

# **Fulton County**

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

January 01, 2024 - December 31, 2025

# Table of Contents

1. Administration .....	1
1.1 Administrative Structure .....	1
1.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies.....	1
1.3 OTDA Jobs Staff Agreement.....	3
1.4 Access to Services at New York State Career Centers .....	4
2. Orientation, Assessment and Employment Plan .....	5
2.1 Orientation (Reference 18 NYCRR 385.5) .....	5
2.2 Temporary Assistance (TA) Employment Assessment.....	6
2.3 TA Employment Planning (Reference 18 NYCRR 385.6 and 385.7) .....	7
3. Engagement .....	8
3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)).....	8
3.2 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency	8
3.3 Strategies/Procedures for Increasing Program Attendance .....	9
3.4 Strategies/Procedures for Engaging Sanctioned TA Participants .....	9
3.5 Strategies for Reducing the Need for TA.....	9
4. Work Activities .....	10
4.1 Allowable Work Activities .....	10
4.2 Job Development .....	13
4.3 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) .....	13
4.4 Post-Secondary Education Approval and Enrollment Policies .....	15
5. Work Requirements .....	16
5.1 Meeting TA Work Requirements .....	16
5.2 Informing SNAP Applicants and Recipients of Work Requirements.....	19
5.3 Meeting SNAP Work Requirements .....	20
5.4 Advising Households of Employment and Training Services .....	21
5.5 Provider Determinations.....	21
6. Quality Assurance/Work Verification .....	22
6.1 Quality Assurance Process - Random Case Sampling.....	22
6.2 Use of Outside Providers/Vendors .....	24
7. Supportive Services .....	25
7.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District.....	25
7.2 Post-Employment/Transitional Supportive Services .....	26
7.3 Extended Support Services.....	26
8. Conciliation, Sanction and Dispute Resolution Procedures .....	26

8.1 Conciliation .....	26
8.2 Sanction.....	28
8.3 Dispute Resolution .....	29
9. Disability Determinations, Documentation and Requirements of Exempt Individuals.....	29
9.1 Disability Determination Process and Tools .....	29
9.2 Mental Health Screening and Assessment.....	30
9.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	31
10. District Certification .....	33
10.1 Certification.....	33

# 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.)*
- 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 works closely with all units of the FCDSS, including but not limited to Temporary Assistance, Child Support, Investigative and Services.

The Employment Unit of the Fulton County DSS (FCDSS) has primary responsibility for coordinating the agency's Employment Program including the provision of supportive services, conducting the initial assessment, completing the employment plan, supervising job searches, making work experience placements, monitoring exempt clients including those involved in substance abuse treatment, referring to a variety of other service providers and monitoring compliance. The staff of the Employment Unit will also initiate the conciliation process and where appropriate make referrals for sanctions.

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

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

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

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

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

<b>Provider</b>	<b>Total Contract Cost per Year</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
PIC	\$55,610	FFFS	FA TANF 200%	Job search, case management
Gloversville Transit	\$3,250	FFFS Local	FA SNA Family SNA Individual SNAP	Contract provides bus tickets for employment activities.
Seeking new provider	\$3,000	FFFS Local	FA SNA Family	Drug and alcohol assessments
Seeking new provider	\$50,000	FFFS Local	FA TANF 200%	Employment history reviews, individual coaching, plan development, employment readiness, job search.

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

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

**Agencies and Providers to whom the District Refers for Employment Services**

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
FMS Workforce Solution Career Center	Local	FA SNA Family SNA Individual TANF 200%	Literacy, One Stop, employment services
Fulton Montgomery BOCES	Others: EPE, WIOA, Literacy Zone, NY seat time aid	FA SNA Family SNA Individual TANF 200%	Adult Basic Ed, HSE, English as a second language

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 Department has a formal policy of annual contract reviews that include discussion with the unit supervisor responsible for that program, input from additional staff as appropriate and review of provider records as requested. The unit supervisor or director completes a written form after discussion with the appropriate parties. If not addressed previously in the year, concerns will be addressed with the provider at that time. Annual reviews are reviewed by the Commissioner. Line staff that interact with the contractor are asked to make supervision aware of any significant or recurring problems. Contract staff that are located on site report to a DSS unit supervisor who oversees their work. Contact with on site contract staff may be as frequent as many times a day. In addition, Employment Unit staff periodically meet with applicants/ recipients who may relate information about their experiences with the provider. The Commissioner periodically asks director staff about contractor/provider performance during regularly scheduled meetings. Bills and back up materials are reviewed by the unit supervisor or division director to check eligibility and accuracy.

**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:
N/A	Assessment/Employment Plan
N/A	Supervised job search
N/A	Job readiness training
N/A	Job club
N/A	Job placement services
N/A	Grant diversion
N/A	Job development (employer outreach)
N/A	WOTC pre-certification

**Jobs Staff Target Groups**

Yes or No:	Target Groups:
N/A	Applicants
N/A	FA & SNA with children
N/A	SNA without children

<b>Yes or No:</b>	<b>Target Groups:</b>
N/A	SNAP
N/A	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).

N/A

## **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**

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

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

Nonexempt Temporary Assistance applicants are required to register at our local one stop. Lists of those referred are shared via email to monitor compliance. WIOA brochure is shared with clientele.

## 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 applicant/recipient is advised that he or she is responsible to participate in employment activities in accordance with the need of the Social Service District to meet Federal and State work participation rates.  They are also advised that they must work towards overcoming barriers to employment. These barriers include, but are not limited to: mental health issues, medical problems, family problems - including domestic violence, literacy, transportation, child/ adult care, and substance abuse. Applicants/ recipients are also advised of the opportunity to accept Child Care in lieu of Temporary Assistance.

- 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:

Orientation for applicants is provided in a paper form. Staff from the Employment Unit and the applicant discuss the orientation information within seven days of the application filing date. Exempt and non-exempt individuals participate in the same orientation. The district has developed a reference worksheet that advises applicants and recipients at application and recertification of items which clients must be informed of during orientation. Generally the eligibility worker discusses this verbally with the client and client receives a copy.

## 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
No	The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a).
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTWCMS.
Yes	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: Current job seeking activity, transportation resources, including license and driving record, health/ medical history. Military status, housing resources, learning disabilities, special education history and any previous criminal history including probation and parole.

- 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:

An assessment is an ongoing process which includes the self-assessment, literacy test, and other appropriate evaluations and tests. The Employment Representative will complete the assessment during an interview. He/she will clarify information collected on the self-assessment form and incorporate it into the assessment completed in CMS. Assessment information received from outside agencies may also be incorporated into the assessment. Assessments are done in person and via phone.

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

Employment Unit

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

Graduation from high school or possession of a high school equivalency diploma with either:

(A) Completion of two years of study at a regionally accredited New York State registered college or university with at least 12 credit hours in social services, human services or related fields; or

(B) Two years' experience as a counselor, employment interviewer, or related position with similar duties and responsibilities; or

(C) An equivalent combination of training and experience as defined by the limits of (A) and (B) above.

- 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?

Assessment is completed at initial appointment with their Employment Representative and each year after as long as they remain on assistance. Process of updating the assessment is the same for exempt and nonexempt individuals.

### 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 at their initial appointment with their Employment Representative. The client is given a copy.

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

The plan is changed if/when their employability status changes or as new information warrants.

### **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:

Meeting with case manager from DSS and / or our contract agencies that can help overcome barriers to self-sufficiency is also considered "Engaged in Work".

#### **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:

We have access to work experience sites with Spanish speaking staff. If needed Language Line and / or other interpreter services can be accessed to facilitate communication between DSS staff and LEP clients. Interpreter services desk guides are available to workers and language posters are available in all client areas as required in 06-ADM-05.

### 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:

We believe that the communication with the majority of our local service providers is excellent. We normally are contacted shortly after a client fails to comply. If conciliation is required, the notice will often be hand delivered by the case manager in order to expedite the good cause/willfulness determination and subsequent re-engagement of the client. If conciliation is not warranted, case manager is advised of recipient no show within one business day. Home visits are routinely made to review the reasons for the client's unwillingness/inability to participate. The client's responsibilities are reinforced and solutions to overcome legitimate barriers are developed. Home visits are consistent with the requirements outlined in 18NYCRR 351.28 and 95 ADM 24 and agency's need to meet federal work participation rates.

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

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

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

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
Yes	Described here are the strategies the district uses to attempt to engage sanctioned participants as soon as they are sanctioned: The household that contains an individual who will be sanctioned has already been assigned a case manager. Eligibility requirements will be used, when appropriate to monitor ongoing eligibility for Temporary Assistance. The case manager will also work with the family until they are reengaged, or the case is closed.
No	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed:
No	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period:

### 3.5 Strategies for Reducing the Need for TA

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

The supportive services identified in section 7.1 will be made available to all based on no specific criteria other than the clients' needs.

## 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><b>Unsubsidized Employment</b> – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Work Experience</b> – Unpaid work performed at a public or not-for-profit organization to enable a participant who has not obtained unsubsidized employment to improve his or her employability. Work experience provides participants with an opportunity to acquire training, knowledge, work habits, and work references necessary to obtain and retain employment. Participation in work experience includes training required for the participant to complete the work experience assignment. For example, an individual who is expected to provide clerical support in a government agency may be provided training to develop or refine filing and data entry skills as needed to perform the tasks required as part of the work activity assignment.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Search</b> – The act of seeking or obtaining employment or preparing to seek or obtain employment and will include: looking for suitable job openings in a group or individual setting; making contact with potential employers; learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing; preparing and applying for, and/or interviewing for jobs and related activities.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Vocational Education</b> – Vocational education is defined as an organized educational program that directly relates to the preparation of individuals for current or emerging occupations that require training up to a four-year degree. Vocational education does not generally include basic or remedial education or English as a Second Language (ESL) but may include work focused general education and language instruction that is a regular or integral part of a vocational education program. Social services districts are responsible for ensuring that any such remedial education or ESL is a regular part of the program for participants with similar skill sets as the TANF/SNA MOE client, is determined necessary by the program provider, and is limited in hours to less than one half of program participation. Vocational education programs include the completion of activities that provide individuals the knowledge and skills to perform a specific trade, occupation or vocation. Vocational education must be provided by an education or training organization.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p><b>Secondary School</b> – Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Skills Training</b> – Training or education in job skills to improve a participant’s employability, to ensure clients have the basic skills competencies required by employers to support job entry and/or to advance or adapt to the changing demands of the workplace. Where identified as needed, such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills. Job skills training may include customized or technical training designed to provide participants with additional workplace skills, post-secondary education courses leading to a bachelor’s or other advanced degree, or other training included under the definition of vocational education training. Job skills training may include literacy instruction, English language instruction, or other basic education for an individual who has already obtained a high school diploma or equivalency when determined from a client’s assessment that such instruction is needed to improve the participant’s employability.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Education Training</b> – Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include Adult Basic Education (ABE), ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Job Readiness Training (JRT) Activities</b> – Participation in programs that include seeking and preparing for work. JRT includes two types of activities: (1) traditional activities of resume preparation, training in interviewing skills, and instruction in workplace expectations, training in effective job seeking, including life skills training; and (2) activities that improve an individual’s employability, such as substance abuse treatment, mental health treatment, or rehabilitation activities in which a qualified medical or mental health professional has certified that such treatment is necessary.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<p><b>Subsidized Private Sector Employment</b> – Employment in the private sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-f. Subsidized private sector employment will include positions subsidized through grant diversion/Transitional Employment Advancement Program (TEAP), supported employment programs, and paid college work study programs at private institutions. Individuals participating in subsidized private sector employment are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Subsidized Public Sector Employment</b> – Employment in the public sector for which the employer receives a subsidy from TANF or other public funds (excluding tax credits) to offset some or all of the wages and costs of employing and training a recipient in accordance with New York State Social Services Law 336-e. Subsidized public sector employment will include positions subsidized through grant diversion/TEAP, supported employment programs, and paid college work study programs at public institutions. Individuals participating in subsidized public sector employment, and work study unless otherwise permitted under a federal work study program, are paid wages and receive the same benefits as unsubsidized employees who perform similar work. An employment situation will be subsidized for up to the full amount of wages/benefits provided to the program participant and will be subsidized for the length of time as determined appropriate by the State or social services district.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	<p>FA SNAFAM SNA SNAP</p>
<p><b>SNAP E&amp;T Supervised Job Search</b> – The act of seeking or obtaining employment through a job search that is directly supervised and may include: case management services, career exploration, interview preparation, job application assistance, learning appropriate workplace expectations and behaviors in preparation for submitting job applications and interviewing, job leads, and direct job referrals.</p>	<p>N/A</p>
<p><b>On-the-Job-Training (OJT)</b> – Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p>	<p>FA SNAFAM SNA SNAP</p>

Activity and Definition	Case Type
<b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.	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?

No

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
No	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.:
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.

HFM BOCES and FMS PIC are the only local providers of the above educational services. FC DSS has regular interaction with staff of these agencies and program changes and updates are emailed to appropriate DSS staff.

- 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.

There is a very limited number of appropriate Voc Ed and Job Skills programs in the area. HFM BOCES and Fulton Montgomery Community College are the only local providers. FCDSS has regular interaction with staff of these agencies and program changes and updates are emailed to appropriate DSS staff.

- 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.

The Employment Representative will review the options with the client. Individuals that have a limited work history and the ability to benefit from such educational programs will be required to accept a referral. All other individuals with a desire to participate will also be referred and will be required to participate in such activities as long as this does not negatively impact the district's ability to meet participation rates.

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

The Employment Representative will review these cases with supervision. Clients with the capacity to successfully complete such programs will be approved. The client would also likely be assigned core activities. The agency's need to achieve federal and state participation rates is taken into consideration when making such a referral. Participation would only be denied if the requested activity precluded participation in core activities. The client would always have the opportunity to participate in home study programs such as GRASP if available.

- 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.

Participants must meet the following requirements in order to be assigned by their Employment Representative to job skills and or vocational activities: a desire to participate, the ability to benefit from such activities, based on clients skills, educational level and aptitude, limited marketable job skills, a limited work history and past compliance with other activities.

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

Past performance, record retention, reporting requirements, performance standards and targets as identified in contracts. Other standards as established by the state agency with regulatory authority over the provider. The standards for approving providers also include the determination that the training is for positions that are in demand in the area or if the training is general, that it provides the base that is needed by some individuals in order to progress to or participate in competitive employment.

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

The client is advised of the appropriate approved training providers by staff during the orientation, assessment and ongoing case management.

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

At the end of the assessment interview the FCDSS Employment Representative will review the case specifics and discuss them with the Employment Principal as needed. After a decision has been made the Employment Representative will inform the client orally while completing the employment plan. The assigned activity will be included in the written employment plan. The client will receive a copy of the plan.

- 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.

Requests for attendance are sent to each school district in the county on approximately a monthly basis. Excessive absenteeism as identified by the school district will result in further interventions, such as scheduling of assessment appointment and or home visit.

- 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.

Pertinent limitations are shared with the staff making the worksite placement and are subsequently shared in writing with the worksite supervisor as warranted.

#### 4.4 Post-Secondary Education Approval and Enrollment Policies

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

The district will allow completion of a two-year program as required in 23-Adm-09. Participation in countable core activities will also be likely required.

- 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.

<b>Yes or No:</b>	<b>Conditions for disapproval of work activity</b>
Yes	The institution or student fails to monitor and report information regarding the student's attendance and performance as required.
Yes	The student fails to progress toward the completion of a course of study without good cause, as determined by the district.
Yes	The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.
No	Additional reasons as stated here:

## 5. Work Requirements

### 5.1 Meeting TA Work Requirements

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

Employment Unit staff normally meet with all adult Temporary Assistance clients, both exempt and non-exempt within 3 business days of the date of their eligibility interview. All non-exempt clients are assigned to a job search and are required to register at the one stop. They are also scheduled for an assessment appointment with their Employment Representative prior to case opening. At approximately two weeks prior to case opening all TANF clients are assigned a case manager. Therefore, all non-exempt Temporary Assistance clients should be engaged in work activities by case opening. Nonexempt individuals are required to participate at least 30 hours per week, but no more than 40 hours per week in countable activities unless restricted by a documented medical condition.

Attendance is submitted by the providers and entered in to WTCMS. WTCMS and COGNOS reports are used to monitor engagement and participation. TANF individuals whose status changes from exempt to nonexempt are also receiving case management services. They are typically engaged during the week their status changes.

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

#### Number of Individuals Who Receive Employment Services

<b>Household Type</b>	<b>Number Served</b>
Households with Dependent Children Average Monthly	30
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 are run at least once per week and are automatically shared with appropriate staff. Weekly caseload review meetings are held with line staff, the Employment Principal and often the Director. The COGNOS reports are reviewed and appropriate direction is given. Prior to the 15th of each month the Employment Principal meets with the Employment Representative in order to ensure that appropriate data entry is completed in CMS.

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

Yes

**Applicant Job Search**

<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	15		Temporary Assistance applicants generally meet with Employment staff within a few days of their eligibility interview. Nonexempt individuals are assigned job search at that time. Weekly job search follow up contact with DSS is generally required.
SNA Individuals	15		Temporary Assistance applicants generally meet with Employment staff within a few days of their eligibility interview. Nonexempt individuals are assigned job search at that time. Weekly job search follow up contact with DSS is generally required.

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

Yes

**TA Recipient Job Search**

<b>Recipient Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
TANF and SNA MOE	15		Nonexempt Temporary Assistance recipients continue their job search after case opening. Such individuals are expected to participate in assigned work activities for at least 30 hours per week but no more than 40 hours per week. They are also required to make at least 15 contacts per week, though this may be adjusted based on their participation in other activities. Recipients use a locally developed job search form to track their job search activity. Weekly job search follow up contact with DSS staff is generally required. 4 weeks is the typical time period for job search.
SNA Individuals	15		Nonexempt Temporary Assistance recipients continue their job search after case opening. Such individuals are expected to participate in assigned work activities for at least 30 hours per week but no more than 40 hours per week. They are also required to make at least 15 contacts per week, though this may be adjusted based on their participation in other activities. Recipients use a locally developed job search form to track their job search activity. Weekly job search follow up contact with DSS staff is generally required. 4 weeks is the typical time period for job search.

- 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:

Self employment will be approved if the client has documentation that shows fulfillment of required hours and proof that the client is earning at least an hourly minimum wage.

## 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&amp;T, and ABAWD)</i> and the LDSS-5193A <i>Important Information about SNAP Work Rules (General and Mandatory E&amp;T)</i> as appropriate.
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.

Eligibility staff give an oral explanation of the General SNAP Work Rules, Mandatory SNAP E&T and ABAWD rules at application and recertification. This is then documented on the SNAP interview guide. At any future client contact IF there is a change in household/ individual circumstances this step is repeated and then documented in the case record through comments in IEDR.

- 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
No	Eligibility staff complete the LDSS-4826C and retain a copy in the case record.
No	Eligibility staff use a locally developed oral explanation tool and retain a copy in the case record.
Yes	Eligibility staff document the case record through case notes/comments.

**5.3 Meeting SNAP Work Requirements**

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

The district is not mandating SNAP E&T work activity assignments. Applicants are informed at time of application that the Employment Unit is available for any job searching assistance if needed.

- b. If the district is offering Supervised Job Search as an E&T activity component, describe below how the job search activity will be supervised and tracked, including the frequency of monitoring the participant's job search efforts.

The district is not mandating SNAP E&T work activity assignments. Applicants are informed at time of application that the Employment Unit is available for any job searching assistance if needed.

- 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):

The district is not mandating SNAP E&T work activity assignments. Applicants are informed at time of application that the Employment Unit is available for any job searching assistance if needed. All SNAP applicants and recipients receive a paper listing all community agencies that assist with job searching within the application/ recertification packet.

## 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.

Each individual is screened to determine specific activities that meet their individualized needs. A referral is made to the appropriate provider to further determine the assignment or training needs of the individual. The provider and the agency are in communication to ensure that activities are appropriate for each individual. The provider notifies the local

district of their determination within 10 days. The district notifies the participant of the determination within 10 days of receipt from the provider. At such time that it is determined that the individual is not an appropriate fit, the provider refers the individual to FCDSS employment Unit for further assessment. This information is documented in the 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.

Through direct communication with vendors the FCDSS informs providers of their responsibility to make notifications to this agency if services are not appropriate for individuals. Fulton County refers each case deemed not appropriate to ensure that is not done based on discriminating against a certain class.

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

The agency takes complaints/communication from individuals and address' them as the issue arises. FCDSS accepts complaints and concerns from all of the individuals we serve. The department reviews all issues or concerns regarding an individual to ensure that no discrimination is occurring. The department also confers regularly with service providers and clients to ascertain that provider determinations are fair and do not discriminate against individuals assigned to work activity. If there are discrepancies, the district may request to meet with a service provider to further discuss questions and concerns. This process is documented in a case note and kept in the client's case file.

## **6. Quality Assurance/Work Verification**

### **6.1 Quality Assurance Process - Random Case Sampling**

Consistent with New York State's approved Work Verification Plan (WVP), and in accordance with the requirements established by the United States Department of Health and Human Services, districts must develop a quality assurance plan to ensure that the data reported, from which their work participation rates are derived, are accurate. The plan must include the district's procedure for monitoring reported scheduled and actual attendance in paid employment and unpaid work activities and the controls in place to ensure that reported exemption statuses resulting in federal exclusions from the work participation rate calculation are accurately made, work eligible individuals are correctly identified, hours of attendance reported are accurate and documented, data entry is accurate and that the district and its providers adhere to the approved work activity definitions and the determination of countable excused absences and holiday reporting within federal limits. Each district must maintain the documentation to verify what is being reported to NYS OTDA.

Each district must describe how it will conduct periodic self audits to determine that system entries are consistent with documentation in case files. The district must also explain how it will choose the sample size, select sample cases and establish the review period (no less frequently than semi-annually). The plan must indicate the district will maintain documentation on all pertinent findings produced through its self audit process and that case records for all reviewed

cases will be available for State and other auditors in their review of the local work verification system for the standard 6 year period associated with such reviews.

The district will sample cases from each month within the (6 month) semi-annual period. The October to March review will be due by May 20th. The April to September review will be due by November 20th. The results of these audits will enable the district to identify policies, processes or cases that may need corrective action.

After each self audit is completed, the district must submit a summary of findings to OTDA A&QI at [AQI.WV.SelfAudits@otda.ny.gov](mailto:AQI.WV.SelfAudits@otda.ny.gov) for State review including specific information on each of the errors identified. In addition, when monitoring reveals substantial problems, the district must describe the corrective action it will take.

The Quality Assurance (QA) plan must include the following elements:

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
  - Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
  - Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
  - Assess that the data entered into either WTWCMS, the Self-Sufficiency, Employment, Assessment and Management System (SEAMS) or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
  - Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (TA Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (TA Employability Code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.
- a. Below is the number of random sample cases of participation in paid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.
- 6
- b. Below is the number of random sample cases of participation in unpaid work activities the district will review semi-annually. Refer to the Instruction Guide for the minimum number of cases per district and guidance regarding review requirements.

6

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

3

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

3

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

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

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

Necessary clothing, including but not limited to shoes, work boots, uniforms, and educational supplies as needed. Occupational expenses including but not limited to tools and equipment. Payment will only be issued with appropriate documentation. Clients may be required to access other available resources before the district will consider providing supportive services which the district determines are needed in order for the individual to participate in approved work activities. Approval of any and all requests is subject to availability of federal, state and local funds.

- 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
Yes	Gas card/voucher
No	Mileage reimbursement at the IRS Business rate (effective 1/1/2023 is 65 cents per mile)
Yes	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:

Clients may be required to walk up to 2 miles, contingent upon their physical ability. Extreme weather conditions will be taken into consideration.

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

The supportive services identified in section 7.1 will be made available as appropriate.

## 7.2 Post-Employment/Transitional Supportive Services

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

The supportive services identified in section 7.1 will be made available as appropriate.

- 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 supportive services identified in section 7.1 will be made available as appropriate.

## 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.):

The supportive services identified in section 7.1 will be made available as appropriate.

# 8. Conciliation, Sanction and Dispute Resolution Procedures

## 8.1 Conciliation

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

### How the District Conducts Conciliation for TA Applicants and Recipients

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

The districts process for conduction TA conciliations is described below:

When it is reported that a client fails to comply, the Employment Representative will generate a conciliation notice. If the client responds the conciliation will be conducted via a manner described above. If the agency determines that noncompliance was willful and without good cause a referral for a sanction will be generated. If the client does not reply the agency will review the case record for pertinent information and take appropriate action.

- 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
No	By phone
Yes	By mail

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

When reported that the SNAP recipient fails to comply the Employment Representative will generate a conciliation notice. If the client responds a good cause determination is considered. If it is determined that the noncompliance was willful and without good cause and the individual is still nonexempt a referral for a sanction will be generated. Any information available to the district is taken into consideration when determining whether or not the individuals conduct was willful and without good cause. The opportunity to avoid a SNAP sanction will be offered to all SNAP recipients. The SNAP recipient will be required to complete 10 job contacts for one week, (5 days).

- 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:

The SNAP recipient will be required to complete 10 job contacts for one week (5 business days).

**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:

The sanctioned client will be required to meet with the Employment Representative and possibly their case manager. The client will then be assigned to a comparable activity and required to demonstrate compliance for one week (5 business days). For SNAP purposes, benefits would be restored for the month following the month when the individual demonstrates compliance. 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:

The sanctioned client will be required to meet with the Employment Representative. The client will then be assigned to comparable activity and required to demonstrate compliance for one week (5 business days). Once the individual demonstrates compliance, SNAP benefits will be restored for the month, following the month when the individual demonstrated compliance but no earlier than the expiration date of the minimum duration period. Those who document an exemption may have their SNAP sanction lifted before the end of the durational sanction 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).

The Employment Representative reviews and determines the client's status based on review of medical documentation submitted and input from other local district staff including nurses, case managers and supervisors.

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

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

- 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:

When an individual is determined exempt or non-exempt the client is sent specific LDSS forms for their specific category. Those that are exempt, receive the LDSS 4005. Those that are not exempt or have limitations, receive the LDSS 4005A.

- 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	Other process: The Employment Representative reviews and determines the client’s status based on review of medical documentation submitted and input from other local district staff including nurses, case managers and supervisors.

**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

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

N/A

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

**Screening Tools the District Uses**

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

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

N/A

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

N/A

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

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

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

The Employment worker with input from the case manager and guidance from supervision makes the decision that an individual can restore or improve his/ her employability through treatment or other rehabilitation activities. Information from the individuals medical and or mental healthcare providers is utilized in the decision-making process. Individuals may also be referred for a Consultative Examination with Industrial Medicine Associates and or other providers.

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

If the individual is deemed by the review explained above (a) to have potential to be restored to self-sufficiency through treatment and or rehabilitation he / she will be seen by his/ her Employment Representative for a re assessment. A rehabilitation plan will be developed with the client, appropriate releases will be signed and the client will receive proper notice of the employability determination. The attendance sheets will be explained and any client questions or concerns will be addressed.

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

The Employment Representative is responsible for tracking the participants compliance with treatment plan. This is done by reviewing monthly attendance forms as well as medical forms and /or notes submitted by the provider. The client will be brought in for a reassessment and an update of their treatment/ rehabilitation plan as changes in his/ her condition dictate.

## **10. District Certification**

### **10.1 Certification**

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

4/4/2024

Anne Solar  
Commissioner