 months or \$300.00 whichever is less. The length authorized at the discretion of the Department Head.

Driver's Education

Fees involved in obtaining permit/drivers licenses.

Relocation expenses {limited to no more than \$250.00 and only one time per year} to a populated area in the County that will allow a client to participate in employment activities.

Transportation, Clients who are enrolled in employment programs that require reimbursement for transportation will be compensated for their expenses in the following way:

If they have access to public transportation, the Agency will provide them with a bus pass or gas cards {Limited to no more than \$50 without Directors Approval} OR, If they have their own vehicle, they will be reimbursed mileage at the IRS rate for Medical and moving rate per mile.

The Department may also provide transportation to work related activities by utilizing Volunteer Transportation Services paid directly through LCDSS if no other transportation option is available.

At the discretion of the Department, if funding is available, the Department may on a case- by- case basis exceed the aforementioned amounts. Each situation would have to be approved by the agency's Commissioner.

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):

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

The district policy mirrors the state limitation of no more than 2 miles.

Transportation, Clients who are enrolled in employment programs that require reimbursement for transportation will be compensated for their expenses in the following way:

If they have access to public transportation, the Agency will provide them with a bus pass or gas cards {Limited to no more than \$50 without Directors Approval} OR, If they have their own vehicle, they will be reimbursed mileage at the IRS rate for Medical and moving rate per mile.

The Department may also provide transportation to work related activities by utilizing Volunteer Transportation Services paid directly through LCDSS if no other transportation option is available.

At the discretion of the Department, if funding is available, the Department may on a case- by- case basis exceed the aforementioned amounts. Each situation would have to be approved by the agency's Commissioner.

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:

Clothing, up to \$150.00 per activity or employment as determined by the Department.

Job Related Safety Equipment - \$400.00 maximum per job.

License and Other Work Related Fees, The amount set by the State of New York for vocational or driver's licenses. Any other license would be up to \$100.00. In no event will the department pay any fines to obtain said licenses.

Work related fees necessary for participation in unsubsidized employment {fingerprinting and testing for employment opportunities}

Tools and Equipment. Up to \$600.00.

7.2 Post-Employment/Transitional Supportive Services

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

Clothing, up to \$150.00 per activity or employment as determined by the Department.

Job Related Safety Equipment - \$400.00 maximum per job.

License and Other Work Related Fees, the amount set by the State of New York for vocational or driver's licenses, and or registrations. Any other license would be up to \$100.00. In no event will the department pay any fines to obtain said licenses.

Work related fees necessary for participation in unsubsidized employment {fingerprinting and testing for employment opportunities}

Tools and Equipment, up to \$600.00.

Automobile repairs- up to \$1200.00 yearly for a vehicle that is owned by the participant or the participant's spouse who resides in the same household and allowing that the value of the vehicle exceeds the amount of the repairs.

Tires may be purchased if the safety {documented in file} of the vehicle is being impacted up to \$400.00 out of the yearly \$1200.00 automobile repair limit.

Automobile Insurance, up to 3 months or \$300.00 whichever is less. The length authorized at the discretion of the Department.

Relocation expenses {limited to no more than \$250.00 and only one time per year} to a populated area in the County that will allow a client to participate in employment activities.

At the discretion of the Department, if funding is available, the Department may on a case- by- case basis exceed the aforementioned amounts. Each situation would have to be approved by the agency's Commissioner.

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:

Car repairs
Auto Insurance
Auto Registration
Tires
Uniforms/work clothing

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.):

Car repairs
Auto Insurance
Auto Registration
Tires
Uniforms/work clothing
Case Management/Post Employment Services
Other emergency support services deemed necessary to assist in job retention and prevent an individual from returning to assistance on a case-by-case basis.
The district maximum for the above-mentioned services is not to exceed \$1200.00..

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 conciliation notice is mailed or given out in person once the district has been notified of a participant's refusal to comply. Individuals are informed of the non-compliance issue and informed of their right to provide good cause. The individual is also informed as to whom they should contact, the time frame in which they need to respond by, and the telephone number and extension of the Staff & Workforce Development Coordinator. The recipient must respond within 10 days. The individual is also informed of the potential consequences if no response is received. If the district, determines that the client was willful and without good cause, a sanction would be imposed. The E&T Specialist will notify the SWE/Social Services Program Examiner via an Employment Unit Interface. The SWE/Social Services Program Examiner will issue a timely and adequate notice of denial, closure or reduction of benefits (whichever is appropriate).

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

Lewis County will allow all SNAP recipients, who fail to comply with a SNAP employment requirement the opportunity to document good cause or demonstrate compliance to avoid the SNAP sanction. The procedure will be the same as the conciliation procedure for TANF and Safety Net individuals as far as notification. Individuals are informed of the non-compliance issue and informed of their right to provide good cause. They will have 10 days to respond. The individual may also document an exemption from participation. The individual will also be offered the opportunity to avoid a SNAP sanction by demonstrating compliance with SNAP work requirements, as assigned by the district. If the district, determines that the client was willful and without good cause, a sanction would be imposed.

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:

SNAP recipients will be assigned to a supervised Job Search monitored by a E&T Specialist or employment assessment when the action of noncompliance is employment assessment. It is expected that recipients will complete a minimum of 5 submitted applications or resumes during the Job Search which will include application and/or resume submissions {in person and/or on-line} and interviews for jobs. Recipients will have 10 days from assignment of the supervised Job Search to return the search log with proof to the agency. Electronic submission of job search will mirror what is offered to TA Applicants & Recipients. After the E&T Specialist has verified the job search activities, an Employment Unit Interface will be sent to the SNAP unit confirming compliance or non-compliance for the SNAP Supervised Job Search. Information on Job Search assistance, WorkPlace services and major employers in the area will be provided to all SNAP recipients regardless of compliance with the Employment Unit.

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:

Only Individuals in sanction status on an active TA case will be notified when they are nearing the end of their sanction period. They are set up with an Eligibility Review appointment to speak with a TA worker. At this contact, the TA worker will ask the sanctioned person if they are willing to comply with employment activities in order to be added back into the case. If they are willing to comply, the individual will have their assessment and employment plan completed with the E&T Specialist. Once the client has satisfactorily complied with 7 days (one week) of the required employment activities the sanction will be ended. Upon demonstrating compliance, individuals will have their sanction removed and benefits restored retroactive to the date that the individual indicated & signed their willingness to comply (but no earlier than the expiration of the minimum duration period). The E&T Specialist will notify the SWE/Social Services Program Examiner via the Employment Interface when compliance is achieved.

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:

Only individuals in sanction status on an active SNAP cases will be notified when they are nearing the end of their sanction period. At this contact, the SNAP SWE/Social Services Program Examiner will ask the sanctioned person if they are willing to comply with employment activities in order to be added back into the case. If they are willing to comply, the individual will be required to document an exemption from SNAP work requirements or demonstrate compliance with SNAP work activities by engaging in a SNAP supervised job search as assigned for 7 days. Once the client has satisfactorily complied with supervised job search or documented an exemption, the sanction will end. Upon demonstrating compliance, individuals will have their sanction removed and benefits restored retroactive to the date that the individual indicated & signed their willingness to comply (but no earlier than the expiration of the minimum duration period). The E&T Specialist will notify the SWE/Social Services Program Examiner via the Employment Interface when compliance is achieved.

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

To determine an individual's disability and/or medical limitations, a medical statement (LDSS-4526) is required at application, recertification or at intervals determined by the circumstances. The DSS medical or mental evaluation is completed and submitted to the department within 10 days; once received, it is reviewed to determine the applicant/recipient's initial ability to engage in work activities or address work limitations. Once all documentation to be reviewed is obtained and a determination is made, the individual will be notified of such, and the right to a fair hearing. The district will inform work site providers of any individual's limitations: to ensure the worksite is responding to the respective limitations of each participant. The E&T Specialist contacts the site supervisor regularly, making adjustments in work assignment/location when necessary, or as warranted upon receipt of updated medical statements. The district will inform providers of any limitations in writing.

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.

An employment code will be assigned by supervisory staff and then the E&T Specialist will create/issue the 4005a (effective date and notice date must match) & 5193A within 2 business days. The E&T Specialist will have the entire documentation packet scanned and stamped, and then provide a copy to the SNAP Worker and send the originals to the TA Worker. Individuals will be notified of the employment code change and responsibilities by the E&T Worker assigned to their case, and a new employment assessment appointment will be scheduled. At the employment assessment appointment, the individual will sign a new rights and responsibilities while updating their employment plan goals.

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

The Staff & Workforce Development Coordinator and/or the Director of Economic Supports will review the LDSS-4526 (including any additional medical information provided by the client) to make the final determination of exempt, non-exempt, or work limited.

Additional documentation may be required of the individual's health care practitioner to evaluate an individual's ongoing claim of a mental or physical impairment, if such individual has been found not to be exempt from work activities by the local district. Such individuals remain non-exempt until a different determination is made by the local district.

If, an individual has demonstrated an inability to successfully participate in work activities or employment and the local district has reason to believe this is due to a disability or work limitation, the local district shall require the individual to participate in a disability related screening and/or evaluation. Additionally, if an individual has demonstrated an inability to successfully function in a work setting and is determined through an evaluation or assessment to need treatment, the individual shall be required to participate in any necessary treatment as a condition of eligibility for public assistance.

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.).

The district relies on doctors, PAs, NPs, CASAC, MSW and other practitioners to determine if an individual has the ability to improve their ability to work. The district relies on the LDSS-4526, doctors notes, Final Recommendations and monthly progress reports to monitor and manage a client's participation and progress in treatment. If an individual claims to have a disability and/or medical limitations, the E&T Specialist will provide the applicants/recipients with signed LDSS-4526(s) forms to provide to their treatment providers to obtain proof of their disabling condition(s) or work limitations. The LDSS-4526 forms are given to all physicians, CASAC's, and/or Mental Health treatment providers by the applicants/recipients and are expected to be returned to the agency within 10 days. The physician(s)/ CASAC/Mental Health provider completes the appropriate sections and returns the forms to the E&T Specialist. The E&T Specialist relies on the physician's/CASAC/Mental Health provider's evaluation, diagnosis, and recommendations in regard to appropriate work activities and whether the individual has limitations or has a need for special accommodations. The physician(s)/CASAC/Mental Health Provider is also asked on this form if rehabilitation services are being considered. The E&T Specialist will follow up on rehabilitation services if they were recommended by the client's physician. The E&T Specialist in conjunction with Supervisory staff will reassess the individual's disability status at least quarterly, unless the initial medical documentation stated the illness/incapacity to be of a longer duration, and may also refer the individual for a second opinion, if further clarification is needed. The Staff & Workforce Development Coordinator and/or The Director of Economic Supports will review the LDSS-4526(s) and make an employability determination and assign the appropriate employment code.

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

The physician(s)/CASAC/Mental Health providers will make a recommendation as to the abilities of the individual to participate in employment and/or work activities. If the medical verification indicates a treatment plan is necessary, the E&T Specialist will refer the individual to the appropriate provider if the medical provider has not already made the referral. The E&T Specialist will make sure the employment code is accurate, document the findings in WTWCMS, and follow-up with the individual to make sure they are following through with the treatment plan. Monthly attendance and progress reports will be collected by the agency and entered into WTWCMS.

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

The E&T Specialist meets with exempt applicants/recipients every other month face to face. During the month where no face-to-face meeting is scheduled, the E&T Specialist will contact the applicant/recipient via the phone to verify that no changes in treatment have occurred that month. The E&T Specialist will review health issues, current treatment plans, and upcoming appointments. If medical documentation shows that an individual may return to work the E&T Specialist will review any/all limitations that may impact the applicants/recipients ability to engage in work activities. Updated medical documentation will be obtained when changes to the A/R treatment are noted on progress/attendance reports, when the E&T Specialist is notified of health changes, and/or at Recertification.

10. District Certification

10.1 Certification

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

10/20/2023 1:32:52 PM

Jennifer Jones

Commissioner
