

Ontario County

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

January 01, 2024 - December 31, 2025

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1. Administration

1.1 Administrative Structure

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.)*

Attached

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.

1. Provide orientation to all public assistance applicants to explain their responsibilities in participating in job search, work experience, community services, and all related employment activities.
2. Complete an assessment and the employability plan with each active TA recipient.
3. Provide counseling, case management, work activity assignment, enrollment, and monitor client progress to ensure compliance with their employment plan.
4. Recruit work experience and community service worksites to ensure ongoing participation opportunities for clients.
5. Provide job development/placement opportunities in the private/public sector.
6. Provide individual and group job readiness and job search activities.
7. Evaluate all supportive service needs for clients in work activities and provide services or refer to outside service provider when appropriate.
8. Provide staff representation for conciliations and fair hearings to provide information and documentation regarding non-compliance with required Workforce Development activities.
9. Report matters of client non-compliance to the Temporary Assistance Unit in accordance with departmental procedures.
10. As required by NYS, the Department of Social Services Workforce Development Unit determines eligibility for contracted programs offered to TANF under 200% of the poverty level.
11. Coordinate employment services with client participation in other programs and ensure documentation of client participation in those programs is received.
12. Make participant records available for the purpose of ongoing program review and monitoring.
13. Provide reports to NYS Office of Temporary and Disability Assistance, as required.
14. Provide targeted services to eligible adults and youth.
15. Provide services at both the Hopewell and Geneva office sites.
16. Require that all staff involved in this program comply with confidentiality policies.
17. Directs program efforts aimed to meet or exceed the participation rates established by New York state.
18. Create and maintain digital and hardcopy files for each client to document compliance with TA work requirements and participation in assigned activities.

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

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

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

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

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

Provider	Total Contract Cost per Year	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
N/A	N/A	N/A	N/A	N/A

- b. Table 2 includes agencies/providers that offer services to participants and to which the district expects to refer participants, but which have no direct financial agreement with the district.

Categories of clients served include Family Assistance (FA), Safety Net Assistance for households with dependent children (SNA Fam), Safety Net Assistance for households without dependent children (SNA Ind), Supplemental Nutrition Assistance Program (SNAP), and TANF 200%.

Agencies and Providers to whom the District Refers for Employment Services

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
NYS Department of Labor	Others: Wagner Peyser and Veterans	FA SNA Family SNA Individual	Labor exchange, job search, job bank.

Provider	Funding Source(s)	Categories of Clients Served	Programs, Services or Activities Provided
		SNAP TANF 200%	
Wayne Finger Lakes BOCES	Others: Educational Resource Grant, SED	FA SNA Family SNA Individual SNAP TANF 200%	High School Equivalency (paused for the 2023-2024 school year), vocational training.
Finger Lakes Community College	Others: SED	FA SNA Family SNA Individual SNAP TANF 200%	Job readiness training, vocational training, higher education, high school equivalency.
ACCES-VR	Others: SED	FA SNA Family SNA Individual SNAP TANF 200%	Vocational training, intensive case management, job placement, supportive employment.
Literacy Volunteers	Others: SED	FA SNA Family SNA Individual SNAP TANF 200%	Literacy support.
Child & Family Resources, Inc.	Others: OCFS	FA SNA Family	"Healthy Families Ontario" provides pregnant clients and those with children under 6/starting kindergarten, with support, community resources, and child development information.

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

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

The contract is reviewed each year to ensure the service continues to meet our client's needs. The service is used in conjunction with employment staff so any concerns with performance are identified and remedied quickly.

1.3 OTDA Jobs Staff Agreement

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

Services Provided by Jobs Staff

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

Jobs Staff Target Groups

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

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

In-person Job Search classes and individual job search assistance.

1.4 Access to Services at New York State Career Centers

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

Programs and Services Provided at Career Centers

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

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

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

The Ontario County Workforce Development Career Center provides access and referral services to all required WIOA Career Center Partners, including Title V Older Americans Act, Jobs for Veterans, Local Offices for the Aging, Local Housing Authorities, JobCorps, Native American Programs, Migrant/Seasonal Farmworkers Program, PathStone Corporation, Trade Act Adjustment (TAA), Wagner-Peyser, Unemployment Insurance (UI) and Temporary Assistance for Needy Families (TANF). Ontario County utilizes a digital referral form to refer and track referrals made to and between WIOA mandated partner services.

2. Orientation, Assessment and Employment Plan

2.1 Orientation (Reference 18 NYCRR 385.5)

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

District Orientation Procedures

Yes or No:	District Orientation:
No	The district provides orientation in accordance with 18 NYCRR 385.5 and no additional information is provided at orientation.
Yes	In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district’s orientation provides the following: The social services district will provide a TA Employment orientation to all applicants at the time of application to include information regarding available home visiting services, explanation of job search requirements, upcoming assessment and employment plan creation and support services available and an overview of ABAWD requirements.

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

At the time of application, the orientation is offered in a group setting for all applicants of TA, exempt and non-exempt.

2.2 Temporary Assistance (TA) Employment Assessment

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

District Assessment Procedures

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

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

At orientation, all applicants complete a Employment Screening form to provide us with initial information. For non-exempt clients, assessments are completed after client attends four Job Search classes and/or their TA case has opened. Exempt clients are assessed as soon as their TA case opens. Ideally, assessments are completed in-person but telephone or mailed assessments are acceptable on a case-by-case basis.

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

Ontario County DSS/Workforce Development 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)):

A Human Services Worker or a Workforce Development Counselor is conducting the assessment and OC uses NYS Civil Service to place minimum qualifications for staff. Job descriptions and qualifications are attached.

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

Yes

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

Yes

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

Yes

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

Assessments are updated every six months or at a time of change to circumstance.

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

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

District Employment Plan Procedures

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

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

District Employment Plan Development

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

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

The employment plan is completed for non-exempt TA clients at the time the assessment is completed. Employment goals are established and appropriate activities to discussed, agreed upon and scheduled.

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

The employment plan is updated every six months or at a time of change to circumstance.

3. Engagement

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

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

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

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

N/A

3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency

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

The district contracts with Family Counseling Services of the Finger Lakes to provide interpreter services to non-English speaking participants. In addition, we have documents commonly used for our employment programs available in Spanish. Telephone and video interpreter services are available for dozens of other languages. Individuals that are non-English speaking are referred to the community college's ESL program. Our partners at the Department of Labor also offer virtual workshops on a variety of employment topics in Spanish.

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:

At the start of an DSS Temporary Assistance application, the agency informs and reinforces that assistance is only temporary and we are available to assist with them with activities and supports to move toward self-sufficiency. We encourage the client to participate in our employment programs and explain the consequences of not complying with required activities.

3.4 Strategies/Procedures for Engaging Sanctioned TA Participants

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

Strategies and Procedures for Engaging Sanctioned TA Participants

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
No	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned:
No	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Sanctioned Family Assistance clients are scheduled monthly to meet with both WD and TA to discuss the family's situation and to encourage them to comply with employment requirements and reinstate full TA benefits.

3.5 Strategies for Reducing the Need for TA

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

Supportive services and diversion payments are offered for individuals that may be employed and in need of transportation assistance or other supports to maintain their employment. This is offered at the initial application and throughout the length of their case. Referrals to other agencies for support services are also made.

4. Work Activities

4.1 Allowable Work Activities

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

Allowable Work Activities by Case Type

Activity and Definition	Case Type
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p>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 equivalency (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalency. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>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 (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p>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.</p>	<p>FA SNAFAM SNA</p>
<p>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.</p>	<p>SNAP</p>
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>
<p>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.</p>	<p>FA SNAFAM SNAP</p>
<p>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.</p>	<p>N/A</p>
<p>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.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
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.	N/A

4.2 Job Development

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

Yes

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

How the District Participates in Job Development Activities

Yes or No:	How the district participates in job development activities
Yes	District staff contacts employers to solicit jobs for TA and/or SNAP participants. Describe how this is done, including number of staff, frequency of contact, etc.: The Ontario County Business Service Representative contacts employers to request their job postings. They are then shared with all TA clients and made available to the general public in writing and posted on the department's web page. The postings are updated weekly.
No	District contacts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Described here is how this is done, including number of staff, frequency of contacts, etc.:

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

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

Two providers have been identified for ABE, HSE and ESL, Wayne Finger Lakes BOCES and Finger Lakes Community College. In addition, Literacy Volunteers provides individual support and tutoring services. Please note: WFLB has "paused" their offering for the 2023-2024 school year due to staffing issues.

- 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.

Ontario County relies on our local Workforce Investment Board to identify training providers and programs.

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

Individuals that disclose a lack of a HS diploma or equivalent, are mandated to attend ABE/HSE and/or ESL classes. This activity is documented on the client's employment plan. Attendance and progress towards completion is monitored.

- 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.

Individuals that lack a HS diploma or equivalent are required to participate in educational activities to improve their basic skills.

- 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.

Clients interested in vocational education and/or skills training are required to complete a Training Options workbook, document career exploration research, training details, and potential jobs upon completion. The training program must be on our/WIB's approved list and be a "demand occupation" for our geographical area.

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

Education and training providers are evaluated by our local Workforce Investment Board and must remain on the list of approved training vendors in order to approve an individual's plan to attend a program.

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

Interested participants are referred to our local WIB's website: www.fingerlakesworks.com for a list of eligible training providers and the demand occupation list.

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

When the individual is approved for training, they are notified in writing of the approval and their employment plan is updated.

- 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.

16-18 year olds are required to submit school attendance documentation at the time of application and at recertification. They are then exempt from employment activities.

- 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.

At the initial assessment, limitations that need to be accommodated are discussed. Referral to a work activity is only made if the accommodation can be met. The details of the activity are provided in writing and reviewed. If appropriate, the partner agency would be notified in writing of necessary accommodations.

4.4 Post-Secondary Education Approval and Enrollment Policies

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

The district may approve up to a two-year Associate degree program in an in-demand occupation to a client that is without post-secondary education. For individuals that have at least 60 credits but do not have a marketable degree, a BS degree program may be approved if completion can be done within two years. Again, the provider must be approved, and the program must lead to an industry recognized credential and an in-demand occupation.

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

Conditions For Disapproval of Work Activities For Individuals Enrolled in College

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

Yes or No:	Conditions for disapproval of work activity
Yes	The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
No	Additional reasons as stated here:

5. Work Requirements

5.1 Meeting TA Work Requirements

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

The district plans to meet participation rates by referring non-exempt individuals in up to 35 hours of activity per week, including, whenever possible, at minimum, the requisite number of hours of countable activity as defined under federal and state legislation. Anyone who is employed less than 35 hours/week will be required to participate in additional activities to total 35 hours/week. Those with children under the age of six will be required to participate in less than 35 hours/week, but always, when possible, in a sufficient number of hours to be countable. Individuals whose employability status changes from exempt to non-exempt are typically re-assessed within 30 days of notification of status change. The participation rate requirements are monitored by Workforce Development supervisory staff and reviewed by staff utilizing the Cognos reports and locally produced reports. Work experience and community service assignments will meet the requirements prohibiting displacement and other provisions. The number of hours of participation in work experience and any work portion of community service will not exceed the Temporary Assistance and SNAP grants divided by the Federal or State minimum wage, whichever is higher. Clients are engaged in on-going job search activities that include components of job readiness training in order to obtain unsubsidized employment. The Workforce Development staff provides immediate engagement to all DSS applicants to divert them from ongoing assistance while combining work activities such as job search and work experience for cases that receive ongoing assistance in order to meet participation rates and ultimately unsubsidized employment.

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

Number of Individuals Who Receive Employment Services

Household Type	Number Served
Households with Dependent Children Average Monthly	80
Households without Dependent Children Average Monthly	80

- 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:

Cognos reports including Employability Code Summary, Combined Engagement and Entries to Unsubsidized Employment are run on a monthly basis to ensure that staff has engaged participants in employment activities with a goal of full participation but more importantly that customers are engaged and taking the necessary steps towards unsubsidized employment and overcoming barriers to employment. The reports are run by senior staff and discussed at monthly staff meeting.

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

Yes

Applicant Job Search

Applicant Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	6	Job contacts due weekly.
SNA Individuals	5	6	Job contacts due weekly.

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

Yes

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

TA Recipient Job Search

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
TANF and SNA MOE	5	6	Clients report their job search activity by completing a Job Search Record every two weeks, for up to twelve weeks. Case management by their assigned Counselor ensures continued assistance with job search and supportive services. Recipients are also assigned to additional activities such as work experience, vocational education, educational activities, job skills trainings and job readiness trainings.
SNA Individuals	5	6	Clients report their job search activity by completing a Job Search Record every two weeks, for up to twelve weeks. Case management by their assigned Counselor ensures continued assistance with job search and supportive services. Recipients are also assigned to additional activities such as work experience, vocational education, educational activities, job skills trainings and job readiness trainings.

- 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:

An individual that is self-employed and who receives less than the NYS 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. OCDSS 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

The district informs SNAP households where at least one member is subject to a work requirement of the applicable work rules at certification, recertification, and when a previously exempt household member or new household member becomes subject to work requirements. Notification is provided verbally and in writing.

- a. Described below is how SNAP applicants and recipients are informed in writing of SNAP work requirements (reply yes or no to options as they apply).

Written Information Provided to SNAP Applicants and Recipients

Yes or No:	How written information is provided to SNAP applicants and recipients
Yes	Eligibility staff use the LDSS-5193 <i>Important Information about SNAP Work Rules (General, Mandatory E&T, and ABAWD)</i> and the LDSS-5193A

Yes or No:	How written information is provided to SNAP applicants and recipients
	<i>Important Information about SNAP Work Rules (General and Mandatory E&T) as appropriate.</i>
No	Eligibility staff use a local equivalent consolidated work requirements notice to inform SNAP applicant and recipient households of their work requirements. Please attach a copy of the district's OTDA approved local equivalent.

- b. Described below is the process eligibility staff follow to provide a comprehensive oral explanation to SNAP households of work requirements, including General SNAP Work Rules, Mandatory SNAP E&T, and ABAWD Rules which pertain to non-exempt individuals in the household.

Oral Explanation: During the interview, eligibility staff provided an oral/written explanation of the work requirements using the LDSS-4826C and the LDSS-5193/LDSS-5193A. Staff maintain documentation that the oral/written explanation was provided, including the date and content of the explanation, as well as the household's understanding of the requirements. This explanation is clear and easy to understand, and the worker ensures that the household is aware of the rules and expectations. If applicable, staff provide information on the mandatory SNAP Employment and Training (E&T) program, explaining that individuals subject to this requirement must participate in employment and training activities to maintain their SNAP benefits. The household is informed of its responsibilities in complying with these rules, including reporting changes in circumstances, participating in required activities, and meeting work-related obligations. Eligibility staff clearly outline the consequences of non-compliance, such as potential benefit sanctions or disqualifications. Throughout the explanation, the household is encouraged to ask questions and seek clarification about any aspects of the work requirements.

General SNAP Work Rules: Eligibility staff explains that individuals aged 16 - 59 and able to work need to meet the general work requirements to get SNAP benefits. The general work requirements include registering for work, participating in SNAP Employment and Training or workfare if assigned, taking a suitable job if offered, and not voluntarily quitting a job or reducing your work hours below 30 a week without a good reason. Failure to meet the general work requirements could result in being disqualified from getting SNAP for a period of time.

ABAWD Rules: Eligibility staff detail the Able-Bodied Adults Without Dependents (ABAWD) rules, which may include the time limit for benefits for ABAWDs who are not meeting work or training requirements. Individuals aged 18 - 52, able to work, and don't have any dependents may need to meet both the general work requirements and an additional work requirement for ABAWDs to get SNAP for more than three months in 3 years (the time limit).

Language Assistance: If the household's primary language is not English, language assistance is provided to ensure understanding.

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

How the District Documents the Written Requirement in the Case Record

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

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

How the District Documents the Oral Requirement in the Case Record

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

NTA SNAP recipients are not required to participate in 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.

N/A

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

NTA SNAP recipients are sent a letter to their home informing them of services available to them for job search, career exploration, resume creation, job interview practice and vocational training assistance.

5.4 Advising Households of Employment and Training Services

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

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

Who the District Provides Employment and Training Services Information to

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

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

How the District Provides Employment and Training Services Information

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

5.5 Provider Determinations

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

Staff screens clients at the time of assessment and employment plan development for appropriate activities to participate in and the provider/contractor who is to provide the activity, such as HSE class, and non-paid work experience. The referral to an outside provider is done in writing and used to communicate all necessary information, including

any accommodations that need to be met. Follow up and progress of the activity is done in writing and issues or concerns are also communicated in writing.

- 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.

All providers/contractors of activities have signed an MOU and/or a worksite agreement with Ontario County and if the provider determines their activity is not appropriate, the provider would document the reasons to us in writing.

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

All providers are reviewed annually, and new MOUs and worksite agreements are signed, with the provider agreeing to fair practices and following EEOC guidelines.

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

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

6.2 Use of Outside Providers/Vendors

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

No

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

N/A

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

N/A

7. Supportive Services

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

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

The district will provide to participants the following expenses, in addition to childcare, which the district deems necessary for the individual to participate in assigned work activities.

Cash applicants and recipients may be entitled to the following support services:

1. Tuition may be paid for those clients enrolled in vocational or job skills training provided there is no other funding source available (TAP, PELL, scholarships, and other sources that may offset the cost of the tuition) and the client and the WD Case Manager have jointly developed the employability plan which has identified the needs for the training.

Reimbursements for books and supplies can also be provided in addition to tuition. Written documentation from the training facility will be required for payment for tuition and books. This will be accomplished by utilizing the Training Facility Voucher. Payment will be made directly to the provider unless otherwise arranged (payment to the client) and approved by the Senior Counselor or Deputy Commissioner. The maximum allowable amount per lifetime is \$3000. The only exceptions are CDL class A license, \$4000 maximum and \$5000 maximum for nursing programs. The limit includes tuition, books, academic fees, and supplies. [NOTE: Tuition, books, and supplies are not an allowable training related expenses (TREs) unless approved by the district.]

2. A transportation allowance reimbursed at the rate of \$.655 per mile for round trips at least 5 miles per day paid to clients enrolled in work activities when other funds and sources of

transportation are not available. Reimbursement to clients will be made twice per month or monthly. The district will consider any transportation hardship claims over and above the policy. Monthly bus passes are purchased for individuals involved in work activities and on fixed public transportation routes. On a case-by-case basis, payment can be pre-approved on the condition the client will attend the assigned activity. If the client fails to attend the activity, the payment will be recouped from future supportive services of the client.

3. A clothing allowance of up to \$250 annually will be available to clients in need of clothing in order to participate in their work activity. The client or instructor/supervisor must provide documentation of the need for the clothing. This allowance can only be used for items absolutely necessary for the participation in the program. If a payment is issued directly to the client, a sales slip must be submitted to WD staff within 5 days after the purchase. All requests will be considered on a case-by-case basis. Consideration will be given to the client's progress and participation in the work activity. Clients are not automatically entitled to this allowance and approval must be granted by the WD Counselor prior to issuance.

4. If a client is required to have a license to pursue training, the fee for the license will be paid at an actual cost not to exceed \$300. This may include driver's license, or any other license required by the state. Whenever possible, the payment will be made directly to the provider. If payment must be made to the client, a receipt or documentation must be submitted to WD staff prior to payment being made. No payments will be made without prior approval of the Senior Counselor or Deputy Commissioner.

5. Tools, equipment and miscellaneous items required for training or employment will be paid for upon documentation from the training facility or employer. The list of tools, etc. that will be required must be identified by the instructor or supervisor at the start of the training or job unless otherwise arranged. Whenever possible, payment will be made directly to the vendor. If payment is made to the client, payment will be made based upon the estimate provided by the instructor or worksite supervisor. The total amount cannot exceed \$500. If payment is made directly to the client, receipts must be submitted to WD staff within five (5) days after the purchase. No payments will be made without prior approval of the Senior Counselor or Deputy Commissioner.

6. Payment for car insurance and car repairs may be made for those enrolled in a work activity provided that this is the least costly means of providing transportation. The cost will not exceed \$1,500.00, or the retail value of the vehicle (as documented by Edmunds.com) per year per individual for repairs and \$1,500.00 per year for insurance. Client must provide a current NYS driver's license, car registration and title of the vehicle. In order for Ontario County Workforce Development to consider paying for a client's car insurance, it is necessary the following be submitted to Ontario County Workforce Development: two separate written quotes of comparable insurance coverage for the vehicle, if a new policy is required. If there is current coverage for the vehicle, the statement/bill is required. All documentation must state the year, make and model of the vehicle, coverage dates, amount due, and date payment is due. One month payment is granted to the client via their benefit card. Documentation of payment made must be submitted in order to make a second payment. For auto repairs, clients must use authorized repair shops licensed by the State of New York and must provide at least two estimates on official company documents. Clients submit these documents to WD staff for review. Approval must be made by a supervisor before work is started. Please note all repairs must be done by authorized repair shops and must include their DMV Repair Shop Identification Number. No reimbursement will be made without prior approval of the Senior Counselor or Director. The estimate must be attached to

the DETA 11 form. In order for Ontario County to consider paying for repair to a client's vehicle, it is necessary that the following be submitted to Workforce Development: A. Two separate written estimates of comparable work from New York State approved vehicle repair shops listing all necessary repairs to the vehicle to put it in safe working order. In addition, a statement on the estimate indicating that the vehicle has been visually inspected, and the repairs listed on the estimate are necessary to put the vehicle in safe working order. This statement must be signed by the repair shop owner or manager and include a valid DMV Repair Shop Identification Number. In the event that two written estimates cannot be obtained (i.e.: the vehicle cannot be driven), the reason why must be documented prior to approval of any repair and/or towing costs. B. Upon receipt of the two written estimates, WD staff will review to determine if car repairs can be paid for by Ontario County. All repairs must be reviewed with a supervisor who will determine if repairs will be approved. No approvals are to be made verbally or without written statements. If the repair expense can be authorized, staff will authorize the repairs in writing, furnishing a copy of the authorization to the repair shop and to the client. If the repairs cannot be authorized, staff will notify the client, in writing, of this fact. Once the work is completed, the repair shop must submit a bill to Workforce Development, showing that the work has been completed and listing the repair shops Federal Employer Tax Identification Number and DMV Identification Number, authorizing them to do repairs. Upon receipt of this bill, staff will submit the bill, along with the estimate for payment. An individual log for each case is maintained that includes case number, name, repairs, vendor, amount and date work completed. Supervisory approval is required for these payments. Expenses will be paid if there are no other monetary sources to meet these needs.

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

Transportation Services Provided to Clients

Yes or No:	Transportation Assistance Provided
Yes	Bus pass/token
No	Gas card/voucher
Yes	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
No	Mile reimbursement at the IRS Medical/Moving rate (effective 1/1/2023 is 22 cents per mile)
No	Other mileage rate (the methodology used to establish reimbursement rate is described here):

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

For TA applicants and recipients that reside in rural areas where public transportation is not available, we would expect them to walk no more than two miles one way. On a case-by-case basis, this maximum could be waived where clients can demonstrate limitations or other extenuating circumstances. In addition, weather and road safety are also considered. Individuals may receive a 'dial a ride' public transportation bus pass that may transport them anywhere within Ontario County with at least 24-hour advanced notice.

- 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:

Support services such as car repair, car insurance, public transportation assistance and licensing fees are commonly provided to individuals at risk of needing assistance to improve their opportunities for employment or to maintain employment. However, other supportive services may be provided to an individual with proper documentation and participation upon the Deputy Commissioner's or Senior staff's approval. Services such as job search assistance, job leads, resource room utilization, access to virtual workshops, and others are available to the universal population at any time.

7.2 Post-Employment/Transitional Supportive Services

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

Additional work supports provided and referred to the myBenefits website will be made as well as additional job coaching/counseling to the individual to overcome any workplace issues in retaining their employment, maybe provided.

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

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

1. non-recurring expenses relating to childcare (daycare registration or application for service fees) not to exceed \$50. Payment will be made directly to the provider.
2. Clothing allowance of up to \$250 for employment or in connection with the participant's job. WD staff and the client will develop a list of necessary items. Payment will be made directly to the client who will submit a receipt after purchase.
3. Tools and equipment for employment, not to exceed \$500 and documented by the employer if such tools and equipment are required to be purchased by other employees similarly employed. Payment will be made directly to the vendor or if this is not possible, payment will be made directly to the client utilizing the estimate received from the employer or the vendor. The need for tools, etc. will be identified at the start of the client's employment unless otherwise arranged. Reimbursement for job related safety equipment of up to \$200 will be provided to the client upon documentation of the need from the employer.
4. Reasonable cost of necessary repairs to a recipient's automobile if this is the only barrier to the client's employment and it is reasonable. At least two estimates from licensed repair

shops or garages are necessary prior to approval. Payment will be made directly to the provider. The total cost will not exceed \$1,500 or the retail value of the vehicle, whichever is lower. Payments will be made only to authorized repair shops.

5. Payment for a monthly bus pass.

6. Payment for automobile insurance premiums up to a maximum of \$1500 per year (coverage will include basic requirements and collision if necessary) if this is the only barrier to the participants employment. Payment will be made directly to the client, who is then responsible for making the payment. Documentation of payment is required for a second month of payment to be made.

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.):

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

Employment related clothing, License and other work-related fees, Job related safety equipment, Automobile repairs/towing, Automobile insurance, Transportation - bus passes.

8. Conciliation, Sanction and Dispute Resolution Procedures

8.1 Conciliation

- a. The district's conciliation process for TA applicants and recipients must be conducted in accordance with 18 NYCRR 385.11(a). Indicate below how conciliations are conducted (reply yes or no to the options as they apply).

How the District Conducts Conciliation for TA Applicants and Recipients

Yes or No:	How conciliation is conducted
Yes	In person
Yes	By phone
No	By mail

The districts process for conduction TA conciliations is described below:

For persons who have failed or refused to comply with one or more requirements, the following conciliation procedure is provided to recipients of Safety Net Assistance, Family Assistance and Safety Net Families. It should be noted that applicants are not afforded the opportunity of conciliation during the applicant process as they are only required to complete an employment assessment and job search.

1. The timeframes for requesting conciliation must be made within the 10 days indicated on the conciliation notice.
2. If the individual responds either in person or in writing, a conciliation meeting will be

scheduled within 14 days at which the individual may give reasons for the failure/refusal to comply.

3. The procedure will be administered by designated trained staff with no direct responsibility for a participant's case. Based on all available evidence, including that offered by a participant, the Mediator must determine willfulness and without good cause in his/her willful refusal or failure to comply.

4. If it is determined that good cause exists, no action shall be taken for failure to comply; if it is determined that the client willfully did, without good cause, refuse or fail to comply, a ten-day notice must be issued to begin the process of negative action.

5. If the participant does not respond to the 10-day conciliation notice, a ten-day written notice of intent to discontinue or reduce assistance will be issued to begin the process of negative action.

The conciliation period shall last no longer than 14 days from the date on which an applicant for or recipient of safety net requests conciliation, and no longer than 30 days from the date of the conciliation notice issued to an applicant for or recipient of family assistance, unless the individual and social services official agree that the conciliation period should last longer.

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

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

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

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

How the District Conducts Conciliation for SNAP Applicants and Recipients

Yes or No:	How conciliation is conducted
Yes	In person
Yes	By phone
No	By mail

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

The client is notified via the Conciliation Notice (LDSS-4230) and given ten days to respond. Included with the conciliation notice are instructions on how the client may demonstrate compliance in lieu of the conciliation hearing. If the client wants a conciliation meeting and is found to not have good cause for their non-compliance, they can still avoid a SNAP sanction by demonstrating compliance.

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

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

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

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

If an Employment Assessment has already been done, they must complete five employer job search contacts within five (5) days and submit verification of those contacts.

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:

Ontario County's policy requires a sanctioned individual to sign an agreement to comply document AND attend at least one activity to demonstrate compliance prior to removing the sanction. Temporary Assistance benefits are restored retroactive to the date the individual indicated a willingness to comply, but no earlier than the expiration of the minimum duration period.

- b. 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:

Ontario County's policy requires a sanctioned individual to sign an agreement to comply document AND attend at least one activity to demonstrate compliance prior to removing the sanction. Temporary Assistance and SNAP benefits are restored retroactive to the date the individual indicated a willingness to comply, but no earlier than the expiration of the minimum duration period.

8.3 Dispute Resolution

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

Grievance Mediation

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

9. Disability Determinations, Documentation and Requirements of Exempt Individuals

9.1 Disability Determination Process and Tools

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

Process for Determining Disabilities and/or Work Limitations

Yes or No:	How the district determines an individual’s disabilities and/or work limitation
No	District participates in the OTDA managed contract for independent medical evaluations.
No	District contracts directly with a physician to provide independent medical evaluations.
Yes	District accepts physician’s statement provided by participant.
No	District accepts physician’s statement provided by participant but refers for an independent evaluation when deemed necessary.
Yes	Other process: DSS TA staff reviews physician statement and determines employability.

- b. Described below is the district’s procedure for notifying an individual of their exempt or non-exempt determination whenever an individual alleges to be unable to participate, or the individual otherwise participates in the employability disability review, including when an individual is notified that their status changes from exempt to non-exempt:

The client is notified in writing of the exempt/non-exempt status.

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

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

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

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

Process for Reviewing Medical Documentation

Yes or No:	District’s process for reviewing medical documentation
No	District directs the contracted physician or individual’s physician to determine status.
No	District review team reviews and determines status (described here):
No	Specialized disability/medical staff or unit reviews and determines status (described here):
Yes	<p>Other process:</p> <ol style="list-style-type: none"> 1. At application and recertification, DSS staff inquire whether the individual has any medical or psychiatric conditions which would limit the client’s ability to participate in work activities. 2. Should the applicant or recipient claim a psychiatric or physical impairment, DSS staff notifies the individual in writing of the opportunity to present, within ten calendar days, a statement from the individual’s treating health care practitioner. Medical form ONT-1229 is issued to the client and upon completion must contain a specific diagnosis resulting from any medically appropriate tests and specify any work limitation of the individual. An AIR form LDSS 2642 is issued with the medical form and states the due date for the completed medical to be returned. DSS will code the client 70 upon issuance of the medical form and Workforce Development staff shall not assign the individual to work activities until after an employability determination is made. 3. Upon receipt of the completed medical form ONT-1229, DSS staff evaluate the individual’s claim of impairment and determine whether the documentation provided is sufficient to make a determination. The client employability code is updated according to the information outlined on the medical and Workforce Development will engage the client in work activities if they are deemed to be non-exempt. 4. DSS staff require new documentation as indicated by the length of disability indicated on the existing medical statement. If the client fails to submit updated

Yes or No:	District's process for reviewing medical documentation
	<p>medical documentation, the TA case would be closed, for a NTA SNAP case, the client would be made employable/non-exempt.</p> <p>5. When DSS staff make a determination of an individual's employability, DSS will notify the applicant or recipient in writing of such determination and of the right to request a fair hearing to contest such determination within ten days of such notification.</p> <p>a. If the individual requests a fair hearing within the ten-day period, Workforce Development staff shall not assign the individual to work activities pending the fair hearing determination.</p> <p>b. An individual shall not have the right to a fair hearing to contest such determination if he or she requests a fair hearing after the ten-day period.</p>

9.2 Mental Health Screening and Assessment

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

No

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

N/A

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

Screening Tools the District Uses

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

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

N/A

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

N/A

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

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

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

A physician makes the determination that an individual may improve their employability through treatment. This piece of information is documented from the physician in writing.

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

The district does not develop treatment plans however we do refer individuals to treatment. We discuss with the individual their needs and provide options to obtain services. Referrals may be done via phone contact or provider information given to the customer for them to follow up with. A release of information may be obtained, or medical verification requested to document if follow up has taken place. Although, the district does not develop the treatment plan, the provider's treatment plan may be requested and used by the district.

- 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.

Tracking of the treatment plan is completed through verification from the provider that the participant is attending through medical statements and releases of information. The participant must provide documentation of medical appointments on a monthly basis. An enrollment is created, and attendance information is then documented in a WTWCMS schedule. A detailed medical statement from the provider is requested every six months.

10. District Certification

10.1 Certification

As a condition of the receipt of federal and State funds the Local District Commissioner of Ontario County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2024 through December 31, 2025. Submission of this Plan certifies that the district has read and accepts the terms of this certification and hereby affirms that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations, and provisions of this Plan.

11/28/2023
Eileen Tiberio
Commissioner