

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

January 1, 2020 – December 31, 2021

## **Genesee County**

# Contents

<b>Section 1- Assurances .....</b>	<b>3</b>
<b>Section 2 Administration .....</b>	<b>5</b>
Section 2.1 Administrative Structure .....	5
Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies .....	6
Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services.....	6
Table 2 – Other Service Providers.....	7
Section 2.3 OTDA Jobs Staff Agreement.....	8
OTDA Jobs Program Services – Target Groups.....	8
Other Services Requested.....	8
Section 2.4 Access to Services at New York State Career Centers .....	8
<b>Section 3 Engagement and Work Preparation.....</b>	<b>10</b>
Section 3.1 Federal “Engaged in Work” Requirement (Reference 18 NYCRR 385.2 (f)) .....	10
Section 3.2 Orientation (Reference 18 NYCRR 385.5).....	10
Section 3.3 Assessment and Employment Planning.....	11
TA Assessment.....	11
TA Employment Plan .....	12
Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9).....	13
Section 3.5 Job Development .....	21
Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9) .....	21
Section 3.7 Work Verification .....	25
The Quality Assurance (QA) plan include the following elements: .....	26
The District’s Quality Assurance Process is as follows:.....	26
Use of Outside Providers/Vendors.....	27
Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency .....	27
Section 3.9 Strategies/Procedures for Increasing Program Attendance .....	27
Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants.....	28
Section 3.11 Strategies for reducing the need for TA .....	28
<b>Section 4 Support Services .....</b>	<b>28</b>
Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District .....	28
Section 4.2 Transitional Support Services .....	32
Section 4.3 Extended Support Services.....	33
<b>Section 5 Conciliation, Sanction and Dispute Resolution Procedures .....</b>	<b>33</b>
Section 5.1 Conciliation.....	33
Section 5.2 Sanctions.....	35
Section 5.3 Dispute Resolution .....	36
<b>Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals.....</b>	<b>37</b>
Section 6.1 Disability Determination Process and Tools.....	37
Section 6.2 Mental Health Screening and Assessment .....	38
Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e)).....	38

## **Section 1- Assurances**

As a condition of the receipt of federal and State funds the Genesee County Department of Social Services submits this Temporary Assistance (TA) and Supplemental Nutrition Assistance Program (SNAP) Employment Plan (Plan) to the New York State Office of Temporary and Disability Assistance. The Plan outlines the administration of employment services for TA and SNAP applicants and recipients for the period January 1, 2020 through December 31, 2021. As Commissioner of Genesee County Department of Social Services, I hereby affirm that employment services programs will be administered in accordance with all applicable federal and State policies, laws, regulations and provisions of this Plan.

/s/ DAR            12/30/19

David A. Rumsey, Social Services Commissioner

December 30, 2019, Date

Amendments to this Plan:

Date Approved OTDA	Section(s) Amended

(To be completed by OTDA)

## **Section 2 Administration**

### **Section 2.1 Administrative Structure**

This agency's organizational chart is attached. It identifies the units and staff within the agency that are involved in the operation of the district's employment program.

Following 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. The responsibilities of each office are described below.

The operation of the Employment Program in Genesee County is a collaborative effort between a number of 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. Genesee County DSS also utilizes a Director of Financial Services, four Principal Social Welfare Examiners, two 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 potential hurdles to self-sufficiency and assist families to overcome these hurdles. Supportive Services are utilized in an effort 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, and work activity 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 uses Industrial Medical Associates (IMA) on a case-by-case basis to help 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 practitioner's report within five business days from the initial appointment. The practitioner's report includes written diagnosis based on medically appropriate tests or evaluations conducted regarding the alleged impairments. The practitioner's report also lists any other conditions discovered during the evaluation which would affect the individual's participation in work activities.

## Section 2.2 TA and SNAP Employment & Training (SNAP E&T) Provider Agencies

**Table 1 - Contracts Associated with TA and SNAP Employment Programs and Services**

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 assessments 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 oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts.

<b>Provider</b>	<b>Total Contract Cost (per year)</b>	<b>Funding Source(s) (Check all that apply)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Genesee County Career Center (JDB)	\$42,940.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Working to Success job readiness training to obtain/retain employment as well as Job Search opportunities.
Genesee Council on Alcoholism and Substance Abuse (GCASA)	\$22,800.00	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Complete assesments to determine if ongoing treatment is necessary. Also, to assist with employability determination if not employable due to substance use.
Industrial Medical Associates (IMA)	\$126.06/visit	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	To complete an independent evaluation of an individual's medical diagnosis. Also, to assist DSS to clarify medical conditions and recommended treatment.
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
	\$0	<input type="checkbox"/> FFFS <input type="checkbox"/> SNAP E&T <input type="checkbox"/> Local <input type="checkbox"/> Other	<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

**Table 2 – Other Service Providers**

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

<b>Provider</b>	<b>Funding Source(s) (if known)</b>	<b>Categories of Clients Served (Check all that apply)</b>	<b>Programs, Services or Activities Provided</b>
Genesee Valley Educational Partnership		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	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 and Continuing Education Services-Vocational Rehabilitation (ACCES-VR)		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Referrals are given by DSS to provide applicants and recipients to assist individuals with disabilities to achieve and maintain employment through training, education, rehabilitation, and career development.
Independent Living of the Genesee Region		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	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 Security Administration for eligible adults.
Early Head Start-Child Care Partnerships		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Referrals are given by DSS to provide applicants and recipients with information on how Early Head Start-Child Care Partnerships can enhance current child care programs by adding additional supports for eligible infants and toddlers.
CORE-The Learning Center		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	Referrals are given by DSS to provide applicants and recipients with adult educational programs, High School Equivalency (HSE), English classes, and Career Services.
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	
		<input type="checkbox"/> FA <input type="checkbox"/> SNA Family <input type="checkbox"/> SNA Individual <input type="checkbox"/> SNAP <input type="checkbox"/> TANF 200%	

### Section 2.3 OTDA Jobs Staff Agreement

#### OTDA Jobs Program Services – Target Groups

(“X” signifies those that apply in this district)

<b>Services</b>		<b>Target Groups</b>	
Assessment/Employment Plan	=	Applicants	=
Supervised Job Search	=	FA & SNA with children	=
Job Readiness Training	=	SNA without Children	=
Job Club	=	SNAP	=
Job Placement Services	=	TANF 200%	=
Grant Diversion	=		
Job Development (employer outreach)	=		
WOTC pre-certifications	=		

#### Other Services Requested

Described below are additional services/duties which will be requested of Jobs staff (e.g. WTWCMS data entry, case conferencing, job fairs)

Genesee County DSS does not have an OTDA Jobs staff.

### Section 2.4 Access to Services at New York State Career Centers

In New York State, TANF is a required WIOA partner and must coordinate access to TANF services with the comprehensive Career Centers.

a. Below is a description of how the district provides access to its programs and services with Career Center partners. Check all that apply:

- The district has employee(s) physically present at a Career Center
- The district has contract staff physically present at a Career Center
- The district makes available direct access to its program staff via phone or technology at a Career Center
- The district makes available copies of the LDSS-2921 (Common Application) at a Career Center

Other:

b. Please provide a description of how the district coordinates with Career Center partners with providing 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 dated October 20, 2017.

- 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 is an active participant 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.

## **Section 3 Engagement and Work Preparation**

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

For purposes of satisfying the federal requirement which states 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, 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 3.4. Also included is pursuit of other forms of income such as SSI and SSDI.

Include any additional information regarding the district’s local “engaged in work” requirements:

No additional information.

### **Section 3.2 Orientation (Reference 18 NYCRR 385.5)**

Check one of the following:

The district provides orientation in accordance with 18 NYCRR Section 385.5 and no additional information is provided at orientation.

In addition to the requirements outlined in 18 NYCRR Section 385.5 of the regulations, the district’s orientation provides the following:

The participant’s obligations to participate in all scheduled activities.

The procedure to follow up if the participant has a conflict or cannot attend a scheduled appointment or activity, including contact phone numbers.

Notification of client’s responsibility to participate in Work Experience.

Scheduling of the Assessment/Employability Plan.

Provide a sign off sheet which clearly states requirements regarding time limits and school attendance for teen parents.

Direct contact with DSS employment workers to immediately initiate the process to reduce or eliminate potential barriers to employment.

Notification of available supportive/transitional services along with various resources available to address the individual’s barriers or personal needs.

Described below is the manner in which the district completes the required orientation for all applicants and recipients of TA (e.g. in a group setting, individually, or a combination of both), including the orientation procedure for exempt individuals and non-exempt individuals, if different:

For non-exempt individuals, the Orientation information is provided during the course of the Job Search Orientation presentation in a group setting by Employment Unit staff. The group Orientation is offered twice a week. 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. We have added the Orientation information to our recertification packet/process to ensure all recipients have this information at the time of recertification.

### **Section 3.3 Assessment and Employment Planning**

#### **TA Assessment**

(Reference 18 NYCRR 385.6 and 385.7)

Check one of the following:

a. The district conducts assessments as required by 18 NYCRR 385.6(a) and 385.7(a):

The district enters assessments directly into WTCMS

The district uses the LDSS 4980 (New York State Assessment) and later enters information into WTCMS.

The district conducts assessments using a local equivalent tool, and later enters information into WTCMS. Attached is the local equivalent.

The local equivalent does not contain additional elements other than what is required.

The local equivalent does contain additional elements beyond what is required, listed below:

b. Describe the district procedure for the completion of an employment assessment:

At initial eligibility, all adults in households with dependent children, including 16 and 17-year olds not in school, receive a staff assisted assessment within 90 days of their eligibility. Additionally, households without dependent children receive assessments within a year following their application. 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 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 support service needs. This reevaluation in participant's work status and activity assignment will be conducted at least annually.

c. The district administrative unit or contractor responsible for conducting assessments is:

Genesee County Department of Social Services Employment Unit.

- d. The qualifications of the employees conducting the assessment are at minimum: [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. Applicants in households **with** dependent children are required to participate in completion of an assessment:

Yes       No

- f. Applicants in households **without** dependent children are required to participate in completion of an assessment:

Yes       No

- g. **Exempt** adults in households **without** dependent children are required to participate in the completion of an assessment:

Yes       No

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

Genesee County DSS updates assessments at the time of application and recertification. Assessments are also updated whenever changes in 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.

### Temporary Assistance Employment Plan

(Reference 18 NYCRR 385.6 and 385.7)

- a. Check one of the following:

The district develops individual employment plans as required by 18 NYCRR 385.6(a) and 385.7(a):

The district enters employment plans directly into WTCMS.

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

The district develops individual employment plans using a local equivalent tool and later enters information into WTCMS. Attached is the local equivalent.

The local equivalent **does not** contain additional elements other than what is required.

The local equivalent **does** contain additional elements beyond what is required, listed below:

b. Check one of the following:

— The same administrative unit or contractor that conducts employment assessments also develops employment plans.

— A different district administrative unit or contractor develops employment plans, and their qualifications include

c. Describe 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 non-exempt 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. Assigned work activities will be reviewed with the client along with providing information on supportive services which can be provided to assist with their success. 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, the individual will participate in creating.

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

Genesee County DSS updates Employment Plans at the time of application and recertification. Employment Plans are also updated whenever changes in 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, Employment Plans are updated yearly.

### **Section 3.4 Participation Rates and Work Activities (Reference 18 NYCRR 385.8 and 385.9)**

a. Describe below how the district plans to meet federal and State TA participation rate requirements. Included is the weekly hours standard participation requirement 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 who status changed from exempt to nonexempt. Information regarding engaging exempt individuals is entered in Section 6:

The District's Plan will include:

- Work Experience

- Job Search

- Vocational/Educational Activities

- Sanctioned individuals, beyond duration, are brought in no more frequently than once per month for an appointment with their Employment Program Assistant. During this appointment, information is reviewed regarding the benefits of employment and supportive services which are available to succeed.

- Job Readiness/Working to Success program

Our goal is to have every non-exempt individual engaged as of the date of case opening. Therefore, non-exempt individuals are invited into a job search orientation group within the first five days from application date. 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 have them engaged in work activities as soon as supportive services are in place which is within five to seven days. 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:

	<b>Households with Dependent Children Average Monthly</b>	<b>Households without Dependent Children Average Monthly</b>
Individuals	19	22

- c. Describe below 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 have access to the various COGNOS reports and frequently run them in order to get up to date information on individual participation, coding, and to compare information entered in WTWCMS vs ABEL.

- d. Describe the extent to which the district requires Non-Temporary Assistance Supplemental Nutrition Assistance Program (NTA SNAP) recipients to participate in SNAP E&T work activities. If the district is offering Supervised Job Search as an E&T activity component, the district must describe how the job search activity will be supervised and tracked, including the frequency of monitoring the participant’s job search efforts. (Please note: Case management services must be provided to all participants enrolled in an 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 by providing the individual with written information on the Genesee County Career Center/Job Development Bureau (JDB) including their location, phone number, and available services.

If the district is not mandating SNAP E&T work activity assignments, please describe 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 make available job search as a SNAP E&T activity 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-4826B to verbally review this information with the NTA/SNAP household. Genesee County DSS does offer Job Search assistance by providing the individual with written information on the Genesee County Career Center/Job Development Bureau (JDB) including 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.

- e. Describe the district procedure for Job Search, including the required number of job search contacts and hours per week assigned. Also 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:

1. The district assigns TA **applicants** to Job Search.       Yes    No

If yes, the process for engaging TA **applicants** is:

Our goal is to have every non-exempt individual engaged as of the date of case opening. Therefore, non-exempt individuals are invited into a job search orientation group within the first five days from application date. At the time of the job search orientation, an individual, whether Safety Net or Family Assistance, is given two job referrals to local employment agencies. 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. The process repeats once for Family Assistance applicants and twice for Safety Net applicants. However, the date of eligibility for the Family Assistance case 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.

Genesee County Social Services samples all job search logs by sending out a letter to 20% of the listed job contacts to confirm that the recipient did make contacts as listed. 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.

In combination with the last week of the applicant job search, Genesee County requires all Family Assistance and Safety Net applicants to participate in our Job Readiness Program. The Job Readiness Program hours will count towards the required 15 hours per week for SNA and TANF.

Both TANF and SNA applicants are either issued gas vouchers or bus passes from RGRTA to complete the search.

Applicant Job Search	Minimum Number of Contacts	Minimum Number of Hours	Additional Information
TANF and SNA MOE	15	20	
SNA Individuals	15	20	

2. The district assigns TA **recipients** to Job Search.  Yes  No

If yes, the process for engaging TA **recipients** is:

All non-exempt Temporary Assistance recipients are required to complete a Job Search using our Job Search Log (attached). Non-exempt recipients, are invited into job search orientation group to initiate the process if not already engaged in job search at the time of case opening. Those individuals will return to see one of the Employment Program Assistants on a weekly basis. SNA recipients must complete at least 10 Job Searches totaling a minimum of 15 hours every week. TANF and SNA MOE recipients must complete at least 5 Job Searches totaling a minimum of 5 hours every week. Both TANF and SNA recipients are either issued gas vouchers or bus passes from RGRTA to complete their search.

Genesee County Social Services samples all job search logs by sending out a letter to 20% of the listed job contacts to confirm that the recipient did make contacts as listed. The 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.

In combination with job search, a recipient may also be participating in work experience or other approved work activities.

- f. Describe the district’s process and policy, including the guidelines workers follow, when determining whether participation in self-employment is approved as part of an individual’s required work activities. 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 higher of the federal or state minimum wage. If the eligible hours are not sufficient to meet the individual's hourly participation requirements as described in Section 3.4, 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.

- g. The allowable work activities that are available in the social services district are listed and defined in the table on the next two pages. An "X" in the appropriate check box indicates the activity is available for individuals receiving Family Assistance (FA), Safety Net Assistance for households with children (SNA Fam), Safety Net Assistance for households without children (SNA IND), and/or Supplemental Nutrition Assistance Program (SNAP) benefits. A blank check box indicates the activity is not available for that case type.

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<p><b>Unsubsidized Employment</b> - Full time or part time employment in the public or private sector that is not subsidized by TANF or any other public program (excluding employer tax credits). Unsubsidized employment includes self-employment and/or paid internships.</p>
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li><input type="checkbox"/> FA</li> <li><input type="checkbox"/> SNA Fam</li> <li><input type="checkbox"/> SNA Ind</li> <li><input type="checkbox"/> SNAP</li> </ul>	<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>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>In addition to those components noted above, work experience will include unpaid internships that are part of any non-graduate student’s education curriculum. (Note: Paid internships are to be reported as employment.)</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>On-the-Job Training (OJT)</b> - Training in a public or private sector employment setting during which the participant receives work-essential paid training while he or she is engaged in productive work that provides the knowledge and skills essential to attain full and adequate performance of the job.</p> <p>OJT will be unsubsidized (for which the employer does not receive a subsidy) or subsidized using TANF funds or other funds to offset the cost of the training provided to the participant. A subsidized OJT will be subsidized for up to the full cost of providing such training and wages/benefits provided to the program participant. Positions will be subsidized for the length of time determined appropriate by the State or social services district. OJT is distinct from subsidized employment since the individual must participate in workplace training to attain full and adequate job performance and the subsidy provided is intended to offset the cost of such training.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Community Service</b> - A structured program in which participants perform work for the direct benefit of the community under the auspices of public or nonprofit organizations. Community service placements must be projects that serve a useful community purpose in fields such as health, social services, environmental protection, education, urban and rural redevelopment, welfare, public recreation, public facilities, public safety, and childcare. Community service programs are designed to improve the employability of participants not otherwise able to obtain unsubsidized employment. Participation in community service may include training that is directly required for the participant to complete the community service assignment. For example, an individual who is expected to provide clerical support to a food pantry may be provided training to develop or refine filing and data entry skills.</p> <p>Community service assignments will primarily be voluntary in nature including participation in VISTA, AmeriCorps, and unpaid volunteer activities at a school, Head Start programs, religious or faith-based institutions, community organizations or a nonprofit or public agency but will also include such mandated participation when court ordered. Participation in activities to support these organizations is deemed to provide a service to the community. In those instances, where the participation could meet the federal definition of work experience or community service and the district or program provider would like to have another recipient provide childcare for the community service individual, such hours of work may be reported as participation in community service.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— SNAP</li> </ul>	<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>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>Traditional JRT activities will include: resume preparation, training in interview skills, instruction in workplace expectations, training in effective job seeking, life skills essential to workplace success, time management, goal setting, budgeting, basic math and literacy skills, household management, interpersonal skills, decision making skills, anger management, parenting skills when it has been determined that such training could help reduce unplanned work leave or apprehension toward entering employment.</p> <p>For TANF and SNA MOE funded families, JRT also includes substance abuse and other treatment and rehabilitative services that are required for individuals who are unable to work or individuals whose employability and employment retention requires such services. Such services, which should be reported on WTWCMS as such, will be deemed within WRTS participation rate logic to be JRT for recipients of TANF and SNA MOE funding but will be deemed to be Community Service for recipients of SNA non-MOE, include:</p> <ul style="list-style-type: none"> <li>• Physical health treatment and rehabilitation services including attending necessary physical therapy, and doctor appointments. Such treatment will include medical, behavioral and other treatment necessary for individuals suffering from substance abuse (current and former users) with such required treatment ranging from detoxification services to after care/abstinence maintenance.</li> <li>• Mental health services including therapy, counseling, and other services to address mental or emotional disorders that can interfere with an individual's daily life functions, ability to work, looking for work or the ability to retain employment.</li> </ul>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>

<b>Activity and Definition</b>	
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Education Training</b> - Education directly related to employment for a recipient who has not received a high school diploma or equivalency must be related to a specific occupation, job or job offer or otherwise determined based on a client assessment as necessary to improve the participant’s employability to support job entry, retention or advancement. Education directly related to employment may include courses designed to provide the knowledge and skills for general or specific occupations or work settings to ensure clients have the basic skills competencies required by employers and may also include adult basic education, ESL instruction and education leading to a high school equivalency diploma as determined as necessary to improve the participant’s job opportunities in potential occupations. Where identified as needed such training may include the development of basic workplace skills including professional workplace behaviors and decision-making skills.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<p><b>Secondary School</b> - Regular attendance in accordance with the requirements of the secondary school or a course of study at a secondary school or other State accredited institution leading to a high school equivalence (HSE) diploma, in the case of a recipient who has not completed secondary school or received a certificate of general equivalence. Secondary school participation may include general adult basic education or ESL if it is linked to attending secondary school or leading to a HSE diploma as determined necessary by the educational institution. Secondary School or HSE programs that routinely include ESL, career training, alternative school, tutoring, dropout prevention, teen pregnancy or parenting programs as a requirement of program participation as determined by the educational institution will also be permitted.</p>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>
<ul style="list-style-type: none"> <li>— FA</li> <li>— SNA Fam</li> <li>— SNA Ind</li> <li>— SNAP</li> </ul>	<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>

### Section 3.5 Job Development

The district conducts or accesses job development services to expand job opportunities for TA and SNAP participants.       Yes       No

If yes, the district participates in job development activities in the following manner:

District staff contacts employers to solicit jobs for TA and SNAP participants.

Below is the description of how this is done, including number of staff, frequency of contacts, etc.:

Genesee County DSS Employment Program Assistants (3) utilize scheduled visits to Genesee County employers as well as cold visits/calls as job development. Employment Program Assistants utilize local temporary employment agencies with weekly contact for current opportunities. 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 and tax incentives that may be available.

Information is also obtained and made available utilizing advertisements, local newspapers and flyers regarding current employment opportunities.

District contracts or has an agreement with another agency to contact employers and solicit jobs for TA and/or SNAP participants. Below is the description of how this is done, including number of staff, frequency of contacts.

OTDA Jobs Program staff are charged with job development as indicated in section 2.3. Additional information, if any, is described below:

### Section 3.6 Training Approval and Activity Enrollment Policies (Reference 18 NYCRR 385.9)

- a. Describe how the district identifies appropriate education program providers for services of Adult Basic Education, 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:

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- The Learning Center provide Equivalency Diploma training to our residents. CORE-The 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. Describe 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:

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 (eg. ACCESS/VR, Assisted Competitive Employment, Genesee Valley Educational Program, Genesee County Career Center/Job Development). Many times, Vocational Education and Job Skills training programs are paid by WIOA or ACCESS/VR.

The Employment Program Assistant will make every effort to identify a work experience placements that supports the individual's job interests and goals.

- c. Describe the process and guideline 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:

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 will allow the Employment Program Assistant to inform the individual of the option to participate in educational activities in conjunction with their work activity and describe how improving literacy levels would increase their job opportunities. If appropriate, this may be a requirement in the individual's Employment Plan.

- d. Describe the district's process and policy, including the guideline 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 agency 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.
- Review the availability of local educational programs that would permit the individual to also be assigned to a work-based activity in order to meet federal and state work participation requirements.

- In most instances, if an individual expresses an interest in enrollment in an educational program and that program meets the above mentioned guidelines, the District will encourage and offer the non-exempt individual the opportunity to participate. For individuals who are not consistently participating in a minimum of 20 hours averaged weekly in a core activity, participation in an educational activity as part of the individuals work requirement, may be denied.
- e. Describe the district's process and policy for determining whether a participant is approved/assigned to participate in job skills or vocational education activities:  
For non-exempt individuals whose 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 will be approved and assigned to participate.
- f. Describe the highest level of post-secondary level education that the district will approve as a work activity, up to a four-year college program:  
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.
- g. Describe how the district will ensure that enrollments in post-secondary education beyond the 12-month lifetime limit are combined with a weekly average of at least 20 hours in paid employment activities which may include work study, work experience or community service:  
The Employment Program Assistants work closely with their caseload to monitor activities and will utilize COGNOS/WTWCMS reports. Employment Program Assistants also ensure that individuals who are beyond their 12-month lifetime limit are fulfilling participation requirements through employment or are assigned to 20 hours countable core activities.
- h. Education and training providers are evaluated by the following standards:
- Compliance with all regulations stipulated in contract or agreement.
  - Placement rates which exceed 80% for the training provided.
  - 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.
- i. The district procedure for advising participants of approved training providers is:
- Work with individuals in identifying their needs.
  - Provide individuals with a list of providers that may help in meeting their needs (e.g. ACCESS-VR, Assisted Competitive Employment, Community College, Genesee Valley Educational Program, etc).

- j. The district procedure for notifying participants of approval for training or enrollment in a work activity is:

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.

- k. In accordance with 18 NYCRR 385.9(b), regardless of whether the college program is approved for the participant as an employment work activity, the district will approve as a work activity a work-study, internship, externship or other work placement that is part of a non-graduate student's curriculum unless one or more of the following conditions applies as checked below:

— It has been determined that the student voluntarily quit a job or reduced earnings to qualify for initial or increased TA.

— A job or on-the-job training position that is comparable to the work-study, internship, externship or other work placement cannot reasonably be expected to exist in the private, public or not-for-profit sector.

— The student is not maintaining a cumulative C average (or the equivalent). The district may disregard this provision if the student documents an undue hardship.

— The institution or student fails to monitor and report information regarding the student's attendance and performance as required.

— The student fails to progress toward the completion of a course of study without good cause, as determined by the district.

— The student has previously enrolled in work-study, internship, or other work placement and failed to complete the work placement without good cause as determined by the district.

— Additional reasons as stated below:

Genesee County DSS makes a reasonable effort to not assign a non-graduate student to work activities during hours that conflict with the student's academic schedule. In attempting to schedule work activity assignments around academic schedules, Genesee County DSS may not always find it possible to enroll individuals in activities for the number of hours required to meet work participation rates or to enroll individuals in activities that Genesee County DSS believes are necessary for the individual to achieve self-sufficiency. Therefore, if a required work activity assignment is only available during hours that conflict with the student's academic schedule, Genesee County DSS may assign the student to that work activity even though the assignment conflicts with the academic schedule.

Genesee County DSS makes a reasonable effort to assign recipients who are students to work experience sites within a reasonable proximity to campus when on-campus is not available.



- I. To verify continued exempt status, the district will monitor the high school attendance of 16-18 year old students in the following manner:  
Teens enrolled and participating in school on a full-time basis will be monitored through the use of 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.
  
- m. The district's procedure for ensuring that an individual's health related limitations are accommodated when assigning the individual to a work activity is:  
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 the limitation.

### **Section 3.7 Work Verification**

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

Each district must describe how it will conduct periodic self audits to determine that system entries are consistent with documentation in case files. The district must also explain how it will choose the sample size, select sample cases and establish the review period (no less frequently than semi-annually). The plan must indicate the district will maintain documentation on all pertinent findings produced through its self audit process and that case records for all reviewed cases will be available for State and other auditors in their review of the local work verification system for the standard 6 year period associated with such reviews.

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

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

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

- Ensure that documentation of wages and actual hours of employment is verified and accurately projected/reported and present in the case file, is actual and is projected correctly;
- Ensure that the documentation for actual hours, supervision/attendance, excused absences, and holidays in other activities is present in the case file;
- Assess whether participation in the work activities reported for work eligible individuals meets the approved federal definition for the activity;
- Assess that the data entered into either WTWCMS, NYCWAY or other automated systems used for reporting work activities is accurate, including actual hours, excused absences and holidays; and is based on documentation in the case record; and
- Ensure that documentation necessary to determine an individual to be exempt due to being the parent caretaker of a disabled household member (Employability Code 38 or 48), and/or parent or caretaker relative of a child in the household under 12 months of age, (Employability code 31), is present in the case file and that individuals meet the exempt status based on the required documentation.

**The District's Quality Assurance Process is as follows:**

The district will perform a random sample of (6) cases semi-annually for **paid work activities** to review district worker collected documentation and data entry. Both the TA and employment case files will be reviewed. Hours of employment will be verified through receipt of pay stubs, employer verification forms or collateral contact with the employer. The review will ensure the hours of employment on the ABEL budget are consistent with the hours reported on WTWCMS and documentation is in the file to support hours reported on WTWCMS and that the scheduled hours on WTWCMS is consistent with the documentation.

The district will perform a random sample of (6) cases semi-annually for participation in **unpaid work activities** to review district worker collected documentation and data entry. The employment case files will be reviewed. Actual hours of attendance will be documented by attendance sheets showing actual hours of attendance, any excused absences during the month, any unexcused absences during the month, and holiday time. The review will ensure the actual hours of attendance reported on the monthly attendance sheets has been correctly reported on WTWCMS, excused absences and holiday time are documented in the case file and correctly reported on WTWCMS in accordance with federal limitations, and documentation of actual hours of attendance is accurate and matches the hours of participation reported on WTWCMS by district or provider staff.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability code **38-needed in the home fulltime or employability code 48-**

**time limit exemption** to care for a disabled household member to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is presence of medical documentation to support the exemption and that the documentation has a timeframe for the exemption and that the individual is the appropriate caretaker.

The district will perform a random sample of (3) cases semi-annually in which a case member is reported as an employability **code 31-caretaker of a child under the age of 12 months** to review district worker collected documentation and data entry. The TA case file will be reviewed to ensure there is documentation from hospital, birth certificate or social security card present to verify the child under the age of one. TA records will also be reviewed to ensure that the household composition is in fact a one parent case and that the individual has not exceeded the 12-month lifetime limit.

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.

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

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

Yes       No

If Yes, does the district's provider/vendor collected documentation, data entry and management of WTWCMS follow the same process that would be used by the district worker?

Yes       No

If No, please describe the process used below:

### **Section 3.8 Strategies/Procedures for Accommodating Individuals with Limited English Proficiency**

Following is a description of how the district accommodates the needs of Non-English-speaking participants in accessing employment activities and services:

Genesee County DSS has access to Language Line and also uses Dynamic Communications Interpretations to provide face-to-face interpreter services.

### **Section 3.9 Strategies/Procedures for Increasing Program Attendance**

Describe district policies and/or procedures in place to reduce the amount of time participants fail to participate in work activities, including absences that are with good cause:

The 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 families 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 clients 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.

### **Section 3.10 Strategies/Procedures for Engaging Sanctioned TA Participants**

— District attempts to engage sanctioned participants as soon as they are sanctioned using the following strategies:

All participants on sanction have a monthly self-sufficiency appointment, this is considered to be part of the ongoing eligibility process. 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.

— District attempts to engage sanctioned participants when the durational period of the sanction is completed using the following strategies:

Genesee County DSS will continue to meet monthly with sanctioned participants encouraging them to participate in employment activities and providing them with the benefits of compliance.

— District attempts to engage sanctioned participants during different times in the sanction period using the following strategies.

See Above

### **Section 3.11 Strategies for reducing the need for TA**

District's strategies for reducing the need for TA are described below:

In-depth evaluation of a family's current living situation to determine what diversionary payments, supportive services, may help as per Section 4.1 "d". In order to be eligible for a diversion payment, supportive services, an individual must have verifiable employment or the verifiable promise of employment.

## **Section 4 Support Services**

(Reference 18 NYCRR 385.4)

### **Section 4.1 TA and Non-TA SNAP Applicants and Recipients in Work Activities Approved by the District**

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

The Genesee County DSS will provide to participants the following expenses, in addition to child care, which the district deems necessary for the individual to participate in assigned work activities. All supportive services are paid by Genesee County DSS 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 in order 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 absolutely necessary for the participation in the program.
2. If a client is required to have a license to pursue employment, the fee for the license will be paid at an actual cost not to exceed \$200.00. This may include driver's licenses or any other license required by the State.
3. Tools, equipment and miscellaneous items required for employment will be paid for upon documentation by the employer. The total amount not to exceed \$200.00.
4. Payment will be made directly to the child care provider for child care registration fees of up to \$50.00 per child for enrollment of children in licensed childcare centers when such child care is necessary for the client's participation in employment activities and employment.
5. For those individuals using their own or borrowed vehicle, gas vouchers are issued. Initially, the individual is provided with a \$20.00 gas voucher. The Agency will continue to provide gas vouchers to meet the cost of fuel used to comply with the work related activity.
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.

In order for Genesee County 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. In the event that 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. The district will use the following approach 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.

Please check all that apply:

- Bus pass/token
- Gas card/voucher
- Mileage reimbursement at IRS Business rate, (effective 1/1/19 is 58 cents/mi)
- Mileage reimbursement at IRS Medical/Moving rate, (effective 1/1/19 is 20 cents/mi)
- Other mileage rate, (please explain methodology used to establish reimbursement rate):

- Bus tokens or bus passes are issued in situations where the individual can utilize mass transit transportation.
- Individuals that have access to a motor vehicle are reimbursed with gas vouchers. Initially the individual is provided with a \$20.00 gas voucher. Genesee County DSS will continue to provide gas vouchers to meet the cost of fuel used to comply with the work related activity.
- In certain situations where mass transit is not available and the individual does not have access to a motor vehicle, volunteer drivers may be utilized.

- c. OTDA policy establishes a distance not to exceed 2 miles as the maximum distance that the district can require a participant to walk to a work activity assignment or to access public transportation. The district's policy states that an individual may be required to walk up to the distance described below 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.

d. The district will provide the following services to assist individuals at risk of needing TA to improve their opportunities for employment or to maintain their employment: Program Income Funds used to establish the Car and Re-Employment Empowerment (CARE) Program - see Section 4.2.

1. A clothing allowance of up to \$150.00 will be available to clients in need of clothing in order 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 absolutely necessary for the participation in the program.

2. If a client is required to have a license to pursue employment, the fee for the license will be paid at an actual cost not to exceed \$200.00. This may include driver's licenses or any other license required by the State.

3. Tools, equipment and miscellaneous items required for employment will be paid for upon documentation by the employer. The total amount not to exceed \$200.00.

4. Payment will be made directly to the child care provider-\* for child care registration fees of up to \$50.00 per child for enrollment of children in licensed childcare centers when such child care is necessary for the client's participation in employment activities and employment.

5. For those individuals using their own or borrowed vehicle, gas vouchers are issued. Initially, the individual is provided with a \$20.00 gas voucher. The Agency will continue to provide gas vouchers to meet the cost of fuel used to comply with the work related activity.

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.

In order for Genesee County to consider paying for repair 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. In the event that 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.

## **Section 4.2 Transitional Support Services**

The district will provide the following supports and strategies to support job retention:

Any of the supportive services listed in Section 4.1(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 Child Care will be evaluated for eligibility for Transitional Child Care.

Any case not eligible for Transitional Child Care will be referred to our Child Care Unit. Our goal is to ensure seamless childcare services for all households who enter employment.

Genesee County uses Program Income funds to establish and maintain the Car and Re-Employment Empowerment (CARE) Program. This program underwrites a loan up to \$4,000 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.

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

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 job problems 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



### **Section 4.3 Extended Support Services**

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

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

## **Section 5 Conciliation, Sanction and Dispute Resolution Procedures**

(Reference 18 NYCRR 385.11 and 385.12)

### **Section 5.1 Conciliation**

The district's conciliation process for TA applicants and recipients is in accordance with 18 NYCRR 385.11(a). Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

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 WTWCMS 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.

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.

The Temporary Assistance good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

For Temporary Assistance, the Genesee County DSS Employment Program Assistant or Coordinator reviews all relevant information. 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.

The district's conciliation process for SNAP recipients is in accordance with 18 NYCRR 385.11. Conciliations are conducted (check all that apply and describe the procedure.):

- in person
- by phone
- by mail

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

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 noncompliance 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.

The SNAP E&T good cause/willfulness determination is made by:

- client's employment worker
- a supervisor
- separate entity:

For SNAP, the Genesee County DSS Employment Program Assistant or Coordinator reviews all relevant information. Individuals who demonstrate that the noncompliance 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.

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 will be choosing Option 1, instructing the individual 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 initiate the activity of a job search consisting of 10 contacts and 10 hours within a 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.

## **Section 5.2 Sanctions**

- a. 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 is:  
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 3.4 as assigned.

Our district's procedure for an individual to show compliance, once the durational sanction period has expired, is the same as above.

For those individuals who are unable to participate in work activities, or claiming to be unable to participate, 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 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 3 to the same extent as other non-exempt TA applicants.

- b. The district's procedure for determining compliance for those SNAP 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 is:  
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.

### **Section 5.3 Dispute Resolution**

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 is conducted in accordance with 18 NYCRR 385.11.

The grievance is mediated by:

- An agreement with an independent entity
- Supervisory staff who are trained in mediation and who have no direct responsibility for the individual's case
- Designated supervisory staff who have no direct responsibility for the individual's case and who are not trained in mediation

## **Section 6 Disability Determinations, Documentation and Requirements of Exempt Individuals**

(Reference 18 NYCRR 385.2)

### **Section 6.1 Disability Determination Process and Tools**

The district's process for determining an individual's disabilities and/or work limitations is in accordance with 18 NYCRR 385.2(d). Check **all** that apply, and describe the process:

- District participates in the OTDA managed contract for independent medical evaluations.
- District contracts directly with a physician to provide independent medical evaluations.
- District accepts physician's statement provided by participant.
- District accepts physician's statement provided by participant but refers for an independent evaluation when deemed necessary.
- Other process (please describe):

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

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.

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.

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.

The local process for reviewing the medical documentation to determine if the individual is exempt, nonexempt, or work limited is as follows:

- District directs the contracted physician or individual's physician to determine status.
- District review team reviews and determines status (described below).
- Specialized disability/medical staff or unit reviews and determines status (described below)
- Other:

See above.

### **Section 6.2 Mental Health Screening and Assessment**

The district is administering a screening tool for TA participants to help determine whether a referral for a mental health evaluation is warranted, in addition to screening for a disability that occurs as part of the application or disability determination process

Yes       No (*If No, section 6.2 is complete*)

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

If yes: Does the district use the LDSS 5009 - Mental Health Screening Tool and/or the computer assisted version of the Modified Mini Screening tool (MMS)?

Yes       No

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

If using a screening tool other than the MMS, indicate the screening tool used:

Describe the district procedure for referring a participant for a mental health evaluation, when warranted by the screening result:

### **Section 6.3 Requirements for Exempt TA Participants (Reference 18 NYCRR 385.2 (e))**

An exempt individual who has the potential to be restored to self-sufficiency through rehabilitation may be required to accept medical care to assist the individual 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 he/she is participating in the assigned program.

- a. Following 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 6.1 of this plan. Included here is who (e.g., medical practitioner, employment worker, TA worker, local review team, etc.) makes or assists in this determination that an individual can restore or improve employability through treatment or other rehabilitative activities. Also

included is 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 the participant to provide additional information from their practitioner or submit to an examination by Industrial Medical Associates (IMA) to help clarify.

- b. Following is the district's procedure for developing a treatment plan and for referring the participant to appropriate treatment, etc. Please be specific:

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 the participant to 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. Following is the district's procedure for tracking the participant's compliance with the 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 keep track of necessary 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 monthly monitoring system with Genesee County Mental Health to assist with monitoring ongoing compliance. Genesee County DSS obtains Substance Abuse Treatment Progress Updates from Treatment Providers on a quarterly basis to monitor ongoing compliance.