

# **Genesee 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

- 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.)*

Organizational chart is attached.

- 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 operation of the Employment Program in Genesee County is a collaborative effort between several partners in the community. The primary partners include Genesee County Career Center/Job Development Bureau (JDB), Genesee Council on Alcoholism and Substance Abuse (GCASA), and Department of Social Services (DSS). Genesee County DSS has an Employment Coordinator and three Employment Program Assistants who provide intensive case management to assist individuals achieve financial independence. Genesee County DSS also utilizes a Director of Financial Services, four Principal Social Welfare Examiners, three Senior Social Welfare Examiners, seventeen Social Welfare Examiners, a Sr. Intake Clerk, and an Intake Clerk at varying levels to support employment related activities.

Genesee County DSS utilizes a pro-active, employment based, front-door philosophy stressing self-sufficiency through Work First. The Intake Unit, Employment Coordinator, and three Employment Program Assistants provide case management at initial contact to help identify hidden and unidentified barriers that may interfere with an individual's ability to obtain and maintain employment. Supportive Services are utilized to divert applicants from the need for ongoing cash assistance.

The Intake Unit explains the employment Rights and Responsibilities to each applicant. This includes, but is not limited to, how employability determinations are made, job search requirements, orientation requirements, assessment requirements, employment planning, work activity requirements, participation in medical care, treatment or rehabilitation requirements, and substance abuse treatment requirements.

The employment services provided by the Genesee County Employment Unit include, but are not limited to, employability determinations, orientation, assessment, employment planning, assignment to work activities, monitoring of participation, developing, and monitoring treatment plans for exempt individuals engaged in treatment or rehabilitation to restore self-sufficiency, coordination of supportive services, and employment placement and retention. The Genesee County Employment Unit staff is responsible for conciliation, sanction, and dispute resolution.

Our Agency contracts with Industrial Medical Associates (IMA) to assist the Employment Program Assistants clarify medical limitations and/or disabilities or in situations where an

applicant/recipient currently does not have a health care practitioner. IMA is also utilized to assist in determining if treatment or rehabilitation is needed to restore an individual to self-sufficiency. IMA returns the provider report within five business days from the initial appointment. The provider report includes written diagnosis based on medically appropriate tests or evaluations conducted regarding the alleged impairments. The provider report also lists any other conditions discovered during the evaluation which would affect the individual's participation in work 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
Genesee County Career Center	\$44,560	FFFS SNAP E & T	FA SNA Family SNA Individual SNAP	Working to Success Job Readiness training to obtain/retain employment as well as Job Search opportunities.
Genesee Council on Alcoholism and Substance	\$22,800	FFFS Local	FA SNA Family SNA Individual	Complete assessments to determine if ongoing treatment is recommended as well as assist DSS with employability

<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>
Abuse (GCASA)				determinations (exempt vs non-exempt) based on substance use diagnosis. Involved in determining appropriateness of recommended change in A/R level of care.
Industrial Medical Associates (IMA)	\$1,680	Local	FA SNA Family SNA Individual	Complete an independent evaluation of an individual's medical diagnosis. Also, assist DSS to clarify medical conditions, recommended treatment, and potential for SSI referrals.

- 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>
Genesee Valley Educational Partnership	Others: No direct financial agreement with district.	FA SNA Family SNA Individual	Referrals are given by DSS to provide applicants and recipients with adult educational programs, training programs, High School Equivalency (HSE), and Adult Basic Education (ABE).
Adult Career/Continuing Education Services-Vocational Rehabilitation	Others: No direct financial agreement with the district.	FA SNA Family SNA Individual	Referrals provided to applicants and recipients to assist individuals with disabilities to achieve and maintain employment through training, education, rehabilitation, and career development.
Community Action	Others: No direct financial agreement with the district.	FA SNA Family SNA Individual	Referrals are given by DSS to provide applicants and recipients with assistance through SOAR program which is designed to increase access to disability income programs administered by Social

<b>Provider</b>	<b>Funding Source(s)</b>	<b>Categories of Clients Served</b>	<b>Programs, Services or Activities Provided</b>
			Security Administration for eligible adults.
Early Head Start-Child Care Partnership	Others: No direct financial agreement with the district.	FA SNA Family	Referrals are given by DSS to provide applicants and recipients with information on how Early Head Start-Child Care Partnerships can enhance current childcare programs by adding additional supports for eligible infants and toddlers.
CORE-The Learning Center	Others: No direct financial agreement with the district.	FA SNA Family SNA Individual	Referrals are given by DSS to provide applicants and recipients with Career Exploration assistance, Job Readiness Counseling, Adult Basic Education, TASP prep classes, English as Second Language, and Certifications.
Genesee Community College	Others: No direct financial agreement with the district.	FA SNA Family SNA Individual	Referrals are given by DSS to provide applicants and recipients with post-secondary education programs.
Early Head Start-Home Visiting Programs	Others: No direct financial agreement with the district.	FA SNA Family	Referrals are given by DSS to provide applicants and recipients with information so they may voluntarily receive parental, infant and early childhood home visiting services if they meet eligibility criteria.
Healthy Families Wyoming/Genesee-HGNY	Others: No direct financial agreement with the district.	FA SNA Family	Referrals are given by DSS to provide applicants and recipients with information so they may voluntarily receive parental, infant and early childhood home visiting services if they meet eligibility criteria.
UMMC-Perinatal and Infant Community Health Collaborative	Others: No direct financial agreement with the district.	FA SNA Family	Referrals are given by DSS to provide applicants and recipients with information so they may voluntarily receive parental, infant and early childhood home visiting services if they meet eligibility criteria.

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:

Genesee County contracts directly with Industrial Medical Associates to provide independent medical evaluations for individuals. The direct contract models the OTDA managed contract. The DSS Employment Coordinator is directly involved in requesting evaluation appointments, following up on participant attendance, and receiving provider reports.

The DSS Employment Coordinator maintains continuous communication between a designated Genesee Council on Alcoholism and Substance Abuse CASAC who performs contracted services to obtain information on participant compliance, much of which is time sensitive.

The DSS Employment Program Assistants maintain weekly communication between designated Genesee County Career Center staff who perform contracted services to obtain information on participant compliance, much of which is time sensitive.

### 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
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).

Genesee County DSS does not have an OTDA Jobs staff.

### 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:
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.

Genesee County DSS coordinates with Career Center partners as outlined in the approved GLOW MOU.

- A customer focused referral system which provides the participant with information on how to apply and access another partner's services.

- The Director of Financial Services and Employment Program Coordinator are active participants of the GLOW Workforce Development Board One Stop Partner/WIOA meetings which occur every four months. At every meeting, one of the partners presents training/information on their services and eligibility requirements.

- Genesee County Career Center provides Genesee County DSS with a monthly activity calendar which lists their upcoming workshops, employer recruitments, and job fairs.

- Genesee County DSS contracts with Genesee County Career Center to provide a Job Readiness program to our applicants/recipients.

## 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	<p>In addition to the requirements outlined in 18 NYCRR 385.5 of the regulations, the district's orientation provides the following: Genesee County reviews in great detail the statement of mutual rights and responsibilities with each client. The client has opportunity to discuss and ask any questions before signing and dating the document (see attachment in document repository).</p> <p>The form details the participant's obligations to participate in all scheduled activities and appointments as well as other requirements they may have as part of the program.</p> <p>The Employment Orientation document (see attachment in document repository) clearly states requirements regarding time limits and school attendance for teen parents. This information is reviewed with each individual and they are asked to sign and date to acknowledge their understanding.</p> <p>The procedure to follow up if the participant has a conflict or cannot attend a scheduled appointment or activity, including contact phone numbers.</p> <p>Notification of client's responsibility to participate in Work Experience, if appropriate based upon assessment.</p> <p>Scheduling of the Assessment/Employability Plan.</p> <p>Direct contact with DSS employment workers to immediately develop an effective strategy to help individuals achieve financial independence.</p> <p>Notification of available supportive/transitional services along with various resources available to address the individual's barriers or personal needs.</p> <p>Information and referrals regarding Home Visiting Programs for families with children up to five years old and individuals that are pregnant.</p>

- 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:

For non-exempt individuals, the Orientation information is provided during the Job Search Orientation presentation in a group setting by Employment Unit staff. The group Orientation is offered twice a week. Information is verbally provided to the individual along with a sign off sheet which clearly states the required elements.

For exempt individuals, Orientation information is provided individually during a 1:1 appointment with an Employment Unit staff. Most times the 1:1 appointment is in conjunction with completion of the Assessment. Information is verbally provided to the individual along with a sign off sheet which clearly states the required elements.

Our Temporary Assistance cases are recertified in a group setting. The Orientation information sign off sheet is included in the recertification process to ensure all recipients have this information at the time of recertification. The Employment Unit staff are present and available during the group recertification process to answer questions and provide clarification if necessary.

## 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 WTCMS.
No	The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.
No	The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. 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 initial eligibility, all adults in households with dependent children, including 16- and 17-year-olds not in school, receive an in-person staff assisted assessment within 90 days of their eligibility. Additionally, households without dependent children receive an in-person assessments within a year following their application. If an in-person assessment presents a hardship for an individual accommodation can be made on a case-by-case basis only when necessary to complete the assessment by phone. The Employment Program Assistant is the ongoing case manager for the family and therefore will be able to provide the individual with the resources necessary to attain and maintain economic independence. Individuals with significant barriers will be provided with the necessary level of case management and supportive services needed to become economically secure.

The Employment Program Assistant will also review an individual's employability by requesting updated medicals on a regular basis (based on the expiration of the original but no less than annually). The Employment Program Assistant will also reevaluate activity assignments with regards to potential change in supportive service needs. This reevaluation of participant's work status and activity assignment will be conducted at least annually.

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

Genesee County Department of Social Services 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)):

The minimum qualification of employees administering assessment tools is to meet the Genesee County Civil Service requirements for Employment Program Assistant. Any staff member administering the assessment tool is trained on appropriate use by our Employment Coordinator.

- 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?

Genesee County DSS update assessments whenever there is a change in an individual's circumstances or activity assignments warrant, or whenever there is reason to believe that an individual has physical or mental impairments which limit their ability to participate in work activities. At a minimum, assessments are updated yearly. Due to the changing circumstance with our clients, most receive several assessments within a year.

### 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:

At the time of initial assessment, the Employment Program Assistant will complete the Employment Plan with the individual. Employment Plans are completed for all individuals. The Employment Plan will provide information to the client regarding expectations and potential challenges and barriers which need to be addressed to meet those expectations. Employable individual assigned work activities will be reviewed with the client along with providing information on supportive services including suitable access to a computer and internet in addition to transportation, childcare and home visiting services. This will include work-limited individuals to ensure the assigned work activity is consistent with their documented limitations.

The Employment Plan will include specific written goals, long-term and short-term, which the individual will participate in creating. The clients sign and date the employment plan and are provided a copy.

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

Genesee County DSS update Employment Plans whenever there is a change in an individual's circumstances or activity assignments warrant, or whenever there is reason to believe that an individual has physical or mental impairments which limit their ability to participate in work activities.

**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:

No additional information.

### **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:

Genesee County DSS has access to Language Line which provides interpreter services for individuals if needed. When the individual is scheduled for their initial employment assessment with the Employment Program Assistant a review of necessary accommodations and supportive services will be completed. Individuals are provided with referrals to providers offering English as a Second Language classes where appropriate.

### **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:

An initial employment assessment is scheduled with the Employment Program Assistant prior to case opening. During this appointment, the Employment Program Assistant explains in detail to the applicant the various work activities and that working, or work experience are the primary core work activity assignments. An in-depth evaluation of the family's personal needs which may restrict maximum participation is completed. The Employment Program Assistant makes every effort to work in coordination with the family to facilitate necessary supportive services so at the time of case opening, there will be limited delay in participation.

The Employment Program Assistant will monitor the client's attendance at least every 2 weeks. If the individual is not meeting their minimum requirements, an outreach letter will immediately be sent requesting contact to determine what issues or barriers are preventing the individual from participating and re-engage.

The conciliation process will be completed immediately if there is no contact from the individual or re-engagement.

### **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: All participants on sanction have a monthly self-sufficiency appointment, this is part of the ongoing eligibility process.

Yes or No:	Strategies and Procedures for Engaging Sanctioned TA Participants
	At this appointment, the Employment Program Assistant discusses the benefits of work. This includes, but is not limited to, hurdles to self-sufficiency and how to overcome those problems. The Employment Program Assistant also discusses the wide array of supportive and transitional services available to support employment. At this appointment the Employment Program Assistant also reviews recipient income, expenses, receipts, etc. and compares that with monthly expenses. If the expenses exceed income, and the client is still meeting expenses, a referral is made to our fraud unit.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants when the durational period of the sanction is completed: Employment Program Assistants will continue to meet monthly with sanctioned participants encouraging them to participate in employment activities and providing them with the benefits of compliance.
Yes	Described below are the strategies the district uses to attempt to engage sanctioned participants during different times in the sanction period: Employment Program Assistants will continue to meet monthly with sanctioned participants encouraging them to participate in employment activities and providing them with the benefits of compliance.

### 3.5 Strategies for Reducing the Need for TA

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

In-depth evaluation of a family's current living situation to determine what diversionary payments, supportive services, may help as per Section 7. To be eligible for a diversion payment and/or supportive services, an individual must have verifiable employment or the verifiable promise of employment.

## 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
<b>Unsubsidized Employment</b> – Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.	FA SNAFAM SNA SNAP

Activity and Definition	Case Type
<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>
<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 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>



Activity and Definition	Case Type
<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>
<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>N/A</p>

Activity and Definition	Case Type
<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>	N/A
<p><b>Community Service</b> – A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p>	FA SNAFAM SNA SNAP
<p><b>Provision of Childcare for Individual Participating in Community Service</b> – Providing unpaid childcare to enable another TA (TANF/SNA MOE funded) recipient to participate in a community service program.</p>	FA SNAFAM
<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>	N/A
<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>	FA SNAFAM SNA SNAP
<p><b>Other</b> – Any work activity that does not meet the criteria of any of the above countable activities constitutes participation that is not countable toward federal and State participation rates.</p>	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.: Genesee County DSS Employment Program Assistants (3) utilize local temporary employment agencies with weekly contact for current opportunities. The Genesee County Career Center provides a monthly list of all available open positions within the county. Many employers call when they need to fill positions as a response to previous job development efforts. Employment Program Assistants also provide information to employers regarding possible wage subsidy programs. Information is also obtained and made available utilizing advertisements, local newspapers, and flyers regarding current employment opportunities.
Yes	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.: N/A

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

- a. Described below is how the district identifies appropriate education program providers for services of Adult Basic Education (ABE), High School Equivalency (HSE) diploma preparation, and English Language Instruction that are available to clients whose assessment indicates such services would be an appropriate work activity assignment. Please ensure to include providers the 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.

Genesee County DSS currently does not have a contract to provide High School Equivalency (HSE) or English Second Language (ESL) instruction. Two local resources, Genesee Valley Educational Program (GVEP) and CORE Learning Center provide Equivalency Diploma training to our residents. CORE Learning Center provides individuals with ESL instruction. The Employment Program Assistants are provided with information and resources from the providers regarding their programs. This information is passed to individuals whose assessment indicated the service is needed. In both instances, staff work closely with both entities to coordinate necessary services and monitor compliance.

- 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.

Genesee County DSS currently does not have a contract to provide vocational education or job skills training. If short-term training is needed to obtain skills necessary to qualify for the job and there are reasonable job opportunities available, the Employment Program Assistant will provide the individual with information for available community resources (e.g. ACCES/VR, Genesee Valley Educational Program, Genesee County Career Center/Job Development, CORE Learning Center, Genesee Community College). Many times, Vocational Education and Job Skills training programs are paid by WIOA or ACCES/VR.

- 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.

All non-exempt applicants and recipients who do not have a high school diploma will be offered the opportunity to enroll in education activities designed to improve literacy levels and/or prepare an individual to attain a high school diploma or equivalent. Genesee County DSS takes on a case management approach and assigns all non-exempt applicants and recipients an Employment Program Assistant who works closely with the individual. This allows the Employment Program Assistant to work with individuals to describe how improving literacy levels would increase their job opportunities. If appropriate, this may be a requirement in the individual's Employment Plan.

- 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.

If the individual has not attained a high school diploma and/or possesses less than a 9th grade literacy level, and expresses an interest in enrollment in educational programs, the Employment Program Assistant will:

- Review the appropriateness based on individual's educational needs.
- Review the capability of the individual to participate.
- Review the benefits of the educational activity to the individual.
- Review the individual's progress in similar activity assignments.
- Review the individual's attendance and prior compliance with past educational activity assignments.

- 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.

A participant is approved/assigned to participate in job skills or vocational education activities if the assessment indicates that additional job skills training or vocational education would increase their job placement efforts and based on the assessment the individual possesses the necessary aptitude and academic ability to benefit from and successfully complete training and the training goal is consistent with local labor market needs.

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

- Be accredited to provide the training proposed by the appropriate agency.
- Must be willing to provide documentation of attendance and satisfactory progress.
- Training provided meets the local labor market needs.

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

Employment Program Assistants work closely with applicants/recipients to identify needs. If appropriate based on assessment, individuals are provided with written information on the availability of approved programs/providers that may help in meeting their training needs or goals (e.g. Access-VR, Assisted Competitive Employment, Community College, Genesee Valley Educational Program, CORE-The Learning Center). Included in the information is their location, phone number and available services.

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

A basic framework of activities will be part of an individual's Employment Development Plan. Individuals will be notified in writing of the specific date and time of an approved activity assignment. Where possible, individuals will also be verbally reminded of approved activity assignments.

- 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.

Teens enrolled and participating in school on a full-time basis will be monitored using the DSS-3708, School Attendance Verification, at application and recertification by either the Social Welfare Examiner or Employment Program Assistant. The Employment Program Assistant staff also utilize the use of COGNOS reports to review those students who are expected to graduate at the end of the school year so that work status can be reviewed timely.

- 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.

Genesee County DSS complies with the requirements of the Americans with Disabilities Act to not discriminate against and provide equal access to services for persons with disabilities. Genesee County DSS assigns applicants and recipients of Temporary Assistance/SNAP to work activities that are consistent with the individual's health related limitations. Genesee County DSS will document requests for health-related accommodations and the district's response to the request. Genesee County DSS will inform work site supervisors in writing of

the health-related limitations of an applicant/recipient of Temporary Assistance/SNAP for purposes of accommodating their limitation.

#### 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):

Individuals involved in a post-secondary level education will be evaluated for appropriateness of the educational program. The Genesee County DSS will have the discretion to approve the post-secondary level education based on the recipient's educational goal and the local labor market needs. The highest level of post-secondary education Genesee County DSS will approve is an associate level college program.

- 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	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's Plan will include:

- Work Experience
- Job Search
- Vocational/Educational Activities
- Job Readiness/Working to Success program
- Sanctioned individuals, beyond duration, are brought in no more frequently than once per month for an appointment with their Employment Program Assistant.

Our goal is to have every non-exempt individual engaged as of the date of case opening. Therefore, non-exempt individuals are referred for an employment assessment at intake interview. The appointments are scheduled within 7-10 days of application date. This allows the employment program assistant the opportunity to work with individual to develop the employment plan and determine what supportive services are necessary to be successful. Once the assessment is completed individuals are scheduled for job search/ job search orientation group. The applicant will continue to actively participate in a Job Search during the application process so that at case opening, the individual is already participating in a countable work activity. The Employment Program Assistant is immediately notified either by the Temporary Assistance Social Welfare Examiner or a daily COGNOS report of all case openings.

For individuals who become non-exempt after case opening, we refer them for an employment assessment within 7-10 days of becoming aware of the change in circumstances. This allows the employment program assistant the opportunity to work with individual to develop the employment plan and determine what supportive services are necessary to be successful. Once the assessment is completed individuals are scheduled for job search/ job search orientation group as the first employment requirement. Additional, activities are added as necessary.

The Employment Program Assistant continuously monitors individual's employability and requests updated medicals on a regular basis (based on the expiration of the original but no less than annually). This enables the Employment Program Assistant to engage a non-exempt individual timely.

To ensure full engagement of all non-exempt adults, we use various state generated COGNOS reports.

A combination of work experience and/or job search may be assigned up to a total of no more than 40 hours per week. Additionally, the number of hours that an individual may be

assigned to work experience will not exceed the hours determined by dividing the household's TA grant plus SNAP allotment by the higher of the federal or state minimum wage.

- 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	15
Households without Dependent Children Average Monthly	20

- c. Described below is how the district uses work participation management reports available through COGNOS or other reports and activities to monitor district progress toward meeting work participation requirements and ensuring full engagement by adults in work or work preparation activities:

The Employment Program Assistants use various COGNOS/WTWCMS reports that are run monthly to review up-to-date information on individual participation and employment codes. The reports are run monthly by the Employment Coordinator and given to each of the (3) employment program assistants.

The Employment Coordinator also reviews various COGNOS/WTWCMS reports to ensure engagement and work participation.

- 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	15	20	Our goal is to have every non-exempt individual engaged as of the date of case opening. Therefore, non-exempt individuals are referred for an employment assessment at intake interview. The appointments are scheduled within 7-10 days of application date. This allows the employment program assistant the opportunity to work with individual to develop the employment plan and determine what supportive services are necessary to be successful. Once the assessment is completed individuals are scheduled for a job search/ job search orientation group. At the time of the job search orientation, an individual, whether Safety Net or Family Assistance, is given two referrals,



<b>Applicant Job Search</b>	<b>Min. Contacts</b>	<b>Min. Hours</b>	<b>Additional Information</b>
			<p>one to a local employment agency and another to Genesee County Career Center. We are currently using a Job Search Log (attached) for the individual to maintain a record of their job search efforts. After the orientation group, individuals are given an appointment to return within one week to see one of the Employment Program Assistants. After the first week, individuals are scheduled to return every 2 weeks for job search appointments. However, the date of eligibility will not be delayed by the job search requirement and will be based on the date the applicant provided all other documentation to establish eligibility.</p> <p>The job search log will be reviewed by the Employment Program Assistant who is responsible for providing supervision of the applicant job search to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply, and interview for a job as well as time spent preparing and sending follow-up materials to an employer. During the job search appointments barriers are discussed and additional referrals are made if necessary. The time is also use for individuals to make calls and follow up with job leads and receive direction and coaching from employment staff on interviewing, resumes etc.</p> <p>Both Family Assistance and Safety Net applicants are either issued gas vouchers or bus passes from RGRTA to complete the search.</p>
SNA Individuals	15	20	See Above

- 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	5	5	All non-exempt Temporary Assistance recipients are required to complete a Job Search using our Job Search Log (attached). Non-exempt recipients typically have already completed the job search orientation group and job search has been initiated prior to the case

Recipient Job Search	Min. Contacts	Min. Hours	Additional Information
			<p>opening. Those individuals will continue to return to see one of the Employment Program Assistants on a bi-weekly basis. SNA recipients must complete at least 10 Job Searches totaling a minimum of 15 hours every week for a maximum of 12 weeks. TANF and SNA MOE recipients must complete at least 5 Job Searches totaling a minimum of 5 hours every week for a maximum of 12 weeks. Both TANF and SNA recipients are either issued gas vouchers or bus passes from RGRTA to complete their search.</p> <p>Employment Program Assistants request individuals to provide verification emails for the jobs they applied for online or through company websites. This is used as a tool to verify job search efforts as most individuals are now applying for jobs virtually. During the bi-weekly visit the recipient's job search log will be reviewed by the Employment Program Assistant who is responsible for providing supervision of the recipient job search to assess the extent to which a reasonable number of contacts were made during the time reported given the amount of time required to identify, apply, and interview for a job as well as time spent preparing and sending follow-up materials to an employer.</p> <p>In combination with job search, a recipient may also be participating in work experience or other approved work activities.</p>
SNA Individuals	10	15	See Above

- 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:

When an individual identifies to the Agency they are participating in self-employment, the Agency will accept all self-employment as an eligible work activity. The hours of eligible participation are determined by the reported self-employment income divided by the federal minimum wage. If the eligible hours are not sufficient to meet the individual's hourly participation requirements, the individual must participate in additional activities. The Agency will re-evaluate the income being generated by the self-employment on a quarterly basis and re-determine if the self-employment will be approved as a work activity.

## 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.

Genesee County DSS staff read the employment requirements script (LDSS-4826C) to individuals upon opening, recertification and when a previously exempt household member or new household member becomes subject to work requirements. A copy of the script is saved in the case file.

- 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**

<b>Yes or No:</b>	<b>How oral information is provided to SNAP applicants and recipients</b>
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.
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):

Genesee County Social Services does not require NTA SNAP applicants or recipients to participate in SNAP E&T work activity assignments. However, Genesee County Social Services does offer Job Search assistance to employable individuals by providing written information on the Genesee County Career Center/Job Development Bureau (JDB) including their location, phone number, and available services.

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

Genesee County Social Services does not require NTA SNAP applicants or recipients to participate in SNAP E&T work activity assignments.

- 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):

At the time of application/recertification eligibility interview, the Social Welfare Examiner verbally advises the NTA/SNAP household of SNAP E&T work requirements. Genesee County utilizes the LDSS-4826C to verbally review this information with the NTA/SNAP household. The 5193A is mailed to household that contain employable individuals. Genesee County DSS does offer Job Search assistance by providing employable individuals with written information on the availability of opportunities through Genesee County Career Center/Job Development Bureau (JDB), community-based organizations, and local education providers. Included in the information is their location, phone number, and available services. Current employment opportunities are also made available to the Social Welfare Examiners on a weekly basis, and they are posted in the waiting areas as well as in the interview rooms.

## 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.

Employment Program assistants conduct an assessment or reassessment with individuals to determine an appropriate SNAP E&T activity, considering the suitability of the individual. Individuals are referred to an appropriate SNAP E&T activity component based on the outcome of the assessment. Additionally, all SNAP E&T participants receive case

management services along with at least one SNAP E&T activity component. The providers are required to notify the agency within 10 days, either verbally or in writing, that an individual is not a good fit for the current placement. Genesee County DSS will in turn notify the individual in writing within 10 calendar days of receiving the notification. The individuals case file will be notated to reflect when the client was informed.

- 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.

Genesee County holds a written and signed agreement with all worksite sponsor agencies (attached). The agreement outlines the providers of their authority and responsibilities. See #14 & #19. Providers use their own policies in determining if an individual is a good fit. Genesee County DSS is notified either in writing or verbally. Due to the longstanding relationships, we have with our providers this has become routine. For non-contracted providers we follow a similar process for informing all providers of their authority and responsibility to determine if an individual is not a good fit for a particular program or activity.

- 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.

Genesee County holds a written and signed agreement with all worksite sponsor agencies. (attached) Providers must have procedures in place to prevent discriminatory practices and ensure provider determinations are fair. See #6 & #10. All providers sign an agreement stating they agree to not violate the Civil Right Non-discrimination Act. For non-contracted providers we follow a similar investigative and oversight process to ensure that provider determinations are not unfair or used to discriminate against protected classes.

## **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 WTWCMS?

No

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

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:

In addition to childcare, Genesee County DSS will provide participants the following expenses, if is determined to be necessary for the individual to participate in assigned work



activities. All supportive services are paid by Genesee County DSS directly to the provider. Applicants and recipients may be entitled to the following:

1. A clothing allowance of up to \$150.00 will be available to clients in need of clothing to participate in their work activity or maintain their employment. The client must provide documentation of the need for the clothing. This allowance can only be used for items necessary for the participation in the program or to maintain their employment.
2. If a client is required to have a license to pursue employment, the fee for the license will be paid at the actual cost not to exceed \$200.00. This may include a driver license, or any other license required by the State.
3. A total not to exceed \$200.00 is available for tools, equipment and miscellaneous items required for employment documented by an employer.
4. Payment will be made directly to the childcare provider for childcare registration fees of up to \$50.00 per child for enrollment of children in licensed childcare centers when such childcare is necessary for the client to participate in employment activities and employment.
5. For those individuals using their own or borrowed vehicle for transportation to employment, Genesee County DSS will initially provide a \$20.00 gas voucher. Additional gas vouchers will be provided based on receipt of individual's first pay and ongoing need. For those individuals using their own or borrowed vehicle for transportation to work related activities, Genesee County DSS will continue to provide gas vouchers to cover individual transportation expense if the individual remains in compliance.
6. Payment for car insurance and car repairs may be made for those enrolled in an employment activity or to maintain their employment. The cost will not exceed \$600.00 for repairs, or the retail value of the vehicle whichever is greater per year per individual and \$500.00 for insurance per year. Clients must use authorized repair shops licensed by the State of New York and must provide at least three estimates.

For Genesee County DSS to consider paying for repairs to a client's vehicle, it is necessary for the following to be submitted:

- Proof of ownership of the vehicle being requested to repair is that of the individual participating in the required activities.
- Proof of employment or compliance in required activities of the individual requesting repairs and/or insurance.
- Proof of valid driver license of the individual requesting repairs and/or insurance.
- Three separate written estimates from New York State approved vehicle repair shops listing all necessary repairs to the vehicle to put it in safe working order. This statement must include a valid DMV Repair Shop Identification Number. If three written estimates cannot be obtained (i.e., the vehicle cannot be driven), the reason why must be documented prior to approval of any repair or towing cost.
- Upon receipt of the three written estimates, Genesee County Employment Unit will review to determine if car repairs can be paid for. Contact must be made to the chosen repair shop to guarantee only those repairs that are listed on the estimate.
- Once the work is completed, the repair shop must submit a bill to Genesee County DSS for payment directly to the repair shop.

- 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**

<b>Yes or No:</b>	<b>Transportation Assistance Provided</b>
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)
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:

Genesee County DSS policy states that an individual may be required to walk to an assigned work activity or to access public transportation, not to exceed two (2) miles each way. Considerations are made for inclement weather conditions, physical limitations, and walking with young children and are made on a case-by-case basis. In these instances, the 2-mile policy would be shortened or even eliminated depending on the situation. In all instances we try to support individuals with transportation needs to the best of our ability given the limited public transportation options available and the rural area that we are located in.

- 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:

Genesee County uses funding from the Transportation Initiative to underwrite auto loans to individuals that may not be able to receive a loan to purchase vehicle otherwise. This program underwrites a loan up to \$4,500 for TANF individuals or TANF eligible non-custodial SNA individuals to purchase a used automobile from a bona fide dealership. This program assists people in rural areas, without public transportation resources, for whom an automobile is necessary to obtain/maintain employment. The individual is responsible to repay the money borrowed at the prime interest rate. Genesee County DSS has a contract with Bank of Castile to provide guaranteed loans. This makes the loan affordable for

individuals. If the individual makes the initial 24 payments of a 36-month loan, Genesee County DSS will forgive the remaining 12 months.

## **7.2 Post-Employment/Transitional Supportive Services**

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

Any of the supportive services listed in Section 7.1(a) are available for up to 90 days after case closing, to individuals whose TA cases have closed due to employment. Each case that is closed on Temporary Assistance due to employment will automatically be evaluated for Transitional Medicaid and TBA SNAP. Information about applying on the NY State of Health website is shared with individuals who are not Medicaid eligible.

All individuals in receipt of childcare will be evaluated for eligibility for transitional childcare. Any case not eligible for transitional childcare will be referred to our childcare Unit. Our goal is to ensure seamless childcare services for all households who enter employment. Genesee County uses funding from the Transportation Initiative to underwrite auto loans to individuals that may not be able to receive a loan to purchase vehicle otherwise. This program underwrites a loan up to \$4,500 for TANF individuals or TANF eligible non-custodial SNA individuals to purchase a used automobile from a bona fide dealership. This program assists people in rural areas, without public transportation resources, for whom an automobile is necessary to obtain/maintain employment. The individual is responsible to repay the money borrowed at the prime interest rate. Genesee County DSS has a contract with Bank of Castile to provide guaranteed loans. This makes the loan affordable for individuals. If the individual makes the initial 24 payments of a 36-month loan, Genesee County DSS will forgive the remaining 12 months.

- 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:

Genesee County DSS's Employment Unit has one Coordinator and two Employment Program Assistants who work with individuals whose Temporary Assistance cases have closed due to employment. They will assist individuals in working out any employment issue that may arise including but not limited to:

- Difficulty with work schedule
- Interrelationship problems with co-workers or supervisors
- Childcare issues
- Transportation problems
- Incumbent worker training/skill upgrades

### 7.3 Extended Support Services

a. Described below are the support services the district will provide for individuals who are eligible under the TANF Services 200% of poverty eligibility guidelines. These services can be provided as long as funding is available (FFFS, etc.):

- Car repair or insurance
- Work clothes
- Other one-time work-related expenses deemed appropriate
- Case Management

## 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:

Temporary Assistance recipients who may have failed or refused to comply with their work activity assignment will be provided an opportunity for conciliation. Genesee County DSS's conciliation process is as follows:

Genesee County DSS issues the WTCMS Conciliation Notice to all Temporary Assistance recipients who refused or failed to comply with a work activity. The Conciliation process gives the individual a chance to provide good cause reasons for failure to comply. The recipient must respond within the required timeframe, currently 10 days. The designated Employment Program Assistant will be listed as the contact person.

The Conciliation session can either be a face-to-face meeting or contact by phone based on the preference of the recipient. It is the individual's responsibility to provide Genesee County DSS with an explanation of why he/she had good cause for failure to comply. The individual is given the chance to present all relevant evidence at the conciliation. Genesee County DSS will then consider the facts and circumstances, including information submitted by the client, and determine if the non-compliance was willful and without good cause. Individuals who demonstrate that the non-compliance was not willful, had good cause, or document an exemption from Temporary Assistance requirements, would not be subject to a Temporary Assistance employment sanction. If Genesee County DSS determines the non-compliance was willful and without good cause, Genesee County DSS will issue a

notice of denial or a ten-day notice of intent to discontinue or reduce Temporary Assistance. Typically, within fourteen days from completion of the conciliation process, issuance of the notice will take place.

If the individual does not contact the Employment Program Assistant or Coordinator within the required time period, Genesee County DSS will then consider the facts and circumstances of all known, relevant information and determine if the non-compliance was willful and without good cause. If Genesee County DSS determines the non-compliance was willful and without good cause, Genesee County DSS will issue a notice of denial or a ten-day notice of intent to discontinue or reduce temporary assistance.

- 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**

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
Yes	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**

<b>Yes or No:</b>	<b>How conciliation is conducted</b>
Yes	In person
Yes	By phone
Yes	By mail

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

Genesee County DSS issues the WTWCMS Conciliation Notice to all SNAP recipients who failed to comply with an assigned SNAP work activity. The Conciliation process gives the individual a chance to document good cause or an exemption from participation in SNAP work activities. SNAP individuals will be given ten days to respond. The designated Employment Program Assistant will be listed as the contact person.

The Conciliation session can either be a face-to-face meeting or a phone contact based on the preference of the recipient. It is the individual's responsibility to provide Genesee County DSS with an explanation of why he/she failed to comply or has an exemption from participation. The individual is given the chance to present all relevant evidence at the conciliation. Genesee County DSS will then consider the facts and circumstances, including information submitted by the client. Individuals who demonstrate that the non-compliance

was not willful, had good cause, or document an exemption from SNAP requirements, or demonstrate compliance with SNAP work requirements as assigned by the district would not be subject to a SNAP employment sanction.

If the individual does not contact the Employment Program Assistant or Coordinator within the required time period, Genesee County DSS will then consider the facts and circumstances of all known, relevant information and determine if the non-compliance was willful and without good cause. If Genesee County DSS determines the non-compliance was willful and without good cause, Genesee County DSS will issue a notice of denial or a ten-day notice of intent to discontinue or reduce Supplemental Nutrition Assistance Program benefits.

- 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**

<b>Yes or No:</b>	<b>Who makes the TA good cause/willfulness determination?</b>
Yes	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 district's procedure for engaging SNAP recipients in a work activity to demonstrate compliance to avoid a SNAP E&T related sanction is:

The conciliation notice is generated via WTWCMS and will inform the individual of the opportunity to request conciliation and include language to inform the individual of the ability to avoid the SNAP sanction by demonstrating compliance with an assigned SNAP work activity. Genesee County DSS instructs individuals to contact Genesee County DSS for information on the action that must be taken to demonstrate compliance and avoid a SNAP work related sanction. Included with the conciliation notice will be a job search log. If contact is made, the individual will be instructed to conduct ten hours of a supervised job search within a one-week time frame and record their efforts on the enclosed job search log. The individual will be given an appointment time one week into the future to meet with their Employment Program Assistant to review compliance with the assigned SNAP work activity. If the individual completed the assigned work activity and demonstrated compliance, no SNAP sanction would be imposed.

## 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:

In accordance with 09-ADM-20, as soon as 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. In all instances, the time period established for demonstrating compliance to the satisfaction of the district will not exceed ten business days.

Our district's procedure for individuals sanctioned until compliance consists of the disqualified (or sanctioned) individual participation in the work activities per Section 4 as assigned by the Agency.

Our district's procedure for an individual to show compliance, once the duration has been satisfied, is the same as above.

For those individuals who are unable to participate in work activities, or claiming to be unable to participate, they also have a time period for demonstrating compliance to the satisfaction of the district not to exceed ten business days. In this instance, if an individual who is unable to work is complying with efforts to determine employability during the 10-day period, the individual would be determined to be compliant and would have his/her benefits restored retroactive to the date the individual claimed to be unable to participate in work activities even if the disability/employability review procedure has not been completed for the first such failure. For individuals who are subject to a durational sanction period who document an exemption from work requirements they must first serve the minimal duration period before benefits are restored. If an individual fails to comply with the disability review procedure to verify the claimed impairment, Temporary Assistance benefits are discontinued (case is closed) consistent with the requirements of 18 NYCRR 385.2(d)(4) and 18 NYCRR 351.

Note: Non-exempt Temporary Assistance applicants who have completed the minimum durational sanction period required by 18 NYCRR 385.12 at the time of application for Temporary Assistance benefits are subject to TA applicant employment requirements as described in Section 5 to the same extent as other non-exempt TA applicants.

- 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:

In accordance with 09-ADM-20, individuals disqualified for SNAP due to an employment sanction may be added back to the household and SNAP benefits re-determined upon the conclusion of the minimum disqualification period once the household requests the individual be added to the household and the disqualified (or sanctioned) individual complies with the work activity assigned by the district. The time period established for demonstrating compliance to the satisfaction of the district will not exceed ten business days. Those SNAP individuals subject to applicant eligibility requirements are not required to demonstrate compliance.

Individuals may reestablish SNAP eligibility during the sanction period if the household requests the individual be included back in the household and the individual is determined by the district to be exempt from participation in SNAP work requirements for reasons other than he/she is participating in TANF work activities or is in receipt of Unemployment Insurance Benefits.

### 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**

<b>Yes or No:</b>	<b>How the district determines an individual's disabilities and/or work limitation</b>
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.
Yes	<p>Other process: At the time of application, recertification, or any other time during an individual's certification period, Genesee County DSS must evaluate whether an applicant/recipient has any medical conditions that would limit their ability to participate in work activities. If medical conditions are indicated by the applicant/recipient, Genesee County DSS advises the individual that they must provide medical documentation within ten calendar days. Extensions may be given based on the availability of the provider to complete required information. Genesee County DSS staff assigned to the Employment Unit reviews the medical information and determines whether the information submitted is sufficient evidence to support the alleged impairment. If there are any questions, Genesee County DSS will contact the medical provider for clarifications or may send a supplemental work status report form.</p> <p>Genesee County DSS reserves the right to refer an individual to Industrial Medical Associates (IMA) to help clarify disability status and determine whether the individual can recover from a mental or physical impairment and be restored to self-sufficiency.</p> <p>Exempt individuals who in the judgement of Genesee County DSS do not have the potential to be restored to self-sufficiency are generally required to apply for SSI benefits.</p> <p>As part of the disability review process, Genesee County DSS will review work limitations prior to work activity placement. Genesee County DSS will notify the worksite supervisor in writing of any work limitations and will verify compliance with work limitations at each worksite. If reasonable accommodation cannot be made, Genesee County DSS will find a worksite where accommodations can be made or waive the individual's work requirement until such time an appropriate worksite becomes available.</p>

- 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:

After a determination is made Genesee County DSS will notify the individual in writing of the disability determination using the LDSS-4005 or LDSS 4005(a).

- 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
Yes	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):
No	Other process:

**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
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.).

Genesee County DSS staff assigned to the Employment Unit reviews the medical information (LDSS-4526) and determines whether the information submitted is sufficient evidence to support whether the individual can recover from mental or physical impairment and be restored to self-sufficiency through treatment or other rehabilitation. If there are any questions, Genesee County DSS will request that participant provide additional information from their practitioner or submit to an examination by Industrial Medical Associates (IMA) to help clarify.

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

If medical documentation indicates that an individual can recover from mental or physical impairment and be restored to self-sufficiency through treatment or other rehabilitation, Genesee County DSS will request that participant accept the recommended medical care to assist the individual in recovering from a mental or physical impairment or accept the recommended vocational rehabilitation program, training, or other essential rehabilitation. The participant is given 10 days to provide evidence of such.

- 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.

Genesee County DSS staff assigned to the Employment Unit follow up on a monthly or on an as needed basis to verify compliance with recommended treatment and/or rehabilitation. Genesee County DSS has an internal monitoring system with Genesee County Mental Health to assist with confirming ongoing participant compliance. Genesee County DSS requests Substance Abuse Treatment Progress reports from treatment providers to assist with confirming ongoing participant compliance. Progress reports are received whenever necessary but no less than quarterly.

## **10. District Certification**

### **10.1 Certification**

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

1/12/2024  
Carla Mindler  
Commissioner